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Guy M. Hicks
General Counsel

May 19, 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)
October 25, 1999	KPMG's October 22, 1999 Interim Status Report
November 10, 1999	Joint OSS Status Report
November 15, 1999	AT&T's Comments on KPMG's Interim Status Report
November 16, 1999	Rhythms Links, Inc.'s Notification of FCC Common Carrier Bureau letter re Third Party Testing
November 22, 1999	Sprint's Comments on KPMG Interim Status Report
December 10, 1999	BellSouth's and AT&T's Joint OSS Status Report
December 17, 1999	AT&T's Comments
January 20, 2000	Notice of CLEC meeting
January 26, 2000	Confirmation of AT&T's participation in CLEC meeting

Date Filed	Description of Document(s)
January 27, 2000	Modified pages from BellSouth-Georgia OSS Evaluation Master Test Plan, Version 4.0
February 29, 2000	ITC^DeltaCom's Petition to Intervene
February 18, 2000	Notice of Withdrawal as Counsel (Laureen McGurk Seeger for AT&T)
March 7, 2000	ITC^DeltaCom's Identification of Concerns re LNP test
March 7, 2000	AT&T's Comments re Supplemental Test Plan Version 1.1
March 8, 2000	Mpower Communications Corp.'s notice of change of name
March 17, 2000	BellSouth's OSS Evaluation – Georgia Supplemental Test Plan Version 2.0 (incorporation CLEC comments received subsequent to Version 1.1)
March 29, 2000	AT&T's response to submission of BellSouth's proposed standards and benchmarks to be used in Georgia OSS evaluation
March 31, 2000	BellSouth's confirmation of intention to propose standards and benchmarks filed by KPMG rather than the Florida PSC standards
April 4, 2000	Sprint's waiver of filing comments regarding proposed standards and benchmarks
April 5, 2000	MCI's Comments regarding proposed standards and benchmarks
April 5, 2000	AT&T's Comments regarding proposed standards and benchmarks
April 5, 2000	Covad Communications Regarding Proposed Analogs and Benchmarks for Georgia OSS Evaluation
April 6, 2000	BellSouth-Georgia OSS Testing Evaluation Interim Status Report
April 6, 2000	Covad's Comments re BellSouth's Progress on Line Sharing

CERTIFICATE OF SERVICE

I hereby certify that on May 19, 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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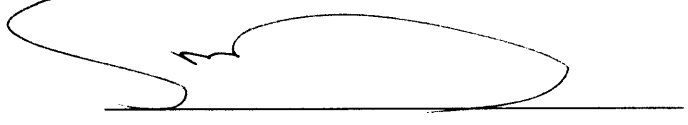

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October 25, 1999

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EXECUTIVE SECRETARY
G.P.S.C.

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

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

Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG LLP's October 22, 1999 Interim Status Report 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 is provided in the table in section 4.0. Each item presented in the table in section 4.0 includes a reference number that identifies the item from a previous status report, where applicable.

2.0 Key Developments

- Transition activities: KPMG and HP have completed the transitioning of Test Manager responsibilities to KPMG.

- Master Test Plan (MTP): A revised MTP, Version 3.0, and Flow-Through Evaluation, Version 2.0, were filed with the Georgia Public Service Commission on October 18, 1999.

- Exception process: The Commission, KPMG, and BellSouth have agreed on a process for identifying, addressing, and resolving exceptions (defects in components of systems, documentation, or processes) identified during the test.

- EDI Interface Testing: System readiness testing (SRT) has completed for all unbundled network element (UNE) order types planned for production submission, with the exception of UNE local number portability (LNP). Additional interface testing needs to occur for Resale and LNP order types before production testing of these products can begin. This second session of EDI LAN-to-LAN interface testing is scheduled.

- TAG Interface Testing: SRT has completed for pre-orders and for all UNE order types planned for production submission, except UNE-LNP. Additional interface testing needs to occur for Resale and LNP order types before production testing of these products can begin. This second session of TAG interface testing is scheduled.

- Test bed provisioning: The provisioning and validation of the Ordering functional test bed is behind schedule but nearing completion. Provisioning of the test beds for the Volume and Maintenance & Repair tests is in progress.

- Order management: KPMG is finishing the implementation of its Order Creation and Management tool, and is conducting end-to-end testing with HP and BellSouth.

- Billing test plans: The filing of the revised MTP has resulted in the need for modifications to the detailed test plans for all process-oriented tests. These revisions

are in progress and are nearing completion. None of these activities is on the schedule critical path.

- Billing test bed: A limited number of issues with the ordering and provisioning of the test bed used for functional billing and usage tests have arisen. The source of the errors could be KPMG order submissions or BellSouth provisioning inconsistencies. Efforts are under way to prevent recurrence of the problems, and to ensure that the test objectives can be accomplished.

3.0 Key Upcoming Activities

- KPMG and BellSouth are currently assessing the impact of delays in test bed provisioning on the overall test schedule. The assessment will be completed during the week of October 25, 1999.

- BellSouth is arranging for a visit by the CLEC Advisory Team to answer KPMG test team questions related to Pre-Order, Order, Billing, and Maintenance & Repair functions.

- KPMG will file the next interim status report during the week of November 15, 1999.

4.0 Specific Item Status

Ref#	Item	Status	Issues	Next Step/Resolution
I-1	Master Test Plan (MTP)	• A revised MTP was filed with the Commission on 10/18/99.	• A small number of minor errors have been identified in the new release.	• KPMG will correct and file revised pages during week of 10/25/99.
I-2	Test bed development	• KPMG has provided specifications for the Ordering and Provisioning (O&P) test bed. Provisioning and validation of the functional test bed is nearing completion.	• Test bed is not yet fully and accurately provisioned.	• KPMG and BST are working to achieve complete and accurate provisioning of test bed.
		• KPMG provided specifications for the Volume testing of the RSIMMS and production systems to BST. Provisioning of the test bed by BST is in progress.	• BST is having difficulty finding exact matches in the RSIMMS database for some items included in the KPMG specification, e.g., business lines without directory listings.	• KPMG will review available accounts in RSIMMS relative to the test bed specifications and will make adjustments to the requirements while maintaining the test objectives.
		• KPMG provided specifications for the Maintenance & Repair test bed. Provisioning of the test bed by BST is in progress.	• KPMG specifications included products not offered by BST.	• KPMG to revise specifications. BST to continue provisioning process.
		• KPMG validation of billing test bed provisioning is in progress.	• Validation identified some errors and inconsistencies in feature sets. Inconsistencies may be due to KPMG order errors or to BST provisioning faults.	• KPMG will audit the switch features to ensure consistency with test cases and service orders. Change orders will be submitted where necessary.

Ref	Item	Status	Issues	Next Step/Resolution
I-6	EDI functional testing	• Four pre-test phases must be completed prior to the initiation of functional testing on the EDI LAN-to-LAN interface. This interface testing has completed for all UNE order types planned for production submission, with the exception of UNE-LNP. • Additional interface testing needs to occur for Resale and LNP order types before production testing of these products can begin. This second session of EDI LAN-to-LAN interface testing is in progress.	• LNP interface and production testing cannot commence until facility and ordering information has been obtained from participating CLECs.	• See Ref # III-2: CLEC Participation – Ordering.
		• Test case templates have been developed. • All test plans should receive final peer review by 10/29/99.	• None.	• KPMG will finalize test plans and submit for peer review.

Ref*	Item	Status	Issues	Next Step/Resolution
I-7	TAG functional testing	• Four pre-test phases must be completed prior to the initiation of functional testing on the TAG interface. This interface testing has completed for pre-orders and for all UNE order types planned for production submission, except UNE-LNP. • Additional interface testing needs to occur for Resale and LNP order types before production testing of these products can begin. This second session of TAG interface testing is in progress.	• LNP interface and production testing cannot commence until facility and ordering information has been obtained from participating CLECs.	• See Ref # III-2 CLEC Participation – Ordering.
		• Test case templates have been developed. • All test plans should receive final peer review by 10/29/99.	• None.	• KPMG will finalize test plans and submit for peer review.
		• During pre-test activities, KPMG/HP received error messages indicating system processing limitations when 40 simultaneous communication sessions are running.	• Source of error could be with KPMG/HP or BST.	• KPMG/HP and BST will continue to investigate source of issue.
I-8	BLG-1 CRIS/CABS Invoicing Functional Test	• Test case execution began with submission of LSRs via EDI-PC for 9/28/99 billing cycle. • Some LSRs submitted for 10/16/99 and 10/17/99 bill cycles did not post in time.	• Test case coverage included in 10/16/99 and 10/17/99 target cycles must be replicated in subsequent test cases targeted at future bill cycles.	• KPMG to develop recovery plan.

Ref*	Item	Status	Issues	Next Step/Resolution
I-9	M&R Functional Testing - Connectivity	• TAFI dial-up connectivity has been established; EC-CPM dial-up connectivity for ECTA access has not yet been established.	• Required SecurID and user ID information to allow dial-up access to EC-CPM has not been entered.	• BST will provide SecurIDs and enter KPMG user ID information to provide access to EC-CPM.
		• BST has clarified that EC-CPM cannot be accessed through LAN-to-LAN.	• Dial-up connectivity (the alternative to LAN-to-LAN) presents limitations for volume testing of ECTA. KPMG is assessing any impact of working through dial-up access on the current functional test plan.	• BST to revise pages 2-13 of the document *Electronic Communication CPM Access* to clarify policy on ECTA access. • KPMG to develop alternative volume test strategy and to assess functional test plan impact, if any.

Ref*	Item	Status	Issues	Next Step/Resolution
II-1	Metrics	• BST has submitted a final list of metrics to be evaluated. • BST has committed to expediting the interval for PMAP reporting, to the extent feasible, for KPMG evaluation purposes.	• If any PMAP reports cannot be expedited, KPMG may not have sufficient time to incorporate all test-CLEC metrics into the report.	• KPMG will confirm BST ability to expedite data delivery.
		• KPMG is developing computer code for validating PMAP metrics calculations for an individual CLEC using BST-provided PMAP raw data and documentation.	• Some BST raw data undergo filtering prior to being reported to evaluate duplicate or invalid reports. This introduces an additional step to the data comparison process.	• KPMG will determine whether it can replicate the filtering.
		• KPMG submitted a request for data and documentation concerning metrics not covered by the PMAP system; KPMG plans to develop computer code for metrics not covered by PMAP following data delivery.	• None.	• BST to provide non-PMAP data/documentation.
		• KPMG is evaluating the correspondence between data collected by KPMG functional test domains and BST-recorded data for the KPMG CLEC.	• Performance results comparisons can be conducted only for transactions submitted and recorded by the KPMG CLEC functional test domains.	• KPMG to complete evaluation of correlation between KPMG CLEC and BST data.

Ref	Item	Status	Issues	Next Step/Resolution
II-3	Project Plan/Schedule	• KPMG issued a project plan/schedule on 9/14/99 and issued revisions to the schedule on 10/4/99.	• Volume of KPMG test bed requirements has exceeded BST expectations, which has increased the provisioning process duration. • KPMG verification of test bed accounts has uncovered some inconsistencies with specifications. Re-provisioning activities are extending the test bed delivery timeframe.	• KPMG and BST are assessing the impact of delays in test bed provisioning on the overall test schedule. Assessment will be completed during the week of 10/25/99.
II-4	Volume Test	• KPMG has re-issued test bed specification to BST based on volume forecasts, system requirements, and test case coverage. Test bed is currently being provisioned by BST.	• None.	• As part of the initial stages of the functional evaluation of EDI and TAG, KPMG will validate transactions to be used in the volume test for syntax and ability to flow through.
II-5	Change Management	• Forecasting test was removed from scope in MTP version 3.0. • Detailed Change Management test plan has been completed and is undergoing peer review. • Entrance criteria for Change Management test have been satisfied.	• None.	• KPMG will commence evaluation with formal BST personnel interviews on 11/4/99.
III-1	Flow-Through Evaluation	• Revised test plan for the flow-through evaluation was filed with BST and the Georgia PSC on 10/18/99. Revised plan provides more specific description of work to be performed for the evaluation. • KPMG metrics team has received the July, August, & September 1999 flow-through reports.	• None.	• KPMG will develop detailed test execution plan integrated with EDI/TAG functionality and metrics components of Order test.

Ref*	Item	Status	Issues	Next Step/Resolution
III-2	CLEC Participation - Ordering	• KPMG distributed a letter to CLECs currently collocated in the seven Central Offices included in the test to solicit participation in aspects of Ordering and Provisioning tests. Five CLECs have expressed interest in assisting with LNP and CLEC-to-CLEC migration orders.	• KPMG requires facilities and account information from CLECs to generate order transactions to migrate fictitious BST customers to the CLECs (LNP and CLEC-to CLEC). KPMG cannot process these orders types as a virtual CLEC without a switch.	• Conference call scheduled for 10/22/99 with CLECs and GA PSC to review requirements.
III-3	Capacity Management	• Detailed test plans for capacity management evaluations of TAG, EDI, TAFI, ECTA, CRIS, CABS, and ODUF/ADUF have been completed and submitted for peer review. • Requests for capacity management system and process documentation and interviewee lists were submitted to BST on 10/19/99.	• None.	• KPMG will receive and review documentation. • KPMG will schedule and conduct interviews

*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 is new for this report.

CERTIFICATE OF SERVICE
Docket No. 8354-U

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

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This 25th day of October, 1999.

David Frey

KPMG
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11/8/99 DR[illegible]

JOINT OSS STATUS REPORT
DOCKET NO. 8354-U
NOVEMBER 10, 1999

RECEIVED
NOV 10 1999
EXECUTIVE SECRETARY
G.P.S.C.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
1. RSAG/LENS			
a. Download of RSAG has not been provided.	BST shall make download of RSAG available, and provide for periodic updates of information.	January 30, 1998 BellSouth	BellSouth: BellSouth is working with MCIW to define their needs, and then is pursuing development of the software required to provide this download. BellSouth will negotiate the costs with any CLEC requesting the software, and, if unsuccessful, will petition the Commission for resolution. BellSouth sent a letter confirming MCIW's RSAG fields' needs and resumed meetings on September 28. In October, 1998, BellSouth created an initial download of RSAG with the main fields needed for address validation. MCIW has requested additional data. Once MCIW has determined the fields it prefers to receive, BellSouth will offer target test dates and implementation. BellSouth is waiting for MCIW to sign licensing agreement required for CPNI information. CLECs: Not Completed. BellSouth's proposal is yet to be implemented. The Florida Commission has ordered the RSAG file provided at no cost to MCIW. MCIW: The Florida Public Service Commission has ordered BellSouth to provide MCImetro with a download of the RSAG. BellSouth has refused to provide a download unless MCImetro signs a License Agreement that contains restrictions not required by the Florida PSC. In order to move the process forward, MCImetro has negotiated with BellSouth concerning these

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
1. RSAG/LENS			
			restrictions and it is hoped that negotiations will be completed in the near future.
b. Information provided to BST (e.g., Connect Thru and QuickServe) is not provided to CLECs.	Not an issue (BST providing through LENS browser, CGI interface, and EC-Lite).	N/A	N/A
c. Requires multiple screen process and repeated address validation.	BST has stated it will revise this inquiry process.	January 30, 1998	BellSouth: Completed. CLECs may use CGI-LENS to choose their own sequence of transactions. CLECs: Not Completed. BellSouth has implemented the "View All" Inquiry Mode, but that mode only addresses the "repeated address validation" issue. The Staff confirmed at the OSS hearing that its proposed solution was intended to address the multiple screen process as well. CLECs, however, still have to proceed through fixed sequence of multiple screens (many of which may not be relevant to the CLECs particular inquiry) or validate the customer's address repeatedly.
d. Human to machine entry requires dual entry of information.	Proposed API interface will alleviate many of these problems.	January 28, 1998 (Vendor Selected) (Implementation by the end of 1998)	BellSouth: TAG is currently implemented. Initially BellSouth held a CLEC focus group session in March 1998 where a TAG document was distributed. BellSouth offered CLECs the opportunity in early 1998 to become TAG early adapters. Three companies requested to be TAG early adapters. BellSouth held 8 training sessions for early adapters and any CLEC, for pre-ordering and ordering. BellSouth is proceeding with implementation of TAG for

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
1. RSAG/LENS			
			several companies; to date six have implemented for ordering and pre-ordering and one additional has implemented for pre-ordering only. The volume of TAG LSR submissions decreased in August 1999 to a total of 11. This low LSR volume contributed to the flow-through result of 37.5%. The TAG LSR volume and flow-through results for the past four months are: Month LSRs Flow-through June 1999 328 89.4% July 1999 532 93.8% August 1999 11 37.5% September 1999 1578 94.09% TAG pre-ordering capability was implemented August 30, 1998. TAG ordering capability was implemented on November 1, 1998. The TAG test plan was posted on the internet by mid-February. CLECs receive TAG documentation when they attend TAG training. TAG is discussed in Change Control meetings – Release 6.0/OSS '99 for example. With reference to AT&T's comment, BellSouth's disagrees that there was anything "misleading" about the TAG implementation dates of August 30, 1998 for pre-ordering and November 1, 1998 for ordering. The system was available for production on these dates. BellSouth has no control as to when a CLEC chooses to enter production.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
1. RSAG/LENS			
			BellSouth's "true nature" is its commitment to provide electronic interfaces based on the industry standard where a demand exists for such by the CLECs. The implementation of TAG based on the CORBA standard illustrates BellSouth's commitment, as well as, the continued improvement of the interface through releases for further functionality. All of these releases and the inclusion of TAG in the Electronic Interface Change Control Process (EICCP) have been thoroughly discussed with BellSouth's CLEC customers. TAG will come under the EICCP on 8/1/99. In reference to AT&Ts comments concerning TAG Flow-through, AT&T continues to confuse the definition of flow-through by their "Basic Flow-Through" calculation. AT&T has defined "Basic Flow-Through" as Issued Service Orders divided by Total Mechanized LSRs. This is a self-serving definition that gives no consideration to those service requests that do not flow through the system by design (Total Manual Fallout) as well as processing errors due to the fault of the CLEC (Auto Clarifications and CLEC Caused Fallout). The FCC has agreed in concept that all of these items are legitimate exclusions for the purpose of determining flow-through. See the Affidavit of Ronald M. Pate, filed on April 23, 1999 with the Georgia Public Service Commission for a thorough explanation and discussion of

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
1. RSAG/LENS			
			flow-through. The TAG Flow-Through results correctly reported for June are: Base Calculation = 82.33% CLEC Error Excluded Calculation = 89.39% In response to AT&Ts comments concerning TAG pre-order business rules, BellSouth did not receive a request for TAG pre-order business rules, but instead, received a list of 40 questions concerning OSS'99 via the change control process on 8-16-99. Many of the questions submitted pertained to TAG pre-order. Responses to 34 of the questions were provided to AT&T on 8-27-99. BellSouth plans to provide remaining responses as soon as possible. On 9-7-99, BST received the Change Request Form submitted by AT&T requesting documentation of the TAG pre-order business rules. The Change Request is being managed via the Electronic Interface Change Control Process (EICCP). The status of the request can be obtained via the EICCP Change Request Log and the 9-28-99 EICCP Enhancement Review Meeting (ERM) minutes posted on the BellSouth website at http://www.interconnection.bellsouth.com/markets/lec/eiccp/eiccp.htm. Additionally, an AT&T representative was in attendance at the EICCP ERM conducted on 9-28-99 at which this request was discussed. Additionally, TAG pre-order information is

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
1. RSAG/LENS			
			provided as part of the TAG Client Application Program Interface (API)), TAG Training, and Tag Programmers Guide. TAG documentation is available on the web site at: http://interconnection.bellsouth.com/oss/tag/tag_info.htm CLECs: AT&T: BellSouth's claimed "implementation" dates in August and November of 1998 for this interface are mis-leading. No company "early adopter" or otherwise entered the production mode for any portion of this interface until January 1999, and none entered production for ordering until March 1999. In April there were 14 local service requests placed by CLECs attempting to use TAG in May there were 5. BellSouth has provided no test data or commercial usage data. Further, BellSouth has excluded API development from the joint BellSouth/CLEC change management process. BellSouth's unilateral discussion of TAG enhancements at Change Control meetings is not the same as having TAG enhancements under the Change Control process. The true nature of BellSouth's treatment of TAG in relationship to this process can be found in BellSouth' recent (5/7/99) filing with the Alabama PSC in Docket 25835, at pages 7-8 where BellSouth discusses why TAG will not be included in the Change Control process until

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
1. RSAG/LENS			
			August 1, 1999. Indeed, on May 17, BellSouth announced its third change to TAG this year, none of which have gone through change control. On September 1, 1999, AT&T requested through the change control process that BellSouth document its business rules for TAG pre-order. AT&T--In response to BellSouth's comment that it is evaluating our change request for pre-order business rules, AT&T submits that although it has been advised informally that the business rules will be available in December, 1999, it has received no official response. Additionally, the December due date does not meet AT&T' needs of a September 30, 1999 due date, which AT&T had discussed with BellSouth many times before the written submission dated September 1. (Oct.) As of November 3rd AT&T has still not received a response to this long standing request. (Nov.) Basic Flow Through for the 328 TAG order in June was 54%. Basic Flow Through reflects the mutual benefit to BellSouth and the CLECs of the use of an electronic interface. Basic Flow Through makes no adjustments to the relationship of Issued Service Orders divided by Total Mechanized Service Orders. BellSouth's "Base Calculation" adjusts for electronically submitted orders BellSouth has elected not to mechanize (Total Manual Fallout).

11/8/99 DRAFT
JOINT OSS STATUS REPORT
DOCKET NO. 8354-U
NOVEMBER 10, 1999

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
1. RSAG/LENS			
			AT&T: Basic flow- through for TAG was 77% in July , fell to 27% in August and rose to 76% in September. AT&T does not agree with BellSouth that a low LSR volume contributed to the low flowthough of TAG orders. If that principle held, all the CLECs on BellSouth's August flow-through report with low order volumes should also experience low flow-through, and that is not the case. (Oct)

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
2. Customer Service Records			
a. Not given access to the same CSR information BST uses and are limited to printing 50 pages	BST currently limits its retail operation to 54 page print limit. The proposed API interface will eliminate this current limitation.	January 28, 1998 (Vendor Selected) (Implementation by the end of 1998)	BellSouth: See Pre-Ordering 1d. TAG has the same CSR access abilities as does EC-Lite (to print more than 54 pages) and, in a different format, LENS. Via LENS, CLEC's can see and print more than 54-page CSRs in the LSI format. (LENS is a human-to-machine interface; TAG and EC-Lite are machine-to-machine interfaces). As of November 14, 1998, LENS allows CLECs to print the entire CSR, 54 pages at a time. AT&T's CSR issue involves specific ported numbers which are being investigated. With respect to MCIW's comment below on the parsing of CSR data, BellSouth has provided to MCIW the data stream which is the same as that provided to the BellSouth retail units. BellSouth is open to MCIW submitting a BFR to develop a parsing mechanism to go beyond that which is currently provided and parse at the line level. On 06/16/99, BellSouth fixed its systems so that facility-based CLECs are able to view their accounts via LENS. BellSouth believes the CSR Retrieval Issue has been resolved. In regards to AT&T's comments about CSR retrieval, the only account inquiry received from AT&T concerned retrieval of directory listing only, and directory listing with INP CSRs.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
2. Customer Service Records			
			Effective 08/24/99, BellSouth resolved the issue which prevented facility based CLECs from retrieving CSRs for some customers. Viewing logic changes were made to resolve this issue. BellSouth has not received any additional CSR retrieval queries. If AT&T experiences any future discrepancies, they should be referred to the BellSouth Account Team. BellSouth is not aware of additional CSR retrieval problems. It requests that AT&T provide proof of continuing problems with CSR retrieval. CLECs: Implemented. AT&T: AT&T continues to experience problems in accessing CSRS for its customers. As recently as June 29 AT&T asked BellSouth to investigate this problem and reply by July 15, 1999. This problem continues, at present BellSouth has requested AT&T to call for a fax of CSRs when we receive the message "BellSouth is not authorized to provide information about this account" on electronic queries. As of September 7, 1999, AT&T continues to have problems retrieving its CSRs. BellSouth has been unable to correct this problem.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
2. Customer Service Records			
			AT&T Although the CSR retrieval situation has improved, AT&T continues to be denied access to all its CSRs. Additionally, AT&T has other CSR issues. Because its CSRs are not being updated by BellSouth in a timely manner, AT&T will submit LSRs with data from inaccurate CSRs, causing its orders to reject through no fault of its own. While AT&T has received no formal response to its escalation at BST of this issue. it has been advised informally that both systems problems and LCSC processes are contributing to this problem (Oct.) MCIW: MCIW WorldCom cannot view or print CSRs for ported numbers MCIW is currently experiencing problems accessing CSRs as well. As of 7/7/99, BST has a list of 23 CSRs that MCIW can not retrieve. At this time, BST has responded "under investigation" BellSouth is not providing a parsed CSR, though requested in OSS'99 by CLECs. Current schema provided by BellSouth does not break the CSR into detailed individual fields. Information from the CSR is thus limited and it can not be used to populate service orders

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
6. Editing Capabilities			
a. BellSouth relies upon machine to human interaction.	This issue is addressed in 4a of Ordering. [BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.]	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER.	BellSouth: Completed. Version 7.0 successfully implemented March 16, 1998. Business rules delivered to CLECs before and on January 30, 1998. Consistent with BellSouth's policy on old software versions, BellSouth kept versions 6.0 working for 90 days after the implementation of version 7.0 on March 16, 1998, and reminded all CLECs in advance of the June 16, 1998 version 6.0 close date that it was approaching. As of August 28, 1998, BellSouth now has a new broader policy on multiple software versions: BellSouth will support 2 EDI software versions at all times. No changes or new measurements will be made to the old version. When a new (3rd) version is issued, the old (1st) version will be dropped. LNP electronic rejects were completed on 4/1/99. A detailed explanation of the Flow-Through Report including definition of LSRs represented by "Total Manual Fallout" and the process for determining allocation of errors to CLECs ("CLEC Caused Fallout") was provided to the GA PSC in affidavit of Ronald M. Pate filed 4/23/99 Pursuant to the requirements of the GA PSC's May 20, 1999 order on Third Party Testing, a Flow-Through Audit Plan was filed June 1, 1999. The results of this audit will provide further validity and clarification

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
6. Editing Capabilities			
			to BellSouth's Flow-Through Report. BellSouth disagrees with AT&T's statement below concerning the Flow-Through Audit Plan. BellSouth is in compliance with the GA PSC order. The Flow-Through Audit will confirm that the performance measures reported in BellSouth's monthly flow-through report are accurate and the flow-through measurement data is valid. In addition, KPMG as the auditor chosen by BellSouth and approved by the GA PSC has the ability at their discretion to modify the test plan to ensure compliance with the GA PSC order. The GA PSC order does not provide for the validation of the BellSouth retail operations. On 6-28-99, the GA PSC approved the Third Party Test plan. KPMG will be revising the description of its flow through audit clarifying that the audit will include live CLEC data for 3 months as specified by the GPSC. AT&T: BellSouth provided CLECs with business rules for LEO, LESOG, SOER, and Version 7.0 of EDI. Still, manual intervention is frequently required for orders. For example, according to BellSouth's flowthrough report for May indicates that 5,087 orders fell out for manual processing, and that an additional 8,552 BellSouth

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
6. Editing Capabilities			
			"system fall-outs" occurred. Many other orders can only be processed manually and so do not appear on this report. The Flow-Through Audit Plan filed with the GA PSC will not validate the process BellSouth is using to report flow-through on actual CLEC local service requests submitted to BellSouth or for BellSouth's retail operations. AT&T: Recent experience involving AT&T Digital Link service, AT&T service provided through the former TCG facilities, and other service orders indicate that the business rules are incomplete and inaccurate. The revised master test plan filed by HP does not remedy the flawed methodology being used to audit BellSouth's flow-through.
b. Prevent on-line edit checks, order rejects and must be resubmitted.	This issue is addressed in 4a of Ordering. [BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.]	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER	BellSouth: Completed. CLECs can program these business rules into their front-end system. BellSouth implemented electronic rejects for LNP orders with errors on 4/1/99. These are much more intricate to mechanize than electronic rejects for INP orders with errors which are electronically rejected. The LNP FOC target is 24 hours for valid mechanized orders, and 48 hours for valid manual orders. August flow-through was89.44%. TAG gives CLECs the ability to use on-line edit checks. Regarding reject return average intervals, the Georgia data for August shows 0.09 hrs for resale residence

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
6. Editing Capabilities			
			and 0.08 hrs. for resale business fully mechanized LSRs. With respect to AT&T's comment concerning flow through rates for BellSouth's retail units, as beginning with the April Flow-Through Report the appropriate BST business retail flow-through is really zero. This is according to the FCC's definition in the Louisiana II Order stating that orders must be transmitted electronically through the gateway without manual intervention. BellSouth disagrees with AT&T's implication that BellSouth does not compute flow-through in compliance with the GA PSC Performance Measure Order. BellSouth is in strict compliance and the flow-through rate as filed with the Commission is: 85.19% for March 1999 84.67% for April 1999 87.48% for May 1999 87.41 % for June 1999 90.13% for July 1999. 89.44% for August 1999 92.09% for September1999 Pursuant to the requirements of the GA PSC's May 20, 1999 order on Third Party Testing, a Flow-Through Audit Plan was filed June 1, 1999. The results of this audit will provide further validity to the methodology for flow-through calculation, as

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
6. Editing Capabilities			
			well as, the allocation of errors to CLECs. See BellSouth's comments regarding the Flow-through Audit in Pre-Ordering 6a. With respect to AT&T's comments below on the May region-wide average interval for the return of reject notifications, the 13.56 days for Partially mechanized UNEs is the result of a population of one (1) LSR and is not representative of normal processing. BellSouth disagrees with AT&T's statement below concerning the Flow-Through Audit Plan. BellSouth is in compliance with the GA PSC order. The Flow-Through Audit will confirm that the performance measures reported in BellSouth's monthly flow-through report are accurate and the flow-through measurement data is valid. In addition, KPMG as the auditor chosen by BellSouth and approved by the GA PSC has the ability at their discretion to modify the test plan to ensure compliance with the GA PSC order. The GA PSC order does not provide for the validation of the BellSouth retail operations. <u>CLECs:</u> Not completed. See Pre-Ordering 3e. BellSouth's RNS and DOE ordering systems have extensive on-line edit capabilities. As a result of these capabilities, BellSouth experiences high flow through

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
6. Editing Capabilities			
			rates for its residential orders (96.5 percent) and business orders (83.2 percent). CLECs using LENS ordering must rely on BellSouth to incorporate on-line edit capabilities because LENS is a proprietary interface. In March, the LENS on-line edits did not detect errors in 13,490 orders, which accounted for approximately 18.6 percent of all LENS orders submitted. This data indicates that the edit capabilities in RNS and DOE are significantly better than the LENS editing capabilities. CLECs using EDI ordering can develop their own on-line edit capabilities to detect CLEC errors, but cannot develop edit capabilities to detect BellSouth-caused errors. The accuracy of BellSouth's allocation of errors to CLECs and BellSouth is dubious. One therefore cannot reasonably draw any inferences on whether EDI editing capabilities is equivalent to RNS and DOE. In any event, when on-line edits fail to detect an error, CLECs have experienced long delays in receiving rejection notices. In May, the BellSouth region-wide average interval for the return of reject notifications was as follows: Fully mechanized UNEs: .07 hours (The CLECs believe that only a tiny percentage of UNE orders are fully mechanized)

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
6. Editing Capabilities			
			Partially mechanized UNEs: up to 13.56 days Non-mechanized UNEs: up to 2.54 days In response to BellSouth's comments above, AT&T finds it alarming that BellSouth only had one order in this category and still was unable to return the rejection for almost 14 days. It would have still been unacceptable, but more understandable, if the volumes had been greater. Secondly, if BellSouth is looking for a more representative sample of the timeliness, AT&T offers BellSouth's other UNE category which took an average of 3 and 1/2 days. • The reason for these delays in electronically submitted orders appears to be that BellSouth manually processes nearly one-third (32% in March, 31% in April and 22% in May) of all error notices. AT&T: Actual flow through when calculated in compliance with the GA PSC Performance Measurement Order and current guidance from the FCC was 73.5% in March, 72% in April, and rose to 81% in May. Basic flow-through for the aggregate of ALL interfaces in August was 73%. For the interfaces that BellSouth advocates are nondiscriminatory, EDI and TAG, its basic flow-through was 23% and 27% respectively. LENS was 76%.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
6. Editing Capabilities			
			Basic Flow-through data for September is as follows: ALL: 77% EDI: 30% TAG: 76% LENS: 80% TAG and LENS order mix in September with the exception of a few UNE order submitted over TAG was virtually 100% resale. The EDI mix on the other hand was approximately 40% UNE. The Flow-Through Audit Plan filed with the GA PSC will not validate the process BellSouth is using to report flow-through on actual CLEC local service requests submitted to BellSouth or for BellSouth's retail operations. For example, in June the Flow-through data for April was not available – BellSouth explained this to the Alabama PSC in a footnote on May 20, 1999, as follows "The Flow-Through report data is still being validated for accuracy and will be provided at a later date." BellSouth does not explain how it feels it can report reject and FOC data when the actual number of rejects and FOCs can not be determined without an accurate count of flow-through data. Further, BellSouth has inexplicably been unable to report comparative data for its own flow through in its residential retail unit since

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
6. Editing Capabilities			
			March. See AT&T's comments regarding Flow-through Audit in Pre-Ordering, 6a.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
7. System Capacity			
a. RSAG and Lens lack sufficient capacity to meet reasonable demand	BellSouth is installing new software to resolve this problem.	December 12, 1997	BellSouth: Completed. Software was installed; problem resolved. CLECs: BellSouth claims that it has installed the new software.
b. System Lock-Out and Time Out	BellSouth is installing new software to resolve this problem.	December 12, 1997	BellSouth: Completed. Software was installed; problem resolved. CLECs: BellSouth claims that it has installed the new software.
8. Systems Integration			
a. LENS is an interim system that does not provide a machine to machine access to BST's legacy systems.	Closed Issue (BST will provide systems specifications so that CLECs can build their own interfaces to integrate).	LENS-CGI specifications provided December 12, 1997.	BellSouth: Completed. Feasibility of integration proven via third-party software demonstrated beginning in April, 1998. Albion built a proof-of-concept interface with 1 order type as requested. As of November 1, 1998, TAG offers pre-ordering and ordering capabilities. CLECs: Not completed. BellSouth has provided LENS-CGI specifications to CLECs. The specifications provided, however, are inadequate to integrate pre-ordering and ordering functions in a manner that is equivalent to the integration that BellSouth provides its own retail operations. CGI raises serious security and robustness concerns for e.spire, more fully explained in the Georgia OSS hearing.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
8. Systems Integration			
			Albion, the company that BellSouth hired to demonstrate that CGI could ostensibly be developed does not assert anywhere that the CGI application it developed functioned rapidly and efficiently in a manner that could be used effectively while a customer was on the line. Albion only developed CGI to process a single type of order. BellSouth's reliance on the test report is unavailing, for the limited and unsupervised work that Albion performed does not begin to address the range of concerns that this Commission and CLECs have raised. The FCC, in its Second Louisiana Order issued October 13, 1998 was "not persuaded that CGI-LENS is operationally ready."
b. LENS pre-ordering interface is not integrated with its EDI ordering interface.	Closed Issue (BST will provide systems specifications so that CLECs can build their own interfaces to integrate).	CGI Specification available December 15, 1997	BST: Completed. See Pre-Ordering 8a. CLECs: Not completed. See Pre-Ordering 8a.
c. BST failed to provide real-time machine to machine access to Direct Order Entry Support Application Program ("DSAP").	Closed Issue (BST will provide systems specifications so that CLECs can build their own interfaces to integrate).	December 31, 1997	BST: Completed. See Pre-Ordering 8a. CLECs: Not completed. See Pre-Ordering 8a.
d. Technical Specifications have not been provided to CLECs so they can transfer information into their systems without manual intervention	Closed Issue (BST will provide systems specifications so that CLECs can build their own interfaces to integrate).	December 31, 1997	BST: Completed. See Pre-Ordering 8a. CLECs: Not completed. See Pre-Ordering 8a.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
MAINTENANCE & REPAIR			
1. Limited Application			
a. Electronic Bonding Interface (EBI) only provides full service for access special circuits.	BST is implementing EBI with AT&T.	February 2, 1998	BellSouth: Completed. ECTA Release 5.0 completed 06-25-99 allows ECTA to handle non-designed loops which are less than 5% of the total loop orders. (More than 95% of loop orders are designed). BellSouth is contacting the CLECs using or testing ECTA regarding the testing of non-designed loops. CLECs: EBI has been implemented. The FCC found that ECTA (EBI) does not provide parity to competitors. The ECTA currently does not support creating trouble tickets for non-designed loops.
b. TAFI only supports basic local exchange services. All others require manual intervention by BST personnel.	EBI will accommodate all services.	February 2, 1998	BellSouth: Completed. CLECs: EBI has been implemented. See 1a. above.
2. Electronic Capabilities			
a. BST has not provided EBI for telephone number based service.	BST shall provide TAFI specifications to CLECs.	Adopted	BellSouth: Completed. See 1.a. above. CLECs: BellSouth has provided CLECs with TAFI specifications. The FCC has found that TAFI does not provide non-discriminatory access. The ECTA currently does not support creating trouble tickets for non-designed loops.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
MAINTENANCE & REPAIR			
2. Electronic Capabilities			
b. No electronic capability to send/receive status on any local telephone service.	Implementation of EBI will address this issue.	February 2, 1998	BellSouth: Completed. CLECs: EBI has been implemented. See 1 a. above.
c. Electronically issued orders are manually entered into BST system.	Implementation of EBI will address this issue.	January 30, 1998	BellSouth: Completed. CLECs: EBI has been implemented. See 1 a. above.
3. System Capacity			
a. TAFI lacks sufficient capacity to meet demand (i.e., simultaneous users).	BST will add capacity to accommodate more users as needed.	As needed	BellSouth: Completed. As of December 31, 1998, 45 CLECs used TAFI. CLECs: N/A
4. Long Term Solution			
a. EBI long term is not in place	BST shall implement EBI. BST is not required to make enhancements to TAFI.	February 2, 1998	BellSouth: Completed. CLECs: EBI has been implemented. See 1 a. above.
5. Integration			
a. BST failed to provide technical specifications for CLECs' TAFI integration	BST shall provide specifications for TAFI to CLECs.	January 30, 1998	BellSouth: Completed. CLECs: BellSouth has provided CLECs with TAFI specifications. See 2 a. above.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
MAINTENANCE & REPAIR			
5. Integration			
b. TAFI and LENS are not integrated	BellSouth does not integrate TAFI with its retail pre-ordering and ordering systems. BST will provide specifications for TAFI and LENS to CLECs so that they may perform their own systems integration.	January 30, 1998	BellSouth: Completed. CLECs: BellSouth has provided CLECs with TAFI specifications.
POTENTIAL ISSUE	**PROPOSED SOLUTION**	**IMPLEMENTATION TIME FRAME**	**STATUS**
ORDERING			
1. Limited Products and Services			
a. LENS is not designed to accommodate unbundled loop and certain complex resale orders.	BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER	BellSouth: Completed. CLECs: Not completed. See Pre-Ordering 3e. Many CLECs are using LENS and PC EDI. LENS and PC EDI do not accommodate all loop types and complex services.
b. Limited pre-ordering and ordering gateway interface (provided by LENS and EDI) to the BellSouth resources that link to its legacy systems.	BST shall provide e-mail capabilities for pre-ordering and ordering complex services initially. This is in addition to the current fax capability.	January 30, 1998	BellSouth: Completed. BellSouth has implemented e-mail service inquiries and ordering for a complex service with one CLEC and is ready to accept requests from other CLECs for trials of other specific products. One additional CLEC has utilized this e-mail capability. BellSouth contacted ICI on 12/12/97 and 4/20/98 to explain the change control and OBF processes concerning complex ordering discussions. BellSouth provided the CLECs the ability to submit LSRs for LNP electronically in 09/98. Effective 12-18-99, CLECs will be able to

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
1. Limited Products and Services			
			submit digital loop LSRs electronically. Effective 01-30-00, CLECs can submit LSRs for digital loops and for LNP (in the new OSS99 format), as separate requests, electronically. CLEC: Not completed. BellSouth has not yet provided an e-mail capability for pre-ordering and ordering complex services to the industry. BellSouth has developed such a process with one company, but has not made that process or any information about that process available to any other parties. MCIW: At this time, no capability exists to do service inquiries electronically. MCIW comments end. The issue of complex ordering at the OBF was to be a joint effort by the parties to this case. The parties must get together before OBF in order to prioritize the issues. Intermedia has contacted its account team at BellSouth about getting this process started and has not received a response. AT&T: In response to BellSouth's comments regarding digital loops, AT&T has the following comments. BellSouth to date remains unwilling to provide AT&T a feasible method of ordering digital loops and number portability. Additionally, the LNP orders will not flow-through when implemented on 01-30-00. Neither will

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
2. Customer Service Records			
b. Rates of services and equipment items displayed on CSR are not presented in LENS.	BST shall make this information available via fax and electronically through LENS.	January 30, 1998	BellSouth: This information was made available by fax by July 6, 1998 and electronically on the LSI and CSR in Release 3.1, implemented August 15, 1998 for Georgia. CLECs: Completed for Georgia only.
c. No "refer to" number is provided on certain CSRs. CLECs must call LCSC to obtain the number.	Not an issue.	N/A	N/A

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
3. Limited Products and Services			
a. A complete list of all valid "USOCs" has not been provided to the CLECs.	BST shall make a complete list of valid USOCs available to CLECs and provide monthly updates to this information.	Adopted.	BellSouth: Completed. USOCs and associated FIDs and state-specific info is in the Local Exchange Ordering Guide, which is on the web at www.interconnection.bellsouth.com/guides. The BellSouth USOCs are also on the web. An inadvertent truncation of the early October USOC file on the web was corrected 10/6/98. State specific USOCs and FIDs in comma spaced value format has been on the web since 1/8/99. CLECs: Completed.
b. Failure to provide information regarding promotional offerings.	BellSouth is currently providing this information in a paper format and will determine whether an electronic version of this information can be provided.	December 17, 1997 (Notice of Availability)	BellSouth: Completed. Tariffs with promotional information are available on the web 45 days in advance of the effective date of the promotion. CLECs: AT&T and MCIW receive e-mail notifications of promotional tariff filings.
c. Failure to provide blocks of DID numbers and DID trunk inquiry.	BST shall make blocks of ten DID numbers available electronically.	March 30, 1998	BellSouth: Completed via EC-Lite and TAG pre-ordering which had this capability implemented on August 30, 1998. CLECs: Not completed. See Pre-Ordering 2a.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
3. Limited Products and Services			
d. Lack of accurate PSIMS information and is received by batch file.	BST shall make accurate information available in PSIMS.	January 30, 1998	BellSouth: Completed. PSIMS information is accurate; it's the same information used by BST retail and CLECs. Additional PSIMS information (Remote Call Forwarding and Memory Call #) was included in Release 3.0, implemented on July 25, 1998. With respect to AT&T's comment, AT&T has misunderstood the situation. There is no correlation to PSIMS information and the information provided in Mr. Pate's Affidavit of April 23, 1999. The specific paragraphs cited discuss LSRs which are for services that can be requested electronically, but have not been designed to flow through BellSouth's systems. It is believed that AT&T's comment is directed to situations where a CLEC made an error in processing their request or failed to use P/SIMS and ordered a product that is not supported by the central office serving that end user. In this situation these requests would error out for processing but not due to any fault on the part of BellSouth. CLECs: Not Completed. BellSouth implemented a solution via Release 3.0 of LENS on July 25, 1998. The solution being implemented provides two pieces of information contained within PSIMS that were not being provided to CLECs, but does not address the data inaccuracies within PSIMS that frequently lead to rejected CLEC

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
3. Limited Products and Services			
			orders. AT&T: New information provided by Mr. Pate in his Affidavit of April 23, 1999, casts additional doubt upon the accuracy of PSIMS data. In ¶¶ 19-20 he discusses a situation which causes CLEC orders to fallout for manual processing based upon conflicting class of service/type of service/information CLECS obtain from PSIMS.
e. LENS is not designed to accommodate unbundled loop and certain complex orders	This issue is addressed in 1a of Ordering. [BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.]	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER	BellSouth: Completed. BellSouth will continue to update its business rules as necessary. With reference to AT&T's comments, BellSouth disagrees in that complete, accurate, and timely business rules are provided to CLECs. In addition to the EICCP as a communication forum, BellSouth posts carrier notification letters to the website concerning releases and provides the appropriate and timely documentation of business rules via the LEO Guides posted to the website. This report is the first forum by which AT&T has alleged that BellSouth programmers had not properly coded their portion of the EDI interface for partial migrations. Proper testing of the functional specifications was performed prior to implementation. BellSouth has no knowledge of this concern. This issue has

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
3. Limited Products and Services			
			not been expressed prior. With respect to AT&T's comments on the "account merging enhancement", it is believed that AT&T is referring to the imposed limitation of four accounts. Due to the amount of work involved with release 6.0 (OSS'99) it was necessary to place some limitations on processes. AT&T is the only CLEC that has voiced a concern on the four account limitation. If this is not sufficient, AT&T could submit an issue to the EICCP stating what is a reasonable number from their perspective. This would permit the participation of all CLECs in the discussion and prioritization of the request. Concerning the requirements for OSS'99, the work associated with moving from a requirements definition to detailed design has revealed numerous issues that are driving the re-interpretation of the requirements. BellSouth agrees that this adds expense and delay to **BOTH** BellSouth and CLEC development efforts, and is part of the process that further illustrates BellSouth's commitment to producing high quality detailed designs As BellSouth moved from detailed design to unit test for the OSS'99 product set, it became apparent that a significant number of changes would be required to implement the functionality as defined in the EICCP

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
3. Limited Products and Services			
			discussions with our CLEC OSS partners. The cumulative effect of these changes created a significant increase in analysis and coding for BellSouth. This together with BellSouth's reluctance to put in place an OSS upgrade that does not meet the needs of CLECs, led to a delay in deploying the OSS'99 upgrade. The implementation team attempted until the last reasonable minute to incorporate the identified changes to meet the beta test dates provided to AT&T. The team did not give up on the beta test dates until it was apparent that they could not be met and still provide the appropriate functionality. It would be unwise to sanction the implementation of a product that falls short of our joint expectations. In response to AT&T's comments concerning identification of line class code information, BellSouth has never supported routing of OS/DA to an unbranded platform electronically. LSRS received electronically will default to BellSouth. CLEC: Not Completed. BellSouth provided CLECs with business rules for LEO, LESOG, SOER, and Version 7.0 of EDI. Ordering for AT&T Digital Link service and other orders indicate that the business rules are incomplete and inaccurate, and new business rules are not provided in a timely manner.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
3. Limited Products and Services			
			Many CLECs are using LENS and PC EDI. LENS and PC EDI do not accommodate all loop types and complex services. AT&T: BellSouth's business rules provided in advance of enhancements to the EDI ordering interface to support partial migrations and the ability to merge a customers lines from multiple existing accounts into a single new account have proven to be inaccurate in practice. The partial migration enhancement was "implemented" on March 28, 1999 but obviously not tested with any CLEC prior to implementation. When used as implemented by BellSouth it was discovered that BellSouth's programmers had not coded their portion of the interface in accordance with the published business rules. The account merging enhancement is scheduled for OSS'99 whose final requirements were "agreed" to on April 19, 1999. Since that date BellSouth has imposed additional business rules which will make the implementation of this enhancement meaningless. Despite having "agreed" to final requirements for OSS'99 on April 19, 1999, three months later than the planned January agreement date, BellSouth continues to issue unilateral changes to the requirements. Each of these changes has the potential to add

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
3. Limited Products and Services			
			expense and add delay to CLECs development efforts. AT&T does not agree with BellSouth that adding delay and expense are indicators of or necessary to "commitment to producing high quality detailed designs." AT&T was notified just three days prior to the implementation of beta testing for OSS'99 that delivery of this upgrade would not be completed until the end of March, 2000, a delay of 7 months. AT&T: Despite executive level escalations of the OSS99 delay, AT&T has received no indication from BellSouth that it intends to expedite the delivery of OSS 99. (Oct.) AT&T: AT&T has recently determined that BellSouth has removed the capability to electronically submit orders requiring the identification of line class code information to route CLEC traffic to other than BellSouth branded OS/DA platforms. This impacts resale and UNE orders involving switch ports. (Nov.)
f. PIC information is not listed in an efficient manner.	BST shall add a search capability for PICs in LENS.	March 30, 1998	BellSouth: Completed. This search capability was implemented in Release 4.1, on December 19, 1998. In order to utilize this feature, CLECs will need to enable the JAVA feature on the Netscape browser. This search capability will find a carrier based on 2-3 letters input of the carrier's name. The

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
3. Limited Products and Services			
			Release 4.1 notice is on the web as of 10/26/98. CLECs: Completed for LENS only.
g. ESSX and MultiServe information is not available.	This issue is addressed in 1g of Ordering. [BST in conjunction with carriers will present this issue of mechanized complex orders to OBF.]	March 30, 1998	BellSouth: Scheduling with OBF. BellSouth is actively working in OBF to add complex product ordering to future software standards, as CLECs can do also. Several complex services are on OBF's issues list: Ordering Requirements for: Centrex Resale – status date 11/7/97 - Issue 9 (just published 7/25/98); DID Resale - status date 10/7/97 – Issue 9; Unbundled ISDN BRI port – status date 2/5/98 – Issue 10 (publish date 2/99); PBX trunks, DID trunks, Number blocks - status date 8/15/97 - Issue 9. BellSouth provides electronic ordering for 4 complex services via EDI,EDI-PC, and TAG: Synchronet, ISDN BRI, PBX trunks, and hunting. BellSouth has agreed to implement complex services ordering in the OSS'99 release as prioritized by the CLECs. See BellSouth comments on OSS'99 implementation provided in Pre-Ordering 3e. CLECs: Not Completed. OBF guidelines have been issued for most complex services, and CLECs have requested that they be included in the next EDI upgrade, now targeted for late third quarter, 1999. To date, BellSouth has not committed to implement all CLEC requests.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
3. Limited Products and Services -			
			AT&T: As discussed above BellSouth is now promulgating additional restrictive business rules after the close of the requirements for OSS'99. See AT&T's comments on OSS99 implementation provided in Pre-Order 3e. MCIW: Complex services and complex listings are not supported by BST electronically.
h. LENS is limited to a maximum of six lines per request and a maximum of 20 features per line.	The proposed API interface will eliminate these limitations.	End of 1998	BellSouth: See Pre-Ordering 1d. LENS has no limit for the number of features per line. CLECs: Implemented.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
4. Telephone Number Resources			
a. Limits number reservation to six numbers/LENS session and 100 numbers/end office.	BST is removing 100 number limit for LENS and EC-Lite.	January 5, 1998	BellSouth: Completed. LENS has unlimited TN reservation capability: CLECs may reserve 6 numbers at a time for an unlimited number of times. As of November 14, 1998, LENS displays and CLECs can reserve 25 numbers at a time. CLECs: Implemented.
b. BST's RNS system automatically generates a telephone number to offer a customer but CLECs must use telephone number reservation in LENS.	BST is providing telephone number availability in a sufficient manner.	N/A	N/A
c. CLECs cannot determine NXX codes available to offer customers.	This information is currently provided in LERG. The proposed API interface will also make this information available.	N/A	BellSouth: N/A. The TAG has a programmers job aid with the NPAs (area codes) associated with the CRIS areas, which CLECs can develop into their systems. CLECs: Not completed. According to a recent filing made by BellSouth in Alabama, the addition of NXX codes available in a switch to TAG is part of a 3/19/99 release of 13 changes to TAG. It is not known if these changes will bring TAG up to par with LENS.
d. BST does not provide parity of access to vanity numbers.	BST is providing vanity number availability in a sufficient manner.	N/A	N/A
e. BST does not enable CLECs to hold a telephone number for 30 days without using cumbersome (firm order mode) of LENS. In the (inquiry mode) CLECs may only make reservations for 9 days.	BST shall make 30 day number reservation available to CLECs.	March 30, 1998	BellSouth: Completed CLECs: Implemented

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
4. Telephone Number Resources			
f. ATLAS information is received by a periodic file data transfer.	Not an issue.	N/A	N/A

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
5. Due Dates			
a. Access for calculation of a due date is not available.	BST shall provide a full due date calculation capability in the pre-ordering mode of LENS.	April 30, 1998	BellSouth: Completed. Implemented 3/15/99 for resale and UNEs in TAG. Implemented in Release 4.0 November 14, 1998. LENS' due date calculation in inquiry mode mirrors this capability in the firm order mode. EC-Lite also gives the CLECs the ability to calculate due dates including for UNEs. UNEs and resale intervals are on the web. CLECs have the information to calculate due dates. With regard to LCI's statement, the dispatch center gives the same due dates, regardless if it's a CLEC or BST order. The status of UNE due date calculation is not uncertain. The intervals for determining a UNE due date have been defined precisely in the BellSouth Products and Services Interval Guide which has been published since April 1998. The most recent interval guide was provided to CLECs on August 30, 1999. The UNE due date calculation is simply a mechanical application of the intervals provided in the Products and Services Interval Guide. The UNE intervals are fixed and always have been. The due date calculation functionality exists in the TAG electronic interface. CLECs: Not completed. Due date calculation is still not at parity. AT&T: The status of UNE due date

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
5. Due Dates			
			calculation capability is uncertain, BellSouth's representatives in the Florida OSS Workshop and the Louisiana Performance Workshops have indicated in contrast to the information above, that UNE due dates are fixed and not subject to a calculation which would take in to account the BellSouth workload in its work centers as is done for resale orders. LCI: Lack of parity in provisioning timeframe. BellSouth sometimes rejects requested due dates, indicating that an order cannot be completed in the timeframe desired by the customer, however, when a customer cancels the LCI order and returns to BS with the same desired due date, BellSouth is able to provide the service by that date. This is true for new orders and MACs.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
5. Due Dates			
b. Dates given are not firm, also the date is assigned by BellSouth after it is entered into BellSouth system.	This issue is addressed in 2l of Ordering. [BST shall provide the same guarantee of FOC information to CLEC that it provides to its retail operations.]	January 30, 1998	BellSouth: Completed. BellSouth's FOC policies and timeframes are in the Interval Guide on the web, and in the Interconnection agreements. The FOC target for LNP is 24 hours for valid mechanized orders and 48 hours for valid manual orders. AT&T has selectively chosen to report only portions of the FOC timeliness. A complete report for FOC Timeliness has been filed with the GA PSC. An analysis of the September 1999 Georgia results note that 99.7% of fully mechanized residence order FOCs were provided in 4 hours or less and 98.8% of fully mechanized business orders were provided in 4 hours or less. For non-mechanized residence order FOCs reflect 96% provided in 48 hours or less and 91.1% in 48 hours or less for non-mechanized business orders. Currently, BellSouth does not have a data feed from the LNP Gateway to PMAP; therefore, mechanized EDI LSRs that flow directly through to the LNP Gateway are not included in BellSouth's Performance Measurements Reports or in the Raw Data Files. BellSouth is currently working on an LNP Gateway feed to PMAP. As AT&T is aware, BellSouth does not have an equivalent FOC process for its retail units.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
5. Due Dates			
			BellSouth is coordinating a meeting with the AT&T users of the Product Interval Guide and AT&T's BST Account Team to provide clarification and a better understanding of the Product Interval Guide. BellSouth provided the Product Interval Guide dated August 1999 to AT&T's Local Service & Access Management Group (LSAM) in August 1999. BellSouth understands that AT&T's LSAM group is currently preparing questions/comments, which will be delivered to BellSouth shortly, pertaining to the August 1999 version of the Interval Guide. BellSouth awaits receipt of these questions/comments to allow it to better define and establish an agenda for the meeting and be adequately prepared to discuss AT&T's specific issues pertaining to the Interval Guide. CLEC: Not completed. BellSouth claims that it has implemented this solution. BellSouth, however, also claims that it does not provide FOCs to its retail operations. The FCC found that the retail analogue of a FOC is when BellSouth's internal OSS recognizes a retail order. This occurs almost immediately after BellSouth submits a retail order. In comparison, however, CLECs received FOCs hours and even days after an order is submitted For example, BellSouth's "Firm Order Confirmation Timeliness" report for March 1999 indicates that

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
5. Due Dates			
			BellSouth takes up to 2.17 days to provide CLECs with FOCs for UNE service orders. AT&T's experience as reported by BellSouth was even worse than the CLEC average with up to 2.53 days to return a FOC for UNE orders and 8.10 days for resale. MediaOne receives FOC's for LNP in Georgia within 48 hour interval 92% of the time. However, the industry standard unanimously agreed to by the Southeast Number Portability Administration Company, LLC for FOCs is 24 hour turnaround. BellSouth fails to recognize the 24 hour interval even though BellSouth agreed to the interval as a member of the Southeast Number Portability Administration Company, L.L.C. e.spire often does not receive FOCs, or receives inaccurate FOCs. When resale FOCs are not received or are inaccurate, CLECs have no record of the date of service transfer, causing double billing and other problems. In reviewing BellSouth's raw data, AT&T has learned that is has LSRs missing from its FOC data, rendering its FOC results as reported by BellSouth meaningless. AT&T has reported this issue to BellSouth. Using its therefore dubious overall results, BellSouth reports FOC ranges for CLECs from under 4 hours to under 48 hours. It

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
5. Due Dates			
			makes no mention, however, of the performance it provides itself for analogous information, and how that compares to the performance it provides CLECs. Additionally, the intervals for FOCS in BellSouth's interval guide continue to increase or be "negotiated". This is entirely inappropriate as no facilities check is being done. Per BellSouth, a FOC merely means they have received a clean or valid LSR. BST should have explain to this Commission why it takes days (per their interval guide) to make such a determination. AT&T-In response to AT&T concerns about BellSouth's interval for FOCs and other issues with its interval guide, BellSouth committed on a conference call on October 4 to meet with AT&T prior to issuance of the November version of this matrix. AT&T's purpose for this meeting is minimally to obtain clarity on the rationale for the FOC interval and on the activities that do and do not take place within BellSouth prior to its issuance of a FOC for all order types, including those requiring service inquiries and projects. Language in the interval guide will also be reviewed for clarity and understanding. It is also hopeful that BellSouth will, in addition to providing clarity, will be responsive to AT&T's business needs for timely, non-discriminatory, and reliable FOC and target service intervals, critical issues for AT&T

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
5. Due Dates			
			(Oct.) AT&T: For September, BellSouth has chosen to analyze only a portion of its FOC timeliness, presenting no discussion of UNEs or any indication of the relative volume and impact of delayed FOCs. In September BellSouth's FOC performance related to UNEs continued to be abysmal - 83% of electronically submitted UNE orders were FOCed by the "partially mechanized" process at an average interval of 3.61 days. AT&T's own experience with partially mechanized FOCs was even worse with an average of over 15 days on a volume of only 4 orders. Further the FOC intervals for AT&T and TCG manually submitted orders for the same types of service vary by as much as .5 to .8 days. (Nov.) AT&T: Similarly BellSouth fails to put its resale results into perspective, only 32% of business resale orders receive fully mechanized FOCs the remaining 68% were FOCed at an average interval of 1.3 days, not four hours or less. AT&T: AT&T is still waiting for BellSouth's promised meeting regarding the product interval guide. Further, in response to BellSouth's comments that it has not received any comments from LSAM, that is the group that intends to attend this meeting, when established, with their comments and

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
5. Due Dates			
			questions. Names of the attendees including LSAM personnel have already been provided to BellSouth.
c. If technician is needed, it would not be known to CLEC. Technician time could be wasted.	Not an issue (Connect-Through and Quick Serve will solve the problem).	N/A	N/A
d. Limited appointment time.	BST is providing this information in a sufficient manner.	N/A	N/A
e. Access to dedicated facilities info available only after due date is assigned.	This information is presently being provided through QuickServe, and the proposed API interface will address this issue long-term.	N/A	BellSouth: N/A CLECs: Not completed. See Pre-Ordering 1d. . According to a recent filing made by BellSouth in Alabama, the addition of QuickServe to TAG is part of a 3/19/99 release of 13 changes to TAG. LCI: See Pre-Ordering 5a.
f. Changes to due date require a phone call to LCSC.	This issue is addressed in 4a of Ordering. [BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.]	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER	BellSouth: Completed; business rules were provided 1/30/98. (TAG, EDI, and LENS can handle changes to orders electronically.) CLECs: Not completed. See Pre-Ordering 3e. BellSouth what about LENS and TAG?
g. Firm Order Confirmation delays.	This issue is addressed in 2i of Ordering. [BST shall provide the same guarantee of FOC information to CLEC that it provides to its retail operations.]	January 30, 1998	BellSouth: Completed. See Performance Measurements FOC data. See Pre-Ordering 5.b. CLECs: Not completed. See Pre-Ordering 5b. LCI: See Pre-Ordering 5a.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
1. Limited Products and Services			
			partial migrations. (Oct.) AT&T: On of October 11 AT&T escalated this issue within BellSouth but has received no resolution. (Nov.)
c. LENS and EDI support only some resale service.	BST in conjunction with carriers will present this issue of mechanized complex orders to OBF.	March 30, 1998	BellSouth: Scheduling with OBF. BellSouth is actively working with CLECs to add complex products to the OSS'99 release. the requirements for which are being finalized. See Pre-Ordering 3.g. Regarding AT&T's comment below concerning the requirements for OSS'99, the work associated with moving from a requirements definition to detailed design has revealed numerous issues that are driving the re-interpretation of the requirements. BellSouth agrees that this adds expense and delay to **BOTH** BellSouth and CLEC development efforts, and is part of the process that further illustrates BellSouth's commitment to producing high quality detailed designs. Also, see Pre-Ordering, 3e regarding OSS'99 implementation. CLEC: OBF guidelines have been issued for most complex services, and CLECs have requested that they be included in the next EDI upgrade, target for July, 1999. BellSouth has not committed to implement the CLECs' requests and has not committed or specified what complex services will be

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
1. Limited Products and Services			
			supported in OSS '99. With the final OSS 99 Document release, now scheduled for 9/99, some complex services have been included for resale. AT&T: Despite having "agreed" to final requirements for OSS'99 on April 19, 1999, three months later than the planned January agreement date, BellSouth continues to issue unilateral changes to the requirements. Each of these changes has the potential to add expense and add delay to CLEC's development efforts. AT&T does not agree with BellSouth that adding delay and expense are indicators of or necessary to "commitment to producing high quality detailed designs." See AT&T's comments regarding Pre-Ordering, 6a.
d. Failure to use industry standard feature identification codes.	Not an issue	N/A	N/A
e. Failure to provide a fully automated system for placing complex orders.	BST in conjunction with carriers will present this issue of mechanized complex orders to OBF.(3/30/98)	March 30, 1998	BellSouth: Scheduling with OBF. BellSouth is actively working with CLECs to add complex products to the OSS'99 release . See Pre-Ordering 3g. Regarding AT&T's comment below concerning the requirements for OSS'99, the work associated with moving from a requirements definition to detailed design has revealed numerous issues that are driving the

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
1. Limited Products and Services			
			re-interpretation of the requirements. BellSouth agrees that this adds expense and delay to **BOTH** BellSouth and CLEC development efforts, and is part of the process that further illustrates BellSouth's commitment to producing high quality detailed designs. See BellSouth's comments in Pre-Ordering 3e regarding OSS'99 implementation. CLEC: See Ordering 1c. BellSouth has not committed or specified what complex services will be supported in OSS '99. AT&T: [Again] Despite having "agreed" to final requirements for OSS'99 on April 19, 1999, three months later than the planned January agreement date, BellSouth continues to issue unilateral changes to the requirements. Each of these changes has the potential to add expense and add delay to CLEC's development efforts AT&T does not agree with BellSouth that adding delay and expense are indicators of or necessary to "commitment to producing high quality detailed designs." See AT&T's comments in Pre-Ordering 3e regarding OSS'99 implementation. AT&T was notified just three days prior to the implementation of beta testing for OSS'99 that delivery of this upgrade would not be completed until the end of March,

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
1. Limited Products and Services			
			2000, a delay of 7 months.
f. Inability of new entrants using Phase I EDI to order all services that BST now orders electronically to support its retail operations, i.e., cannot order private line, Centrex, ISDN or complex business service or unbundled network elements.	Issue addressed in 1a, 1b, and 1c of Ordering. [BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.] [BST shall provide e-mail capabilities for pre-ordering and ordering complex services initially. This is in addition to the current fax capability.] [BST in conjunction with carriers will present this issue of mechanized complex orders to OBF.]	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER January 30, 1998 for e-mail capability; March 30, 1998 for presentation to OBF	BellSouth: Business rules have been provided, and e-mail capability for ordering complex services has been implemented. The issue of mechanized complex orders is being implemented in the OSS'99 release. See Pre-Ordering 1g. Regarding AT&T's comment below concerning the requirements for OSS'99, the work associated with moving from a requirements definition to detailed design has revealed numerous issues that are driving the re-interpretation of the requirements. BellSouth agrees that this adds expense and delay to **BOTH** BellSouth and CLEC development efforts. and is part of the process that further illustrates BellSouth's commitment to producing high quality detailed designs. See BellSouth's comments in Pre-Ordering 3e regarding OSS'99 implementation. CLEC: See Pre-Ordering 3e. BellSouth has not yet provided an e-mail capability for pre-ordering and ordering complex services. BellSouth claims that it is conducting a trial with ICI. BellSouth, however, has not advised AT&T regarding the scope of the trial or its progress. BellSouth has not committed to implement the CLECs' requests and has not committed or specified what complex services will be

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
1. Limited Products and Services			
			supported in OSS '99. See Ordering 1c. AT&T: Despite having "agreed" to final requirements for OSS'99 on April 19, 1999, three months later than the planned January agreement date, BellSouth continues to issue unilateral changes to the requirements. Each of these changes has the potential to add expense and add delay to CLEC's development efforts AT&T does not agree with BellSouth that adding delay and expense are indicators of or necessary to "commitment to producing high quality detailed designs." See AT&T's comments in Pre-Ordering 3e regarding OSS'99 implementation. Many CLECs are using LENS and PC EDI. LENS and PC EDI do not accommodate all loop types and complex services. See Ordering 1b.
g. No provision for ordering capabilities for Centrex, some ISDN, Multiserv, complex services, private line services other than Synchronet, or all unbundled network elements when Phase II EDI interface is implemented.	BST in conjunction with carriers will present this issue of mechanized complex orders to OBF.	March 30, 1998	BellSouth: See Ordering 1c. and 1e (Pre-Ordering 3g. CLEC: Not completed. See Ordering 1b and 1c.
h. EXACT designed for access, not local service, thus only part of the customers service, such as the loop, can be ordered electronically; the remainder of the customers order, for items such as E911, directory	Not an issue.	N/A	N/A

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
1. Limited Products and Services			
listings, interim number portability, etc. must be ordered through another interface such as EDI or via fax.			
i. CLEC orders placed through LENS are currently limited to a maximum of 6 lines per residence or business request, and a maximum of twenty features per line.	Issue addressed in 3h of Pre-ordering. [Proposed API interface will eliminate these limitations.]	End of 1998	BellSouth: See Pre-Ordering 3h. CLECs: See Pre-Ordering 2a. MCIW – This comment does not match the issue. Comments?

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
2. Order Status			
a. LENS and EDI have not led to faster provisioning of simple LSRs.	Not an issue at this time.	N/A	BellSouth: N/A CLECs: See Pre-Ordering 2a. MediaOne receives 92% of FOCs for EDI ordered LNP requests within the BellSouth 48 hour interval. However, the turnaround period should be 24 hour as established by the LLC. EDI is not resulting in a faster provisioning process than the previous FAX mode. LCI must submit expedited orders manually, as EDI is not reliable. Since BellSouth manual processing is much faster than EDI, LCI has found that it has a better chance of having the order completed on time by BellSouth if it is submitted on paper rather than via EDI.
b. Communications processes fail to adequately advise CLECs of the status of the orders placed via the electronic gateways.	Not an issue at this time.	N/A	BellSouth: N/A CLECs: Must continually manually monitor the EDI screen/order to see when a FOC has been issued.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
2. Order Status			
c. Sufficient notices not provided to CLEC, e.g. service jeopardies, rejects, competitive disconnects, circuit based services.	In the interim, BST will work with carriers on the provision of timely notices.	January 30, 1998	BellSouth: Completed. BellSouth's LCSC does provide CLECs including e.spire advance notice of service jeopardies via phone and fax. e.spire is not using an electronic interface for ordering. CLECs can also receive service jeopardies electronically via EDI,LENS and TAG. EDI's electronic service jeopardies (via pending order status) in advance of standards was discussed in the Change Control process and implemented December 19, 1998. The published mechanized FOC and rejects measurements for AT&T look good. November and December FOC data combine totally mechanized and partially mechanized FOCs at the DOJs request. A detailed explanation of the Flow-Through Report including definition of LSRs represented by "Total Manual Fallout" and the process for determining allocation of errors to CLECs ("CLEC Caused Fallout") was provided to the GA PSC in affidavit of Ronald M. Pate filed 4/23/99. Mr. Pate's affidavit is not contradictory to any previously provided BellSouth testimony. It is just a more detailed explanation to provide further clarification. AT&T has selectively chosen to report only portions of the FOC timeliness. A complete Report for FOC Timeliness has been filed with the GA PSC. An analysis of the

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
2. Order Status			
			September 1999 Georgia results note that 99.7% of fully mechanized residence order FOCs were provided in 4 hours or less and 98.8% of fully mechanized business orders were provided in 4 hours or less. For non-mechanized residence order FOCs reflects 96% provided in 48 hours or less and 91.1% in 48 hours or less for non-mechanized business orders. Concerning AT&T's FOCs for its ADL orders, the result of 66% of FOCs received within 24 hours is based on a population of 9 orders. The three orders, which did not receive a FOC within 24 hours, did receive a FOC within 48 hours. The overall FOC average interval for these 9 orders was 0.83 days. See BellSouth's comments regarding missing LSRs in Pre-Ordering 5b. With respect to MCIW's comment concerning jeopardy notices for LNP, release 1.9.1 deployed May 30, 1999 added electronic notification of pending order status, including jeopardies. Carrier notification letter SN91081486 dated April 30, 1999 was posted to the BellSouth website advising of the forthcoming release implementation. e.spire: Not completed. BellSouth has no meaningful notice processes in place for

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
2. Order Status			
			e.spire, which has been providing competitive service since November 1996 using fax and phone for pre-ordering and ordering. Despite repeated requests for improvements, no advance notice is provided for service jeopardies or competitive disconnects. Combined with the lack of consistent FOCs, this makes it impossible for e.spire to keep track of its own resale subscribes, resulting in double billing of CLEC customers and other problems. CLECs: The service jeopardies referenced above by BellSouth do not include orders for local number portability. BellSouth's performance data demonstrates that BellSouth still does not provide carriers with timely order status notices. AT&T: BellSouth's "Firm Order Confirmation Timeliness" report for May 1999 indicates that BellSouth takes up to 2.17 days to provide CLECs with FOCs for mechanized orders and up to 1.21 days for non mechanized orders. In April it took up to 12.2 days for mechanized orders and up to 1.27 days for non-mechanized orders. In May, AT&T received FOCs within the 24 hours required by the contract only 48% of the time on its ADL orders. See AT&T's comments regarding missing LSRs in Pre-Ordering 5b.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
2. Order Status			
			Mr. Pate's 4/23/99 Affidavit creates more questions concerning orders which fallout for manual process and the error allocation process that it answers. All previous information provided by BellSouth to the FCC, this Commission and other commissions in BellSouth's serving area concerning orders that fallout for manual processing stated that such orders were for complex services and occurred only on orders submitted over the EDI interface. Mr. Pate provides at least 10 other categories of events that trigger such fallout across the EDI, TAG, and LENS interfaces. (¶¶ 19-20). Mr. Pate provides no information as to how BellSouth handles these newly identified situations in its own retail process. The counts of the various types of errors underlying the "Detail Flow-Through Report", the "Error Analysis Section" and the "Percent Rejects Report" which all stem from the handling of the same orders in the same process can not be reconciled and do not relate to each other in logical fashion. The LCSC service representative based determination process Mr. Pate describes is exactly the same as BellSouth SME witnesses have repeatedly testified BellSouth did not consider to be valid. As of 4/99, BST does not provide jeopardy notifications electronically for orders with LNP.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
2. Order Status			
			AT&T: For September, BellSouth has chosen to analyze only a portion of its FOC timeliness, presenting no discussion of UNEs or any indication of the relative volume and impact of delayed FOCs. In September BellSouth's FOC performance related to UNEs continued to be abysmal - 83% of electronically submitted UNE orders were FOCed by the "partially mechanized" process at an average interval of 3.61 days. AT&T's own experience with partially mechanized FOCs was even worse with an average of over 15 days on a volume of only 4 orders. Further the FOC intervals for AT&T and TCG manually submitted orders for the same types of service vary by as much as .5 to .8 days. (Nov.) AT&T: Similarly BellSouth fails to put its resale results into perspective, only 32% of business resale orders receive fully mechanized FOCs the remaining 68% were FOCed at an average interval of 1.3 days, not four hours or less.
d. Treatment of CLEC order as two order- one to disconnect and one to reconnect.	BST is installing new software to resolve this issue. BST will verify memory call item is resolved also.	January 5, 1998	BellSouth: Completed. New software was installed and orders are now processed as a single change order, not two orders. With regard to AT&T's comment below, the situation referenced required the CLEC to submit a single LSR. BellSouth then had to perform two requests at no burden to the

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			CLEC. However, this situation is now mute in that Release 5.0 (April 1999) permits this order to electronically flow-through. AT&T: Here again, Mr. Pate's 4/23/99 Affidavit raises additional concern. In it he describes a situation in which BellSouth over a year later is still utilizing this manual two-order process.
e. Failure to provide adequate flow-through for POTS resale and UNE orders.	BST will share edits and all scenarios that produce order fall out for manual processing.	December 19, 1997	BellSouth: Completed. A detailed explanation of the Flow-Through Report including definition of LSRs represented by "Total Manual Fallout" and the process for determining allocation of errors to CLECs ("CLEC Caused Fallout") was provided to the GA PSC in affidavit of Ronald M. Pate filed 4/23/99. Mr. Pate's affidavit is not contradictory to any previously provided BellSouth testimony. It is just a more detailed explanation to provide further clarification. As of the November 1998 flow-through report, all flow-through reports are now mechanically prepared; CLEC and BST Errors counts are now totally mechanically counted and presented as an attachment to the flow-through reports. LENS is part of BellSouth's non-discriminatory OSS access. LENS up-front edits are done by BellSouth; EDI up-front edits are done by the CLECs, which has not always occurred. AT&T's note on EDI flow-through is incorrect:

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			EDI's flow-through for November and December was 95.4% and 97.2% respectively. All of MCIW's referenced EDI loop orders contained MCIW order errors which caused them to fall out. Flow-through for the loop+LNP LSRs was implemented 1/17/99, after MCIW submitted their loop+LNP LSRs. BellSouth disagrees with AT&T's characterization of statements made which appear to indicate that errors (Total System Fallout) have been mechanically designated as CLEC (CLEC Caused Fallout) or BST (BST Caused Fallout) errors. BellSouth has clearly stated that the change which took place with the November 1998 Flow-Through Report was a mechanized counting of the errors. If these errors are such that they are conducive to a mechanized designation, then they would be auto clarified. Pursuant to the requirements of the GA PSC's May 20, 1999 order on Third Party Testing, a Flow-Through Audit Plan was filed June 1, 1999. The results of this audit will provide further validity and clarification flow-through calculation methodology and to the allocation of errors process to CLECs. With respect to AT&T's comment concerning flow through rates for BellSouth's retail units, as noted on the April Flow-Through Report the appropriate BST

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			business retail flow-through is really zero. This is according to the FCC's definition in the Louisiana II Order stating that orders must be transmitted electronically through the gateway without manual intervention. BellSouth disagrees with AT&T's statement below concerning the Flow-Through Audit Plan. BellSouth is in compliance with the GA PSC order. The Flow-Through Audit will confirm that the performance measures reported in BellSouth's monthly flow-through report are accurate and the flow-through measurement data is valid. In addition, KPMG as the auditor chosen by BellSouth and approved by the GA PSC has the ability at their discretion to modify the test plan to ensure compliance with the GA PSC order. The GA PSC order does not provide for the validation of the BellSouth retail operations. See BellSouth's comments regarding Flow-through Audit in Pre-Ordering 6a. BellSouth disagrees with AT&T's below statement that CLEC orders submitted via EDI and LENS interfaces are discriminatory. AT&T reports incorrect data to further confuse their claim. Correct EDI flow-through rates as reported in the monthly Flow-Through Report which is filed with the GA PSC are as follows:

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			March: 77.2% April: 78.06% May 86.73%. June 81.76% July 70.94% CLECs: BellSouth provided AT&T with SOER edits. Recent testing involving AT&T Digital Link service and loop/port combination indicate that the business rules (including SOER edits) are incomplete and inaccurate. BellSouth, moreover, has not provided AT&T with all of the scenarios that cause manual fall out because of deficiencies in BellSouth's systems. BellSouth's flowthrough reports are deficient in a number of respects. They unilaterally and incorrectly categorize errors as CLEC errors, which excludes them from the report. It does not include the host of order types that BellSouth has designed to be manual, although CLECs want them electronic, and it includes LENS orders, which BellSouth is not even relying on to provide non-discriminatory access. AT&T: Although BellSouth states above that CLEC and BST errors counts are "mechanically counted", they are designated as CLEC or BST errors manually by BST service representatives, not mechanically, as BST's statement appears to indicate. Again, the Pate Affidavit presents new information contradictory to BellSouth's

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
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			previous testimony in several jurisdictions. It also contains unfounded claims that the CCB Staff of the FCC has agreed to certain reporting procedures BellSouth has implemented. The truth is the FCC Staff's letter outlines procedures BellSouth must follow to demonstrate and evidence that the adjustments it is claiming are validly excludable. BellSouth has yet to comply with the FCC Staff's suggested procedures. The Flow-Through Audit Plan filed with the GA PSC will not validate the process BellSouth is using to report flow-through on actual CLEC local service requests submitted to BellSouth or for BellSouth's retail operations. Also, see AT&T's comments regarding Flow-Through Audit in Pre-Ordering 6a. MCIW: 100% of orders recently submitted to BellSouth via EDI did not flow through and fell out for manual intervention. BellSouth's contention that this lack of flow through was caused by ordering errors is incorrect. As explained in the Affidavits of Bryan Green filed on January 29, 1999 and April 12, 1999, BellSouth system errors caused the orders to fall out for manual processing." AT&T: The electronic flow through of

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
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2. Order Status			
			CLEC orders submitted to BellSouth via the EDI and LENS interfaces remains discriminatory. BellSouth's actual flow-through rate for EDI orders in March was 58.3 %. In contrast, BellSouth's retail operations experienced flowthrough rates of 96.5 percent for residential orders and 83.20 percent for business orders in March. EDI flow through for April was 63.6% for May was 70.6% and for June was 72.7%. July fell to 33.7%. August fell even further to 23%.
f. Failure to disclose internal editing and data formatting.	BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER	BellSouth: Completed. CLECs: Not completed. See Pre-Ordering 3e.
g. Failure to provide sufficient order summaries and/or order summary screen.	BST and the CLECs have committed to resolve this issue.	First Quarter 1998	BellSouth: Completed. Order summaries for LENS are available as of Release 4.1, implemented December 19, 1998. (EDI-PC has order summary already.) CLECs: Implemented for LENS only.
h. No means for CLECs to access and view pending orders.	BST and the CLECs have committed to resolve this issue.	First Quarter 1998	BellSouth: Completed. LENS has electronic viewing of pending orders status. For EDI, in the July 13, 1998 Change Control meeting where BellSouth surfaced this issue, the CLECs told BellSouth not to make any changes to EDI without their concurrence; BellSouth is trying to determine a way to implement this in EDI. BellSouth presented a recommended method to CLECs in an October 23 meeting. The 7/13 meeting

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			minutes indicate, "Service/Company Jeopardies: CLECs requested to participate in the requirements process. BST advised that they are attempting to come up with a solution that would require minimum or no changes to the EDI map." BellSouth is working on giving CLECs the capability to view the actual pending orders. CLECs: BellSouth claims that it has completed this solution. The CLECs disagree. CLECs can change pending orders in EDI, but cannot view pending orders in BellSouth's SOCS. Without the ability to view a pending order in SOCS the CLEC cannot know if BellSouth human intervention results in an unintended change to the CLEC order. BellSouth has not provided access to its internal systems that will give CLECs views into pending orders.
i. Lack of a system that provides adequate FOC information -- the "soft" FOC before facility availability is determined is inadequate.	BST shall provide the same guarantee of FOC information to CLEC that it provides to its retail operations.	January 30, 1998	BellSouth: Completed. See BellSouth's response to 2k. CLECs: Not completed. See Pre-Ordering 5b. LCI: See Pre-Ordering 5a.
j. EDI not fully automated, e.g. more than two thirds of orders placed through its electronic interfaces fall out for manual processing.	BST will share edits and all scenarios which produce order fall out for manual processing.	December 19, 1997	BellSouth: Completed. Edits have been shared with CLECs. It is unknown what efforts have been made by CLECs to incorporate these edits into their systems. CLECs: See 1st paragraph, Ordering 2e.

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ORDERING			
2. Order Status			
			LCI: See Ordering 2a.
k. EDI not capable of electronically transmitting necessary provisioning notices, i.e., error notices, reject notices, jeopardy notices, status reports.	In the interim, BST will work with carriers on the provision of timely notices.	January 30, 1998	BellSouth: Completed. This is a continuous process. As of December 19, 1998, EDI can electronically transmit service jeopardy notices, in addition to the customer-caused jeopardies and reject notices EDI has been providing. Electronic clarification and rejects for LNP was implemented 4/1/99 With respect to MCIW's comment concerning jeopardy notices for LNP, release 1.9.1 deployed May 30, 1999 added electronic notification of pending order status, including jeopardies. Carrier notification letter SN91081486 dated April 30, 1999 was posted to the BellSouth website advising of the forthcoming release implementation. In reference to AT&T's comments concerning problems receiving completion notices, BellSouth received a list of 11 PONs from AT&T on 7-20-99 for which no completion notices were received. Investigation revealed that completion notices were not sent on the PONs because, even though the physical facility work was completed, BellSouth inadvertently did not complete the orders in its internal OSS. As a result, the PONs were archived in the LNP gateway. Nine (9) of the orders have now been completed in BellSouth's systems and completion notices have been sent. The remaining (2) orders have been completed in

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			BST's internal OSS systems and BST is in the process of "forcing" the completion notices to AT&T. An initial analysis of the problem was returned to AT&T on 8-13-99. A root cause analysis for each PON and a corrective action plan is being prepared and will be sent to AT&T by 10-20-99. BellSouth's preliminary investigation results were sent to AT&T on 10-20-99. The final investigation results are being prepared. In response to AT&T's comments concerning the list of PONs submitted on 10-25-99, BellSouth received the 8 additional PONS on 10-25-99 and is currently investigating them. Per AT&T's request, the BellSouth Acct Team has scheduled a meeting with AT&T on Wednesday, November 10, to discuss this issue. <u>CLECs</u> Not Completed. Jeopardies for LNP orders. AT&T continues to have serious problems in receiving completion notices, although this issue was referred to BellSouth months ago. AT&T-In response to BellSouth's comments regarding completion notices, AT&T continues to have problems receiving completion notices. Additionally, although BellSouth states that it corrected the problem on the PONs that AT&T identified, it has provided no information indicating that this

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
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2. Order Status			
			problem will not reoccur, and indeed it has reoccurred. Apparently, nor have they even identified the problem for all the PONs AT&T identified, much less solved it, even though the list was provided to BellSouth in July. (Oct.). AT&T: AT&T continues to experience significant delays in BellSouth's updating of a customer's service record once a customer has ported service to AT&T. On October 25th AT&T submitted a new list of PONS for BellSouth to investigate. (Nov.) MCIW: As of 4/99, BST does not provide jeopardy notifications electronically for orders with LNP.
1. All necessary business rules not provided to CLECs; rules in LEO Guide in Error or internally inconsistent.	BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER	BellSouth: Completed. The LEO Guide is continually updated for new information. With respect to AT&T's comment below, new software release notices are not intended to provide CLECs with the detailed business rules. As the name implies, it is a notice of an upcoming release. The business rules are provided though updates to the Local Exchange Ordering (LEO) Guides which are posted to the website in sufficient time for CLEC implementation. Additionally, AT&T is advised of these releases well in advance through the EICCP to include their targeted implementation dates.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
2. Order Status			
			CLECs: Not completed. See Pre-Ordering 3e. AT&T: LEO guides are not updated concurrently with new software releases. The software release notices are insufficient in that they only provide a list of changes, not the accompanying business rules or other information needed to implement the change. Additionally, AT&T has asked for a release schedule, but it has not been provided. MCIW: See Pre-Ordering 6a.
m. Batch processing is not real time or near real-time for ordering.	BST will explore event-driven EDI with AT&T and MCIW.	First Quarter 1998	BellSouth: BellSouth has stopped deploying an interactive agent at MCIW's request. CLECs: Not completed. The AT&T and MCIW EDI Gateway have the capability for event-driven interface. AT&T and MCIW continue to await BellSouth's implementation. MCIW: BellSouth has agreed to develop and implement EDI/TCP/IP/SSL3 upon MCIWWORLDCOM's request.
n. Access to dedicated facility information is available only after the due date is assigned and not before which would enable a representative to immediately offer the same day service on a new install that does to require an additional line.	BST shall provide a full due date calculation capability in the pre-ordering mode of LENS.	April 30, 1998	BellSouth: Completed. This capability for inquiry mode was included in Release 4.0, which was implemented November 14, 1998. This capability exists in firm order mode. CLECs: This solution was implemented for

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2. Order Status			
			LENS resale orders only. Additionally, it is not clear how this release will fix the problem of access to dedicated facility information. LCI: See Pre-Ordering 5a.
3. Manual Intervention			
a. Substantial numbers of LSRs placed via EDI being handled manually.	Issue addressed in 2e and 2j of Ordering. [BST will share edits and all scenarios which produce order fall out for manual processing.]	December 19, 1997	BellSouth: Completed. EDI can process 25 loops in 1 order. Initial partial migration orders are electronically supported, and are further supported in Release 4.2 implemented March 28, 1999 (non-LNP) and March 28, 1999 for LNP per the CLECs request for a common date. The letter MCIW references used exact wording proposed by MCIW in a NC Commission case. All of MCIW's referenced EDI loop orders contained MCIW order errors that caused them to fall out. Flow-through for the loop+LNP LSRs was implemented 1/17/99, after MCIW submitted their loop+LNP LSRs.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
3. Manual Intervention			
			See BellSouth's comments in Pre-Ordering 3e regarding OSS'99 implementation and Ordering 1b regarding the ordering of digital loops and LNP. Because there is no restriction on the number of telephone numbers that can be ported on a single order, BellSouth needs clarification on AT&T's comment. CLECs: See Ordering 2e. Orders that require manual handling include, digital loops, UNE orders associated with complex directory listings, and orders for 15 or more unbundled loops, all partial migrations, and jeopardies for LNP orders. AT&T: Also see the Pate affidavit for additional orders that require manual handling. BellSouth's delay in implementation of OSS 99, its unwillingness to provide a reasonable solution for ordering digital loops and LNP, its restriction of the number of telephone numbers that can be ported on one order, etc. require CLECs to stay in a manual mode. MCIW: MCIW100% of recent UNE loop orders submitted to BellSouth electronically have fallen out for manual intervention. LCI: See Ordering 2a.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
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3. Manual Intervention			
b. No working EDI interface for ordering.	Not an issue.	N/A	N/A
c. EDI-PC not fully automated.	Not an issue at this time.	N/A	N/A
d. Process for ordering unbundled elements through LENS (information is entered into the "Remarks" section of the order screen and is manually retrieved and re-entered by BST).	BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER	BellSouth: Completed. CLECs: Not completed. See Pre-Ordering 3e.
e. Availability of an electronic interface that does not require manual intervention for the provisioning of unbundled loops.	BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER	BellSouth: Completed. CLECs: Not completed. See Pre-Ordering 3e. MCIW: See 2nd paragraph, Ordering 3a.
4. Edit Capabilities			
a. Failure to provide electronic edit capabilities with ordering and provisioning at parity with BST. Edit to comply with OBF ordering form requirements or BST business rules.	BST shall provide business rules to CLECs for Version 7.0 of EDI LEO, LESOG, and SOER.	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER	BellSouth: Completed. CLECs: Not completed. See Pre-Ordering 3e. MCIW: See Pre-Ordering 6a.
b. Inability to submit change orders (in case of errors, customer change order, and adding or removing features).	BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER	BellSouth: Completed. CLECs: Not completed. See Pre-Ordering 3e.
5. System Capacity			
a. Failure to provide systems with sufficient capacity to meet anticipated or reasonable demand. (Applies to both EDI and EDI-PC).	BST has agreed to provide the methodology utilized to calculate present system capacity and its proposed plan for expanding system capacity.	December 31, 1997	BellSouth: The GA PSC under docket number 8354-U has ordered BST to establish a third party testing program. The testing program will provide transaction and operational testing, as well as, volume testing. A test plan was filed with the GA PSC on 6/1/99.

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5. System Capacity			
			BellSouth disagrees with the comments provided below by AT&T and MCIW concerning the third party test plan. Obviously there is not an understanding as to the full scope of the test. HP is using EDI-PC only to BEGIN the test, facilitating the placing of orders for the functional test, and they will be testing all features that are currently available in the version 7.0 map which is fully OBF compliant. MCIW seems to imply that testing should wait for the next release of software (Version 9.0), even though MCIW has indicated that it does not intend to implement 9.0 in the near future. Additionally, HP is building a separate EDI interface for volume testing, which will demonstrate a CLEC's ability to construct the interface from the current documentation. CLECs: Not completed. BellSouth has provided summary level reports regarding capacity testing, but BellSouth has not provided the detailed methodology and assumptions used to conduct the tests. The summary level reports contain many defects and unanswered questions about BellSouth's capacity testing. The FCC Louisiana 271 Order found "nor is there any evidence of volume testing of CGI-LENS...BellSouth fails to show, through either commercial use or testing, that it can provide access to network elements through

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5. System Capacity			
			collocation in a timely manner that would allow new entrants to recombine elements to meet reasonable foreseeable demand." AT&T The third party test plan filed by BellSouth in Georgia will not evaluate non-discriminatory access, nor will it ensure that CLECs have the OSS they need to compete in the local market. MCIW: MCIW agrees with AT&T. Another problem with the test with respect to ordering is its reliance on EDI PC, which uses EDI specifications that are outdated, not OBF compliant, and do not include all functionalities that should be tested. EDI PC was grandfathered in April 1999. To make matters worse, BellSouth does not even propose to test all the functionalities it has added to EDI 7.0 since it was first released. Nothing in BellSouth's response changes the accuracy of the AT&T and MCIW's comments
b. Insufficient testing of systems and test documentation. (Applies to both EDI and EDI-PC).	Issue addressed in 1a and 1b of General Section. [BellSouth, AT&T, MCIW and Sprint started a series of meetings on December 11, 1997 to develop a Process Document addressing and resolving these "change management" issues. This series of meetings and development of the document are supposed to conclude	January 30, 1998	BellSouth: Completed. The Change Control process does include appropriate BellSouth initiated and Regulatory changes, such as service jeopardies in EDI, which BellSouth discussed in the 7/13 change control meeting. LCI uses EDI, not LENS for ordering. LENS was not down "the majority of the time" during the first 3.0 week of 7/27/98: LENS had no operational problems. There were 3 outages with the Internet access to

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5. System Capacity			
	by January 31, 1998. One additional CLEC will also be notified so that they can have some input. The parties view this as positive, interactive solution.]		LENS, which have been fixed; the dial-in access remained operational. BellSouth has suggested clarification of the Change Control Process document discussing Regulatory changes in the November 16 Change Control meeting. Release 4.0 (November 14) is the first release where change control items began to be implemented. The GA PSC under docket number 8354-U has ordered BST to establish a third party testing program. The testing program will provide transaction and operational testing, as well as, volume testing. A test plan was filed with the GA PSC on 6/1/99. In response to AT&T's comments concerning the requests submitted via the change control process, BellSouth re-instated the three "canceled" change controls requests as pending on 9-10-99. The CLEC prioritization list was revised on 9-10-99 to include the three requests BellSouth received AT&T's June 23rd change control request. The Change Control Acknowledgement Notification was returned to AT&T on 7-27-99. Additionally BellSouth has discussed this request with AT&T on numerous occasions the last being 9-14-99. BellSouth is evaluating all of these requests. The request is being managed via the EICCP. The status of the request can be obtained via the EICCP Change Request Log and the 9-28-99 EICCP Enhancement

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5. System Capacity			
			Review Meeting (ERM) minutes posted on the BellSouth website at http://www.interconnection.bellsouth.com/markets/lec/eiccp/eiccp.htm. Additionally, an AT&T representative was in attendance at the EICCP ERM conducted on 9-28-99 at which this request was discussed. CLECs: BellSouth published a document entitled "Electronic Interface Change Control Process." The document appears to apply only to changes to existing OSS requested by CLECs. It does not appear to apply to BellSouth initiated changes or the development of new OSS such as API. Such "internal" changes are most critical to CLEC's ability to manage OSS changes. Additionally, BellSouth continues to state in regulatory proceedings that the change control process does not apply to regulatory decisions, although the agreed-upon change control document states that it does. Also, BellSouth has not responded to two written communications from AT&T seeking clarification on this issue. CLECs are in the process of preparing proposed improvements to the change control process. .BellSouth continues to make changes to its OSS but BellSouth has yet to submit an item to the change control process. AT&T: Notwithstanding any informal discussions of changes that may occur between CLECs and BellSouth, the end

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5. System Capacity			
			result is BellSouth's unilateral decision, rather than having items managed by change control. BellSouth's inappropriate power over the change control process was again manifested when BellSouth recently unilaterally "cancelled" three change control requests of AT&T, requiring escalation to have them reinstated. Further, a critical AT&T June 23rd change control request has been escalated by AT&T to BellSouth but still not addressed. AT&T: In response to BellSouth's comments regarding change control, AT&T asks that the Commission note although BellSouth's comments only indicate discussions that occurred in September, there is much more to the story. Only after repeated calls to AT&T's account team in July did AT&T receive a verbal acknowledgement of its request on July 20, weeks after the deadlines established for the change control process. As of October 7, no resolution exists, over three months later. Importantly, this change request is an attempt to correct a BellSouth problem that has direct negative impact on customers who have requested AT&T service. AT&T: On November 3, over four months later, no resolution exists to this critical business issue; it is being "managed" via the

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5. System Capacity			
			EICCP. (Nov.) MCIW LCI: Software upgrades sent by BellSouth are routinely problematic. Judging from the number of problems following the installation of a Bell South upgrade, it does not appear that BellSouth tested the upgrade prior to initiation. For example, during the first week of LENS 3.0 upgrade, LCI provisioners had to submit 19 orders via fax because LENS 3.0 was not in operation the majority of the time. When the system was operational, it was extremely slow. The lack of readiness in BellSouth software upgrades has caused LCI to expend additional effort, time and resources in its efforts to submit orders to BellSouth.
c. Inadequate field for directory listings. (Applies to both EDI and EDI-PC).	Issue addressed in 1a and 1b of General Section. [BellSouth, AT&T, MCIW and Sprint started a series of meetings on December 11, 1997 to develop a Process Document addressing and resolving these "change management" issues. This series of meetings and development of the document are supposed to conclude by January 31, 1998. One additional CLEC will also be notified so that they can have some input. The parties view this as positive, interactive solution.]	January 30, 1998	BellSouth: Completed CLECs: See response to 5b above.

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ORDERING			
6. Integration			
a. LENS, EDI, and EDI-PC are not integrated to provide direct, unmitigated access to BST's legacy systems for pre-ordering and ordering functions.	Closed Issue (BST will provide systems specifications so that CLECs can build their own interfaces to integrate).	December 31, 1997	BellSouth: N/A. CLECs: BellSouth has provided LENS-CGI specifications to CLECs. The specifications provided, however, are inadequate to integrate pre-ordering and ordering functions in a manner that is equivalent to the integration that BellSouth provides its own retail operations. CGI raises serious security and robustness concerns for e.spire, more fully explained in the Georgia OSS hearing. Also see Pre-Ordering 8 a.
b. LENS must be utilized with additional interfaces such as the TAFI system and EDI-PC in order to meet additional CLEC needs.	Not an issue	N/A	N/A
c. Insufficient information provided new entrants to develop a system compatible with Phase II EDI.	Issue addressed in 2f of Ordering and 1a and 1b of the General Section. [BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.] [BellSouth, AT&T, MCIW and Sprint started a series of meetings on December 11, 1997 to develop a Process Document addressing and resolving these "change management" issues. This series of	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER January 30, 1998 for Process Document	BellSouth: Completed. The Change Control process does include appropriate BellSouth initiated changes, such as service jeopardies in EDI, which BellSouth discussed in the 7/13 change control meeting. CLECs: Not completed. See Pre-Ordering 3e. Also, see 1st paragraph, Ordering 5b.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
6. Integration			
	meetings and development of the document are supposed to conclude by January 31, 1998. One additional CLEC will also be notified so that they can have some input. The parties view this as positive, interactive solution.]		
d. LENS, EDI, and EDI-PC require dual entry by entrants into their own ordering/customer records systems.	Closed Issue (BST will provide systems specifications so that CLECs can build their own interfaces to integrate).	December 31, 1997	See Pre-Ordering 8a.

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BILLING			
1. System Capability			
a. BST has failed to provide systems relating to detailed access usage data for UNEs for billing purposes.	BST will provide access daily usage file (ADUF).	December 31, 1997	BellSouth: Completed. AT&T has been provided the daily ADUF since July 24, 1998. The issue of records missing from the AT&T ADUF file was raised by AT&T on July 31, 1998 and investigated by BellSouth. The root cause of the problem stems not from the ADUF process but from the OCN information populated on the port account. The information on the account was changed on July 29, 1998. The daily file sent to AT&T on July 31, 1998 contains records associated with calls placed from the port in question. AT& T provided BellSouth details of a second claim of missing ADUF records on October 14, 1998. AT&T stated that three test calls placed 8 weeks prior to the notification were not represented on the ADUF. After investigating the claim BellSouth could not find any evidence that the calls described by AT&T were made. BellSouth stands ready to investigate any other ADUF issue that is raised by AT&T. AT&T's claim that over 40% of the test calls placed are not represented on the ADUF is not accurate. The latest claim made by AT&T that the ADUF did not provide complete information was sent to BellSouth on January 12, 1999. Again, AT&T claimed that certain usage records were missing from the ADUF. Again, upon investigation, it was determined by BellSouth that all appropriate records, with the exception of a handful of call record was provided on the ADUF weeks prior to receiving the dispute. Fortunately, AT&T has agreed to the long-

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
BILLING			
1. System Capability			
			Standing offer made by BellSouth to meet to discuss any outstanding issues with the ADUF. On February 4, 1999 AT&T and BellSouth met to discuss the ADUF. With the exception of a handful of usage records which were involved in error correction efforts by BellSouth, all records which AT&T claimed to have expected and which BellSouth could find evidence of calls being placed in its network were provided on the files. Several claims made by AT&T were found to be errors on the side of AT&T's efforts to process the ADUF on its side of the interface. ADUF enhancements were implemented on October 31, 1998 to provide records for the one remaining call scenario that is currently not provided for on ADUF. This involves records for intra-LATA toll calls, carried by BellSouth, terminating to unbundled switch ports. All other intra-LATA (and intrastate) data is currently provided on ADUF. The appropriate processes needed to begin sending ADUF data to MCIW were implemented on December 16, 1998. No call that would generate ADUF records was seen in BellSouth's network until January 10, 1999. Due to a problem in completing all the steps required to transmit the files, the data was not transmitted until 2/5/99. This delay affected three usage records. Additional ADUF customer added in May,

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
BILLING			
1. System Capability			
			1999. Total records provided per month now exceeds 1 million. No customer has reported any specific issues with the records being provided since the AT&T issues document above. CLECs: AT&T has begun receiving ADUF files, however, they remain inaccurate and incomplete. AT&T's analysis of the ADUFs it has been provided indicates that certain test call data continues to be missing Until testing is completed successfully the ADUF is not available in a practical manner.
b. BST has failed to provide systems to bill for UNEs, including local loops, local transport and switching via CABS or using a CABS format.	This is a contractual issue and therefore no proposed solution is offered in the context of this technical workshop.	N/A	N/A
c. BST does not have the capability to record usage data or generate mechanized bills for many network elements. BST is not capable of providing usage sensitive for those UNEs that have usage sensitive pricing such as transport, switching, and signaling.	BST shall furnish an accurate paper bill in accordance with interconnection agreements.	February 15, 1998	BellSouth: Completed. BellSouth has addressed all billing errors referred by the CLECs; have resolved them and applicable adjustments have been made to the appropriate accounts. To the best of BellSouth's knowledge, accurate bills are being provided to CLECs for unbundled network elements. AT&T's claim that usage UNE billing entries lack the rates and minutes of use information is not correct. AT&T has not reviewed the bills which have been provided to it on the CABS electronic billing feeds since September, 1998. The account numbers for these bills were communicated to AT&T on 2/5/99 to assist in this review.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
BILLING			
1. System Capability			
			In September, 1998 BellSouth provided information to AT&T describing the new bills which would be received with the details for UNE usage. BellSouth continues to stand ready to assist AT&T with any additional information that would be useful to explain these bills. Beginning with UNE bills provided in September, 1999, BellSouth will be using the CBOS guidelines derived at the Ordering and Billing Forum. The new bill record types will provide generally the same information as provided previously but will adhere to the CBOS release 31 formats. CLECs were notified of this change via a customer notification letter on the BellSouth website. CLECs: BellSouth is now providing mechanized bills, however, they are inaccurate and incomplete. AT&T: AT&T continues to receive inaccurate and incomplete bills. Additionally, BellSouth has yet to provide rate and minutes of use information for usage sensitive elements. A letter from Fost Haley of BellSouth dated September 9, 1998 stated that this capability would not be available until mid-1999.
d. BST cannot electronically transmit originating and terminating recording information for interstate calls and does not know when it will be able to do so.	BST will provide access daily usage file (ADUF).	December 31, 1997	BellSouth: See Billing 1a. CLECs: See Billing 1a.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
BILLING			
1. System Capability			
e. BST has failed to provide systems that accurately produce bills for resold services.	Not an issue.	N/A	N/A
f. BST has failed to provide systems for accessing usage data for flat rate calls.	BST will add capability in its central offices to capture data for flat rate calls.	December 1998	BellSouth: Completed on December 31, 1998. BellSouth completed the implementation of the programming software needed to provide CLECs with usage records for flat-rate local calls. These records were provided to MCIW in Florida effective with that date. An announcement of this new capability was posted to the BellSouth website on December 18, 1998 and written notice was filed with the GPSC on 12/23/98. BellSouth has developed contract language which services as the vehicle for a CLEC to request these usage records. The language spells out the responsibilities for both parties and services to ensure that no gaps in understanding is left between BST and the CLEC. To date, no CLEC in Georgia has made a formal request for these records. CLECs:. CLECs such as AT&T and MCIW have access to this information as part of their interconnection agreement with BellSouth and should not have to request to receive it.
g. BST is not providing usage rates for Information Service Provider (e.g. N11) calls even though BST agreed to in middle 1996 and are required to by the AT&T/BST Interconnection Agreement.	CLECs have the ability to negotiate their own contracts with ISPs.	N/A	N/A
h. BST has failed to provide systems for mechanically generated billing statements.	BST shall furnish an accurate paper bill in accordance with interconnection agreements.	February 15, 1998	BellSouth: Completed. BellSouth has addressed all billing errors referred by the CLECs; have resolved them and applicable adjustments have been made to the appropriate accounts. To the

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
BILLING			
1. System Capability			
			best of BellSouth's knowledge, accurate bills are being provided to CLECs for unbundled network elements. AT&T's claim that usage UNE billing entries lack the rates and minutes of use information is not correct. AT&T has not reviewed the bills which have been provided each month to it on the CABS electronic billing feeds since September, 1998. The account numbers for these bills were communicated to AT&T on 2/5/99 to assist in this review. Beginning with the UNE bills provided in September, 1999, BellSouth will be using the CBOS guidelines derived at the Ordering and Billing Forum. The new bill record types will provide generally the same information as provided previously but will adhere to the CBOS release 31 formats. CLECs were notified via a customer notification letter on the BellSouth website. CLECs: BellSouth has yet to provide rate and minutes-of-use information for usage sensitive elements. A letter from Foster-Haley of BellSouth dated September 9, 1998 stated that this capability would not be available until mid-1999. AT&T: AT&T continues to receive inaccurate bills. Billing for UNEs includes loop and port charges only.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
BILLING			
1. System Capability			
			AT&T: AT&T has recently escalated an issue it has been working on with BellSouth on to resolve billing on interconnection trunking. The issue revolves around the use of ACNA and CIC information in BellSouth's ordering and billing systems. For some time, AT&T has been discussing with BellSouth the use of ACNA codes in ordering local trunks. Due to the inability of the CABS billing system to bill correctly without the presence of a CIC, BellSouth maintained that AT&T "must" use a CIC with the local services ACNA of "LOA." Additionally, BellSouth has objected to AT&T's use of its "LOA" ACNA code in conjunction with AT&T's "288" CIC code. AT&T has unsuccessfully explored with Lockheed the assignment of a new CIC code for AT&T's use in ordering BellSouth services and facilities to be used in connection with AT&T's local service operations Because of this inability to obtain a new CIC code, and because it was trying to assist BellSouth in working around the limitations of CABS, AT&T has proposed alternatives to BellSouth. AT&T first proposed to use its "LOA" ACNA code with no CIC code. This is certainly in compliance with the ATIS/OBF-ASR-004 guidelines, effective February 20, 1999, and implemented February 27, 1999. On page 3-22, Section 16. CIC – Carrier Identification Code, the OBF rules state that, unless the order is for a new Feature Group "D" or "B" request, the

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
BILLING			
1. System Capability			
			inclusion of a CIC code is optional. Notwithstanding this clear authority, BellSouth objected to this alternative. AT&T then proposed that BellSouth assign AT&T a CIC code from the "9000" series for AT&T's use with its "LOA" ACNA code. This range is classified as "unassignable" by the NANPA and is to be used by the industry on a INTRA-network basis only. CLECs and ILECs reached handshake agreements to use one of these 9000 CICs exclusively between their networks and the problem was thought to be resolved. AT&T has entered into 3 or 4 such agreements. BellSouth has refused to make this assignment via Randy Jenkins' letter of October 22, 1999. Not only has BellSouth refused this alternative, Randy informs us that BellSouth plans to change all "LOA" billing account numbers to AT&T's "ATX" ACNA code beginning October 31, 1999. In light of BellSouth's position, AT&T is compelled to begin issuing all trunk orders with the "LOA" ACNA with no CIC, as outlined in the OBF guidelines. This will assure that charges for BellSouth services and facilities used in connection with AT&T's local service operations will not appear on the same billing statement for BellSouth services and facilities concerning AT&T's non-local service operations. In order for AT&T to make a proper

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
BILLING			
1. System Capability			
			determination of which charges shown on each billing statement rendered by BellSouth relate to which AT&T operations, it is necessary that separate statements be rendered to each AT&T operation. These charges would continue to be mixed together if the "LOA" ACNA code is associated with the "288" CIC code. Accordingly, BellSouth must cease its plans to change AT&T's billing account numbers to "ATX."
2. Billing Accuracies			
a. CABS formatted bills were to be implemented by August 2, 1997, AT&T still has not received accurate CABS bills.	This is a contractual issue and therefore no proposed solution is offered in the context of this technical workshop.	N/A	N/A

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
GENERAL			
1. Notice of Changes			
a. Insufficient notice of changes.	BellSouth, AT&T, MCIW and Sprint started a series of meetings on December 11, 1997 to develop a Process Document addressing and resolving these "change management" issues. This series of meetings and development of the document are supposed to conclude by January 31, 1998. One additional CLEC will also be notified so that they can have some input. The parties view this as positive, interactive solution.	January 30, 1998	BellSouth: Completed. The minutes from the 7/13 Change Control meeting indicate BellSouth did introduce changing EDI to add service jeopardies, "Service/Company Jeopardies: CLECs requested to participate in the requirements process. BST advised that they are attempting to come up with a solution that would require minimum or no changes to the EDI map." Regulatory driven changes, such as service jeopardies in EDI, are discussed in change control as needed. BellSouth posts notice of systems changes regularly on the web. Major changes are posted 3-weeks to 30 days in advance of the release. BellSouth is posting the Releases schedule on the web as well. CGI specification updates were/will be posted as follows: for Release 4.0, a draft two weeks prior and final five business days prior to the release date; for Release 5.0, a draft 30 days prior and final one week prior to the release date. Release 4.0 (November 14) began to implement some change control items. See BellSouth's comments regarding OSS'99 implementation in Pre-Ordering 3e. CLECs: See Ordering 5b. See AT&T's comments regarding OSS'99 implementation in Pre-Ordering 3e. MCIW: BellSouth's posting of changes on the web does not meet the requirements established

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
GENERAL			
1. Notice of Changes			
			by the Change Control Process. MCIW requires final CGI specifications reflecting any screen changes at least 4-6 weeks prior to release implementation. BellSouth has proposed that preliminary specs be provided two weeks prior followed by final specs three days prior, which is unacceptable. CLECs need more detail in order to determine what changes, if any, are required. LCI: BellSouth has not provided advanced notice or adequate documentation on the requirements needed to implement software upgrades. BellSouth has implemented software upgrades before providing LCI the requirements to meet the upgrade. For example, BellSouth initiated EDI 3050 in April 1998, however the EDI 3050 LEO Implementation Guide was not made available to LCI until July 1998. Notification for major upgrades, such as LENS 3.0, should be made directly to CLEC contacts. In the case of LENS 3.0, BellSouth merely placed a general customer announcement on the BellSouth website and provided no further attempt to inform LCI of this upgrade. In both situations, the lack of prior notification and required information preclude LCI from making necessary plans and preparations to conform with BellSouth software changes and negatively impacts our production.
b. Insufficient documentation of specifications.	BellSouth, AT&T, MCIW and Sprint started a series of meetings on December 11, 1997 to develop a	January 30, 1998	BellSouth: Completed.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
GENERAL			
1. Notice of Changes			
	Process Document addressing and resolving these "change management" issues. This series of meetings and development of the document are supposed to conclude by January 31, 1998. One additional CLEC will also be notified so that they can have some input. The parties view this as positive, interactive solution.		CLECs: See response to 1a above. On September 1, 1999, AT&T requested through the change control process that BellSouth document its business rules for TAG pre-order.
2. Proprietary Interface			
a. Interim interface.	EDI & API will be based on industry standards and therefore can be integrated and available for machine-to-machine use.	EDI Version 7.0 by March 16, 1998 API by December 31, 1998	BellSouth: Completed. Six CLECs have fully implemented TAG for both preordering and ordering. One CLEC has implemented TAG for pre-ordering only. With reference to AT&T's comment, BellSouth's disagrees that there was anything "misleading" about the TAG implementation dates of August 30, 1998 for pre-ordering and November 1, 1998 for ordering. The system was available for production on these dates. BellSouth has no control as to when a CLEC chooses to enter production. Results noted 532 TAG LSR submissions, a 62% increase over the previous month's volume. TAG flow-through rate for July was 93.8%.for the July 1999 Flow-Through Report note a significant increase in LSR volume processed via TAG .

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
GENERAL			
2. Proprietary Interface			
			The GA PSC under docket number 8354-U has ordered BST to establish a third party testing program. The testing program will provide transaction and operational testing, as well as, volume testing. A test plan was filed with the GA PSC on 6/1/99. CLECs: BellSouth states that the status is "completed" although the ordering implementation timeframe for API is ostensibly November, 1998. Additionally, API pre-ordering is also not complete. See Pre-Ordering 1d. AT&T: BellSouth's claimed "implementation" dates in August and November of 1998 for this interface are misleading. No company "early adopter" or otherwise entered the production mode for any portion of this interface until January 1999, and none entered production for ordering until March 1999. . In April there were 14 local service requests placed by CLECs attempting to use TAG in May there were 5. BellSouth has provided no test data or commercial usage data.
b. Not compatible with industry standard EDI interfaces.	EDI & API will be based on industry standards and therefore can be integrated and available for machine-to-machine use.	EDI Version 7.0 by March 16, 1998 API by December 31, 1998	BellSouth: Completed. CLECs: See Response to 2a above
c. CLECs cannot integrate pre-ordering and ordering at parity with BST.	EDI & API will be based on industry standards and therefore can be integrated and available for machine-to-machine use.	EDI Version 7.0 by March 16, 1998 API by December 31, 1998	BellSouth: Completed. CLECs: See Response to 2a above

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
GENERAL			
2. Proprietary Interface			
d. Need for machine-to-machine or Application Programming Interface for pre-ordering.	EDI & API will be based on industry standards and therefore can be integrated and available for machine-to-machine use.	EDI Version 7.0 by March 16, 1998 API by December 31, 1998	BellSouth: Completed. CLECs: See Response to 2a above.
3. Training			
a. Usage specs not made available.	Issue addressed in 1a and 1b.	January 30, 1998	BellSouth: Completed. CLECs: See 1st paragraph, Ordering 5b. MCIW: See General 1a.
b. Documentation incomplete, has errors.	Issue addressed in 1a and 1b.	January 30, 1998	BellSouth: Completed. CLECs: See response to 3a above.
c. BST personnel lack adequate training.	Issue addressed in 1a and 1b. Also, BST to provide feedback on orders submitted for CLEC information in training their own staff.	January 30, 1998	BellSouth: Completed. CLECs: See response to 3a above. Also, BellSouth has not provided AT&T with feedback its orders on a regular basis.
4. Information			
a. Information is not provided to show parity (i.e. CLEC tour of BST facilities).	Not a technical issue to be resolved in this docket.	N/A	N/A

CERTIFICATE OF SERVICE
Docket No. 8354-U

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

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This 10th of November, 1999.

Fred McCallum Jr.

Fred McCallum Jr.

BellSouth Telecommunications, Inc.
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107983

AT&T

Southern Region

1200 Peachtree St.
Atlanta, Georgia 30309

November 15, 1999

BY HAND DELIVERY

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

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

Dear Ms. O'Leary:

Enclosed please find an original and fifteen (15) copies of AT&T's Comments on KPMG's Interim Status Reports 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 Ockleberry

Suzanne W. Ockleberry

Enclosures
cc: Parties of Record

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

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

AT&T'S COMMENTS ON KPMG'S INTERIM STATUS REPORTS

Comes Now AT&T Communications of the Southern States, Inc. (AT&T), and files its Comments on KPMG's Interim Status Reports and shows this Commission as follows:

1.

On May 20, 1999, this Commission ordered third party testing of BellSouth Telecommunications, Inc.'s (BellSouth's) OSS. On June 28, 1999, in approving BellSouth's proposed OSS Evaluation Master Test Plan and Flow-through Audit Plan, this Commission provided the opportunity for intervenors to file responses to the Interim Status Reports made under BellSouth's Plan.

2.

On July 22, 1999, September 10, 1999, and October 25, 1999, KMPG, as directed by the Order, filed Interim Status Reports reflecting activities associated with the test effort. AT&T has reviewed these documents and provides initial comments below.

3.

Although the Interim Status Reports provide some limited information on the status of activities associated with the third party test effort, intervenors' ability to comment constructively upon the issues is restricted by the lack of detail in the reports, and by the

lack of a defined process to make documents, plans, schedules, and other information referenced in these reports available. For example, the October 25, 1999, Interim Report (October Report) refers to the following documents, plans, schedules, and other information exchanges that have not been provided to intervenors:

- The Agreed Exception Process Approved by the Commission, KPMG and BellSouth
- KPMG's Current Project Plan/Schedule
- KPMG's Assessment of the Impact of Delays in Test Bed Provisioning

Additionally, earlier status reports refer to a number of other documents, plans, schedules and other information exchanges, none of which have been provided to intervenors. They are as follows:

- KPMG's Test Project Schedule (September Report)
- KPMG's Review of Test Bed Requirements and Specifications (September Report)
- The HP to KPMG Transition Plan (September Report)
- HP's Initial Project Plan and Schedule (July Report)
- HP's projected date for the identification of test evaluation criteria (July Report)
- KPMG's description of representative audit activities to be used in the test (July Report)

Intervenors need access to the aforementioned documents. In addition, the following vital documents and information exchanges referenced in the October Report need to be provided as soon as they become available:

- Advice provided to KPMG/HP as a result of a visit by the BellSouth CLEC Advisory Team
- BellSouth's non-PMAP Metrics Data Documentation
- BellSouth's Capacity Management Documentation

Without access to this vital information referenced in the October Report and all information that may be a part of the test in the future, intervenors' ability to provide constructive and complete comments on the Interim Status Reports is severely limited.

4.

The October and September Reports also refer to a number of problems being encountered as a part of the test. These problems, which may be shared by other CLECs utilizing BellSouth's processes, are not adequately documented or part of an exception process through which the source of the problem is identified, the problem is corrected and the solution is shared with affected industry participants.

For example, the October and September Reports both indicate problems in the creation (provisioning) of various "test beds." The October Report indicates problems or delays in the functional test bed for ordering, the volume testing (RSIMMS) test bed, and the billing test bed. Similar problems were indicated in the September Report, including an indication that "BST transaction processing constraints could result in extension of the transaction test schedule." In the October Report, KPMG states that "The source of the errors could be KPMG order submissions or BellSouth provisioning inconsistencies. Efforts are under way to prevent recurrence of the problems and to ensure that the test objectives can be accomplished." These difficulties should be included as part of an exception process that includes CLECs. The problems identified in these reports could indicate process problems that impact not only the third party test but also a CLEC's ability to conduct business with BellSouth. Accordingly, such a process should identify the source of the problem, correct it, and share the solution with the industry members affected.

5.

Similarly, in the initial report (July Report) EDI-PC was to be subject to functionality testing as directed in the Order. The September Report indicated that EDI-PC was being used to create many of the orders necessary to create various test beds and that its use had been problematic. Significantly, the problems were not going to be included within the test – "Transactions sent through this interface are not part of the order functional transactions evaluations" (September Report I-6). KPMG states in the report that "it was agreed to allow BST to assist in preparation of the LSRs, since LSR development and submission are outside the scope of the billing test targets" (September Report I-8). In the October Report and Version 3 of the Revised Master Test Plan, EDI-PC functionality has been completely removed from the scope of the test, although it is still being used to provide orders for test bed provisioning. The EDI documentation and associated electronic ordering business rules are the same for EDI-PC and EDI. Further, the electronic ordering business rules for EDI-PC also apply to the TAG and LENS interfaces. Any problems with the utilization of the EDI-PC interface encountered by KPMG/HP and attributable to BellSouth may be problems that CLECs using EDI-PC, EDI, TAG or LENS encounter daily. Clearly such situations should be the subject of investigation under an exception process open to all interested parties. Such a process could be used to identify the source of the problem, correct it, and share the solution with the industry members affected.

6.

In addition to the warning in the September Report that "BST transaction processing constraints could result in extension of the transaction test schedule," the October Report indicates that for TAG, there may be "system processing limitations when 40 simultaneous communications sessions are running" (October Report I-7). This problem is similar to constraints CLECs have encountered in the past with the LENS interface and should be the subject of investigation under a publicly visible exception process to

identify the source of the problem, correct it, and share the solution with the industry members affected.

7.

In the October Report, KPMG notes that "Some LSRs submitted to 10/16/99 and 10/17/99 bill cycles did not post in time." The proposed Next Step/Resolution is for KPMG to develop a recovery plan. Here again, the failure of BellSouth's systems to perform should be the subject of investigation under a publicly visible exception process to identify the source of the problem, correct it, and share the solution with the industry members affected.

8.

In the September Report, KPMG/HP announced that they had made the decision to use EC-CPM (Exchange Carrier – Common Presentation Manager) instead of using an available BellSouth provided ECTA (Exchange Carrier Trouble Analysis) maintenance interface, as had been indicated in the July Report, or building their own ECTA. EC-CPM has never been used in production by any CLEC and does not have the same functionality as ECTA. In October KPMG/HP reports that they have discovered that EC-CPM can not be connected to BellSouth on a LAN-to-LAN (machine-to-machine) basis. KPMG is now developing alternative testing strategies and assessing the impact to functional testing of its selection of a substitute, non-standard interface not specified in the Commission's Order. KPMG/HP should be directed to return to a testing strategy utilizing the ECTA interface specified in the Commission's Order. Tests performed on EC-CPM will not be a true indicator of BellSouth's ability to provide nondiscriminatory access in its maintenance and repair interfaces since EC-CPM has never been used by a CLEC.

In the October Report, KPMG reports findings that some "raw data" is in fact "filtered," that not all data reported is covered by BellSouth's PMAP system and that correlation is still on-going between KPMG and BST data collection. AT&T also has had difficulty in attempting to have BellSouth document and reconcile the raw data for AT&T's transactions provided by BellSouth from the PMAP system with reports posted to the Performance Measures Web Site. AT&T remains unable to consistently track raw data from BellSouth's PMAP system to the reports BellSouth provides. Significantly the problems identified by KPMG are not included as a part of the test and therefore will not be completely reviewed. Absent clear, reliable and consistent data, the Commission will not have trustworthy evidence upon which to determine BellSouth's ability to provide nondiscriminatory OSS access.

10.

WHEREFORE, AT&T requests this Commission to:

- Direct KPMG and BellSouth to make all documents, plans, schedules and other information exchanges referenced in Interim Status Reports available to all parties in a timely manner.
- Require the timely preparation and publication of Exception Reports on substantive issues raised in the Interim Reports.
- Require the documentation of all failures of BellSouth's systems to perform during the preparation of "test beds" and other preliminary testing efforts which rely upon the same interfaces CLECs use on a daily basis.
- Direct KPMG/HP to conduct machine-to-machine maintenance interface testing using the ECTA interface as specified in the Commission's Order.

- Include a complete review of BellSouth's PMAP and other data collection processes and reports.

Respectfully submitted this 15th day of November, 1999.

SUZANNE W. OCKLEBERRY
AT&T COMMUNICATIONS OF THE
SOUTHERN STATES, INC.
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(404) 810-7175

CERTIFICATE OF SERVICE - Docket No. 8354-U

This is to certify that a copy of **"AT&T'S COMMENTS ON KPMG'S INTERIM STATUS REPORTS"** 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 15th day of November, 1999.

Suzanne Ockleberry

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November 16, 1999

VIA HAND DELIVERY

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

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

Consideration of BellSouth Telecommunications, Inc.'s Services Pursuant to Section 271 of the Telecommunications Act of 1996, Docket No. 6863-U

Dear Ms. O'Leary:

Rhythms Links Inc. (f/k/a ACI Corp.) ("Rhythms"), through its attorneys, submits this letter to notify the Georgia Public Service Commission (the "Commission") of a recent letter issued by the Federal Communications Commission's ("FCC") Common Carrier Bureau ("CCB") regarding third-party testing of Bell Operating Company ("BOC") operations support systems ("OSS").[1] Furthermore, Rhythms respectfully requests the Commission to amend the current third-party test plan consistent with the CCB Letter and the comments herein.

I. BACKGROUND

Rhythms is an advanced service provider which intends to offer a host of digital subscriber line ("xDSL") services to Georgia consumers in 1999. As a new entrant into the Georgia telecommunications market, Rhythms was encouraged that the Commission, on May 20, 1999, ordered KPMG LLP and Hewlett-Packard to conduct third-party testing of

[1]Letter to Nancy E. Lubamersky, Executive Director - Regulatory Planning, US WEST, from Lawrence E. Strickling, Chief, Common Carrier Bureau, Federal Communications Commission (dated Sept. 27, 1999) (attached hereto) [hereinafter, the "CCB Letter"].

BellSouth Telecommunications, Inc.'s ("BellSouth") OSS.[2] Thereafter, on June 8, 1999, Rhythms requested the Commission to amend the third-party test plan in order to ensure thorough evaluation of the pre-ordering, ordering and provisioning functions relating to xDSL services.[3] On June 30, 1999, the Commission denied Rhythms' request.[4] Since such denial, the OSS test plan has undergone no less than three comprehensive revisions. However, none of the revisions expanded the scope of the third-party test to include testing of xDSL services.

II. OVERVIEW OF THE CCB LETTER

On September 27, 1999, the FCC's CCB issued a letter to US WEST, Inc. and to other interested parties including BellSouth[5] providing "guidance on important elements that a third-party test should include to assist [the FCC's] determination that a BOC is providing nondiscriminatory access to its OSS."[6]

Specifically, the CCB Letter addressed seven (7) critical areas, including xDSL testing. With regard to xDSL testing, the CCB Letter stated that "[t]he third-party test [sh]ould test *significant volumes of xDSL orders (i.e., xDSL capable loops)*."[7] Furthermore, the CCB stated that its letter was *"not . . . intended to be an exhaustive list* of the necessary elements for a successful third-party test."[8]

---

[2] *Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems*, Order on Petition for Third Party Testing, Docket No. 8354-U (May 20, 1999).

[3] *Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems*, Letter Comments of Rhythms Links Inc. (f/k/a ACI Corp.), Docket No. 8354-U (June 8, 1999).

[4] *Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems*, Order Approving BellSouth's Third Party Test Plan, Docket No. 8354-U (June 30, 1999).

[5] As evidenced by footnote 3 in the CCB Letter, the FCC's CCB included a copy of the CCB Letter in the record of BellSouth's FCC proceeding addressing in-region, interLATA authority in the State of Louisiana. CCB Letter at Note 3.

[6] CCB Letter at 1.

[7] CCB Letter at 3 (emphasis added).

[8] CCB Letter at 5 (emphasis added).

III. RHYTHMS' REQUEST FOR AMENDMENT TO THIRD-PARTY TEST PLAN

Based upon the recent issuance of the CCB Letter, Rhythms respectfully renews its request that the Commission expand the scope of the BellSouth OSS third-party test to ensure that pre-ordering, ordering and provisioning of xDSL services are thoroughly evaluated.

First, Rhythms (again) urges the Commission to ensure that the third-party test includes an analysis of the outside loop plant information and data provided by BellSouth to competitors. Specifically, the Commission should ensure that the test evaluates the ability of competitors to receive real-time, electronic information about the physical composition of xDSL loops, including: (i) loop length; (ii) wire gauge; (iii) the presence and number of repeaters, load coils, pair gains, and Digital Added Main Lines (so-called DAMLs); (iv) the presence of digital loop carrier systems; and (v) the cumulative length of bridged taps. Second, the test should determine whether competitors are able to obtain access to this information before deciding whether to order a particular loop. Finally, the test should evaluate whether, once BellSouth provides this loop information, competitors are able to place their xDSL loop orders using real-time, electronic interfaces.

In sum, any test performed in accordance with the existing third-party test guidelines will not comply with the CCB Letter and will not provide the Commission with the information necessary to determine whether BellSouth is providing competitors with nondiscriminatory access to OSS.

IV. CONCLUSION

Rhythms looks forward to providing Georgia consumers with the most advanced technological services available. In order to accomplish this result, Rhythms must be able to obtain access to the loop information described above and must be able to order xDSL loops using real-time, electronic interfaces.

As always, if the Commission has any questions or comments regarding this letter, please do not hesitate to contact the undersigned.

Respectfully submitted,

By: _____

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By: Jeremy D. Marcus (w/permission CAH)

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CAH/jh
Enc.
cc: Rhythms Links Inc. (with enclosure)
All Interested Parties (with enclosure)

RECEIVED
SEP 27 1999
Federal Communications Commission
Office of Secretary

Federal Communications Commission
Washington, D.C. 20554

September 27, 1999

Nancy E. Lubamersky
Executive Director
Regulatory Planning
U S WEST
11 Upper Ardmore Road
Larkspur, CA 94939

Dear Ms. Lubamersky:

During the course of the last several weeks, members of the Common Carrier Bureau's Policy and Program Planning Division ("Division") have met with representatives from U S WEST to discuss third-party testing of operations support systems ("OSS") and the competitive local exchange carriers ("CLECs") access to those systems. The Commission has previously indicated that for a Bell Operating Company ("BOC") to obtain approval under section 271 of the Telecommunications Act of 1996 to provide in-region, interLATA services, it must demonstrate that it provides to CLECs nondiscriminatory access to its OSS and that its systems are operationally ready and capable of handling reasonably foreseeable demand. A number of companies, including yours, have undertaken or are developing independent third party tests of their OSS.

The purpose of the discussions between Division staff and interested parties has been to provide guidance on important elements that a third-party test should include to assist our determination that a BOC is providing nondiscriminatory access to its OSS. These views represent the current thinking of the Common Carrier Bureau and are in no way binding on the Commission. Any final determination concerning whether a BOC is providing nondiscriminatory access to its OSS will be made based upon the record in a section 271 application. It is my hope, however, that the Bureau's views on these issues will be helpful to you and other Bell Operating Companies in formulating successful section 271 applications.

1. Performance Measure Evaluation

A thorough and well-documented independent assessment of the data collection and calculation processes for performance data will considerably facilitate the Commission's review of a section 271 application. An independent review of the performance measurements is crucial in determining the accuracy and validity of performance data. In particular, the staff believes that such an independent review would include the following qualitative and quantitative aspects.

- An evaluation would include an assessment of whether the raw data being collected by the BOC is accurate, which could be tested by observing the raw data collection processes and by comparing the BOC's raw data to independently-collected data.

- The evaluation would assess the processes by which the raw data is filtered and transformed into final, reported results.

- The evaluator would assess whether the BOC's data collection and data processing functions are consistent with the published performance measurement business rules.

- The evaluator would assess the adequacy and functioning of the BOC's internal controls over the data collection processes and the software programs that process the data (such as the controls over personnel access to the databases, and the controls that ensure that the programs and program modifications are properly authorized, documented, tested and approved).

- The evaluation would include an independent quantitative verification of the reported performance data. To accomplish this, the evaluator could be provided with the BOC's raw data and independently process the data, pursuant to the business rules, to ensure that the stated calculations and algorithms have been accurately applied.

We note that a comprehensive evaluation of the BOC's performance measure processes may include elements in addition to those listed above, as determined by the states or by an independent evaluator. Accordingly, we encourage BOCs to make the details of the proposed evaluation available to the Commission, and to the public, as they are developed.

2. Change Management Test

We also believe it critical that there be an independent review of a BOC's change management process and procedures as well as its implementation of these procedures.[1] The change management test should provide information which can be used to evaluate the methods and procedures that the BOC employs to communicate with CLECs regarding OSS system performance and system updates. The independent evaluator should assess the BOC's change management processes and should include, but not be limited to, a review of the BOC's ability to implement at least one significant software release. The following

[1] For purposes of this discussion, we use the phrase "change management process" as referring to the management of changes to OSS interfaces that affect CLECs' production or test environments. Such changes may include: 1) operations changes to existing functionality that impact the CLEC interface(s) upon a BOC's release date for new interface software; 2) technology changes that require CLECs to meet new technical requirements upon a BOC's software release date; 3) additional functionality changes that may be used at the CLEC's option, on or after a BOC's release date for new interface software; and 4) changes that may be mandated by regulatory bodies.

elements would be indicative, but not dispositive, of a satisfactory change management process and should be evaluated by the independent third-party:

- CLEC Participation: CLECs would have a role in the development of, and modifications to, the change management process.

- Release Implementation: Prior to issuing a new software release or upgrade, the BOC would provide a testing environment that mirrors the production environment in order for CLECs to test the documentation for the new release. The testing environment would be stable (*i.e.*, no changes by the BOC), and would be maintained for an adequate time-period, at least 30 days, for the CLECs to test. To ensure CLECs are not forced to cut over to a new release prematurely, a BOC could adopt a "Go/No Go" vote process to decide whether to implement a new release. Pursuant to this process the new release is delayed if a majority, such as two-thirds, of eligible CLECs vote to delay the release. Similarly, a BOC could maintain a pre-existing version, or versions, of the interface (*e.g.*, Electronic Data Interchange) when issuing a new release rather than switching directly from one version to the next.

- Memorialization of Process: The change management process would be clearly memorialized and set forth in one document that can be readily accessed by the CLECs. Any modifications to the change management process would be included with this document.

- Dispute Resolution: There would be a dispute resolution process for change management that is separate and apart from any process that is set forth in interconnection agreements. This would provide CLECs a forum specifically designated to resolve any change management disputes.

3. **xDSL Testing**

The third-party test would test significant volumes of xDSL orders (*i.e.*, xDSL capable loops).

4. **Normal, High, and Stress Volume Testing**

- Normal and High Volume Testing: The third-party test would test projected normal and high volumes of pre-order and order transactions that flow-through the BOC's systems.[2] The mix of transactions would replicate expected CLEC

[2] An incumbent LEC's internal ordering system permits its retail service representatives to submit retail customer orders electronically, directly into the ordering system. This is known as "flow-through." Similarly, a competing carrier's orders "flow through" if they are transmitted electronically (i.e., with no manual intervention) through the gateway into the incumbent LEC's ordering systems. Order flow-through applies solely to the OSS ordering function, not the OSS provisioning system. In other words, order flow-through measures only how the competing carrier's order is transmitted to the incumbent's back office ordering system, not how the incumbent ultimately completes that order. Electronically processed service

ordering patterns by including, for instance, error conditions and change orders, and by covering the process end-to-end (*i.e.*, through the receipt of order confirmation notice or electronic error notice). "Normal" volumes would be based on the BOC's reasonable estimate, with input from CLECs, of daily order volumes. "High" volumes would be significantly greater than normal volumes and based on the BOC's reasonable estimate, with input from CLECs, of forecasted demand.

- Capacity or Stress Testing: The third-party stress test would assess scalability of the BOC's OSS systems by testing a mix of transactions similar to those in the normal and high volume testing. These volumes would be significantly greater than the high volume test and be sufficient to identify potential weak points in the systems.

5. **Pseudo-CLEC**

If no CLEC has constructed an interface with whatever OSS system the BOC is relying on to meet the nondiscriminatory obligations set forth in the 1996 Act, the third-party tester should build a pseudo-CLEC. The pseudo-CLEC should build an interface not only to test the quality of the BOC's documentation for such OSS systems but also to ensure that these systems are capable of submitting and receiving valid transactions. The pseudo-CLEC should build the interface(s) using the BOC's documentation and business rules to determine whether any CLEC can build an interface based upon these materials. Third-party testing can be conducted using orders from a combination of existing CLECs and a pseudo-CLEC.

6. **Dissemination of Information**

A third-party test of OSS should include a formal, predictable and public mechanism for the third-party tester to communicate to both the BOC and the CLEC community issues identified by the third-party tester that arise during the course of testing. Staff proposes the following options for reporting problems:

- Report issues as they arise; or
- Issue reports pursuant to a specified time-frame (*i.e.*, weekly or bi-weekly); or
- Issue an interim report in the middle of the test and a final report at the end.

Combinations of these options could provide optimal balance between frequency and detail.

7. **Functionality**

- CLECs would be consulted in developing the test scenarios to reflect their market entry and growth and expansion scenarios in a particular region.

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orders are more likely to be completed and less prone to human error than orders that require some degree of human intervention.

- Functionality testing would be conducted for pre-ordering, ordering, provisioning, maintenance and repair, and billing transactions. The transaction mix should replicate CLEC ordering patterns and include, for instance, orders that fall out for manual processing, orders that contain errors, and order changes and supplements. Functionality testing also would test these transactions end-to-end (*i.e.*, orders should be actually provisioned), as applicable.

This letter is intended to provide a summary of staff views regarding key elements of a third-party test which could assist our determination that a BOC's OSS is operationally ready and capable of efficiently supporting ever-increasing volumes of transactions. It is not, however, intended to be an exhaustive list of the necessary elements for a successful third-party test. Moreover, it is possible that additional issues will be raised by interested parties in future section 271 dockets. I emphasize that any final determinations regarding whether a BOC is providing nondiscriminatory access to its OSS will be made by the Commission based on the record of the BOC's 271 application for a particular state. To this end, Bureau staff is committed to working with all parties to ensure that the section 271 application process is as orderly and predictable as possible.

For information purposes, a copy of this letter will be placed in CC Docket No. 98-121[3] and CC Docket No. 98-56.[4]

Sincerely,

for Lawrence E. Strickling, Chief
Common Carrier Bureau

[3] Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana, CC Docket No. 98-121, Memorandum Opinion and Order, 13 FCC Rcd 20599 (1998).

[4] Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance, CC Docket No. 98-56, Notice of Proposed Rulemaking, 13 FCC Rcd 12817 (1998).

Sprint

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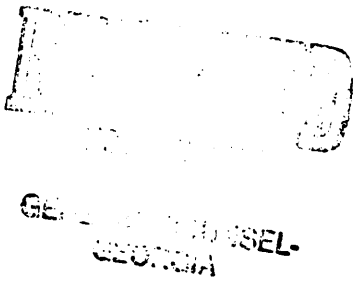
November 22, 1999

VIA HAND DELIVERY

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



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

Dear Ms. O'Leary:

Enclosed please find for filing an original, fifteen (15) copies and a 3.5" diskette of the Comments of Sprint Communications Company L.P. on Status Report of Third Party OSS Testing.

An extra copy is also included which I would ask that you please date stamp and return to me.

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

Sincerely,

William R. Atkinson

William R. Atkinson

WRA/de
Enclosures

Cc: Parties of Record

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

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

COMMENTS OF SPRINT COMMUNICATIONS COMPANY L.P. ON STATUS REPORT OF THIRD PARTY OSS TESTING

Pursuant to Order of the Georgia Public Service Commission ("Commission") dated June 28, 1999,[1] Sprint Communications Company L.P. ("Sprint") submits herewith its Comments on the KPMG BellSouth Georgia OSS Third Party Master Test Plan Version 3.0, the Flow-Through Evaluation Version 2.0 dated October 15, 1999, and the BellSouth Georgia OSS testing evaluation interim status report dated October 25, 1999. (Collectively, "Master Test Plan")

I. INTRODUCTION

Sprint appreciates the opportunity to comment on the Master Test Plan. Sprint also appreciates the efforts to date of the Commission and its Staff in providing for third party testing of BellSouth's OSS systems, interfaces, and processes.

The critical importance of adequate OSS systems to the development of local competition in Georgia cannot be ignored. The ability of customers to switch easily between local carriers depends entirely upon the adequacy of BellSouth's OSS systems. An end-user who has a bad experience in choosing to switch to a competitive local exchange carrier will, more than likely, not choose to change local providers in the future. Therefore, if there is to be a broad scale introduction of competition in the Georgia local exchange market, it is crucial that BellSouth has the ability to promptly and accurately handle large volumes of orders

Sprint has previously filed Comments in support of Motion for Reconsideration filed by AT&T Communications for the Southern States ("AT&T") with respect to the

[1] Order approving BellSouth's Third Party Testing Plan in Docket No. 8354-U, dated June 28, 1999.

Commission Order for Third Party Testing, dated June 9, 1999. In its previous Comments, Sprint requested that critical revisions be made to the Master Test Plan in an effort to ensure that the third party testing give a true picture of the status of BellSouth's OSS. Sprint identified problems and flaws associated with the proposed Master Test Plan and the process as established by the Commission. Sprint noted significant gaps in the Master Test Plan which will prevent a clear view of how BellSouth's OSS operates for CLECs, and a need for better definitions or more information in the Master Test Plan before the test results can be accepted as a comprehensive and accurate assessment of BellSouth's OSS functionality. Specifically, Sprint commented that the Master Test Plan should be amended to address the following issues:

1) Directory Listings should be tested.
2) E911 should be tested.
3) A mixture of various accounts (single line and multi-line; flat and measured service; business and residential; Lifeline, Optional Calling plans, Coin and government) should be tested.
4) Planned and unplanned outages should be tested. The test plan offers limited network testing in these areas. This should be corrected before testing goes forward.
5) Not all order types described under the Ordering and Billing ("OBF") Guidelines are being tested, including Partial Migration and Deny. The Test Plan should be amended to provide testing of all OBF order types.
6) The Test Plan should be amended to mirror the testing required before CLECs become operational. The Test Plan should be amended to require the same testing, including application testing, validity testing, and service readiness testing in production, as required of CLECs.
7) The Test Plan offers limited change control procedures. The Test Plan should be amended to add test scenarios for multiple versions of code and unplanned version updates. BellSouth should be testing OSS 99. OSS 99 is a major enhancement to BellSouth's system and subsequently to the OSS business rules. OSS 99 is more aligned with Local Service Ordering Guidelines ("LSOG") sanctioned by the OBF.
8) The Test Plan offers limited Pre-Order functionality. The Test Plan should test functionality for additional information, supplemental information, cross-

boundary, restricted accounts, and extended reservation.

9) The Test Plan should be amended to indicate who assigns Severity levels.

10) The Test Plan should be amended to indicate who assigns or makes the decision for exit criteria.

11) A test bed is being created for the third party test, but Sprint and other CLECs will not have access to any testing environment for its own testing.

12) The Test Plan should be amended to indicate who is in charge of problem management.[2]

Moreover, Sprint specifically raised concerns about the process whereby CLECs were excluded from participating in the process. Sprint stated:

> For example, CLECs should be able to submit test scenarios to be processed by the testers. Testers should also be required to use BellSouth's documentation to build to BellSouth's ordering interfaces. Change Management procedures should be monitored and tested in action rather than based on documentation and interviews. CLEC's should be permitted to comment on the exception report process as well as the exception reports issued during testing. Performance metrics and standards should be determined with CLEC participation and reporting should be subject to an audit.[3]

II. COMMENTS

It is becoming increasingly apparent that the New York Public Service Commission ("NYPSC") approved OSS testing plan is the standard against which other state tests will be measured. However, the Federal Communications Commission's ("FCC") Common Carrier Bureau Staff has provided a summary of what it considers to be the key elements of a third party test which could assist in the FCC's determination that a Bell Operating Company's OSS is operationally ready and capable. Attached hereto and marked as Attachment 1 is letter, dated September 27, 1999, from Lawrence E. Strickling, Chief, Common Carrier Bureau at the FCC, directed to Nancy E. Lubamersky, Executive Director-Regulatory Planning of U.S. WEST. (hereinafter referred to as "Strickling Letter") The Strickling Letter goes into detail regarding what the FCC Common Carrier Bureau considers key elements in a full and thorough independent third party OSS testing process.

The Strickling Letter covers 7 major key elements: 1) Performance Measure Evaluation, 2) Change Management Test, 3) xDSL Testing, 4) Normal, high, and stress

[2] Sprint Communications Company L.P. Comments in Docket No. 8354-U, dated June 9, 1999, at 2-3.

volume testing, 5) Pseudo-CLEC, 6) Dissemination of Information, and 7) Functionality.

The following Comments will include each of these key elements as it relates to the Georgia OSS Master Test Plan, with parenthetical references in bold to the New York plan, where applicable.

A. Test Scope

Page II-14 of the Georgia OSS Evaluation Master Plan Version 3.0 states that:

> *"The test will be conducted using a military-style approach. Each test target will be regression tested until all test exceptions are eliminated, or until a determination is made to halt testing of a target."*

The above statement raises at least four (4) issues that should be addressed.

1. How is KPMG/HP defining regression testing?

Each and every deficiency should be regression tested after a fix has been identified. This ensures that existing code is not adversely impacted with a fix. Regression testing should be conducted throughout the various domains after fixes have been implemented. Root cause analysis of deficiencies should be documented and conducted with the proper code fixes. "Band-aid" type approaches should be avoided. Sprint would urge that any deficiencies identified should be fully disclosed and updated through timely channels so that Sprint and other CLECs are informed of potential gaps in documentation. Production fixes as a result of deficiencies should not impact CLECs currently operating in Georgia.

2. How is KPMG/HP defining military-style approach?

It is not clear what channels will govern the pass or fail criteria. How will KPMG conclude whether or not BellSouth's performance is acceptable? These questions need to be addressed.

3. What are the halt testing criteria?

All CLECs should be involved in the "halt testing" decisions in order that all parties understand and agree to the decision.

[3] Comments of Sprint Communications Company L.P. in Docket 8354-U dated June 9, 1999, at 3-4.

B. Performance Measure Evaluation

The Strickling Letter notes that an independent review of the performance measurements is crucial in determining the accuracy and validity of performance data. Further, the Strickling Letter sets out the qualitative and quantitative aspects that should be included in such an independent review. These aspects include assessment of: (1) whether the raw data collected by the BOC is accurate; (2) the processes by which the raw data is filtered and transformed into final, reported results; (3) whether the BOC's data collection and data processing functions are consistent with the published performance measurement business rules; (4) adequacy and functioning of the BOC's internal controls over the data collection processes and the software programs that process the data; and (5) independent quantitative verification of the reported performance data.

The Georgia Master Test Plan simply states that before testing begins performance metrics are to be "fully functional, tested and operationally ready," but it is not clear what "testing" will be required. In fact, the Georgia Master Test Plan only calls for auditing of the ordering flow-through report. The Georgia Master Test Plan also fails to call for a review of BellSouth's retail operations and results to determine what is required to establish parity. To make matters worse, there is no established procedure for allowing CLECs to comment as to metrics, standards, and processes used during the testing. This is a fatal flaw in the Georgia Master Test Plan.

BellSouth's performance measurement system must be validated by the third party closely analyzing how BellSouth generates performance reports, what raw data BellSouth relies on, the methodologies used by BellSouth, and the assumptions BellSouth makes for each measurement it reports. This validation process is critical given the great reliance this Commission, and other regulators, places on performance reports and BellSouth's incentive to create reports that demonstrate parity. The test results must then be measured against pre-established performance standards.

It is essential that CLECs be able to determine that they are receiving at least equal treatment to what BellSouth is providing to its own retail operations. Performance standards and benchmarks should clearly demonstrate that CLECs are receiving nondiscriminatory treatment. Validation of performance measures is, therefore, critical to the development of local competition in Georgia; however, it is missing in the Georgia Master Test Plan.

C. Change Management Test

The Strickling Letter points out that it is critical there be an independent review of a BOC's change management process and procedures as well as its implementation of these procedures. The change management test should provide information that can be used to evaluate the methods and procedures that the BOC employs to communicate with CLECs regarding OSS system performance and system updates. Further, the Strickling Letter sets out four (4) elements that would be indicative of a satisfactory change management process and should be evaluated by the independent third party: (1) CLEC Participation; (2) Release Implementation; (3) Memorialization of Process; and (4) Dispute Resolution.

The Georgia Master Test Plan calls for the assessment of change management only through review of documentation and interviews. The Georgia Master Test plan does not provide for review of what actually occurs between BellSouth and CLECs during a change to BellSouth's OSS. As a result, it is clear that the Georgia Master Test Plan does not test change management process, procedures or implementation. This is a fatal flaw in the Georgia Master Test Plan.

The Georgia Master Test Plan should provide that change management processes must be evaluated by the third party through the review of actual notices, such as modification to business rules, to confirm that BellSouth is complying with the established procedures. Moreover, the third party should verify that quality assurance requirements are being met.

Moreover, test case scenarios should be developed so those fully supported versions are adequately introduced or validated. KPMG cannot evaluate the ability of CLECs to compete if only one version is considered. "Real life" system considerations should include a transition from one major release to the next major release.

D. xDSL Testing

The Strickling Letter states that the third-party test would test significant volumes of xDSL orders (i.e., xDSL capable loops). The Georgia Master Test Plan does not provide any testing of BellSouth's ability to provision xDSL capable loops and collocation. This is a fatal flaw in the Georgia Master Test Plan.

The Georgia Master Test Plan must recognize that there is a rapidly developing market demand for broadband and data services. BellSouth support for all types of xDSL

is critical to the success of a competitive environment in Georgia. Therefore, xDSL should be tested as fully as possible, including access to loop qualification and BellSouth bandwidth management information.

Specifically, Sprint's Integrated On-Demand Network ("ION") will utilize ADSL and HDSL loops in the absence of other broadband access to consumers. It is therefore imperative that the Georgia test plan includes the testing of pre-ordering, ordering, provisioning, maintenance and repair, and billing of ADSL and HDSL loops. ADSL and HDSL loops must be available to Sprint at parity with what BellSouth offers to its own customers. Appropriate testing of the pre-ordering, ordering, maintenance and repair of ADSL and HDSL loops is essential to determine if such parity exists.

(New York has not tested xDSL, but has tested related issues with ISDN. Also, New York has initiated a xDSL collaborative process.)

E. Normal, High, and Stress Volume Testing

The Strickling Letter states that the third party test would test projected normal and high volumes of pre-order and order transactions that flow-through the BOC's system and the mix of transactions would replicate expected CLEC ordering patterns. Further, these volumes should be significantly greater than the high volume test and be sufficient to identify potential weak points in the systems.

1. STRESS TEST

The Georgia Master Test Plan states that the "normal" and "peak" volume testing will be done based on projections of year-end 2001 volume; actual volumes are not specified. The Master Test Plan calls for the tests to be run against "a volume test environment" developed by BellSouth, rather than BellSouth's production systems that are used to service its customers. The Georgia Master Test Plan calls for coordination between BellSouth and the test cycle manager for volume testing, so it appears that BellSouth will be aware of the timing of these tests. This is a fatal flaw in the Georgia Master Test Plan.

A volume stress test appropriate to the market should be required over multiple days. Stress testing should occur at commercial volumes, as determined by the expected future demand in a competitive local market in which multiple CLECs are operating at full production. BellSouth should not know the days of stress testing. **(New York**

conducted two days of volume testing with 4400 and 4500 orders, one day of peak volume testing with 6500 orders, and one day of stress testing with over 7900 orders, with generally twice as many pre-order transactions as orders for each day.)

KPMG should have a full volume test on BellSouth's manual ordering capability. An adequate test of all manual applications demonstrates BellSouth's capability to provide an appropriate level of performance and operational readiness.

Moreover, for a valid test, BellSouth should not be involved in determining the specific details of the test, such as they precise scenarios to be tested. For volume testing, orders should be submitted to BellSouth without it knowing when they will arrive. This will avoid BellSouth being prepared on the specific days of the test.

To the greatest extent possible, the test should match market conditions in which BellSouth should be able to respond adequately to the unanticipated ordering and related activities of multiple CLECs.

2. FULL RANGE OF ORDERS

The Georgia Master Test Plan scenarios do not include a number of typical orders for UNE loop with LNP or stand-alone LNP. This is a fatal flaw in the Georgia Master Test Plan.

The Georgia Master Test Plan should include the full range of orders that would permit all modes of market entry including, but not limited to, UNE combinations. This would ensure that OSS for all methods of entry contemplated by the Telecommunications Act is available to CLECs regardless of whether other barriers currently prevent CLECs from entering the local exchange market.

3. REALISTIC MIX OF ORDERS

The Georgia Master Test Plan scenarios do not include a number of typical orders for UNE loop with LNP or stand-alone LNP. This is a fatal flaw in the Georgia Master Test Plan.

The Georgia Master Test Plan should provide that the test involve the types of orders that are likely in a competitive environment, and CLECs should be able to provide input to the third party. An effective test plan must mimic the real world environment to the greatest extent possible.

F. Pseudo-CLEC

The Strickling Letter notes that if no CLEC has constructed an interface with whatever OSS system the BOC is relying on to meet the nondiscriminatory obligations set forth in the Telecommunications Act of 1996, the third party tester should build a pseudo-CLEC. Also, third–party testing can be conducted using orders from a combination of existing CLECs and a pseudo-CLEC.

The Georgia Master Test plan does not require HP to build OSS interfaces. The Georgia Master Test Plan simply states that "due to operational and time constraints of the [Georgia third party testing] procedural order," HP will use "test clients" to access the TAG (used for pre-ordering and ordering) and ECTA (used for maintenance and repair) interfaces. The Georgia Master Test Plan also does not require HP to build to the EDI ordering interface. This is a fatal flaw in the Georgia Master Test Plan.

The third party should build all necessary OSS interfaces to determine whether BellSouth's documentation is sufficient to permit CLECs to develop their OSS in order to enter the market across the range of order types.

The Georgia Master Test Plan calls for testers to assess the adequacy of BellSouth's documentation that CLECs must use to build to its interfaces by reviewing the documentation and interviewing personnel from BellSouth and CLECs. This is a fatal flaw in the Georgia Master Test Plan.

The third party should test and review all supporting documentation for OSS and processes, including business rules, EDI specifications, BOC handbooks on which CLECs must rely, and other materials. Final specifications and business rules should be tested by the third party to make sure any CLEC could build an interface based only on the documentation, since the BOCs will have no incentive to rapidly cure documentation problems after obtaining Section 271 relief.

Specifically, KPMG should build its interfaces duplicating the real world environments. A testing tool will simply generate orders in the EDI format. Sprint and other CLECs will be required to translate the OBF standard into the EDI standard. EDI and OBF business requirements are critical in developing an accurate interface.

It should be noted that under the New York plan, HP built the interfaces. Moreover, the Department of Justice ("DOJ") commended the New York Model with respect to its third party pseudo-CLEC with concurrent CLEC testing. Following are the

DOJ's comments:[4]

"The Third Party Test of Bell Atlantic's wholesale support systems has been particularly valuable in opening the New York Market."

"Placing themselves in the position of a market entrant, KPMG and HP reviewed the processes by which CLECs establish and maintain a wholesale relationship with Bell Atlantic, independently developed interfaces to Bell Atlantic's operations support systems (OSS), prepared test data and submitted test transactions."

"KPMG's review of Bell Atlantic's documentation, software testing and change management processes identified serious problems, which were addressed by Bell Atlantic through process improvements during the test period."

"Together, the NYPSC and KPMG created an open testing environment – consulting with all interested parties, disclosing contacts with Bell Atlantic, issuing draft plans and reports, and reporting in detail on issues and concerns."

"KPMG's test could not exactly replicate commercial use of Bell Atlantic's systems; for this reason concurrent commercial use of these systems significantly enhances our knowledge about their strengths and capabilities."

G. Dissemination of Information

The Strickling Letter provides that a third party test of OSS should include a formal, predictable and public mechanism for the third-party tester to communicate to both the BOC and the CLEC community issues identified by the third party tester that arise during the course of testing. The three options proposed are: (1) report issues as they arise; (2) issue reports pursuant to a specified time frame; and (3) issue an interim report in the middle of the test and a final report at the end.

The Georgia Master Test plan calls for a closed process. BellSouth states that the tools and documentation made available to the testers are or will be publicly available. However, CLECs have no involvement in the process except to be permitted to see and comment on the interim and final KPMG reports. This is a fatal flaw in the Georgia Master Test plan.

CLECs should be given access to all materials and assistance provided by BellSouth to the third party, to ensure that the development by the third party can be duplicated by the competitors in the real world. Minutes should be kept of all contacts

[4] Excerpts from DOJ Evaluation to FCC on BA-NY's 271 Application, 11/1/99.

between the third party and BellSouth and made available to the CLECs.

(In New York, minutes of meetings between KPMG and Bell Atlantic were not made available to CLECs.)

CLEC monitoring of the test ensures that current versions of systems/documentation are being tested and ensures that the third party is not receiving assistance and cooperation from BellSouth that the CLECs will not be able to receive after Section 271relief.

H. Functionality

The Strickling Letter makes it clear that CLECs should be consulted in developing the test scenarios to reflect their market entry and growth and expansion scenarios in a particular region. Further, functionality testing would be conducted for pre-ordering, ordering, provisioning, maintenance and repair and billing transactions. Moreover, the transaction mix should replicate CLEC ordering patterns and include orders that drop out for manual processing, orders that contain errors, and order changes and supplements. Functionality testing also would test these transactions end-to-end (i.e., orders should be actually provisioned), as applicable.

The Georgia Master Test Plan provides for a more limited end-to-end testing that begins with ordering and ends with provisioning of orders. Further, evaluation of support functions such as Account Team, network design requests, help desk functions, and CLEC training is not required by the Georgia Master Test Plan. This is a fatal flaw in the Georgia Master Test Plan.

The Georgia Master Test Plan should provide that the OSS test must be end-to-end with a comprehensive test of pre-ordering, ordering, provisioning, maintenance and repair, and billing. This would include the integration of pre-ordering and ordering. These functions are required if CLECs are to compete in the Georgia local exchange market. **(New York planned a four-week feature functionality test and a four-day volume test of each function.)**

The Georgia Master Test Plan should provide that the BellSouth account team would support KPMG and HP in a manner similar to another CLEC. Checks and balances should be in place such that KPMG and HP are not given preferential treatment.

1. PRE-ORDERING TEST SECTION

The Georgia Master Test Plan has no requirement that the testers evaluate whether or not BellSouth's pre-ordering and ordering interfaces can be integrated. This is a fatal flaw in the Georgia Master Test Plan. The Georgia Master Test Plan should provide that functions such as address validation, CSR availability, USOC availability, numbering resource availability, due date interval and availability, editing capabilities, systems integration capabilities, telephone number verification, current PIC status verification and facilities availability will be included and integrated with Local Service Request ("LSR") orders.

While the Georgia Master Test Plan (page IV-2) provides that "Pre-Orders will be submitted as both stand-alone transactions and as integrated pre-order/order transactions," the relational type fields for pre-order population of order population are not described. Pre-order fields which are applicable for ordering services should be documented and tested. For example, pre-order addressing fields should match the end user ordering addressing fields.

In connection with TAG pre-ordering documentation evaluation (3.0), CLECs should be notified of any discrepancy identified in the BellSouth TAG Pre-Ordering document.

Pre-Order processing capacity management evaluation (6.0) should include any error limitations for the CSR retrieval. This will assist Sprint and other CLECs in identifying potential fatal internal OSS conditions for Pre-Order CSR limitations.

CLECs are at a competitive disadvantage if Pre-Order data is incomplete and compiled in such a manner as not to be transparent or seamless (without keying) to the Ordering system. Pre-Order population to an Ordering system is imperative to successfully produce a timely LSR.

2. ORDERING

The Georgia Master Test Plan does not provide for testing of the OSS 99 ordering interfaces. This is a fatal flaw in the Georgia Master Test Plan.

The Georgia Master Test Plan should provide that access to product and service offerings for simple and complex orders and promotions, performance of the provisioning and order status reports, editing capabilities and the integration of ordering systems with other systems will be included in order functionality testing.

In addition, unplanned system outages should be incorporated in the O&P-6 Capacity Processing to ensure database reliability of pending orders and possible system constraints in the LSR process.

3. PROVISIONING

The Georgia Master Test Plan is ambiguous with respect to the extent to which HP is required to test the provisioning coordination process and does not indicate the number of orders that will be provisioned. This is a fatal flaw in the Georgia master Test Plan.

The Georgia Master Test Plan should recognize that provisioning is critical to the process to ensure that a substantial quantity of orders are processed through the system, from beginning to end, and are, in fact, actually provisioned. **(In New York, 20% of test orders were provisioned, totaling about 3000 orders.)**

4. MAINTENANCE AND REPAIR

The Georgia Master Test Plan does not provide for assessment of actual performance of maintenance and repair. This is a fatal flaw in the Georgia Master Test Plan.

The Georgia Master Test Plan should provide that maintenance and repair will include the implementation of the electronic bonding interface, and test functionalities including OSS interface availability, average OSS response interval, average answer time – repair, missed repair appointments, customer trouble report rate, maintenance average duration, percent repeat troubles (within 30 days) and out of service greater than 24 hours. **(The New York test only covered Bell Atlantic's proprietary system, RETAS.)**

Moreover, Sprint would urge that test case scenarios be developed in the ECTA for the following:

(a) Test in the ECTA where the trouble ticket was completed for either resale or UNE. This should include the actual on-site repair at the customer facilities.

(b) Test the difference in ECTA between resale and UNE, i.e., close out verification processes for circuit (UNE) based services.

(c) Tests or procedures for non-telephone number based troubles.

(d) Test escalation procedures or ECTA processes.

5. BILLING

The Georgia Master Test Plan only provides for two billing cycles and it is not clear if the test includes an audit of end-user billing, reciprocal compensation billing and access billing. This is a fatal flaw in the Georgia Master Test Plan.

The Georgia Master Test Plan should provide that invoice accuracy, invoice timeliness, usage data delivery accuracy, usage data delivery timeliness and completeness, and ability to capture usage data for all calls, including local and access, will be included in Billing testing. Also, the test should include an audit of BellSouth's end-user billing, wholesale billing, reciprocal compensation billing, and access billing. The test should cover three complete billing cycles.

6. TEST SCENARIOS

Under the Georgia Master Test Plan, BellSouth designs the test scenarios. It appears that BellSouth has chosen scenarios designed to test what BellSouth perceives to be strong points of its OSS and avoids possible weak points in its OSS. In particular, these scenarios do not test all of BellSouth's system upgrades, such as the upgrade that should enable BellSouth to process partial migration orders that leave a customer's directory listing. This is a fatal flaw in the Georgia Master Test Plan.

The Georgia Master Test Plan should prohibit BellSouth from designing the test scenarios. Detailed test scenarios must be developed by the third party for the test, including specific order and customer information. **(New York tested 133 scenarios, which represent over 80% of CLEC order types.)**

Further, a test case should be developed to identify non-industry standard OBF/ED TCIF fields so that a comparison to industry compliance can be measured. As Sprint builds its interfaces it is becoming aware of many proprietary (i.e., ILEC specific) data fields that are non-industry compliant. Subtle non-industry standard design decisions can cause ordering and provisioning problems in the OSS interfaces. The Georgia Master Test Plan should reflect the current industry standard TCIF/OBF version being utilized for this test.

The Georgia Master Test Plan should reflect connectivity test case scenarios for order, pre-order and trouble. It has been Sprint's experience that little, if any, documentation exists on connectivity interface requirements.

In addition, the Georgia Master Test Plan should reflect test cases scenarios for stand alone Directory Listing for REQTYP J. It does not appear that test conditions exist for this REQTYP J.

III. CONCLUSION

Sprint urges the Commission to consider these and its previous Comments in this docket, and reconsider the Master Test Plan that is underway in Georgia and make the necessary revisions to bring the test into line with the Strickling letter and a New York-style OSS test. Anything less than that probably will not pass muster at the FCC, and will not move Georgia any further toward opening the market to local competition.

Respectfully submitted this 22nd day of November, 1999.

Sprint Communications Company L.P.

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ATTACHMENT 1 RECEIVED

SEP 27 1999

Federal Communications Commission
Office of Secretary

Federal Communications Commission
Washington, D.C. 20554

September 27, 1999

Nancy E. Lubamersky
Executive Director
Regulatory Planning
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11 Upper Ardmore Road
Larkspur, CA 94939

Dear Ms. Lubamersky:

During the course of the last several weeks, members of the Common Carrier Bureau's Policy and Program Planning Division ("Division") have met with representatives from U S WEST to discuss third-party testing of operations support systems ("OSS") and the competitive local exchange carriers ("CLECs") access to those systems. The Commission has previously indicated that for a Bell Operating Company ("BOC") to obtain approval under section 271 of the Telecommunications Act of 1996 to provide in-region, interLATA services, it must demonstrate that it provides to CLECs nondiscriminatory access to its OSS and that its systems are operationally ready and capable of handling reasonably foreseeable demand. A number of companies, including yours, have undertaken or are developing independent third party tests of their OSS.

The purpose of the discussions between Division staff and interested parties has been to provide guidance on important elements that a third-party test should include to assist our determination that a BOC is providing nondiscriminatory access to its OSS. These views represent the current thinking of the Common Carrier Bureau and are in no way binding on the Commission. Any final determination concerning whether a BOC is providing nondiscriminatory access to its OSS will be made based upon the record in a section 271 application. It is my hope, however, that the Bureau's views on these issues will be helpful to you and other Bell Operating Companies in formulating successful section 271 applications.

1. Performance Measure Evaluation

A thorough and well-documented independent assessment of the data collection and calculation processes for performance data will considerably facilitate the Commission's review of a section 271 application. An independent review of the performance measurements is crucial in determining the accuracy and validity of performance data. In particular, the staff believes that such an independent review would include the following qualitative and quantitative aspects.

- An evaluation would include an assessment of whether the raw data being collected by the BOC is accurate, which could be tested by observing the raw data collection processes and by comparing the BOC's raw data to independently-collected data.

- The evaluation would assess the processes by which the raw data is filtered and transformed into final, reported results.

- The evaluator would assess whether the BOC's data collection and data processing functions are consistent with the published performance measurement business rules.

- The evaluator would assess the adequacy and functioning of the BOC's internal controls over the data collection processes and the software programs that process the data (such as the controls over personnel access to the databases, and the controls that ensure that the programs and program modifications are properly authorized, documented, tested and approved).

- The evaluation would include an independent quantitative verification of the reported performance data. To accomplish this, the evaluator could be provided with the BOC's raw data and independently process the data, pursuant to the business rules, to ensure that the stated calculations and algorithms have been accurately applied.

We note that a comprehensive evaluation of the BOC's performance measure processes may include elements in addition to those listed above, as determined by the states or by an independent evaluator. Accordingly, we encourage BOCs to make the details of the proposed evaluation available to the Commission, and to the public, as they are developed.

2. Change Management Test

We also believe it critical that there be an independent review of a BOC's change management process and procedures as well as its implementation of these procedures.[1] The change management test should provide information which can be used to evaluate the methods and procedures that the BOC employs to communicate with CLECs regarding OSS system performance and system updates. The independent evaluator should assess the BOC's change management processes and should include, but not be limited to, a review of the BOC's ability to implement at least one significant software release. The following

[1] For purposes of this discussion, we use the phrase "change management process" as referring to the management of changes to OSS interfaces that affect CLECs' production or test environments. Such changes may include: 1) operations changes to existing functionality that impact the CLEC interface(s) upon a BOC's release date for new interface software; 2) technology changes that require CLECs to meet new technical requirements upon a BOC's software release date; 3) additional functionality changes that may be used at the CLEC's option, on or after a BOC's release date for new interface software; and 4) changes that may be mandated by regulatory bodies.

elements would be indicative, but not dispositive, of a satisfactory change management process and should be evaluated by the independent third-party:

- CLEC Participation: CLECs would have a role in the development of, and modifications to, the change management process.

- Release Implementation: Prior to issuing a new software release or upgrade, the BOC would provide a testing environment that mirrors the production environment in order for CLECs to test the documentation for the new release. The testing environment would be stable (*i.e.*, no changes by the BOC), and would be maintained for an adequate time-period, at least 30 days, for the CLECs to test. To ensure CLECs are not forced to cut over to a new release prematurely, a BOC could adopt a "Go/No Go" vote process to decide whether to implement a new release. Pursuant to this process the new release is delayed if a majority, such as two-thirds, of eligible CLECs vote to delay the release. Similarly, a BOC could maintain a pre-existing version, or versions, of the interface (*e.g.*, Electronic Data Interchange) when issuing a new release rather than switching directly from one version to the next.

- Memorialization of Process: The change management process would be clearly memorialized and set forth in one document that can be readily accessed by the CLECs. Any modifications to the change management process would be included with this document.

- Dispute Resolution: There would be a dispute resolution process for change management that is separate and apart from any process that is set forth in interconnection agreements. This would provide CLECs a forum specifically designated to resolve any change management disputes.

3. xDSL Testing

The third-party test would test significant volumes of xDSL orders (*i.e.*, xDSL capable loops).

4. Normal, High, and Stress Volume Testing

- Normal and High Volume Testing: The third-party test would test projected normal and high volumes of pre-order and order transactions that flow-through the BOC's systems.[2] The mix of transactions would replicate expected CLEC

[2] An incumbent LEC's internal ordering system permits its retail service representatives to submit retail customer orders electronically, directly into the ordering system. This is known as "flow-through." Similarly, a competing carrier's orders "flow through" if they are transmitted electronically (i.e., with no manual intervention) through the gateway into the incumbent LEC's ordering systems. Order flow-through applies solely to the OSS ordering function, not the OSS provisioning system. In other words, order flow-through measures only how the competing carrier's order is transmitted to the incumbent's back office ordering system, not how the incumbent ultimately completes that order. Electronically processed service

ordering patterns by including, for instance, error conditions and change orders, and by covering the process end-to-end (*i.e.*, through the receipt of order confirmation notice or electronic error notice). "Normal" volumes would be based on the BOC's reasonable estimate, with input from CLECs, of daily order volumes. "High" volumes would be significantly greater than normal volumes and based on the BOC's reasonable estimate, with input from CLECs, of forecasted demand.

- Capacity or Stress Testing: The third-party stress test would assess scalability of the BOC's OSS systems by testing a mix of transactions similar to those in the normal and high volume testing. These volumes would be significantly greater than the high volume test and be sufficient to identify potential weak points in the systems.

5. Pseudo-CLEC

If no CLEC has constructed an interface with whatever OSS system the BOC is relying on to meet the nondiscriminatory obligations set forth in the 1996 Act, the third-party tester should build a pseudo-CLEC. The pseudo-CLEC should build an interface not only to test the quality of the BOC's documentation for such OSS systems but also to ensure that these systems are capable of submitting and receiving valid transactions. The pseudo-CLEC should build the interface(s) using the BOC's documentation and business rules to determine whether any CLEC can build an interface based upon these materials. Third-party testing can be conducted using orders from a combination of existing CLECs and a pseudo-CLEC.

6. Dissemination of Information

A third-party test of OSS should include a formal, predictable and public mechanism for the third-party tester to communicate to both the BOC and the CLEC community issues identified by the third-party tester that arise during the course of testing. Staff proposes the following options for reporting problems:

- Report issues as they arise; or
- Issue reports pursuant to a specified time-frame (*i.e.*, weekly or bi-weekly); or
- Issue an interim report in the middle of the test and a final report at the end.

Combinations of these options could provide optimal balance between frequency and detail.

7. Functionality

- CLECs would be consulted in developing the test scenarios to reflect their market entry and growth and expansion scenarios in a particular region.

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orders are more likely to be completed and less prone to human error than orders that require some degree of human intervention.

- Functionality testing would be conducted for pre-ordering, ordering, provisioning, maintenance and repair, and billing transactions. The transaction mix should replicate CLEC ordering patterns and include, for instance, orders that fall out for manual processing, orders that contain errors, and order changes and supplements. Functionality testing also would test these transactions end-to-end (*i.e.*, orders should be actually provisioned), as applicable.

This letter is intended to provide a summary of staff views regarding key elements of a third-party test which could assist our determination that a BOC's OSS is operationally ready and capable of efficiently supporting ever-increasing volumes of transactions. It is not, however, intended to be an exhaustive list of the necessary elements for a successful third-party test. Moreover, it is possible that additional issues will be raised by interested parties in future section 271 dockets. I emphasize that any final determinations regarding whether a BOC is providing nondiscriminatory access to its OSS will be made by the Commission based on the record of the BOC's 271 application for a particular state. To this end, Bureau staff is committed to working with all parties to ensure that the section 271 application process is as orderly and predictable as possible.

For information purposes, a copy of this letter will be placed in CC Docket No. 98-121[3] and CC Docket No. 98-56.[4]

Sincerely,

for Lawrence E. Strickling, Chief
Common Carrier Bureau

[3] Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana, CC Docket No. 98-121, Memorandum Opinion and Order, 13 FCC Rcd 20599 (1998).

[4] Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance, CC Docket No. 98-56, Notice of Proposed Rulemaking, 13 FCC Rcd 12817 (1998).

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and exact copy of the within and foregoing Comments of Sprint Communications Company L.P. on Status Report of Third Party OSS Testing in Docket No. 8354-U, via United States, first class mail, postage paid and properly addressed to the following:

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This 22nd day of November, 1999.

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December 10, 1999

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EXECUTIVE SECRETARY
G.P.S.C.

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

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

Dear Ms. O'Leary:

Enclosed please find the original and twenty-eight copies, as well as an electronic copy, of the December 10, 1999 Joint OSS Status Report in the above-referenced matter. The participants in this month's conference call were BellSouth Telecommunications, Inc. and AT&T.

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

Thank you for your assistance in this regard.

Sincerely,

Fred McCallum Jr./nvd
Fred McCallum Jr.

FMJ:nvd
Enclosures

cc: Parties of Record

189283/189597

JOINT OSS STATUS REPORT
DOCKET NO. 8354-U
DECEMBER 10, 1999

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
1. RSAG/LENS			
a. Download of RSAG has not been provided.	BST shall make download of RSAG available, and provide for periodic updates of information.	January 30, 1998 BellSouth	BellSouth: BellSouth is working with MCIW to define their needs, and then is pursuing development of the software required to provide this download. BellSouth will negotiate the costs with any CLEC requesting the software, and, if unsuccessful, will petition the Commission for resolution. BellSouth sent a letter confirming MCIW's RSAG fields' needs and resumed meetings on September 28. In October, 1998, BellSouth created an initial download of RSAG with the main fields needed for address validation. MCIW has requested additional data. Once MCIW has determined the fields it prefers to receive, BellSouth will offer target test dates and implementation. BellSouth is waiting for MCIW to sign licensing agreement required for CPNI information. CLECs: Not Completed. BellSouth's proposal is yet to be implemented. The Florida Commission has ordered the RSAG file provided at no cost to MCIW. MCIW: The Florida Public Service Commission has ordered BellSouth to provide MCImetro with a download of the RSAG. BellSouth has refused to provide a download unless MCImetro signs a License Agreement that contains restrictions not required by the Florida PSC. In order to move the process forward, MCImetro has negotiated with BellSouth concerning these restrictions and it is hoped that negotiations

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PRE-ORDERING			
1. RSAG/LENS			
			will be completed in the near future.
b. Information provided to BST (e.g., Connect Thru and QuickServe) is not provided to CLECs.	Not an issue (BST providing through LENS browser, CGI interface, and EC-Lite).	N/A	N/A
c. Requires multiple screen process and repeated address validation.	BST has stated it will revise this inquiry process.	January 30, 1998	BellSouth: Completed. CLECs may use CGI-LENS to choose their own sequence of transactions. CLECs: Not Completed. BellSouth has implemented the "View All" Inquiry Mode, but that mode only addresses the "repeated address validation" issue. The Staff confirmed at the OSS hearing that its proposed solution was intended to address the multiple screen process as well. CLECs, however, still have to proceed through fixed sequence of multiple screens (many of which may not be relevant to the CLECs particular inquiry) or validate the customer's address repeatedly.
d. Human to machine entry requires dual entry of information.	Proposed API interface will alleviate many of these problems.	January 28, 1998 (Vendor Selected) (Implementation by the end of 1998)	BellSouth: TAG is currently implemented. Initially BellSouth held a CLEC focus group session in March 1998 where a TAG document was distributed. BellSouth offered CLECs the opportunity in early 1998 to become TAG early adapters. Three companies requested to be TAG early adapters. BellSouth held 8 training sessions for early adapters and any CLEC, for pre-ordering and ordering. BellSouth is proceeding with implementation of TAG for several companies; to date six have implemented for ordering and pre-ordering

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
1. RSAG/LENS			
			and one additional has implemented for pre-ordering only. The volume of TAG LSR submissions decreased in August 1999 to a total of 11. This low LSR volume contributed to the flow-through result of 37.5%. The TAG LSR volume and flow-through results for the past five months are: Month LSRs Flow-through June 1999 328 89.4% July 1999 532 93.8% August 1999 11 37.5% September 1999 1578 94.09% October 1999 5846 95% TAG pre-ordering capability was implemented August 30, 1998. TAG ordering capability was implemented on November 1, 1998. The TAG test plan was posted on the internet by mid-February. CLECs receive TAG documentation when they attend TAG training. TAG is discussed in Change Control meetings – Release 6.0/OSS '99 for example. With reference to AT&T's comment, BellSouth's disagrees that there was anything "misleading" about the TAG implementation dates of August 30, 1998 for pre-ordering and November 1, 1998 for ordering. The system was available for production on these dates. BellSouth has no control as to when a CLEC chooses to enter production. BellSouth's "true nature" is its commitment to provide electronic interfaces based on the

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
1. RSAG/LENS			
			industry standard where a demand exists for such by the CLECs. The implementation of TAG based on the CORBA standard illustrates BellSouth's commitment, as well as, the continued improvement of the interface through releases for further functionality. All of these releases and the inclusion of TAG in the Electronic Interface Change Control Process (EICCP) have been thoroughly discussed with BellSouth's CLEC customers. TAG will come under the EICCP on 8/1/99. In reference to AT&Ts comments concerning TAG Flow-through, AT&T continues to confuse the definition of flow-through by their "Basic Flow-Through" calculation. AT&T has defined "Basic Flow-Through" as Issued Service Orders divided by Total Mechanized LSRs. This is a self-serving definition that gives no consideration to those service requests that do not flow through the system by design (Total Manual Fallout) as well as processing errors due to the fault of the CLEC (Auto Clarifications and CLEC Caused Fallout). The FCC has agreed in concept that all of these items are legitimate exclusions for the purpose of determining flow-through. See the Affidavit of Ronald M. Pate, filed on April 23, 1999 with the Georgia Public Service Commission for a thorough explanation and discussion of flow-through. The TAG Flow-Through results correctly reported for June are: Base Calculation = 82.33%

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
1. RSAG/LENS			
			CLEC Error Excluded Calculation = 89.39% In response to AT&Ts comments concerning TAG pre-order business rules, BellSouth did not receive a request for TAG pre-order business rules, but instead, received a list of 40 questions concerning OSS'99 via the change control process on 8-16-99. Many of the questions submitted pertained to TAG pre-order. Responses to 34 of the questions were provided to AT&T on 8-27-99. BellSouth plans to provide remaining responses as soon as possible. On 9-7-99, BST received the Change Request Form submitted by AT&T requesting documentation of the TAG pre-order business rules. The Change Request is being managed via the Electronic Interface Change Control Process (EICCP). The status of the request can be obtained via the EICCP Change Request Log and the 9-28-99 EICCP Enhancement Review Meeting (ERM) minutes posted on the BellSouth website at http://www.interconnection.bellsouth.com/markets/lec/eiccp/eiccp.htm. Additionally, an AT&T representative was in attendance at the EICCP ERM conducted on 9-28-99 at which this request was discussed. Additionally, TAG pre-order information is provided as part of the TAG Client Application Program Interface (API)), TAG Training, and Tag Programmers Guide. TAG documentation is available on the web

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PRE-ORDERING			
1. RSAG/LENS			
			site at: http://interconnection.bellsouth.com/oss/tag/tag_info.htm CLECs: AT&T: BellSouth's claimed "implementation" dates in August and November of 1998 for this interface are mis-leading. No company "early adopter" or otherwise entered the production mode for any portion of this interface until January 1999, and none entered production for ordering until March 1999. In April there were 14 local service requests placed by CLECs attempting to use TAG in May there were 5. BellSouth has provided no test data or commercial usage data. Further, BellSouth has excluded API development from the joint BellSouth/CLEC change management process. BellSouth's unilateral discussion of TAG enhancements at Change Control meetings is not the same as having TAG enhancements under the Change Control process. The true nature of BellSouth's treatment of TAG in relationship to this process can be found in BellSouth' recent (5/7/99) filing with the Alabama PSC in Docket 25835, at pages 7-8 where BellSouth discusses why TAG will not be included in the Change Control process until August 1, 1999. Indeed, on May 17, BellSouth announced its third change to TAG this year, none of which have gone through change control. On September 1, 1999, AT&T requested through the change

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
1. RSAG/LENS			
			control process that BellSouth document its business rules for TAG pre-order. AT&T--In response to BellSouth's comment that it is evaluating our change request for pre-order business rules, AT&T submits that although it has been advised informally that the business rules will be available in December, 1999, it has received no official response. Additionally, the December due date does not meet AT&T' needs of a September 30, 1999 due date, which AT&T had discussed with BellSouth many times before the written submission dated September 1. (Oct.) As of November 3rd AT&T has still not received a response to this long standing request. (Nov.) Basic Flow Through for the 328 TAG order in June was 54%. Basic Flow Through reflects the mutual benefit to BellSouth and the CLECs of the use of an electronic interface. Basic Flow Through makes no adjustments to the relationship of Issued Service Orders divided by Total Mechanized Service Orders. BellSouth's "Base Calculation" adjusts for electronically submitted orders BellSouth has elected not to mechanize (Total Manual Fallout). AT&T: Basic flow- through for TAG was 77% in July , fell to 27% in August and rose to 76% in September. AT&T does not agree with BellSouth that a low LSR volume contributed to the low

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PRE-ORDERING			
1. RSAG/LENS			
			flowthough of TAG orders. If that principle held, all the CLECs on BellSouth's August flow-through report with low order volumes should also experience low flow-through, and that is not the case. (Oct)

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
2. Customer Service Records			
a. Not given access to the same CSR information BST uses and are limited to printing 50 pages	BST currently limits its retail operation to 54 page print limit. The proposed API interface will eliminate this current limitation.	January 28, 1998 (Vendor Selected) (Implementation by the end of 1998)	BellSouth: See Pre-Ordering 1d. TAG has the same CSR access abilities as does EC-Lite (to print more than 54 pages) and, in a different format, LENS. Via LENS, CLECs can see and print more than 54-page CSRs in the LSI format. (LENS is a human-to-machine interface; TAG and EC-Lite are machine-to-machine interfaces). As of November 14, 1998, LENS allows CLECs to print the entire CSR, 54 pages at a time. AT&T's CSR issue involves specific ported numbers which are being investigated. With respect to MCIW's comment below on the parsing of CSR data, BellSouth has provided to MCIW the data stream which is the same as that provided to the BellSouth retail units. BellSouth is open to MCIW submitting a BFR to develop a parsing mechanism to go beyond that which is currently provided and parse at the line level. On 06/16/99, BellSouth fixed its systems so that facility-based CLECs are able to view their accounts via LENS. BellSouth believes the CSR Retrieval Issue has been resolved. In regards to AT&T's comments about CSR retrieval, the only account inquiry received from AT&T concerned retrieval of directory listing only, and directory listing with INP CSRs.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
2. Customer Service Records			
			Effective 08/24/99, BellSouth resolved the issue which prevented facility based CLECs from retrieving CSRs for some customers. Viewing logic changes were made to resolve this issue. BellSouth has not received any additional CSR retrieval queries. If AT&T experiences any future discrepancies, they should be referred to the BellSouth Account Team. BellSouth is not aware of additional CSR retrieval problems. It requests that AT&T provide proof of continuing problems with CSR retrieval. CLECs: Implemented. AT&T: AT&T continues to experience problems in accessing CSRS for its customers. As recently as June 29 AT&T asked BellSouth to investigate this problem and reply by July 15, 1999. This problem continues, at present BellSouth has requested AT&T to call for a fax of CSRs when we receive the message "BellSouth is not authorized to provide information about this account" on electronic queries. As of September 7, 1999, AT&T continues to have problems retrieving its CSRs. BellSouth has been unable to correct this problem. AT&T Although the CSR retrieval situation

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
2. Customer Service Records			
			has improved, AT&T continues to be denied access to all its CSRs. Additionally, AT&T has other CSR issues. Because its CSRs are not being updated by BellSouth in a timely manner, AT&T will submit LSRs with data from inaccurate CSRs, causing its orders to reject through no fault of its own. While AT&T has received no formal response to its escalation at BST of this issue. it has been advised informally that both systems problems and LCSC processes are contributing to this problem (Oct.) MCIW: MCIW WorldCom cannot view or print CSRs for ported numbers MCIW is currently experiencing problems accessing CSRs as well. As of 7/7/99, BST has a list of 23 CSRs that MCIW can not retrieve. At this time, BST has responded "under investigation" BellSouth is not providing a parsed CSR, though requested in OSS'99 by CLECs. Current schema provided by BellSouth does not break the CSR into detailed individual fields. Information from the CSR is thus limited and it can not be used to populate service orders

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
2. Customer Service Records			
b. Rates of services and equipment items displayed on CSR are not presented in LENS.	BST shall make this information available via fax and electronically through LENS.	January 30, 1998	BellSouth: This information was made available by fax by July 6, 1998 and electronically on the LSI and CSR in Release 3.1, implemented August 15, 1998 for Georgia. CLECs: Completed for Georgia only.
c. No "refer to" number is provided on certain CSRs. CLECs must call LCSC to obtain the number.	Not an issue.	N/A	N/A

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
3. Limited Products and Services			
a. A complete list of all valid "USOCs" has not been provided to the CLECs.	BST shall make a complete list of valid USOCs available to CLECs and provide monthly updates to this information.	Adopted.	BellSouth: Completed. USOCs and associated FIDs and state-specific info is in the Local Exchange Ordering Guide, which is on the web at www.interconnection.bellsouth.com/guides. The BellSouth USOCs are also on the web. An inadvertent truncation of the early October USOC file on the web was corrected 10/6/98. State specific USOCs and FIDs in comma spaced value format has been on the web since 1/8/99. CLECs: Completed.
b. Failure to provide information regarding promotional offerings.	BellSouth is currently providing this information in a paper format and will determine whether an electronic version of this information can be provided.	December 17, 1997 (Notice of Availability)	BellSouth: Completed. Tariffs with promotional information are available on the web 45 days in advance of the effective date of the promotion. CLECs: AT&T and MCIW receive e-mail notifications of promotional tariff filings.
c. Failure to provide blocks of DID numbers and DID trunk inquiry.	BST shall make blocks of ten DID numbers available electronically.	March 30, 1998	BellSouth: Completed via EC-Lite and TAG pre-ordering which had this capability implemented on August 30, 1998. CLECs: Not completed. See Pre-Ordering 2a.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
3. Limited Products and Services			
d. Lack of accurate PSIMS information and is received by batch file.	BST shall make accurate information available in PSIMS.	January 30, 1998	BellSouth: Completed. PSIMS information is accurate; it's the same information used by BST retail and CLECs. Additional PSIMS information (Remote Call Forwarding and Memory Call #) was included in Release 3.0, implemented on July 25, 1998. With respect to AT&T's comment, AT&T has misunderstood the situation. There is no correlation to PSIMS information and the information provided in Mr. Pate's Affidavit of April 23, 1999. The specific paragraphs cited discuss LSRs which are for services that can be requested electronically, but have not been designed to flow through BellSouth's systems. It is believed that AT&T's comment is directed to situations where a CLEC made an error in processing their request or failed to use P/SIMS and ordered a product that is not supported by the central office serving that end user. In this situation these requests would error out for processing but not due to any fault on the part of BellSouth. CLECs: Not Completed. BellSouth implemented a solution via Release 3.0 of LENS on July 25, 1998. The solution being implemented provides two pieces of information contained within PSIMS that were not being provided to CLECs, but does not address the data inaccuracies within PSIMS that frequently lead to rejected CLEC orders.

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PRE-ORDERING			
3. Limited Products and Services			
			AT&T: New information provided by Mr. Pate in his Affidavit of April 23, 1999, casts additional doubt upon the accuracy of PSIMS data. In ¶¶ 19-20 he discusses a situation which causes CLEC orders to fallout for manual processing based upon conflicting class of service/type of service/information CLECS obtain from PSIMS.
e. LENS is not designed to accommodate unbundled loop and certain complex orders	This issue is addressed in 1a of Ordering. [BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.]	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER	BellSouth: Completed. BellSouth will continue to update its business rules as necessary. With reference to AT&T's comments, BellSouth disagrees in that complete, accurate, and timely business rules are provided to CLECs. In addition to the EICCP as a communication forum, BellSouth posts carrier notification letters to the website concerning releases and provides the appropriate and timely documentation of business rules via the LEO Guides posted to the website. This report is the first forum by which AT&T has alleged that BellSouth programmers had not properly coded their portion of the EDI interface for partial migrations. Proper testing of the functional specifications was performed prior to implementation. BellSouth has no knowledge of this concern. This issue has not been expressed prior.

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PRE-ORDERING			
3. Limited Products and Services			
			With respect to AT&T's comments on the "account merging enhancement", it is believed that AT&T is referring to the imposed limitation of four accounts. Due to the amount of work involved with release 6.0 (OSS'99) it was necessary to place some limitations on processes. AT&T is the only CLEC that has voiced a concern on the four account limitation. If this is not sufficient, AT&T could submit an issue to the EICCP stating what is a reasonable number from their perspective. This would permit the participation of all CLECs in the discussion and prioritization of the request. Concerning the requirements for OSS'99, the work associated with moving from a requirements definition to detailed design has revealed numerous issues that are driving the re-interpretation of the requirements. BellSouth agrees that this adds expense and delay to **BOTH** BellSouth and CLEC development efforts. and is part of the process that further illustrates BellSouth's commitment to producing high quality detailed designs As BellSouth moved from detailed design to unit test for the OSS'99 product set, it became apparent that a significant number of changes would be required to implement the functionality as defined in the EICCP discussions with our CLEC OSS partners. The cumulative effect of these changes created a significant increase in analysis and

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
3. Limited Products and Services			
			coding for BellSouth. This together with BellSouth's reluctance to put in place an OSS upgrade that does not meet the needs of CLECs, led to a delay in deploying the OSS'99 upgrade. The implementation team attempted until the last reasonable minute to incorporate the identified changes to meet the beta test dates provided to AT&T. The team did not give up on the beta test dates until it was apparent that they could not be met and still provide the appropriate functionality. It would be unwise to sanction the implementation of a product that falls short of our joint expectations. In response to AT&T's comments concerning identification of line class code information, BellSouth has never supported routing of OS/DA to an unbranded platform electronically. LSRS received electronically will default to BellSouth. CLEC: Not Completed. BellSouth provided CLECs with business rules for LEO, LESOG, SOER, and Version 7.0 of EDI. Ordering for AT&T Digital Link service and other orders indicate that the business rules are incomplete and inaccurate, and new business rules are not provided in a timely manner. Many CLECs are using LENS and PC EDI. LENS and PC EDI do not accommodate all loop types and complex services.

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PRE-ORDERING			
3. Limited Products and Services			
			AT&T: BellSouth's business rules provided in advance of enhancements to the EDI ordering interface to support partial migrations and the ability to merge a customers lines from multiple existing accounts into a single new account have proven to be inaccurate in practice. The partial migration enhancement was "implemented" on March 28, 1999 but obviously not tested with any CLEC prior to implementation. When used as implemented by BellSouth it was discovered that BellSouth's programmers had not coded their portion of the interface in accordance with the published business rules. The account merging enhancement is scheduled for OSS'99 whose final requirements were "agreed" to on April 19, 1999. Since that date BellSouth has imposed additional business rules which will make the implementation of this enhancement meaningless. Despite having "agreed" to final requirements for OSS'99 on April 19, 1999, three months later than the planned January agreement date, BellSouth continues to issue unilateral changes to the requirements. Each of these changes has the potential to add expense and add delay to CLECs development efforts. AT&T does not agree with BellSouth that adding delay and expense are indicators of or

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
3. Limited Products and Services			
			necessary to "commitment to producing high quality detailed designs." AT&T was notified just three days prior to the implementation of beta testing for OSS'99 that delivery of this upgrade would not be completed until the end of March, 2000, a delay of 7 months. AT&T: Despite executive level escalations of the OSS99 delay, AT&T has received no indication from BellSouth that it intends to expedite the delivery of OSS 99. (Oct.) AT&T: AT&T has recently determined that BellSouth has removed the capability to electronically submit orders requiring the identification of line class code information to route CLEC traffic to other than BellSouth branded OS/DA platforms. This impacts resale and UNE orders involving switch ports. (Nov.)
f. PIC information is not listed in an efficient manner.	BST shall add a search capability for PICs in LENS.	March 30, 1998	BellSouth: Completed. This search capability was implemented in Release 4.1, on December 19, 1998. In order to utilize this feature, CLECs will need to enable the JAVA feature on the Netscape browser. This search capability will find a carrier based on 2-3 letters input of the carrier's name. The Release 4.1 notice is on the web as of 10/26/98. CLECs: Completed for LENS only.
g. ESSX and MultiServe information is not	This issue is addressed in 1g of	March 30, 1998	BellSouth: Scheduling with OBF. BellSouth

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
3. Limited Products and Services			
available.	Ordering. [BST in conjunction with carriers will present this issue of mechanized complex orders to OBF.]		is actively working in OBF to add complex product ordering to future software standards, as CLECs can do also. Several complex services are on OBF's issues list: Ordering Requirements for: Centrex Resale – status date 11/7/97 - Issue 9 (just published 7/25/98); DID Resale - status date 10/7/97 – Issue 9; Unbundled ISDN BRI port – status date 2/5/98 – Issue 10 (publish date 2/99); PBX trunks, DID trunks, Number blocks - status date 8/15/97 - Issue 9. BellSouth provides electronic ordering for 4 complex services via EDI,EDI-PC, and TAG: Synchronet, ISDN BRI, PBX trunks, and hunting. BellSouth has agreed to implement complex services ordering in the OSS'99 release as prioritized by the CLECs. See BellSouth comments on OSS'99 implementation provided in Pre-Ordering 3e. CLECs: Not Completed. OBF guidelines have been issued for most complex services, and CLECs have requested that they be included in the next EDI upgrade, now targeted for late third quarter, 1999. To date, BellSouth has not committed to implement all CLEC requests. AT&T: As discussed above BellSouth is now promulgating additional restrictive business rules after the close of the requirements for OSS'99. See AT&T's comments on OSS99

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
3. Limited Products and Services			
			implementation provided in Pre-Order 3e. MCIW: Complex services and complex listings are not supported by BST electronically.
h. LENS is limited to a maximum of six lines per request and a maximum of 20 features per line.	The proposed API interface will eliminate these limitations.	End of 1998	BellSouth: See Pre-Ordering 1d. LENS has no limit for the number of features per line. CLECs: Implemented.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
4. Telephone Number Resources			
a. Limits number reservation to six numbers/LENS session and 100 numbers/end office.	BST is removing 100 number limit for LENS and EC-Lite.	January 5, 1998	BellSouth: Completed. LENS has unlimited TN reservation capability: CLECs may reserve 6 numbers at a time for an unlimited number of times. As of November 14, 1998, LENS displays and CLECs can reserve 25 numbers at a time. CLECs: Implemented.
b. BST's RNS system automatically generates a telephone number to offer a customer but CLECs must use telephone number reservation in LENS.	BST is providing telephone number availability in a sufficient manner.	N/A	N/A
c. CLECs cannot determine NXX codes available to offer customers.	This information is currently provided in LERG. The proposed API interface will also make this information available.	N/A	BellSouth: N/A. The TAG has a programmers job aid with the NPAs (area codes) associated with the CRIS areas, which CLECs can develop into their systems. CLECs: Not completed. According to a recent filing made by BellSouth in Alabama, the addition of NXX codes available in a switch to TAG is part of a 3/19/99 release of 13 changes to TAG. It is not known if these changes will bring TAG up to par with LENS.
d. BST does not provide parity of access to vanity numbers.	BST is providing vanity number availability in a sufficient manner.	N/A	N/A
e. BST does not enable CLECs to hold a telephone number for 30 days without using cumbersome (firm order mode) of LENS. In the (inquiry mode) CLECs may only make reservations for 9 days.	BST shall make 30 day number reservation available to CLECs.	March 30, 1998	BellSouth: Completed CLECs: Implemented
f. ATLAS information is received by a periodic file data transfer.	Not an issue.	N/A	N/A

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
5. Due Dates			
a. Access for calculation of a due date is not available.	BST shall provide a full due date calculation capability in the pre-ordering mode of LENS.	April 30, 1998	BellSouth: Completed. Implemented 3/15/99 for resale and UNEs in TAG. Implemented in Release 4.0 November 14, 1998. LENS' due date calculation in inquiry mode mirrors this capability in the firm order mode. EC-Lite also gives the CLECs the ability to calculate due dates including for UNEs. UNEs and resale intervals are on the web. CLECs have the information to calculate due dates. With regard to LCI's statement, the dispatch center gives the same due dates, regardless if it's a CLEC or BST order. The status of UNE due date calculation is not uncertain. The intervals for determining a UNE due date have been defined precisely in the BellSouth Products and Services Interval Guide which has been published since April 1998. The most recent interval guide was provided to CLECs on August 30, 1999. The UNE due date calculation is simply a mechanical application of the intervals provided in the Products and Services Interval Guide. The UNE intervals are fixed and always have been. The due date calculation functionality exists in the TAG electronic interface. CLECs: Not completed. Due date calculation is still not at parity. AT&T: The status of UNE due date calculation capability is uncertain,

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
5. Due Dates			
			BellSouth's representatives in the Florida OSS Workshop and the Louisiana Performance Workshops have indicated in contrast to the information above, that UNE due dates are fixed and not subject to a calculation which would take in to account the BellSouth workload in its work centers as is done for resale orders. LCI: Lack of parity in provisioning timeframe. BellSouth sometimes rejects requested due dates, indicating that an order cannot be completed in the timeframe desired by the customer, however, when a customer cancels the LCI order and returns to BS with the same desired due date, BellSouth is able to provide the service by that date. This is true for new orders and MACs.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
5. Due Dates			
b. Dates given are not firm, also the date is assigned by BellSouth after it is entered into BellSouth system.	This issue is addressed in 21 of Ordering. [BST shall provide the same guarantee of FOC information to CLEC that it provides to its retail operations.]	January 30, 1998	BellSouth: Completed. BellSouth's FOC policies and timeframes are in the Interval Guide on the web, and in the Interconnection agreements. The FOC target for LNP is 24 hours for valid mechanized orders and 48 hours for valid manual orders. AT&T has selectively chosen to report only portions of the FOC timeliness. A complete report for FOC Timeliness has been filed with the GA PSC. An analysis of the October 1999 Georgia results note that 99.8% of fully mechanized residence order FOCs were provided in 4 hours or less and 98.3% of fully mechanized business orders were provided in 4 hours or less. For non-mechanized residence order FOCs reflect 99.6% provided in 48 hours or less and 97% in 48 hours or less for non-mechanized business orders. Currently, BellSouth does not have a data feed from the LNP Gateway to PMAP; therefore, mechanized EDI LSRs that flow directly through to the LNP Gateway are not included in BellSouth's Performance Measurements Reports or in the Raw Data Files. BellSouth is currently working on an LNP Gateway feed to PMAP. As AT&T is aware, BellSouth does not have an equivalent FOC process for its retail units.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
5. Due Dates			
			BellSouth is coordinating a meeting with the AT&T users of the Product Interval Guide and AT&T's BST Account Team to provide clarification and a better understanding of the Product Interval Guide. BellSouth provided the Product Interval Guide dated August 1999 to AT&T's Local Service & Access Management Group (LSAM) in August 1999. BellSouth understands that AT&T's LSAM group is currently preparing questions/comments, which will be delivered to BellSouth shortly, pertaining to the August 1999 version of the Interval Guide. BellSouth awaits receipt of these questions/comments to allow it to better define and establish an agenda for the meeting and be adequately prepared to discuss AT&T's specific issues pertaining to the Interval Guide. CLEC: Not completed. BellSouth claims that it has implemented this solution. BellSouth, however, also claims that it does not provide FOCs to its retail operations. The FCC found that the retail analogue of a FOC is when BellSouth's internal OSS recognizes a retail order. This occurs almost immediately after BellSouth submits a retail order. In comparison, however, CLECs received FOCs hours and even days after an order is submitted For example, BellSouth's "Firm Order Confirmation Timeliness" report for March 1999 indicates that

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
5. Due Dates			
			BellSouth takes up to 2.17 days to provide CLECs with FOCs for UNE service orders. AT&T's experience as reported by BellSouth was even worse than the CLEC average with up to 2.53 days to return a FOC for UNE orders and 8.10 days for resale. MediaOne receives FOC's for LNP in Georgia within 48 hour interval 92% of the time. However, the industry standard unanimously agreed to by the Southeast Number Portability Administration Company, LLC for FOCs is 24 hour turnaround. BellSouth fails to recognize the 24 hour interval even though BellSouth agreed to the interval as a member of the Southeast Number Portability Administration Company, L.L.C. e.spire often does not receive FOCs, or receives inaccurate FOCs. When resale FOCs are not received or are inaccurate, CLECs have no record of the date of service transfer, causing double billing and other problems. In reviewing BellSouth's raw data, AT&T has learned that is has LSRs missing from its FOC data, rendering its FOC results as reported by BellSouth meaningless. AT&T has reported this issue to BellSouth. Using its therefore dubious overall results, BellSouth reports FOC ranges for CLECs from under 4 hours to under 48 hours. It makes no mention, however, of the

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
5. Due Dates			
			performance it provides itself for analogous information, and how that compares to the performance it provides CLECs. Additionally, the intervals for FOCS in BellSouth's interval guide continue to increase or be "negotiated". This is entirely inappropriate as no facilities check is being done. Per BellSouth, a FOC merely means they have received a clean or valid LSR. BST should have explain to this Commission why it takes days (per their interval guide) to make such a determination. AT&T-In response to AT&T concerns about BellSouth's interval for FOCs and other issues with its interval guide, BellSouth committed on a conference call on October 4 to meet with AT&T prior to issuance of the November version of this matrix. AT&T's purpose for this meeting is minimally to obtain clarity on the rationale for the FOC interval and on the activities that do and do not take place within BellSouth prior to its issuance of a FOC for all order types, including those requiring service inquiries and projects. Language in the interval guide will also be reviewed for clarity and understanding. It is also hopeful that BellSouth will, in addition to providing clarity, will be responsive to AT&T's business needs for timely, non-discriminatory, and reliable FOC and target service intervals, critical issues for AT&T (Oct.)

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
5. Due Dates			
			AT&T: For September, BellSouth has chosen to analyze only a portion of its FOC timeliness, presenting no discussion of UNEs or any indication of the relative volume and impact of delayed FOCs. In September BellSouth's FOC performance related to UNEs continued to be abysmal - 83% of electronically submitted UNE orders were FOCed by the "partially mechanized" process at an average interval of 3.61 days. AT&T's own experience with partially mechanized FOCs was even worse with an average of over 15 days on a volume of only 4 orders. Further the FOC intervals for AT&T and TCG manually submitted orders for the same types of service vary by as much as .5 to .8 days. (Nov.) AT&T: Similarly BellSouth fails to put its resale results into perspective, only 32% of business resale orders receive fully mechanized FOCs the remaining 68% were FOCed at an average interval of 1.3 days, not four hours or less. AT&T: AT&T is still waiting for BellSouth's promised meeting regarding the product interval guide. Further, in response to BellSouth's comments that it has not received any comments from LSAM, that is the group that intends to attend this meeting, when established, with their comments and questions. Names of the attendees including LSAM personnel have already been provided to BellSouth.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
5. Due Dates			
c. If technician is needed, it would not be known to CLEC. Technician time could be wasted.	Not an issue (Connect-Through and Quick Serve will solve the problem).	N/A	N/A
d. Limited appointment time.	BST is providing this information in a sufficient manner.	N/A	N/A
e. Access to dedicated facilities info available only after due date is assigned.	This information is presently being provided through QuickServe, and the proposed API interface will address this issue long-term.	N/A	BellSouth: N/A CLECs: Not completed. See Pre-Ordering 1d. . According to a recent filing made by BellSouth in Alabama, the addition of QuickServe to TAG is part of a 3/19/99 release of 13 changes to TAG. LCI: See Pre-Ordering 5a.
f. Changes to due date require a phone call to LCSC.	This issue is addressed in 4a of Ordering. [BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.]	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER	BellSouth: Completed; business rules were provided 1/30/98. (TAG, EDI, and LENS can handle changes to orders electronically.) CLECs: Not completed. See Pre-Ordering 3e. BellSouth what about LENS and TAG?
g. Firm Order Confirmation delays.	This issue is addressed in 2i of Ordering. [BST shall provide the same guarantee of FOC information to CLEC that it provides to its retail operations.]	January 30, 1998	BellSouth: Completed. See Performance Measurements FOC data. See Pre-Ordering 5.b. CLECs: Not completed. See Pre-Ordering 5b. LCI: See Pre-Ordering 5a.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
6. Editing Capabilities			
a. BellSouth relies upon machine to human interaction.	This issue is addressed in 4a of Ordering. [BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.]	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER.	BellSouth: Completed. Version 7.0 successfully implemented March 16, 1998. Business rules delivered to CLECs before and on January 30, 1998. Consistent with BellSouth's policy on old software versions, BellSouth kept versions 6.0 working for 90 days after the implementation of version 7.0 on March 16, 1998, and reminded all CLECs in advance of the June 16, 1998 version 6.0 close date that it was approaching. As of August 28, 1998, BellSouth now has a new broader policy on multiple software versions: BellSouth will support 2 EDI software versions at all times. No changes or new measurements will be made to the old version. When a new (3rd) version is issued, the old (1st) version will be dropped. LNP electronic rejects were completed on 4/1/99. A detailed explanation of the Flow-Through Report including definition of LSRs represented by "Total Manual Fallout" and the process for determining allocation of errors to CLECs ("CLEC Caused Fallout") was provided to the GA PSC in affidavit of Ronald M. Pate filed 4/23/99 Pursuant to the requirements of the GA PSC's May 20, 1999 order on Third Party Testing, a Flow-Through Audit Plan was filed June 1, 1999. The results of this audit will provide further validity and clarification to BellSouth's Flow-Through Report.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
6. Editing Capabilities			
			BellSouth disagrees with AT&T's statement below concerning the Flow-Through Audit Plan. BellSouth is in compliance with the GA PSC order. The Flow-Through Audit will confirm that the performance measures reported in BellSouth's monthly flow-through report are accurate and the flow-through measurement data is valid. In addition, KPMG as the auditor chosen by BellSouth and approved by the GA PSC has the ability at their discretion to modify the test plan to ensure compliance with the GA PSC order. The GA PSC order does not provide for the validation of the BellSouth retail operations. On 6-28-99, the GA PSC approved the Third Party Test plan. KPMG will be revising the description of its flow through audit clarifying that the audit will include live CLEC data for 3 months as specified by the GPSC. AT&T: BellSouth provided CLECs with business rules for LEO, LESOG, SOER, and Version 7.0 of EDI. Still, manual intervention is frequently required for orders. For example, according to BellSouth's flowthrough report for May indicates that 5,087 orders fell out for manual processing, and that an additional 8,552 BellSouth "system fall-outs" occurred. Many other orders can only be processed manually and

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
6. Editing Capabilities			
			so do not appear on this report. The Flow-Through Audit Plan filed with the GA PSC will not validate the process BellSouth is using to report flow-through on actual CLEC local service requests submitted to BellSouth or for BellSouth's retail operations. AT&T: Recent experience involving AT&T Digital Link service, AT&T service provided through the former TCG facilities, and other service orders indicate that the business rules are incomplete and inaccurate. The revised master test plan filed by HP does not remedy the flawed methodology being used to audit BellSouth's flow-through.
b. Prevent on-line edit checks, order rejects and must be resubmitted.	This issue is addressed in 4a of Ordering. [BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.]	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER	BellSouth: Completed. CLECs can program these business rules into their front-end system. BellSouth implemented electronic rejects for LNP orders with errors on 4/1/99. These are much more intricate to mechanize than electronic rejects for INP orders with errors which are electronically rejected. The LNP FOC target is 24 hours for valid mechanized orders, and 48 hours for valid manual orders. August flow-through was89.44%. TAG gives CLECs the ability to use on-line edit checks. Regarding reject return average intervals, the Georgia data for August shows 0.09 hrs for resale residence and 0.08 hrs. for resale business fully mechanized LSRs.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
6. Editing Capabilities			
			With respect to AT&T's comment concerning flow through rates for BellSouth's retail units, as beginning with the April Flow-Through Report the appropriate BST business retail flow-through is really zero. This is according to the FCC's definition in the Louisiana II Order stating that orders must be transmitted electronically through the gateway without manual intervention. BellSouth disagrees with AT&T's implication that BellSouth does not compute flow-through in compliance with the GA PSC Performance Measure Order. BellSouth is in strict compliance and the flow-through rate as filed with the Commission is: 85.19% for March 1999 84.67% for April 1999 87.48% for May 1999 87.41 % for June 1999 90.13% for July 1999. 89.44% for August 1999 92.09% for September1999 92.56% for October 1999 Pursuant to the requirements of the GA PSC's May 20, 1999 order on Third Party Testing, a Flow-Through Audit Plan was filed June 1, 1999. The results of this audit will provide further validity to the methodology for flow-through calculation, as well as, the allocation of errors to CLECs. See BellSouth's comments regarding the

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
6. Editing Capabilities			
			Flow-through Audit in Pre-Ordering 6a. With respect to AT&T's comments below on the May region-wide average interval for the return of reject notifications, the 13.56 days for Partially mechanized UNEs is the result of a population of one (1) LSR and is not representative of normal processing. BellSouth disagrees with AT&T's statement below concerning the Flow-Through Audit Plan. BellSouth is in compliance with the GA PSC order. The Flow-Through Audit will confirm that the performance measures reported in BellSouth's monthly flow-through report are accurate and the flow-through measurement data is valid. In addition, KPMG as the auditor chosen by BellSouth and approved by the GA PSC has the ability at their discretion to modify the test plan to ensure compliance with the GA PSC order. The GA PSC order does not provide for the validation of the BellSouth retail operations. CLECs: Not completed. See Pre-Ordering 3e. BellSouth's RNS and DOE ordering systems have extensive on-line edit capabilities. As a result of these capabilities, BellSouth experiences high flow through rates for its residential orders (96.5 percent) and business orders (83.2 percent). CLECs using LENS ordering must rely on

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
6. Editing Capabilities			
			BellSouth to incorporate on-line edit capabilities because LENS is a proprietary interface. In March, the LENS on-line edits did not detect errors in 13,490 orders, which accounted for approximately 18.6 percent of all LENS orders submitted. This data indicates that the edit capabilities in RNS and DOE are significantly better than the LENS editing capabilities. CLECs using EDI ordering can develop their own on-line edit capabilities to detect CLEC errors, but cannot develop edit capabilities to detect BellSouth-caused errors. The accuracy of BellSouth's allocation of errors to CLECs and BellSouth is dubious. One therefore cannot reasonably draw any inferences on whether EDI editing capabilities is equivalent to RNS and DOE. In any event, when on-line edits fail to detect an error, CLECs have experienced long delays in receiving rejection notices. In May, the BellSouth region-wide average interval for the return of reject notifications was as follows: Fully mechanized UNEs: .07 hours (The CLECs believe that only a tiny percentage of UNE orders are fully mechanized) Partially mechanized UNEs: up to 13.56 days Non-mechanized UNEs: up to 2.54 days In response to BellSouth's comments above, AT&T finds it alarming that BellSouth only

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
6. Editing Capabilities			
			had one order in this category and still was unable to return the rejection for almost 14 days. It would have still been unacceptable, but more understandable, if the volumes had been greater. Secondly, if BellSouth is looking for a more representative sample of the timeliness, AT&T offers BellSouth's other UNE category which took an average of 3 and 1/2 days. • The reason for these delays in electronically submitted orders appears to be that BellSouth manually processes nearly one-third (32% in March, 31% in April and 22% in May) of all error notices. AT&T: Actual flow through when calculated in compliance with the GA PSC Performance Measurement Order and current guidance from the FCC was 73.5% in March, 72% in April, and rose to 81% in May. Basic flow-through for the aggregate of ALL interfaces in August was 73%. For the interfaces that BellSouth advocates are nondiscriminatory, EDI and TAG, its basic flow-through was 23% and 27% respectively. LENS was 76%. Basic Flow-through data for September is as follows: ALL: 77% EDI: 30% TAG: 76%

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
6. Editing Capabilities			
			LENS: 80% TAG and LENS order mix in September with the exception of a few UNE order submitted over TAG was virtually 100% resale. The EDI mix on the other hand was approximately 40% UNE. The Flow-Through Audit Plan filed with the GA PSC will not validate the process BellSouth is using to report flow-through on actual CLEC local service requests submitted to BellSouth or for BellSouth's retail operations. For example, in June the Flow-through data for April was not available – BellSouth explained this to the Alabama PSC in a footnote on May 20, 1999, as follows "The Flow-Through report data is still being validated for accuracy and will be provided at a later date." BellSouth does not explain how it feels it can report reject and FOC data when the actual number of rejects and FOCs can not be determined without an accurate count of flow-through data. Further, BellSouth has inexplicably been unable to report comparative data for its own flow through in its residential retail unit since March. See AT&T's comments regarding Flow-through Audit in Pre-Ordering, 6a.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
7. System Capacity			
a. RSAG and Lens lack sufficient capacity to meet reasonable demand	BellSouth is installing new software to resolve this problem.	December 12, 1997	BellSouth: Completed. Software was installed; problem resolved. CLECs: BellSouth claims that it has installed the new software.
b. System Lock-Out and Time Out	BellSouth is installing new software to resolve this problem.	December 12, 1997	BellSouth: Completed. Software was installed; problem resolved. CLECs: BellSouth claims that it has installed the new software.
8. Systems Integration			
a. LENS is an interim system that does not provide a machine to machine access to BST's legacy systems.	Closed Issue (BST will provide systems specifications so that CLECs can build their own interfaces to integrate).	LENS-CGI specifications provided December 12, 1997.	BellSouth: Completed. Feasibility of integration proven via third-party software demonstrated beginning in April, 1998. Albion built a proof-of-concept interface with 1 order type as requested. As of November 1, 1998, TAG offers pre-ordering and ordering capabilities. CLECs: Not completed. BellSouth has provided LENS-CGI specifications to CLECs. The specifications provided, however, are inadequate to integrate pre-ordering and ordering functions in a manner that is equivalent to the integration that BellSouth provides its own retail operations. CGI raises serious security and robustness concerns for e.spire, more fully explained in the Georgia OSS hearing.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
PRE-ORDERING			
8. Systems Integration			
			Albion, the company that BellSouth hired to demonstrate that CGI could ostensibly be developed does not assert anywhere that the CGI application it developed functioned rapidly and efficiently in a manner that could be used effectively while a customer was on the line. Albion only developed CGI to process a single type of order. BellSouth's reliance on the test report is unavailing, for the limited and unsupervised work that Albion performed does not begin to address the range of concerns that this Commission and CLECs have raised. The FCC, in its Second Louisiana Order issued October 13, 1998 was "not persuaded that CGI-LENS is operationally ready."
b. LENS pre-ordering interface is not integrated with its EDI ordering interface.	Closed Issue (BST will provide systems specifications so that CLECs can build their own interfaces to integrate).	CGI Specification available December 15, 1997	BST: Completed. See Pre-Ordering 8a. CLECs: Not completed. See Pre-Ordering 8a.
c. BST failed to provide real-time machine to machine access to Direct Order Entry Support Application Program ("DSAP").	Closed Issue (BST will provide systems specifications so that CLECs can build their own interfaces to integrate).	December 31, 1997	BST: Completed. See Pre-Ordering 8a. CLECs: Not completed. See Pre-Ordering 8a.
d. Technical Specifications have not been provided to CLECs so they can transfer information into their systems without manual intervention	Closed Issue (BST will provide systems specifications so that CLECs can build their own interfaces to integrate).	December 31, 1997	BST: Completed. See Pre-Ordering 8a. CLECs: Not completed. See Pre-Ordering 8a.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
MAINTENANCE & REPAIR			
1. Limited Application			
a. Electronic Bonding Interface (EBI) only provides full service for access special circuits.	BST is implementing EBI with AT&T.	February 2, 1998	BellSouth: Completed. ECTA Release 5.0 completed 06-25-99 allows ECTA to handle non-designed loops which are less than 5% of the total loop orders. (More than 95% of loop orders are designed). BellSouth is contacting the CLECs using or testing ECTA regarding the testing of non-designed loops. CLECs: EBI has been implemented. The FCC found that ECTA (EBI) does not provide parity to competitors. The ECTA currently does not support creating trouble tickets for non-designed loops.
b. TAFI only supports basic local exchange services. All others require manual intervention by BST personnel.	EBI will accommodate all services.	February 2, 1998	BellSouth: Completed. CLECs: EBI has been implemented. See 1a. above.
2. Electronic Capabilities			
a. BST has not provided EBI for telephone number based service.	BST shall provide TAFI specifications to CLECs.	Adopted	BellSouth: Completed. See 1.a. above. CLECs: BellSouth has provided CLECs with TAFI specifications. The FCC has found that TAFI does not provide non-discriminatory access. The ECTA currently does not support creating trouble tickets for non-designed loops.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
MAINTENANCE & REPAIR			
2. Electronic Capabilities			
b. No electronic capability to send/receive status on any local telephone service.	Implementation of EBI will address this issue.	February 2, 1998	BellSouth: Completed. CLECs: EBI has been implemented. See 1 a. above.
c. Electronically issued orders are manually entered into BST system.	Implementation of EBI will address this issue.	January 30, 1998	BellSouth: Completed. CLECs: EBI has been implemented. See 1 a. above.
3. System Capacity			
a. TAFI lacks sufficient capacity to meet demand (i.e., simultaneous users).	BST will add capacity to accommodate more users as needed.	As needed	BellSouth: Completed. As of December 31, 1998, 45 CLECs used TAFI. CLECs: N/A
4. Long Term Solution			
a. EBI long term is not in place	BST shall implement EBI. BST is not required to make enhancements to TAFI.	February 2, 1998	BellSouth: Completed. CLECs: EBI has been implemented. See 1 a. above.
5. Integration			
a. BST failed to provide technical specifications for CLECs' TAFI integration	BST shall provide specifications for TAFI to CLECs.	January 30, 1998	BellSouth: Completed. CLECs: BellSouth has provided CLECs with TAFI specifications. See 2 a. above.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
MAINTENANCE & REPAIR			
5. Integration			
b. TAFI and LENS are not integrated	BellSouth does not integrate TAFI with its retail pre-ordering and ordering systems. BST will provide specifications for TAFI and LENS to CLECs so that they may perform their own systems integration.	January 30, 1998	BellSouth: Completed. CLECs: BellSouth has provided CLECs with TAFI specifications.
POTENTIAL ISSUE	**PROPOSED SOLUTION**	**IMPLEMENTATION TIME FRAME**	**STATUS**
ORDERING			
1. Limited Products and Services			
a. LENS is not designed to accommodate unbundled loop and certain complex resale orders.	BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER	BellSouth: Completed. CLECs: Not completed. See Pre-Ordering 3e. Many CLECs are using LENS and PC EDI. LENS and PC EDI do not accommodate all loop types and complex services.
b. Limited pre-ordering and ordering gateway interface (provided by LENS and EDI) to the BellSouth resources that link to its legacy systems.	BST shall provide e-mail capabilities for pre-ordering and ordering complex services initially. This is in addition to the current fax capability.	January 30, 1998	BellSouth: Completed. BellSouth has implemented e-mail service inquiries and ordering for a complex service with one CLEC and is ready to accept requests from other CLECs for trials of other specific products. One additional CLEC has utilized this e-mail capability. BellSouth contacted ICI on 12/12/97 and 4/20/98 to explain the change control and OBF processes concerning complex ordering discussions. BellSouth provided the CLECs the abiltiy to submit LSRs for LNP electronically in 09/98. Effective 12-18-99, CLECs will be able to submit digital loop LSRs electronically. Effective 01-30-00, CLECs can submit LSRs

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
1. Limited Products and Services			
			for digital loops and for LNP (in the new OSS99 format), as separate requests, electronically. CLEC: Not completed. BellSouth has not yet provided an e-mail capability for pre-ordering and ordering complex services to the industry. BellSouth has developed such a process with one company, but has not made that process or any information about that process available to any other parties. MCIW: At this time, no capability exists to do service inquiries electronically. MCIW comments end. The issue of complex ordering at the OBF was to be a joint effort by the parties to this case. The parties must get together before OBF in order to prioritize the issues. Intermedia has contacted its account team at BellSouth about getting this process started and has not received a response. AT&T: In response to BellSouth's comments regarding digital loops, AT&T has the following comments. BellSouth to date remains unwilling to provide AT&T a feasible method of ordering digital loops and number portability. Additionally, the LNP orders will not flow-through when implemented on 01-30-00. Neither will partial migrations. (Oct.) AT&T: On of October 11 AT&T escalated

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
1. Limited Products and Services			
			this issue within BellSouth but has received no resolution. (Nov.)
c. LENS and EDI support only some resale service.	BST in conjunction with carriers will present this issue of mechanized complex orders to OBF.	March 30, 1998	BellSouth: Scheduling with OBF. BellSouth is actively working with CLECs to add complex products to the OSS'99 release. the requirements for which are being finalized. See Pre-Ordering 3.g. Regarding AT&T's comment below concerning the requirements for OSS'99, the work associated with moving from a requirements definition to detailed design has revealed numerous issues that are driving the re-interpretation of the requirements. BellSouth agrees that this adds expense and delay to **BOTH** BellSouth and CLEC development efforts, and is part of the process that further illustrates BellSouth's commitment to producing high quality detailed designs. Also, see Pre-Ordering, 3e regarding OSS'99 implementation. CLEC: OBF guidelines have been issued for most complex services, and CLECs have requested that they be included in the next EDI upgrade, target for July, 1999. BellSouth has not committed to implement the CLECs' requests and has not committed or specified what complex services will be supported in OSS '99. With the final OSS 99 Document release, now scheduled for 9/99, some complex

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
1. Limited Products and Services			
			services have been included for resale. AT&T: Despite having "agreed" to final requirements for OSS'99 on April 19, 1999, three months later than the planned January agreement date, BellSouth continues to issue unilateral changes to the requirements. Each of these changes has the potential to add expense and add delay to CLEC's development efforts. AT&T does not agree with BellSouth that adding delay and expense are indicators of or necessary to "commitment to producing high quality detailed designs." See AT&T's comments regarding Pre-Ordering, 6a.
d. Failure to use industry standard feature identification codes.	Not an issue	N/A	N/A
e. Failure to provide a fully automated system for placing complex orders.	BST in conjunction with carriers will present this issue of mechanized complex orders to OBF.(3/30/98)	March 30, 1998	BellSouth: Scheduling with OBF. BellSouth is actively working with CLECs to add complex products to the OSS'99 release . See Pre-Ordering 3g. Regarding AT&T's comment below concerning the requirements for OSS'99, the work associated with moving from a requirements definition to detailed design has revealed numerous issues that are driving the re-interpretation of the requirements. BellSouth agrees that this adds expense and delay to **BOTH** BellSouth and CLEC development efforts, and is part of the process that further illustrates BellSouth's

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
1. Limited Products and Services			
			commitment to producing high quality detailed designs. See BellSouth's comments in Pre-Ordering 3e regarding OSS'99 implementation. CLEC: See Ordering 1c. BellSouth has not committed or specified what complex services will be supported in OSS '99. AT&T: [Again] Despite having "agreed" to final requirements for OSS'99 on April 19, 1999, three months later than the planned January agreement date, BellSouth continues to issue unilateral changes to the requirements. Each of these changes has the potential to add expense and add delay to CLEC's development efforts AT&T does not agree with BellSouth that adding delay and expense are indicators of or necessary to "commitment to producing high quality detailed designs." See AT&T's comments in Pre-Ordering 3e regarding OSS'99 implementation. AT&T was notified just three days prior to the implementation of beta testing for OSS'99 that delivery of this upgrade would not be completed until the end of March, 2000, a delay of 7 months.
f. Inability of new entrants using Phase I EDI to order all services that BST now orders electronically to support its retail operations, i.e., cannot order private line, Centrex, ISDN or complex business service or unbundled	Issue addressed in 1a, 1b, and 1c of Ordering. [BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO,	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER	BellSouth: Business rules have been provided, and e-mail capability for ordering complex services has been implemented. The issue of mechanized complex orders is being implemented in the OSS'99 release.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
1. Limited Products and Services			
network elements.	LESOG, and SOER.] [BST shall provide e-mail capabilities for pre-ordering and ordering complex services initially. This is in addition to the current fax capability.] [BST in conjunction with carriers will present this issue of mechanized complex orders to OBF.]	January 30, 1998 for e-mail capability; March 30, 1998 for presentation to OBF	See Pre-Ordering 1g. Regarding AT&T's comment below concerning the requirements for OSS'99, the work associated with moving from a requirements definition to detailed design has revealed numerous issues that are driving the re-interpretation of the requirements. BellSouth agrees that this adds expense and delay to **BOTH** BellSouth and CLEC development efforts. and is part of the process that further illustrates BellSouth's commitment to producing high quality detailed designs. See BellSouth's comments in Pre-Ordering 3e regarding OSS'99 implementation. CLEC: See Pre-Ordering 3e. BellSouth has not yet provided an e-mail capability for pre-ordering and ordering complex services. BellSouth claims that it is conducting a trial with ICI. BellSouth, however, has not advised AT&T regarding the scope of the trial or its progress. BellSouth has not committed to implement the CLECs' requests and has not committed or specified what complex services will be supported in OSS '99. See Ordering 1c. AT&T: Despite having "agreed" to final requirements for OSS'99 on April 19, 1999, three months later than the planned January agreement date, BellSouth continues to issue unilateral changes to the requirements. Each

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
1. Limited Products and Services			
			of these changes has the potential to add expense and add delay to CLEC's development efforts AT&T does not agree with BellSouth that adding delay and expense are indicators of or necessary to "commitment to producing high quality detailed designs." See AT&T's comments in Pre-Ordering 3e regarding OSS'99 implementation. Many CLECs are using LENS and PC EDI. LENS and PC EDI do not accommodate all loop types and complex services. See Ordering 1b.
g. No provision for ordering capabilities for Centrex, some ISDN, Multiserv, complex services, private line services other than Synchronet, or all unbundled network elements when Phase II EDI interface is implemented.	BST in conjunction with carriers will present this issue of mechanized complex orders to OBF.	March 30, 1998	BellSouth: See Ordering 1c. and 1e (Pre-Ordering 3g. CLEC: Not completed. See Ordering 1b and 1c.
h. EXACT designed for access, not local service, thus only part of the customers service, such as the loop, can be ordered electronically; the remainder of the customers order, for items such as E911, directory listings, interim number portability, etc. must be ordered through another interface such as EDI or via fax.	Not an issue.	N/A	N/A
i. CLEC orders placed through LENS are currently limited to a maximum of 6 lines per residence or business request, and a maximum of twenty features per line.	Issue addressed in 3h of Pre-ordering. [Proposed API interface will eliminate these limitations.]	End of 1998	BellSouth: See Pre-Ordering 3h. CLECs: See Pre-Ordering 2a. MCIW – This comment does not match the issue. Comments

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
2. Order Status			
a. LENS and EDI have not led to faster provisioning of simple LSRs.	Not an issue at this time.	N/A	BellSouth: N/A CLECs: See Pre-Ordering 2a. MediaOne receives 92% of FOCs for EDI ordered LNP requests within the BellSouth 48 hour interval. However, the turnaround period should be 24 hour as established by the LLC. EDI is not resulting in a faster provisioning process than the previous FAX mode. LCI must submit expedited orders manually, as EDI is not reliable. Since BellSouth manual processing is much faster than EDI, LCI has found that it has a better chance of having the order completed on time by BellSouth if it is submitted on paper rather than via EDI.
b. Communications processes fail to adequately advise CLECs of the status of the orders placed via the electronic gateways.	Not an issue at this time.	N/A	BellSouth: N/A CLECs: Must continually manually monitor the EDI screen/order to see when a FOC has been issued.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
2. Order Status			
c. Sufficient notices not provided to CLEC, e.g. service jeopardies, rejects, competitive disconnects, circuit based services.	In the interim, BST will work with carriers on the provision of timely notices.	January 30, 1998	BellSouth: Completed. BellSouth's LCSC does provide CLECs including e.spire advance notice of service jeopardies via phone and fax. e.spire is not using an electronic interface for ordering. CLECs can also receive service jeopardies electronically via EDI,LENS and TAG. EDI's electronic service jeopardies (via pending order status) in advance of standards was discussed in the Change Control process and implemented December 19, 1998. The published mechanized FOC and rejects measurements for AT&T look good. November and December FOC data combine totally mechanized and partially mechanized FOCs at the DOJs request. A detailed explanation of the Flow-Through Report including definition of LSRs represented by "Total Manual Fallout" and the process for determining allocation of errors to CLECs ("CLEC Caused Fallout") was provided to the GA PSC in affidavit of Ronald M. Pate filed 4/23/99. Mr. Pate's affidavit is not contradictory to any previously provided BellSouth testimony. It is just a more detailed explanation to provide further clarification. AT&T has selectively chosen to report only portions of the FOC timeliness. A complete Report for FOC Timeliness has been filed with the GA PSC. An analysis of the October 1999 Georgia results note that

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2. Order Status			
			99.8% of fully mechanized residence order FOCs were provided in 4 hours or less and 98.3% of fully mechanized business orders were provided in 4 hours or less. For non-mechanized residence order FOCs reflects 99.6% provided in 48 hours or less and 97% in 48 hours or less for non-mechanized business orders. Concerning AT&T's FOCs for its ADL orders, the result of 66% of FOCs received within 24 hours is based on a population of 9 orders. The three orders, which did not receive a FOC within 24 hours, did receive a FOC within 48 hours. The overall FOC average interval for these 9 orders was 0.83 days. See BellSouth's comments regarding missing LSRs in Pre-Ordering 5b. With respect to MCIW's comment concerning jeopardy notices for LNP, release 1.9.1 deployed May 30, 1999 added electronic notification of pending order status, including jeopardies. Carrier notification letter SN91081486 dated April 30, 1999 was posted to the BellSouth website advising of the forthcoming release implementation. AT&T's comments concerning the two migration orders for UNE-P are in reference to LSRs submitted in Florida not Georgia. AT&T submitted LSRs to migrate two

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
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			Florida retail accounts to UNE-P. The LSRs were clarified back to AT&T by the BellSouth LCSC due to incomplete and incorrect information. AT&T corrected the information and re-submitted the LSRs. BellSouth's LCSC clarified one of the re-submitted LSRs back to AT&T due to an incorrect USOC. The re-submitted LSR contained a new USOC, which required validation on the BellSouth rate tape and should not have been clarified back to AT&T. This caused a delay in processing the LSR. e.spire: Not completed. BellSouth has no meaningful notice processes in place for e.spire, which has been providing competitive service since November 1996 using fax and phone for pre-ordering and ordering. Despite repeated requests for improvements, no advance notice is provided for service jeopardies or competitive disconnects. Combined with the lack of consistent FOCs, this makes it impossible for e.spire to keep track of its own resale subscribes, resulting in double billing of CLEC customers and other problems. CLECs: The service jeopardies referenced above by BellSouth do not include orders for local number portability. BellSouth's performance data demonstrates that BellSouth still does not provide carriers with timely order status notices.

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2. Order Status			
			AT&T: BellSouth's "Firm Order Confirmation Timeliness" report for May 1999 indicates that BellSouth takes up to 2.17 days to provide CLECs with FOCs for mechanized orders and up to 1.21 days for non mechanized orders. In April it took up to 12.2 days for mechanized orders and up to 1.27 days for non-mechanized orders. In May, AT&T received FOCs within the 24 hours required by the contract only 48% of the time on its ADL orders. See AT&T's comments regarding missing LSRs in Pre-Ordering 5b. Mr. Pate's 4/23/99 Affidavit creates more questions concerning orders which fallout for manual process and the error allocation process that it answers. All previous information provided by BellSouth to the FCC, this Commission and other commissions in BellSouth's serving area concerning orders that fallout for manual processing stated that such orders were for complex services and occurred only on orders submitted over the EDI interface. Mr. Pate provides at least 10 other categories of events that trigger such fallout across the EDI, TAG, and LENS interfaces. (¶¶ 19-20). Mr. Pate provides no information as to how BellSouth handles these newly identified situations in its own retail process. The counts of the various types of errors

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			underlying the "Detail Flow-Through Report", the "Error Analysis Section" and the "Percent Rejects Report" which all stem from the handling of the same orders in the same process can not be reconciled and do not relate to each other in logical fashion. The LCSC service representative based determination process Mr. Pate describes is exactly the same as BellSouth SME witnesses have repeatedly testified BellSouth did not consider to be valid. As of 4/99, BST does not provide jeopardy notifications electronically for orders with LNP. AT&T: For September, BellSouth has chosen to analyze only a portion of its FOC timeliness, presenting no discussion of UNEs or any indication of the relative volume and impact of delayed FOCs. In September BellSouth's FOC performance related to UNEs continued to be abysmal - 83% of electronically submitted UNE orders were FOCed by the "partially mechanized" process at an average interval of 3.61 days. AT&T's own experience with partially mechanized FOCs was even worse with an average of over 15 days on a volume of only 4 orders. Further the FOC intervals for AT&T and TCG manually submitted orders for the same types of service vary by as much as .5 to .8 days. (Nov.) AT&T: Similarly BellSouth fails to put its

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			resale results into perspective, only 32% of business resale orders receive fully mechanized FOCs the remaining 68% were FOCed at an average interval of 1.3 days, not four hours or less. AT&T: AT&T issued two migration orders for UNE-P. BellSouth incorrectly rejected each order multiple times. .AT&T's attempts to escalate the problem at the LCSC resulted in no phone calls returned at any level of management. AT&T then involved the account team, and the problem still remained unresolved for one week.
d. Treatment of CLEC order as two order- one to disconnect and one to reconnect.	BST is installing new software to resolve this issue. BST will verify memory call item is resolved also.	January 5, 1998	BellSouth: Completed. New software was installed and orders are now processed as a single change order, not two orders. With regard to AT&T's comment below, the situation referenced required the CLEC to submit a single LSR. BellSouth then had to perform two requests at no burden to the CLEC. However, this situation is now mute in that Release 5.0 (April 1999) permits this order to electronically flow-through. AT&T: Here again, Mr. Pate's 4/23/99 Affidavit raises additional concern. In it he describes a situation in which BellSouth over a year later is still utilizing this manual two-order process.

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2. Order Status			
e. Failure to provide adequate flow-through for POTS resale and UNE orders.	BST will share edits and all scenarios that produce order fall out for manual processing.	December 19, 1997	BellSouth: Completed. A detailed explanation of the Flow-Through Report including definition of LSRs represented by "Total Manual Fallout" and the process for determining allocation of errors to CLECs ("CLEC Caused Fallout") was provided to the GA PSC in affidavit of Ronald M. Pate filed 4/23/99. Mr. Pate's affidavit is not contradictory to any previously provided BellSouth testimony. It is just a more detailed explanation to provide further clarification. As of the November 1998 flow-through report, all flow-through reports are now mechanically prepared; CLEC and BST Errors counts are now totally mechanically counted and presented as an attachment to the flow-through reports. LENS is part of BellSouth's non-discriminatory OSS access. LENS up-front edits are done by BellSouth; EDI up-front edits are done by the CLECs, which has not always occurred. AT&T's note on EDI flow-through is incorrect: EDI's flow-through for November and December was 95.4% and 97.2% respectively. All of MCIW's referenced EDI loop orders contained MCIW order errors which caused them to fall out. Flow-through for the loop+LNP LSRs was implemented 1/17/99, after MCIW submitted their loop+LNP LSRs. BellSouth disagrees with AT&T's

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			characterization of statements made which appear to indicate that errors (Total System Fallout) have been mechanically designated as CLEC (CLEC Caused Fallout) or BST (BST Caused Fallout) errors. BellSouth has clearly stated that the change which took place with the November 1998 Flow-Through Report was a mechanized counting of the errors. If these errors are such that they are conducive to a mechanized designation, then they would be auto clarified. Pursuant to the requirements of the GA PSC's May 20, 1999 order on Third Party Testing, a Flow-Through Audit Plan was filed June 1, 1999. The results of this audit will provide further validity and clarification flow-through calculation methodology and to the allocation of errors process to CLECs. With respect to AT&T's comment concerning flow through rates for BellSouth's retail units, as noted on the April Flow-Through Report the appropriate BST business retail flow-through is really zero. This is according to the FCC's definition in the Louisiana II Order stating that orders must be transmitted electronically through the gateway without manual intervention. BellSouth disagrees with AT&T's statement below concerning the Flow-Through Audit Plan. BellSouth is in compliance with the GA PSC order. The Flow-Through Audit will confirm that the performance measures

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			reported in BellSouth's monthly flow-through report are accurate and the flow-through measurement data is valid. In addition, KPMG as the auditor chosen by BellSouth and approved by the GA PSC has the ability at their discretion to modify the test plan to ensure compliance with the GA PSC order. The GA PSC order does not provide for the validation of the BellSouth retail operations. See BellSouth's comments regarding Flow-through Audit in Pre-Ordering 6a. BellSouth disagrees with AT&T's below statement that CLEC orders submitted via EDI and LENS interfaces are discriminatory. AT&T reports incorrect data to further confuse their claim. Correct EDI flow-through rates as reported in the monthly Flow-Through Report which is filed with the GA PSC are as follows: March: 77.2% April: 78.06% May 86.73%. June 81.76% July 70.94% CLECs: BellSouth provided AT&T with SOER edits. Recent testing involving AT&T Digital Link service and loop/port combination indicate that the business rules (including SOER edits) are incomplete and inaccurate. BellSouth, moreover, has not

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			provided AT&T with all of the scenarios that cause manual fall out because of deficiencies in BellSouth's systems. BellSouth's flowthrough reports are deficient in a number of respects. They unilaterally and incorrectly categorize errors as CLEC errors, which excludes them from the report. It does not include the host of order types that BellSouth has designed to be manual, although CLECs want them electronic, and it includes LENS orders, which BellSouth is not even relying on to provide non-discriminatory access. AT&T: Although BellSouth states above that CLEC and BST errors counts are "mechanically counted", they are designated as CLEC or BST errors manually by BST service representatives, not mechanically, as BST's statement appears to indicate. Again, the Pate Affidavit presents new information contradictory to BellSouth's previous testimony in several jurisdictions. It also contains unfounded claims that the CCB Staff of the FCC has agreed to certain reporting procedures BellSouth has implemented. The truth is the FCC Staff's letter outlines procedures BellSouth must follow to demonstrate and evidence that the adjustments it is claiming are validly excludable. BellSouth has yet to comply with the FCC Staff's suggested procedures. The Flow-Through Audit Plan filed with the GA PSC will not validate the process BellSouth is using to report flow-through on

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2. Order Status			
			actual CLEC local service requests submitted to BellSouth or for BellSouth's retail operations. Also, see AT&T's comments regarding Flow-Through Audit in Pre-Ordering 6a. MCIW: 100% of orders recently submitted to BellSouth via EDI did not flow through and fell out for manual intervention. BellSouth's contention that this lack of flow through was caused by ordering errors is incorrect. As explained in the Affidavits of Bryan Green filed on January 29, 1999 and April 12, 1999, BellSouth system errors caused the orders to fall out for manual processing." AT&T: The electronic flow through of CLEC orders submitted to BellSouth via the EDI and LENS interfaces remains discriminatory. BellSouth's actual flow-through rate for EDI orders in March was 58.3 %. In contrast, BellSouth's retail operations experienced flowthrough rates of 96.5 percent for residential orders and 83.20 percent for business orders in March. EDI flow through for April was 63.6% for May was 70.6% and for June was 72.7%. July fell to 33.7%. August fell even further to 23%.
f. Failure to disclose internal editing and data formatting.	BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO,	March 16, 1998 for Version 7.0	BellSouth: Completed.

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ORDERING			
2. Order Status			
	LESOG, and SOER.	January 30, 1998 for LEO, LESOG, and SOER	CLECs: Not completed. See Pre-Ordering 3e.
g. Failure to provide sufficient order summaries and/or order summary screen.	BST and the CLECs have committed to resolve this issue.	First Quarter 1998	BellSouth: Completed. Order summaries for LENS are available as of Release 4.1, implemented December 19, 1998. (EDI-PC has order summary already.) CLECs: Implemented for LENS only.
h. No means for CLECs to access and view pending orders.	BST and the CLECs have committed to resolve this issue.	First Quarter 1998	BellSouth: Completed. LENS has electronic viewing of pending orders status. For EDI, in the July 13, 1998 Change Control meeting where BellSouth surfaced this issue, the CLECs told BellSouth not to make any changes to EDI without their concurrence; BellSouth is trying to determine a way to implement this in EDI. BellSouth presented a recommended method to CLECs in an October 23 meeting. The 7/13 meeting minutes indicate, "Service/Company Jeopardies: CLECs requested to participate in the requirements process. BST advised that they are attempting to come up with a solution that would require minimum or no changes to the EDI map." BellSouth is working on giving CLECs the capability to view the actual pending orders. CLECs: BellSouth claims that it has completed this solution. The CLECs disagree. CLECs can change pending orders in EDI, but cannot view pending orders in BellSouth's SOCS. Without the ability to view a pending order in SOCS the CLEC cannot know if BellSouth human

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			intervention results in an unintended change to the CLEC order. BellSouth has not provided access to its internal systems that will give CLECs views into pending orders.
i. Lack of a system that provides adequate FOC information -- the "soft" FOC before facility availability is determined is inadequate.	BST shall provide the same guarantee of FOC information to CLEC that it provides to its retail operations.	January 30, 1998	BellSouth: Completed. See BellSouth's response to 2k. CLECs: Not completed. See Pre-Ordering 5b. LCI: See Pre-Ordering 5a.
j. EDI not fully automated, e.g. more than two thirds of orders placed through its electronic interfaces fall out for manual processing.	BST will share edits and all scenarios which produce order fall out for manual processing.	December 19, 1997	BellSouth: Completed. Edits have been shared with CLECs. It is unknown what efforts have been made by CLECs to incorporate these edits into their systems. CLECs: See 1st paragraph, Ordering 2e. LCI: See Ordering 2a.
k. EDI not capable of electronically transmitting necessary provisioning notices, i.e., error notices, reject notices, jeopardy notices, status reports.	In the interim, BST will work with carriers on the provision of timely notices.	January 30, 1998	BellSouth: Completed. This is a continuous process. As of December 19, 1998, EDI can electronically transmit service jeopardy notices, in addition to the customer-caused jeopardies and reject notices EDI has been providing. Electronic clarification and rejects for LNP was implemented 4/1/99 With respect to MCIW's comment concerning jeopardy notices for LNP, release 1.9.1 deployed May 30, 1999 added electronic notification of pending order status, including jeopardies. Carrier notification letter SN91081486 dated April 30, 1999 was posted to the BellSouth website advising of the forthcoming release

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2. Order Status			
			implementation. In reference to AT&T's comments concerning problems receiving completion notices, BellSouth received a list of 11 PONs from AT&T on 7-20-99 for which no completion notices were received. Investigation revealed that completion notices were not sent on the PONs because, even though the physical facility work was completed, BellSouth inadvertently did not complete the orders in its internal OSS. As a result, the PONs were archived in the LNP gateway. Nine (9) of the orders have now been completed in BellSouth's systems and completion notices have been sent. The remaining (2) orders have been completed in BST's internal OSS systems and BST is in the process of "forcing" the completion notices to AT&T. An initial analysis of the problem was returned to AT&T on 8-13-99. A root cause analysis for each PON and a corrective action plan is being prepared and will be sent to AT&T by 10-20-99. BellSouth's preliminary investigation results were sent to AT&T on 10-20-99. The final investigation results are being prepared. Final response was provided to AT&T on 11-9-99. Response included the action items required to complete resolution of the PONs and confirmation of the process for handling the service directory listings. In response to AT&T's comments concerning the list of PONs submitted on 10-25-99, BellSouth received the 8 additional

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			PONS on 10-25-99 and is currently investigating them. Per AT&T's request, the BellSouth Acct Team has scheduled a meeting with AT&T on Wednesday, November 10, to discuss this issue. The meeting was conducted on 11-10-99. During the meeting, it was determined that inconsistencies exist with the manner in which AT&T is submitting directory listing requests. AT&T will conduct further training. Additionally, AT&T requested it be included in the BellSouth process issue trial. The BellSouth CSM submitted a formal request to include AT&T in the trial. AT&T met with BellSouth on November 10 to discuss the problem of missing completion notices and incorrect customer service records. BellSouth acknowledged in this meeting that this is a problem for BellSouth, and exists for other CLECs as well as AT&T. AT&T agreed to continue to collect examples of completion notice and CSR problems to assist BellSouth in uncovering the cause and correcting the problem. Additionally, AT&T has asked BellSouth to investigate the lack of completion notice data in the PMAP performance reports provided to AT&T by BellSouth. CLECs Not Completed. Jeopardies for LNP orders. AT&T continues to have serious problems in receiving completion notices, although this

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			issue was referred to BellSouth months ago. AT&T-In response to BellSouth's comments regarding completion notices, AT&T continues to have problems receiving completion notices. Additionally, although BellSouth states that it corrected the problem on the PONs that AT&T identified, it has provided no information indicating that this problem will not reoccur, and indeed it has reoccurred. Apparently, nor have they even identified the problem for all the PONs AT&T identified, much less solved it, even though the list was provided to BellSouth in July. (Oct.). AT&T: AT&T continues to experience significant delays in BellSouth's updating of a customer's service record once a customer has ported service to AT&T. On October 25th AT&T submitted a new list of PONS for BellSouth to investigate. (Nov.) MCIW: As of 4/99, BST does not provide jeopardy notifications electronically for orders with LNP.
l. All necessary business rules not provided to CLECs; rules in LEO Guide in Error or internally inconsistent.	BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER	BellSouth: Completed. The LEO Guide is continually updated for new information. With respect to AT&T's comment below, new software release notices are not intended to provide CLECs with the detailed business rules. As the name implies, it is a notice of an upcoming release. The business rules are provided though updates

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			to the Local Exchange Ordering (LEO) Guides which are posted to the website in sufficient time for CLEC implementation. Additionally, AT&T is advised of these releases well in advance through the EICCP to include their targeted implementation dates. CLECs: Not completed. See Pre-Ordering 3e. AT&T: LEO guides are not updated concurrently with new software releases. The software release notices are insufficient in that they only provide a list of changes, not the accompanying business rules or other information needed to implement the change. Additionally, AT&T has asked for a release schedule, but it has not been provided. MCIW: See Pre-Ordering 6a.
m. Batch processing is not real time or near real-time for ordering.	BST will explore event-driven EDI with AT&T and MCIW.	First Quarter 1998	BellSouth: BellSouth has stopped deploying an interactive agent at MCIW's request. CLECs: Not completed. The AT&T and MCIW EDI Gateway have the capability for event-driven interface. AT&T and MCIW continue to await BellSouth's implementation. MCIW: BellSouth has agreed to develop and implement EDI/TCP/IP/SSL3 upon MCIWWORLDCOM's request.

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n. Access to dedicated facility information is available only after the due date is assigned and not before which would enable a representative to immediately offer the same day service on a new install that does to require an additional line.	BST shall provide a full due date calculation capability in the pre-ordering mode of LENS.	April 30, 1998	BellSouth: Completed. This capability for inquiry mode was included in Release 4.0, which was implemented November 14, 1998. This capability exists in firm order mode. CLECs: This solution was implemented for LENS resale orders only. Additionally, it is not clear how this release will fix the problem of access to dedicated facility information. LCI: See Pre-Ordering 5a.
3. Manual Intervention			
a. Substantial numbers of LSRs placed via EDI being handled manually.	Issue addressed in 2e and 2j of Ordering. [BST will share edits and all scenarios which produce order fall out for manual processing.]	December 19, 1997	BellSouth: Completed. EDI can process 25 loops in 1 order. Initial partial migration orders are electronically supported, and are further supported in Release 4.2 implemented March 28, 1999 (non-LNP) and March 28, 1999 for LNP per the CLECs request for a common date. The letter MCIW references used exact wording proposed by MCIW in a NC Commission case. All of MCIW's referenced EDI loop orders contained MCIW order errors that caused them to fall out. Flow-through for the loop+LNP LSRs was implemented 1/17/99, after MCIW submitted their loop+LNP LSRs.

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ORDERING			
3. Manual Intervention			
			See BellSouth's comments in Pre-Ordering 3e regarding OSS'99 implementation and Ordering 1b regarding the ordering of digital loops and LNP. Because there is no restriction on the number of telephone numbers that can be ported on a single order, BellSouth needs clarification on AT&T's comment. CLECs: See Ordering 2e. Orders that require manual handling include, digital loops, UNE orders associated with complex directory listings, and orders for 15 or more unbundled loops, all partial migrations, and jeopardies for LNP orders. AT&T: Also see the Pate affidavit for additional orders that require manual handling. BellSouth's delay in implementation of OSS 99, its unwillingness to provide a reasonable solution for ordering digital loops and LNP, its restriction of the number of telephone numbers that can be ported on one order, etc. require CLECs to stay in a manual mode. MCIW: MCIW100% of recent UNE loop orders submitted to BellSouth electronically have fallen out for manual intervention. LCI: See Ordering 2a.

JOINT OSS STATUS REPORT
DOCKET NO. 8354-U
DECEMBER 10, 1999

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3. Manual Intervention			
b. No working EDI interface for ordering.	Not an issue.	N/A	N/A
c. EDI-PC not fully automated.	Not an issue at this time.	N/A	N/A
d. Process for ordering unbundled elements through LENS (information is entered into the "Remarks" section of the order screen and is manually retrieved and re-entered by BST).	BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER	BellSouth: Completed. CLECs: Not completed. See Pre-Ordering 3e.
e. Availability of an electronic interface that does not require manual intervention for the provisioning of unbundled loops.	BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER	BellSouth: Completed. CLECs: Not completed. See Pre-Ordering 3e. MCIW: See 2nd paragraph, Ordering 3a.
4. Edit Capabilities			
a. Failure to provide electronic edit capabilities with ordering and provisioning at parity with BST. Edit to comply with OBF ordering form requirements or BST business rules.	BST shall provide business rules to CLECs for Version 7.0 of EDI LEO, LESOG, and SOER.	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER	BellSouth: Completed. CLECs: Not completed. See Pre-Ordering 3e. MCIW: See Pre-Ordering 6a.
b. Inability to submit change orders (in case of errors, customer change order, and adding or removing features).	BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER	BellSouth: Completed. CLECs: Not completed. See Pre-Ordering 3e.
5. System Capacity			
a. Failure to provide systems with sufficient capacity to meet anticipated or reasonable demand. (Applies to both EDI and EDI-PC).	BST has agreed to provide the methodology utilized to calculate present system capacity and its proposed plan for expanding system capacity.	December 31, 1997	BellSouth: The GA PSC under docket number 8354-U has ordered BST to establish a third party testing program. The testing program will provide transaction and operational testing, as well as, volume testing. A test plan was filed with the GA PSC on 6/1/99.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
5. System Capacity			
			BellSouth disagrees with the comments provided below by AT&T and MCIW concerning the third party test plan. Obviously there is not an understanding as to the full scope of the test. HP is using EDI-PC only to BEGIN the test, facilitating the placing of orders for the functional test, and they will be testing all features that are currently available in the version 7.0 map which is fully OBF compliant. MCIW seems to imply that testing should wait for the next release of software (Version 9.0), even though MCIW has indicated that it does not intend to implement 9.0 in the near future. Additionally, HP is building a separate EDI interface for volume testing, which will demonstrate a CLEC's ability to construct the interface from the current documentation. CLECs: Not completed. BellSouth has provided summary level reports regarding capacity testing, but BellSouth has not provided the detailed methodology and assumptions used to conduct the tests. The summary level reports contain many defects and unanswered questions about BellSouth's capacity testing. The FCC Louisiana 271 Order found "nor is there any evidence of volume testing of CGI-LENS...BellSouth fails to show, through either commercial use or testing, that it can provide access to network elements through collocation in a timely manner that would

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
5. System Capacity			
			allow new entrants to recombine elements to meet reasonable foreseeable demand." AT&T The third party test plan filed by BellSouth in Georgia will not evaluate non-discriminatory access, nor will it ensure that CLECs have the OSS they need to compete in the local market. MCIW: MCIW agrees with AT&T. Another problem with the test with respect to ordering is its reliance on EDI PC, which uses EDI specifications that are outdated, not OBF compliant, and do not include all functionalities that should be tested. EDI PC was grandfathered in April 1999. To make matters worse, BellSouth does not even propose to test all the functionalities it has added to EDI 7.0 since it was first released. Nothing in BellSouth's response changes the accuracy of the AT&T and MCIW's comments
b. Insufficient testing of systems and test documentation. (Applies to both EDI and EDI-PC).	Issue addressed in 1a and 1b of General Section. [BellSouth, AT&T, MCIW and Sprint started a series of meetings on December 11, 1997 to develop a Process Document addressing and resolving these "change management" issues. This series of meetings and development of the document are supposed to conclude by January 31, 1998. One additional CLEC will also be notified so that	January 30, 1998	BellSouth: Completed. The Change Control process does include appropriate BellSouth initiated and Regulatory changes, such as service jeopardies in EDI, which BellSouth discussed in the 7/13 change control meeting. LCI uses EDI, not LENS for ordering. LENS was not down "the majority of the time" during the first 3.0 week of 7/27/98: LENS had no operational problems. There were 3 outages with the Internet access to LENS, which have been fixed; the dial-in access remained operational. BellSouth has

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
5. System Capacity			
	they can have some input. The parties view this as positive, interactive solution.]		suggested clarification of the Change Control Process document discussing Regulatory changes in the November 16 Change Control meeting. Release 4.0 (November 14) is the first release where change control items began to be implemented. The GA PSC under docket number 8354-U has ordered BST to establish a third party testing program. The testing program will provide transaction and operational testing, as well as, volume testing. A test plan was filed with the GA PSC on 6/1/99. In response to AT&T's comments concerning the requests submitted via the change control process, BellSouth re-instated the three "canceled" change controls requests as pending on 9-10-99. The CLEC prioritization list was revised on 9-10-99 to include the three requests BellSouth received AT&T's June 23rd change control request. The Change Control Acknowledgement Notification was returned to AT&T on 7-27-99. Additionally BellSouth has discussed this request with AT&T on numerous occasions the last being 9-14-99. BellSouth is evaluating all of these requests. The request is being managed via the EICCP. The status of the request can be obtained via the EICCP Change Request Log and the 9-28-99 EICCP Enhancement Review Meeting (ERM) minutes posted on the BellSouth website at http://www.interconnection.bellsouth.com/m

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
5. System Capacity			
			arkets/lec/eiccp/eiccp.htm. Additionally, an AT&T representative was in attendance at the EICCP ERM conducted on 9-28-99 at which this request was discussed. CLECs: BellSouth published a document entitled "Electronic Interface Change Control Process." The document appears to apply only to changes to existing OSS requested by CLECs. It does not appear to apply to BellSouth initiated changes or the development of new OSS such as API. Such "internal" changes are most critical to CLEC's ability to manage OSS changes. Additionally, BellSouth continues to state in regulatory proceedings that the change control process does not apply to regulatory decisions, although the agreed-upon change control document states that it does. Also, BellSouth has not responded to two written communications from AT&T seeking clarification on this issue. CLECs are in the process of preparing proposed improvements to the change control process. .BellSouth continues to make changes to its OSS but BellSouth has yet to submit an item to the change control process. AT&T: Notwithstanding any informal discussions of changes that may occur between CLECs and BellSouth, the end result is BellSouth's unilateral decision, rather than having items managed by change control.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
5. System Capacity			
			BellSouth's inappropriate power over the change control process was again manifested when BellSouth recently unilaterally "cancelled" three change control requests of AT&T, requiring escalation to have them reinstated. Further, a critical AT&T June 23rd change control request has been escalated by AT&T to BellSouth but still not addressed. AT&T: In response to BellSouth's comments regarding change control, AT&T asks that the Commission note although BellSouth's comments only indicate discussions that occurred in September, there is much more to the story. Only after repeated calls to AT&T's account team in July did AT&T receive a verbal acknowledgement of its request on July 20, weeks after the deadlines established for the change control process. As of October 7, no resolution exists, over three months later. Importantly, this change request is an attempt to correct a BellSouth problem that has direct negative impact on customers who have requested AT&T service. AT&T: On November 3, over four months later, no resolution exists to this critical business issue; it is being "managed" via the EICCP. (Nov.) MCIW LCI: Software upgrades sent by BellSouth

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
5. System Capacity			
			are routinely problematic. Judging from the number of problems following the installation of a Bell South upgrade, it does not appear that BellSouth tested the upgrade prior to initiation. For example, during the first week of LENS 3.0 upgrade, LCI provisioners had to submit 19 orders via fax because LENS 3.0 was not in operation the majority of the time. When the system was operational, it was extremely slow. The lack of readiness in BellSouth software upgrades has caused LCI to expend additional effort, time and resources in its efforts to submit orders to BellSouth.
c. Inadequate field for directory listings. (Applies to both EDI and EDI-PC).	Issue addressed in 1a and 1b of General Section. [BellSouth, AT&T, MCIW and Sprint started a series of meetings on December 11, 1997 to develop a Process Document addressing and resolving these "change management" issues. This series of meetings and development of the document are supposed to conclude by January 31, 1998. One additional CLEC will also be notified so that they can have some input. The parties view this as positive, interactive solution.]	January 30, 1998	BellSouth: Completed CLECs: See response to 5b above.
6. Integration			

6. Integration			
a. LENS, EDI, and EDI-PC are not integrated to provide direct, unmitigated access to BST's legacy systems for pre-ordering and ordering functions.	Closed Issue (BST will provide systems specifications so that CLECs can build their own interfaces to integrate).	December 31, 1997	BellSouth: N/A. CLECs: BellSouth has provided LENS-CGI specifications to CLECs. The specifications provided, however, are inadequate to integrate pre-ordering and ordering functions in a manner that is equivalent to the integration that BellSouth provides its own retail operations. CGI raises serious security and robustness concerns for e.spire, more fully explained in the Georgia OSS hearing. Also see Pre-Ordering 8 a.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
ORDERING			
6. Integration			
b. LENS must be utilized with additional interfaces such as the TAFI system and EDI-PC in order to meet additional CLEC needs.	Not an issue	N/A	N/A
c. Insufficient information provided new entrants to develop a system compatible with Phase II EDI.	Issue addressed in 2f of Ordering and 1a and 1b of the General Section. [BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG, and SOER.] [BellSouth, AT&T, MCIW and Sprint started a series of meetings on December 11, 1997 to develop a Process Document addressing and resolving these "change management" issues. This series of meetings and development of the document are supposed to conclude by January 31, 1998. One additional CLEC will also be notified so that they can have some input. The parties view this as positive, interactive solution.]	March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG, and SOER January 30, 1998 for Process Document	BellSouth: Completed. The Change Control process does include appropriate BellSouth initiated changes, such as service jeopardies in EDI, which BellSouth discussed in the 7/13 change control meeting. CLECs: Not completed. See Pre-Ordering 3e. Also, see 1st paragraph, Ordering 5b.
d. LENS, EDI, and EDI-PC require dual entry by entrants into their own ordering/customer records systems.	Closed Issue (BST will provide systems specifications so that CLECs can build their own interfaces to integrate).	December 31, 1997	See Pre-Ordering 8a.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
BILLING			
1. System Capability			
a. BST has failed to provide systems relating to detailed access usage data for UNEs for billing purposes.	BST will provide access daily usage file (ADUF).	December 31, 1997	BellSouth: Completed. AT&T has been provided the daily ADUF since July 24, 1998. The issue of records missing from the AT&T ADUF file was raised by AT&T on July 31, 1998 and investigated by BellSouth. The root cause of the problem stems not from the ADUF process but from the OCN information populated on the port account. The information on the account was changed on July 29, 1998. The daily file sent to AT&T on July 31, 1998 contains records associated with calls placed from the port in question. AT& T provided BellSouth details of a second claim of missing ADUF records on October 14, 1998. AT&T stated that three test calls placed 8 weeks prior to the notification were not represented on the ADUF. After investigating the claim BellSouth could not find any evidence that the calls described by AT&T were made. BellSouth stands ready to investigate any other ADUF issue that is raised by AT&T. AT&T's claim that over 40% of the test calls placed are not represented on the ADUF is not accurate. The latest claim made by AT&T that the ADUF did not provide complete information was sent to BellSouth on January 12, 1999. Again, AT&T claimed that certain usage records were missing from the ADUF. Again, upon investigation, it was determined by BellSouth that all appropriate records, with the exception of a handful of call record was provided on the ADUF weeks prior to receiving the dispute. Fortunately, AT&T has agreed to the long-Standing offer made by BellSouth to meet to

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
BILLING			
1. System Capability			
			discuss any outstanding issues with the ADUF. On February 4, 1999 AT&T and BellSouth met to discuss the ADUF. With the exception of a handful of usage records which were involved in error correction efforts by BellSouth, all records which AT&T claimed to have expected and which BellSouth could find evidence of calls being placed in its network were provided on the files. Several claims made by AT&T were found to be errors on the side of AT&T's efforts to process the ADUF on its side of the interface. ADUF enhancements were implemented on October 31, 1998 to provide records for the one remaining call scenario that is currently not provided for on ADUF. This involves records for intra-LATA toll calls, carried by BellSouth, terminating to unbundled switch ports. All other intra-LATA (and intrastate) data is currently provided on ADUF. The appropriate processes needed to begin sending ADUF data to MCIW were implemented on December 16, 1998. No call that would generate ADUF records was seen in BellSouth's network until January 10, 1999. Due to a problem in completing all the steps required to transmit the files, the data was not transmitted until 2/5/99. This delay affected three usage records. Additional ADUF customer added in May, 1999. Total records provided per month now exceeds 1 million. No customer has reported

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
BILLING			
1. System Capability			
			any specific issues with the records being provided since the AT&T issues document above. CLECs: AT&T has begun receiving ADUF files, however, they remain inaccurate and incomplete. AT&T's analysis of the ADUFs it has been provided indicates that certain test call data continues to be missing Until testing is completed successfully the ADUF is not available in a practical manner.
b. BST has failed to provide systems to bill for UNEs, including local loops, local transport and switching via CABS or using a CABS format.	This is a contractual issue and therefore no proposed solution is offered in the context of this technical workshop.	N/A	N/A
c. BST does not have the capability to record usage data or generate mechanized bills for many network elements. BST is not capable of providing usage sensitive for those UNEs that have usage sensitive pricing such as transport, switching, and signaling.	BST shall furnish an accurate paper bill in accordance with interconnection agreements.	February 15, 1998	BellSouth: Completed. BellSouth has addressed all billing errors referred by the CLECs; have resolved them and applicable adjustments have been made to the appropriate accounts. To the best of BellSouth's knowledge, accurate bills are being provided to CLECs for unbundled network elements. AT&T's claim that usage UNE billing entries lack the rates and minutes of use information is not correct. AT&T has not reviewed the bills which have been provided to it on the CABS electronic billing feeds since September, 1998. The account numbers for these bills were communicated to AT&T on 2/5/99 to assist in this review. In September, 1998 BellSouth provided information to AT&T describing the new bills

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
BILLING			
1. System Capability			
			which would be received with the details for UNE usage. BellSouth continues to stand ready to assist AT&T with any additional information that would be useful to explain these bills. Beginning with UNE bills provided in September, 1999, BellSouth will be using the CBOS guidelines derived at the Ordering and Billing Forum. The new bill record types will provide generally the same information as provided previously but will adhere to the CBOS release 31 formats. CLECs were notified of this change via a customer notification letter on the BellSouth website. CLECs: BellSouth is now providing mechanized bills, however, they are inaccurate and incomplete. AT&T: AT&T continues to receive inaccurate and incomplete bills. Additionally, BellSouth has yet to provide rate and minutes of use information for usage sensitive elements. A letter from Fost Haley of BellSouth dated September 9, 1998 stated that this capability would not be available until mid-1999.
d. BST cannot electronically transmit originating and terminating recording information for interstate calls and does not know when it will be able to do so.	BST will provide access daily usage file (ADUF).	December 31, 1997	BellSouth: See Billing 1a. CLECs: See Billing 1a.
e. BST has failed to provide systems that accurately produce bills for resold services.	Not an issue.	N/A	N/A
f. BST has failed to provide systems for accessing usage data for flat rate calls.	BST will add capability in its central offices to capture data for flat rate	December 1998	BellSouth: Completed on December 31, 1998. BellSouth completed the implementation of the

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
BILLING			
1. System Capability			
	calls.		programming software needed to provide CLECs with usage records for flat-rate local calls. These records were provided to MCIW in Florida effective with that date. An announcement of this new capability was posted to the BellSouth website on December 18, 1998 and written notice was filed with the GPSC on 12/23/98. BellSouth has developed contract language which services as the vehicle for a CLEC to request these usage records. The language spells out the responsibilities for both parties and services to ensure that no gaps in understanding is left between BST and the CLEC. To date, no CLEC in Georgia has made a formal request for these records. CLECs:. CLECs such as AT&T and MCIW have access to this information as part of their interconnection agreement with BellSouth and should not have to request to receive it.
g. BST is not providing usage rates for Information Service Provider (e.g. N11) calls even though BST agreed to in middle 1996 and are required to by the AT&T/BST Interconnection Agreement.	CLECs have the ability to negotiate their own contracts with ISPs.	N/A	N/A
h. BST has failed to provide systems for mechanically generated billing statements.	BST shall furnish an accurate paper bill in accordance with interconnection agreements.	February 15, 1998	BellSouth: Completed. BellSouth has addressed all billing errors referred by the CLECs; have resolved them and applicable adjustments have been made to the appropriate accounts. To the best of BellSouth's knowledge, accurate bills are being provided to CLECs for unbundled network elements. AT&T's claim that usage UNE billing entries

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
BILLING			
1. System Capability			
			lack the rates and minutes of use information is not correct. AT&T has not reviewed the bills which have been provided each month to it on the CABS electronic billing feeds since September, 1998. The account numbers for these bills were communicated to AT&T on 2/5/99 to assist in this review. Beginning with the UNE bills provided in September, 1999, BellSouth will be using the CBOS guidelines derived at the Ordering and Billing Forum. The new bill record types will provide generally the same information as provided previously but will adhere to the CBOS release 31 formats. CLECs were notified via a customer notification letter on the BellSouth website. CLECs: BellSouth has yet to provide rate and minutes-of-use information for usage sensitive elements. A letter from Foster-Haley of BellSouth dated September 9, 1998 stated that this capability would not be available until mid-1999. AT&T: AT&T continues to receive inaccurate bills. Billing for UNEs includes loop and port charges only. AT&T: AT&T has recently escalated an issue it has been working on with BellSouth on to resolve billing on interconnection trunking. The issue revolves around the use of ACNA and CIC information in BellSouth's ordering and billing systems.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
BILLING			
1. System Capability			
			For some time, AT&T has been discussing with BellSouth the use of ACNA codes in ordering local trunks. Due to the inability of the CABS billing system to bill correctly without the presence of a CIC, BellSouth maintained that AT&T "must" use a CIC with the local services ACNA of "LOA." Additionally, BellSouth has objected to AT&T's use of its "LOA" ACNA code in conjunction with AT&T's "288" CIC code. AT&T has unsuccessfully explored with Lockheed the assignment of a new CIC code for AT&T's use in ordering BellSouth services and facilities to be used in connection with AT&T's local service operations Because of this inability to obtain a new CIC code, and because it was trying to assist BellSouth in working around the limitations of CABS, AT&T has proposed alternatives to BellSouth. AT&T first proposed to use its "LOA" ACNA code with no CIC code. This is certainly in compliance with the ATIS/OBF-ASR-004 guidelines, effective February 20, 1999, and implemented February 27, 1999. On page 3-22, Section 16. CIC – Carrier Identification Code, the OBF rules state that, unless the order is for a new Feature Group "D" or "B" request, the inclusion of a CIC code is optional. Notwithstanding this clear authority, BellSouth objected to this alternative. AT&T then proposed that BellSouth assign AT&T a CIC code from the "9000" series for AT&T's use with its "LOA" ACNA code. This

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
BILLING			
1. System Capability			
			range is classified as "unassignable" by the NANPA and is to be used by the industry on a INTRA-network basis only. CLECs and ILECs reached handshake agreements to use one of these 9000 CICs exclusively between their networks and the problem was thought to be resolved. AT&T has entered into 3 or 4 such agreements. BellSouth has refused to make this assignment via Randy Jenkins' letter of October 22, 1999. Not only has BellSouth refused this alternative, Randy informs us that BellSouth plans to change all "LOA" billing account numbers to AT&T's "ATX" ACNA code beginning October 31, 1999. In light of BellSouth's position, AT&T is compelled to begin issuing all trunk orders with the "LOA" ACNA with no CIC, as outlined in the OBF guidelines. This will assure that charges for BellSouth services and facilities used in connection with AT&T's local service operations will not appear on the same billing statement for BellSouth services and facilities concerning AT&T's non-local service operations. In order for AT&T to make a proper determination of which charges shown on each billing statement rendered by BellSouth relate to which AT&T operations, it is necessary that separate statements be rendered to each AT&T operation. These charges would continue to be mixed together if the "LOA" ACNA code is associated with the "288" CIC code. Accordingly, BellSouth must cease its plans to

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POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
BILLING			
1. System Capability			
			change AT&T's billing account numbers to "ATX."
2. Billing Accuracies			
a. CABS formatted bills were to be implemented by August 2, 1997, AT&T still has not received accurate CABS bills.	This is a contractual issue and therefore no proposed solution is offered in the context of this technical workshop.	N/A	N/A

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
GENERAL			
1. Notice of Changes			
a. Insufficient notice of changes.	BellSouth, AT&T, MCIW and Sprint started a series of meetings on December 11, 1997 to develop a Process Document addressing and resolving these "change management" issues. This series of meetings and development of the document are supposed to conclude by January 31, 1998. One additional CLEC will also be notified so that they can have some input. The parties view this as positive, interactive solution.	January 30, 1998	BellSouth: Completed. The minutes from the 7/13 Change Control meeting indicate BellSouth did introduce changing EDI to add service jeopardies, "Service/Company Jeopardies: CLECs requested to participate in the requirements process. BST advised that they are attempting to come up with a solution that would require minimum or no changes to the EDI map." Regulatory driven changes, such as service jeopardies in EDI, are discussed in change control as needed. BellSouth posts notice of systems changes regularly on the web. Major changes are posted 3-weeks to 30 days in advance of the release. BellSouth is posting the Releases schedule on the web as well. CGI specification updates were/will be posted as follows: for Release 4.0, a draft two weeks prior and final five business days prior to the release date; for Release 5.0, a draft 30 days prior and final one week prior to the release date. Release 4.0 (November 14) began to implement some change control items. See BellSouth's comments regarding OSS'99 implementation in Pre-Ordering 3e. Following is in response to AT&T's comments concerning unannounced changes to BellSouth operating procedures. Per a request from AT&T, BellSouth provided written instructions in September 1999 for handling Directory Listing Requests (DLR) for the remaining service on partial migrations. The

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
GENERAL			
1. Notice of Changes			
			instructions advised the disposition of the remaining lines must be provided by AT&T in the remarks section of the LSR. These DLR procedures are being changed. BellSouth is preparing a CLEC notification to be placed on the BellSouth web site. However during November 1999, BellSouth's LCSC began clarifying the DLR back to AT&T. The clarifications were premature and the LCSC is no longer clarifying the DLR back to AT&T. BellSouth has not made changes in the Operating Company Number (OCN) operating procedures. When AT&T's Q billing accounts were established, an OCN was assigned for each Q account. Both the Q account and the OCN are populated on the LSR. The LSR must contain the correct OCN and Q account numbers. The BellSouth Account Team recently investigated this issue for AT&T. It was determined that AT&T has been submitting LSRs with incorrect OCN numbers and BellSouth's LCSC representatives were accepting the LSRs and correcting the OCN information. The LCSC is now clarifying the LSRs back to AT&T per the existing BellSouth operating procedures. BellSouth has not made changes in the operating procedures for Access Customer Terminal Location (ACTL). The ACTL information identifies the serving central office and the type of equipment requested by the CLEC, such as physical collocation, virtual collocation, etc. BellSouth provided AT&T the ACTLs as they were established. The CLEC is responsible for

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
GENERAL			
1. Notice of Changes			
			maintaining a list of the ACTLs. However, the BellSouth Account Team has recently worked this issue with AT&T and has provided AT&T a list of the correct ACTLs and the associated N billing account numbers. CLECs: See Ordering 5b. See AT&T's comments regarding OSS'99 implementation in Pre-Ordering 3e. MCIW: BellSouth's posting of changes on the web does not meet the requirements established by the Change Control Process. MCIW requires final CGI specifications reflecting any screen changes at least 4-6 weeks prior to release implementation. BellSouth has proposed that preliminary specs be provided two weeks prior followed by final specs three days prior, which is unacceptable. CLECs need more detail in order to determine what changes, if any, are required. LCI: BellSouth has not provided advanced notice or adequate documentation on the requirements needed to implement software upgrades. BellSouth has implemented software upgrades before providing LCI the requirements to meet the upgrade. For example, BellSouth initiated EDI 3050 in April 1998, however the EDI 3050 LEO Implementation Guide was not made available to LCI until July 1998.

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
GENERAL			
1. Notice of Changes			
			Notification for major upgrades, such as LENS 3.0, should be made directly to CLEC contacts. In the case of LENS 3.0, BellSouth merely placed a general customer announcement on the BellSouth website and provided no further attempt to inform LCI of this upgrade. In both situations, the lack of prior notification and required information preclude LCI from making necessary plans and preparations to conform with BellSouth software changes and negatively impacts our production. AT&T (December)--At the end of November BellSouth made several unilateral and unannounced changes to their operating procedures at the LCSC which has resulted in the rejection of virtually all of AT&T's LSRs for its Georgia ALS unit (UNE loops and loop migrations), and serious operating problems for other AT&T groups. AT&T first received notice of these changes via rejected orders. --Requiring a separate Directory Listing Order for the services remaining at BellSouth on a partial migration. This information had been previously been provided in remarks. --Requiring that AT&T move from a regional Operating Company Number (OCN) to state specific number. --Rejecting Access Customer Termination Location (ACTL)

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
GENERAL			
1. Notice of Changes			
			information appropriately obtained from the BellCore database. Additionally, BellSouth's business rules on how to populate this information are incorrect.
b. Insufficient documentation of specifications.	BellSouth, AT&T, MCIW and Sprint started a series of meetings on December 11, 1997 to develop a Process Document addressing and resolving these "change management" issues. This series of meetings and development of the document are supposed to conclude by January 31, 1998. One additional CLEC will also be notified so that they can have some input. The parties view this as positive, interactive solution.	January 30, 1998	BellSouth: Completed. CLECs: See response to 1a above. On September 1, 1999, AT&T requested through the change control process that BellSouth document its business rules for TAG pre-order.
2. Proprietary Interface			
a. Interim interface.	EDI & API will be based on industry standards and therefore can be integrated and available for machine-to-machine use.	EDI Version 7.0 by March 16, 1998 API by December 31, 1998	BellSouth: Completed. Six CLECs have fully implemented TAG for both preordering and ordering. One CLEC has implemented TAG for pre-ordering only. With reference to AT&T's comment, BellSouth's disagrees that there was anything "misleading" about the TAG implementation dates of August 30, 1998 for pre-ordering and November 1, 1998 for ordering. The system was available for production on these dates. BellSouth has no control as to when a CLEC chooses to enter production. Results noted 532 TAG LSR submissions, a

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GENERAL			
1. Notice of Changes			
			62% increase over the previous month's volume. TAG flow-through rate for July was 93.8%.for the July 1999 Flow-Through Report note a significant increase in LSR volume processed via TAG .

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
GENERAL			
2. Proprietary Interface			
			The GA PSC under docket number 8354-U has ordered BST to establish a third party testing program. The testing program will provide transaction and operational testing, as well as, volume testing. A test plan was filed with the GA PSC on 6/1/99. CLECs: BellSouth states that the status is "completed" although the ordering implementation timeframe for API is ostensibly November, 1998. Additionally, API pre-ordering is also not complete. See Pre-Ordering 1d. AT&T: BellSouth's claimed "implementation" dates in August and November of 1998 for this interface are misleading. No company "early adopter" or otherwise entered the production mode for any portion of this interface until January 1999, and none entered production for ordering until March 1999. . In April there were 14 local service requests placed by CLECs attempting to use TAG in May there were 5. BellSouth has provided no test data or commercial usage data.
b. Not compatible with industry standard EDI interfaces.	EDI & API will be based on industry standards and therefore can be integrated and available for machine-to-machine use.	EDI Version 7.0 by March 16, 1998 API by December 31, 1998	BellSouth: Completed. CLECs: See Response to 2a above
c. CLECs cannot integrate pre-ordering and ordering at parity with BST.	EDI & API will be based on industry standards and therefore can be integrated and available for machine-to-machine use.	EDI Version 7.0 by March 16, 1998 API by December 31, 1998	BellSouth: Completed. CLECs: See Response to 2a above

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DOCKET NO. 8354-U
DECEMBER 10, 1999

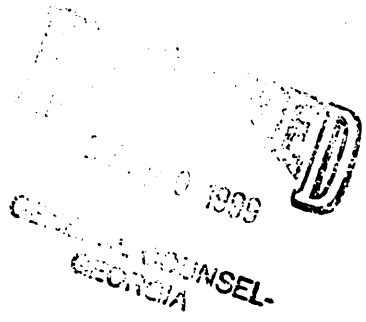
POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	STATUS
GENERAL			
2. Proprietary Interface			
d. Need for machine-to-machine or Application Programming Interface for pre-ordering.	EDI & API will be based on industry standards and therefore can be integrated and available for machine-to-machine use.	EDI Version 7.0 by March 16, 1998 API by December 31, 1998	BellSouth: Completed. CLECs: See Response to 2a above.
3. Training			
a. Usage specs not made available.	Issue addressed in 1a and 1b.	January 30, 1998	BellSouth: Completed. CLECs: See 1st paragraph, Ordering 5b. MCIW: See General 1a.
b. Documentation incomplete, has errors.	Issue addressed in 1a and 1b.	January 30, 1998	BellSouth: Completed. CLECs: See response to 3a above.
c. BST personnel lack adequate training.	Issue addressed in 1a and 1b. Also, BST to provide feedback on orders submitted for CLEC information in training their own staff.	January 30, 1998	BellSouth: Completed. CLECs: See response to 3a above. Also, BellSouth has not provided AT&T with feedback its orders on a regular basis.
4. Information			
a. Information is not provided to show parity (i.e. CLEC tour of BST facilities).	Not a technical issue to be resolved in this docket.	N/A	N/A

AT&T

Law & Government Affairs

Suite 8100
1200 Peachtree Street, N.E
Atlanta, GA 30309-3579

December 17, 1999



BY HAND DELIVERY

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

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

Dear Ms. O'Leary:

Enclosed please find an original and fifteen (15) copies of **"AT&T's Comments"** 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

Recycled Paper

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

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

AT&T's COMMENTS

AT&T Communications of the Southern States, Inc. ("AT&T") hereby files its Comments in response to issues raised by BellSouth Telecommunications, Inc. ("BellSouth") in its response to AT&T's Comments on KPMG's Interim Status Reports and Supplement to Motion for Reconsideration of the Commission's Order for Third-Party Testing.

AT&T previously filed an analysis of the Revised Master Test Plan and the FCC Letter with this Commission on November 5, 1999, as well as its comments regarding Interim Status Reports filed with this Commission on November 15, 1999, and December 9, 1999. AT&T hereby incorporates those comments herein.

BellSouth now states in its comments that it has developed and will conduct two "additional evaluations" and is proposing to develop and conduct these additional valuations without the Commission's guidance or oversight, using unidentified metrics and standards, and without any input from CLECs. While AT&T agrees that additional tests are critical, the plan proposed by BellSouth in its comments will not satisfy the requirements set forth in the FCC letter, as AT&T will explain below. Additionally, BellSouth makes conflicting statements about the current test plan and status that differ

from what has been submitted by KPMG to this Commission. AT&T addresses some of these issues below.

COMMON CARRIER BUREAU LETTER TO US WEST

In its filing, BellSouth attempts to convince this Commission that it complies with criteria for third-party OSS testing set forth in the September 27, 1999 letter to US West, Inc., from Lawrence E. Strickling, Chief of the FCC's Common Carrier Bureau (the "FCC letter"). The FCC letter sets forth seven elements that should be included in a third- party OSS test:

(1) Performance measures evaluations;
(2) Change management test;
(3) xDSL testing;
(4) Normal, high and stress volume testing;
(5) Pseudo-CLEC;
(6) Dissemination of information; and
(7) Functionality.

BellSouth asserts that the current test plan complies with three of these criteria ((4), (5), and (6)); that additional evaluations, which BellSouth asserts need not be incorporated in the test plan, will allow it to comply with two more criteria ((2) and (3)); and that the test plan need not be modified to meet the remaining two criteria ((1) and (7)) because they are either covered by the current testing or somehow would be redundant. However, a review of the Revised Master Plan indicates that this Commission should issue an Amendatory Order to incorporate the FCC's guidance, which is discussed below.

(1) Performance measures evaluations: The FCC letter states that an independent review of performance measurements is "crucial in determining the accuracy and validity of performance data.." (FCC letter at 1, emphasis added.) BellSouth's test,

however, simply is not designed to determine the accuracy and validity of its performance measures and, therefore, cannot comply with this requirement.

The FCC letter sets forth specific qualitative and quantitative requirements for an appropriate evaluation of performance measures. Although BellSouth concedes that this area "may not be fully addressed" in the current test plan (BellSouth Response at 5), it wishes to avoid fully addressing the issue, suggesting that "any additional testing would be duplicative of data already in the Commission's possession" and that "[t]he level of detail envisioned by the [FCC Common Carrier] Bureau is redundant and unnecessary..." (BellSouth Response at 7). Instead, BellSouth assures the Commission that its monthly performance data reports, the ability of CLECs to audit its performance data, and the KPMG "audit" of flow-through data render this requirement unnecessary. However, the performance data reports have never been subject to any evidentiary review or independent testing. An independent CLEC audit of its own performance data does not provide adequate evidence to review BellSouth's obligation to provide nondiscriminatory OSS access, and the KPMG flow-through evaluation is too limited to satisfy the requirements set forth in the FCC letter.

Indeed, the FCC letter sets forth expectations for "a thorough and well-documented independent assessment of the data collection and calculation processes for performance data..." (FCC letter at 1.) The KPMG flow-though evaluation, however, does not purport to assess BellSouth's performance measures. Instead, the test is limited to an evaluation (not an audit, as BellSouth professes) of BellSouth's flow-through data, which is only a small subset of its performance measures. Most of BellSouth's

performance measures will not be tested at all, let alone subjected to the rigorous review outlined in the FCC letter.

According to the FCC letter, performance measures evaluations should be thorough, well-documented, and independent, and should cover data collection as well as calculation. The letter sets forth five minimum qualitative and quantitative requirements:

- Accuracy of raw data collection should be tested.
- The process by which raw data is filtered and transformed into final, reported results should be evaluated.
- Data collection and processing functions should be compared with published performance measurement business rules to determine consistency.
- Internal controls over data collection processes and the software programs that process the data should be assessed.
- The independent tester would conduct a quantitative verification, in which it would independently process the raw data to ensure correct application of the stated business rules and algorithms.

(FCC letter at 2.)

BellSouth's test does not address these areas outlined in the FCC letter. The test cannot answer some of the most basic questions about BellSouth's performance measures, such as:

- Is the data that BellSouth reports accurate?
- Does the data show that the service BellSouth provides to CLECs is equal in quality to that which it provides to its own customers?
- Does BellSouth have controls in place to ensure that data collection remains consistent over time?
- Does BellSouth have controls in place to ensure that data being reported are accurate and have not been changed?
- Can KPMG replicate from the raw data the reports BellSouth produces?

BellSouth's test, contrary to the FCC's guidance, is not designed to determine the accuracy and validity of its performance measures and, therefore, cannot provide answers to those questions. Indeed, performance measures are largely unaddressed by BellSouth's test.

(2) Change management test: The FCC letter states that an independent review of change management processes, procedures and implementation is "critical". (FCC letter at 2.) BellSouth is proposing to perform its own additional evaluation that will not be formally incorporated into the current test plan. If the Commission were to accept BellSouth's plan, this additional evaluation would not be described in detail, reviewed by CLECs, or scrutinized by the Commission.[1] The scope, objectives, metrics, and standards of this evaluation remain unknown. Change control is a key issue for CLECs. BellSouth continues to make changes to its OSS, and CLECs need to receive complete, accurate, and timely notification of all such changes before they take effect. Without such notice, CLECs cannot make necessary changes to their interfaces and procedures to ensure that their customers will not be adversely impacted.

(3) xDSL testing: The FCC letter states that the independent tester should test "significant volumes" of orders for xDSL-capable loops. (FCC letter at 3.) BellSouth's proposal of an additional evaluation is not formally incorporated into the test plan, is not adequately described, has not been reviewed by CLECs and would not be subject to approval by this Commission.[2] Once more, the scope, objectives, metrics and standards of this evaluation are entirely unknown.

(4) Normal, high and stress volume testing: The FCC letter notes that the test should include projected normal and high volumes of pre-order and order flow-through transactions, which would replicate the transactions expected from CLECs and which

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[1] The limited description of this crucial test is found on the bottom of page 5 of BellSouth's Response: "KPMG will conduct and certify results for the following: Evaluate the Electronic Interface Change Control Process as applied to the implementation of Release 6.0 (a/k/a OSS '99) . . . ."

[2] The description of this test is no less cryptic: "KPMG will conduct and certify results for the following: . . . Evaluate the current pre-ordering and ordering and provisioning capacity management for xDSL capable loops." (BellSouth Response at 5, 6.)

would include errors and change orders. Additionally, the test should include capacity (stress) testing at volumes "significantly greater than the high volume test" which would be "sufficient to identify potential weak points in the systems." (FCC letter at 3, 4.) The current test plan calls for only a limited amount of testing in the production environment, to be conducted at volumes no greater than "normal".[3] (BellSouth Response at 4.) BellSouth also points out that KPMG is conducting testing at high volumes in the RSIMMS test environment, however, there is no evidence to indicate that this RSIMMS test environment will satisfy the FCC's concerns that the evaluation be "sufficient to identify potential weak points in the systems." (FCC letter at 4.) Further, a review of the test plan reveals that no stress volume testing will be performed.

What this Commission needs to know is whether BellSouth's OSS can handle the kinds of volume that will occur when there are promotional product offerings or when demand for telecommunications service peaks beyond expectations. BellSouth's OSS must be capable of handling large volumes of orders in a timely manner. If not, the customer desiring to change carriers or who has changed carriers suffers. This Commission could be inundated with complaints about failure to receive service, service interruptions, billing inaccuracies, and inability to disconnect service. High volume and stress testing will assure that BellSouth's OSS is operationally ready to handle the volume of orders expected in a competitive market when CLECs, including AT&T, enter the market, on a broad scale commercial basis.

(5) Pseudo-CLEC: According to the FCC letter, a pseudo-CLEC has two important functions: it should build an OSS interface to test the quality of the BOC's

[3] The test plan includes contradictory language regarding whether test volumes will be normal or at current transaction load levels – which is even less than projected normal volumes.

OSS documentation, and it should determine whether the system, once built, can send and receive valid transactions. (FCC letter at 4.) BellSouth argues that its test plan meets this requirement, stating that Hewlett Packard constructed interfaces using available documentation and training, KPMG is evaluating the documentation and Hewlett Packard's use of it, and KPMG is building TAFI and ECTA interfaces. (BellSouth Response at 4.)

Although Hewlett Packard constructed an EDI and TAG interface, there were no test objectives, reporting requirements, or criteria for evaluating the adequacy of BellSouth's documentation. As this aspect of the test was not evaluated, there is no evidence available to determine whether Hewlett Packard received special assistance or information from BellSouth not otherwise provided to CLECs. Nor will KPMG build TAFI and ECTA interfaces. There is no interface to build for TAFI, because it is a text terminal access into a BellSouth system, and KPMG is using a BellSouth test interface to access ECTA. (KPMG Interim Status Report, November 19, 1999.) Thus, the BellSouth test fails to meet this requirement.

This Commission needs information to evaluate whether or not a new CLEC entering the market can, based upon the information made generally available by BellSouth, build interfaces that allow the CLEC to obtain, serve, and retain customers in competition with BellSouth. BellSouth's test, as revised by KPMG, fails to provide this information.

(6) Dissemination of information: According to the FCC letter, the test should include a "formal, predictable and public mechanism for the third party tester to communicate to both the BOC and the CLEC community issues . . . that arise during the

course of testing." (FCC letter at 4.) BellSouth asserts that the filing of interim test reports, coupled with "feedback" via the KPMG reporting process, meets this requirement.

The comments filed by AT&T and other CLECs in this docket attest to the highly limited dissemination of information from the test -- CLECs lack access to such basic information as the KPMG Test Project Schedule and the Agreed Upon Exception Process. The exceptions process does not correct for this deficiency. Descriptions of exceptions posted to the Commission's web site are neither timely nor sufficiently detailed to allow meaningful CLEC understanding of and input to the process.

Allowing CLECs to take part in the process will not delay or hinder the test. AT&T and others can provide KPMG with valuable information about what their customers actually are experiencing. AT&T and others can evaluate whether or not BellSouth is providing information to KPMG that has not been provided to CLECs. AT&T and others could assist KPMG in understanding the major problems being experienced with BellSouth's OSS so that the test can focus on correcting these problems. Ultimately, CLECs must use BellSouth's OSS -- not BellSouth, the Commission, KPMG or HP. Accordingly, CLECs should be allowed to participate in the test. This type of input from CLECs and a focus on correcting OSS problems will ultimately support rapid market entry and result in a higher quality of customer service.

(7) Functionality: The FCC letter envisions that the independent tester would consult with CLECs to develop specific test scenarios based on real-world CLEC market entry and growth plans, after which it would conduct end-to-end functionality testing for pre-

ordering, ordering, provisioning, maintenance and repair, and billing transactions. (FCC letter at 4, 5.) BellSouth argues that "[f]unctionality testing for resale orders would be... redundant" because Georgia CLECs currently order resale services in "commercial volumes" via BellSouth's electronic interfaces, the number of which "is identified in BellSouth's monthly flow-through report." (BellSouth Response at 7.)

BellSouth's argument is incorrect regarding the contents of its flow-through report and the need for functionality testing of resale orders. First, BellSouth does not identify the actual number of resale orders in its flow-through report, a deficiency noted by the FCC in its evaluation of BellSouth's 271 application for South Carolina and both Louisiana applications. Instead, BellSouth separately reports the number of "resale units" in service at the beginning of each month, which inflates the appearance of competition because it counts lines and features equally. For example, in the most recent reporting period, BellSouth reported a total growth of 1,379 units/day across its nine-state region. The number of orders processed to purchase these units was likely less than 700 per day for the entire region, far less than "commercial volumes". In the absence of true commercial volumes of resale orders, functionality testing remains necessary.

AT&T simply seeks to provide CLEC input into the type of functionality testing that KPMG plans to do, based upon real-world scenarios CLECs encounter in serving their customers.

CONCLUSION

In closing, as AT&T has demonstrated in its prior filings, BellSouth's test, as modified by KPMG, needs some adjustments to incorporate the FCC's guidance. In

addition, these adjustments would assist this Commission in its effort to determine if BellSouth's systems are in fact non-discriminatory. Although the Georgia Commission has spent an appreciable amount of time and labor to review BellSouth's OSS and performance measures, there is additional work that BellSouth must undertake before it can meet its obligation to provide nondiscriminatory OSS. The Commission should reject BellSouth's arguments and issue an Amendatory Order to ensure the Revised Master Test Plan by KPMG complies with the OSS testing requirements set forth in the FCC Letter.

Respectfully submitted this 17th day of December , 1999.

SUZANNE W. OCKLEBERRY
AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.
1200 Peachtree Street, N.E.
Suite 8100
Atlanta, GA 30309
(404) 810-7175

CERTIFICATE OF SERVICE - Docket No. 8354-U

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

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Gerry Friend & Sapronov
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Blumenfeld & cohen
1625 Massachusetts Avenue, NW
Suite 300
Washington, D. C. 20036

This 17th day of December, 1999.

SOCK Iddm

Suzanne W. Ockleberry

303 Peachtree Street, N.E.
Suite 2000
Atlanta, GA 30308

Telephone 404 222 3000
Fax 404 222 3050

January 20, 2000

Fred McCallum, Jr.
125 Perimeter Center West, Room 376
Atlanta, GA 30346

Dear Fred:

KPMG and the Georgia Public Service Commission (GAPSC) invite you to attend a CLEC meeting from 3-5pm on Tuesday, February 1, 2000 in the board room on the 20th Floor of the SunTrust Plaza Building at 303 Peachtree Street NE in Atlanta. If you would like to take part, but cannot attend in person, you may participate via conference call.

During this meeting, KPMG will announce arrangements for a weekly CLEC conference call to discuss the status of the BellSouth – Georgia OSS Evaluation, including test progress, exception resolution and other relevant developments.

If you would like to participate in this CLEC meeting, either in person or via conference call, please contact Christopher Casey of KPMG by Friday, January 28, 2000 at:

Christopher Casey
KPMG
270 Peachtree Street, NE, 10th Floor
Atlanta, GA 30308
Phone: (407) 492-7867
E-mail: Christophercasey@kpmg.com

In addition, KPMG will file the *BellSouth Telecommunications, Inc. OSS Evaluation – Georgia Supplemental Test Plan* (STP) with the GAPSC on Monday, January 24, 2000. Subsequently, KPMG will receive comments on the STP from CLECs through the close-of-business on February 3, 2000.

Comments must be made in writing and may be submitted to Christopher Casey at the business or e-mail address above.

Thank you for your interest. We look forward to your participation.

Sincerely,

Christopher Casey
KPMG

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

AT&T

Law & Government Affairs

Suite 8100
1200 Peachtree Street, N.E.
Atlanta, GA 30309-3579

January 26, 2000

Christopher Casey
KPMG
270 Peachtree Street, NE
10th Floor
Atlanta, GA 30308

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

Dear Mr. Casey:

This letter is to notify you that AT&T will participate in the CLEC meeting on Tuesday, February 1, 2000 from 3-5 p.m. The attendees will/may be one or more of the following:

David Eppsteiner
Jaimie Hardin
Pat Wingo
Shane Robinson
Suzanne Ockleberry
Jay Bradbury
Sharon Norris
Cheryl Bursch

If you have any questions, please contact me at the above address or at (404) 810-7175.

Sincerely,

SUZANNE W. OCKLEBERRY
Regulatory Attorney, Georgia

Recycled Paper

CERTIFICATE OF SERVICE

This is to certify that a copy of the within and foregoing AT&T's Notice of Participation 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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Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue, Room 520
Atlanta, GA 30334-5701

This 26th day of January, 2000.

Suzanne W. Ockleberry

303 Peachtree Street, N.E.
Suite 2000
Atlanta, GA 30308

Telephone 404 222 3000
Fax 404 222 3050

RECEIVED
JAN 2 8 2000
EXECUTIVE SECRETARY
G.P.S.C.

January 27, 1999

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

Dear Ms. O'Leary:

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

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of modified pages from the BellSouth - Georgia OSS Evaluation Master Test Plan Version 4.0. These pages represent an update to versions filed with the Commission on October 18, 1999, October 26, 1999 and December 16, 1999.

The updated pages contain material that is designed to provide the Commission and other interested parties with additional detail about various aspects of the evaluation.

The updated pages do not constitute a change in direction with respect to the testing, nor is it in conflict with the Commission's July 2, 1999 order approving BellSouth's Third Party Testing Plan.

Please file the pages and return one (1) file-stamped copy of the pages to us in the enclosed envelope.

Thank you for your assistance in this matter.

Very truly yours,

KPMG LLP

David Frey
Manager

Enclosures

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

VII. Maintenance and Repair Test Section

A. Overview

The purpose of this section is to define the specific maintenance and repair tests to be undertaken in evaluating the systems and related operational elements associated with BellSouth's maintenance of business with CLECs.

B. Scope

The maintenance and repair test scope is defined in the following table. The table identifies the test target, the interface under test, the primary test objective(s), the BST product offering, and the test technique(s) to be employed.

Test Cycle	*Test Dimensions*			
	Interface	*Primary Test Objective*	*Product Category*	*Test Technique*
M&R-1: TAFI Functional Test	TAFI	Functionality	UNE	Transaction Processing
M&R-2: ECTA Functional Test	ECTA	Functionality	UNE	Transaction Processing
M&R-3: ECTA Normal Volume Performance Test	ECTA	Volume Performance	Resale UNE	Transaction Processing
M&R-4: ECTA Peak Volume Performance Test	ECTA	Volume Performance	Resale UNE	Transaction Processing
M&R-5: TAFI Capacity Management Evaluation	TAFI	Processing Capacity	Resale UNE	Inspection Interview
M&R-6: ECTA Capacity Management Evaluation	ECTA	Processing Capacity	Resale UNE	Inspection Interview
M&R-7: M&R Performance Results Comparison	TAFI/ ECTA	Performance Reporting	Resale UNE	Performance Comparison, Inspection Interview

Test Cycle	Test Dimensions			
	Interface	Primary Test Objective	Product Category	Test Technique
M&R-8: TAFI Documentation Evaluation	TAFI	Documentation	Resale UNE	Document Review Interview
M&R-9: ECTA Documentation Evaluation	ECTA	Documentation	Resale UNE	Document Review Interview
M&R-10: M&R Process Evaluation	TAFI ECTA	Performance	Resale UNE	Document Review Inspection Interview

Note: Since TAFI is in large volume production in BellSouth's retail environment, no volume or peak tests are planned.

Figure VII-I: Maintenance & Repair Test Cycles

C. Test Cycles

1.0 M&R-1: TAFI Functional Test

1.1 Description

The TAFI Functional Test will evaluate the functional elements of the trouble reporting and screening process for telephone number assigned UNEs, as delivered to CLECs via the TAFI interface in BellSouth's production environment. This test cycle will be executed by exercising a defined set of TAFI functions associated with trouble management activities against test bed accounts.

The functional elements of TN-based UNE trouble reporting and screening to be specifically targeted by this test include the entry and resolution of trouble reports, query and receipt of status reports, access to test capabilities, access to trouble history, and error conditions.

TAFI functionality will be reviewed along with the documentation addressing its use. BellSouth will be required to identify or establish a test bed of TN-based UNE customer accounts for the purpose of this test.

The Test Manager will coordinate with BellSouth to ensure that BellSouth's and KPMG's performance measurement systems are prepared to track test transaction performance prior to beginning the test.

1.2 Objective

The objective of the TAFI Functional Test is to validate the existence of TAFI trouble reporting and screening functionality for telephone number-assigned UNE customers in accordance with the CLEC TAFI End User Training and User Guide.

1.3 Entrance Criteria

- Global Entrance Criteria satisfied.
- CLEC TAFI End-User Training and User Guide obtained.
- BellSouth's and KPMG's performance measurement tracking systems prepared to track test transactions.
- BellSouth's test bed customer account data loaded and verified by Test Manager.
- Expected results files and test logs completed.
- Test management tools installed and fully configured with test account data.
- TAFI account and security access tools established.
- TAFI terminal stations established and configured.
- TAFI connectivity established.
- Test execution team identified, scheduled, and trained.
- Test Plan and evaluation criteria defined and approved.

1.4 Test Scope

The test scope will address the following sub-processes and functions to evaluate TAFI functionality.

Objective: Functionality, Documentation, Interface *Test Technique: Transaction Processing*	
Sub-Process	***Function***
Trouble Reports	Create trouble report.
	Modify trouble report.
	Create repeat report.
	Create subsequent report.
	Retrieve LMOS recent status report.
	Execute manual queuing capabilities
	Execute supervisor functions
Access to Test Capability	Initiate port and loop-port test.
	View port and loop-port test results.
	Obtain customer line record.
	Obtain predictor results.
	View DLR (Display Line Record).
	View SOCS pending order (open issue).
	Close trouble report.
	Cancel trouble report.
Access Error Reports	Reset communications.
	Host request errors.
Trouble History	Retrieve trouble history.
Trouble Status	View pending ticket status.

Figure VII-II: TAFI Functional Test Scope

1.5 Test Activities

1. Review detailed test cycle checklist to ensure that all activities are addressed.
2. Assign TAFI Ids and assign terminals for testing.
3. Submit TAFI test case transactions according to schedule.
4. Log transaction identifier(s) and submission date/time stamp.
5. Receive transaction responses.
6. Log transaction identifier(s) and receipt date/time stamp.
7. Verify that transaction response contains expected results.
8. Analyze timeliness performance.
9. Flag any exceptions or mismatched responses and determine next steps in exception process.
10. Generate test results report.

1.6 Exit Criteria

- Global Exit Criteria satisfied.
- Exception resolution activities and reports completed.
- Expected results versus actual test case results reported.
- Test report generated.
- Exit review completed.

2.0 M&R-2: ECTA Functional Test

2.1 Description

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

The functional elements of TN-based and circuit identified UNE trouble reporting and screening to be targeted by this test include the entry and resolution of trouble reports, the query and receipt of status reports, *access to test capabilities*, access to trouble reports, and error conditions. The ECTA Functional Test will be conducted against BellSouth's production environment system.

ECTA functionality will be reviewed in conjunction with the documentation addressing its use.

BellSouth will be required to identify or establish a test bed of existing TN-based and circuit-identified UNE customer accounts for the purpose of this test.

The Test Cycle Manager will coordinate efforts with BellSouth to ensure that BellSouth's and KPMG's performance measurement systems are prepared to track Build test transaction performance prior to beginning the test.

2.2 Objective

The objective of the ECTA Functional Test is to validate the existence of ECTA trouble reporting and screening functionality for both telephone number assigned and circuit identified UNE customers in accordance with BellSouth's published specifications.

2.3 Entrance Criteria

- Global Entrance Criteria satisfied.
- ECTA documentation obtained.
- BellSouth's and KPMG's performance measurement tracking systems prepared to track test transactions.
- BellSouth's test bed customer account data loaded and verified by Test Manager.
- Expected results files and test logs completed.
- Test management tools installed and fully configured with test account data.
- ECTA account and security access tools established.
- ECTA terminals established and configured.
- ECTA connectivity established.
- Test execution team identified, scheduled, and trained.

- Test Plan and evaluation criteria defined and approved.

2.4 Test Scope

The test scope will address the following sub-processes and functions to evaluate ECTA functionality.

Objective: Functionality ***Test Technique: Transaction Processing***	
Sub-Process	***Function***
Trouble Reports	Create trouble report.
	Modify trouble report.
	Add trouble information.
	Cancel trouble report.
	Request trouble ticket status.
	Verify Repair Completion.
Access to Test Capability	*Conduct MLT test.*

Figure VII-III: ECTA Functional Test Scope

2.5 Test Activities

1. Review detailed test cycle checklist to ensure that all activities are addressed.
2. Assign ECTA IDs and terminals for testing.
3. Submit ECTA test case transactions according to schedule.
4. Log transaction identifier(s) and submission date/time stamp.
5. Receive transaction responses.
6. Log transaction identifier(s) and receipt date/time stamp.
7. Verify that transaction response contains expected results.
8. Analyze timeliness performance.

9. Flag any exceptions or mismatched responses and determine next steps in exception resolution process.
10. Generate test results report.

2.6 Exit Criteria

- Global Exit Criteria satisfied.
- Exception resolution activities and reports completed.
- Expected results versus actual test case results reported.
- Test report generated.
- Exit review completed.

3.0 M&R-3: ECTA Normal Volume Performance Test

3.1 Description

The ECTA Normal Volume Performance Test will evaluate the behavior and performance of the ECTA interface under "normal" YE01 projected transaction load conditions. This test cycle will be executed by a test transaction generator capable of submitting large volumes of resale services and UNE trouble test cases in a manner consistent with ECTA's current and forecasted daily usage patterns and transaction mix, including error conditions.

BellSouth's estimates of YE01 trouble reports for ECTA will be used to calculate hourly transaction levels. The test will be executed during two ten-hour periods by modeling the expected normal daily usage (*e.g.*, the off-peak nighttime hour loads will be excluded for the test). Trouble transaction loads will be distributed geographically across multiple Georgia COs to more accurately reflect a realistic operating environment. BellSouth will ensure that customer test accounts are established and configured accordingly.

The Test Manager will coordinate efforts with BellSouth to ensure that BellSouth's and KPMG's performance measurement systems are prepared to track Build test transaction performance prior to beginning the test.

3.2 Objective

The objective of the ECTA Normal Volume Performance Test is to measure the performance of the ECTA interface under normal projected YE01 transaction loads.

3.3 Entrance Criteria

- Global Entrance Criteria satisfied.
- M&R-2: ECTA Functional Test successfully completed.
- Test transaction tracking data elements identified.
- Normal volume level defined.
- BellSouth's and KPMG's performance measurement tracking systems prepared to track transactions.
- Successful certification testing for ECTA completed.
- Test Plan defined and approved.

3.4 Test Scope

The test scope will address the following sub-processes and functions to evaluate ECTA normal performance.

Objective: Functionality, Volume Performance, and Interface ***Test Technique: Transaction Processing***	
Sub-Process	***Function***
Submit Trouble Transactions in Projected Normal Volumes	Create trouble report.
	Modify trouble report.
	Add trouble information.
	Cancel trouble report.
	Request trouble ticket status.
	Verify repair completion.

Figure VII-IV: ECTA Normal Volume Performance Test Scope

3.5 Test Activities

1. Submit ECTA test case transactions according to schedule.
2. Log transaction identifier(s) and critical performance responsiveness/time stamp information.
3. Verify that transaction responses meet expected results.
4. Flag any exceptions or mismatched responses and determine next steps in exception resolution process.
5. Perform volume responsiveness analysis.
6. Generate test results reports.

3.6 Exit Criteria

- Global Exit Criteria satisfied.
- Exception resolution activities and reports completed.
- Expected results versus actual test case results reported.
- Test report generated.
- Exit review completed.

4.0 M&R-4: ECTA Peak Volume Performance Test

4.1 Description

The ECTA Peak Volume Performance Test will evaluate the behavior and performance of the ECTA interface under peak YE01 projected transaction load conditions. This test cycle will be run following the execution of the ECTA Normal Volume Performance Test (M&R-3) and will utilize a sample of resale services and UNE trouble test cases, including error conditions.

The peak volume forecast will be developed using the peak hourly load identified for the ECTA Normal Volume Performance Test and replicating those transaction volumes across an eight-hour period. Alternatively, a multiple may be applied to the non-peak hourly load and the result replicated across an eight-hour day. The methodology and calculations are discussed further in **Appendix C: Volume Analysis**.

The peak volume test will be executed during two separate eight-hour periods. BellSouth will ensure that customer test accounts are established and configured accordingly. Trouble transaction loads will again be distributed geographically across multiple Georgia COs to more accurately reflect a realistic peak load operating environment.

The Test Cycle Manager will coordinate efforts with BellSouth to ensure that BellSouth's and KPMG's performance measurement systems are prepared to track Build test transaction performance prior to beginning the test.

4.2 Objective

The objective of the ECTA Peak Volume Performance Test is to measure the performance of the ECTA interface under peak projected YE01 transaction loads.

4.3 Entrance Criteria

- Global Entrance Criteria satisfied.
- M&R-3: ECTA Normal Volume Test successfully completed.
- Test transaction tracking data elements identified.
- Peak level volume defined.
- BellSouth's and KPMG's performance measurements tracking systems prepared to track transactions.
- Successful certification testing for ECTA test tools completed.
- Test Plan defined and approved.

4.4 Test Scope

The test scope will address the following sub-processes and functions to evaluate ECTA peak performance.

Objective: Functionality, Volume Performance, and Interface ***Test Technique: Transaction Processing***	
Sub-Process	***Function***
Submit Trouble Transactions in Projected Peak Volumes	Create trouble report.
	Modify trouble report.

Objective: Functionality, Volume Performance, and Interface *Test Technique: Transaction Processing*	
Sub-Process	***Function***
	Add trouble information.
	Cancel trouble ticket.
	Request trouble ticket status.
	Verify repair completion.

Figure VII-V: ECTA Peak Volume Performance Test Scope

4.5 Test Activities

1. Submit ECTA test case transactions according to schedule.
2. Log transaction identifier(s) and critical performance responsiveness/date/time stamp information.
3. Verify that transaction responses meet expected results.
4. Flag any exceptions or mismatched responses and determine next steps in exception resolution process.
5. Perform volume responsiveness analysis
6. Generate test results report.

4.6 Exit Criteria

- Global Exit Criteria satisfied.
- Exception resolution activities and reports completed.
- Expected results versus actual test case results reported.
- Test report generated.
- Exit review completed.

5.0 M&R-5: TAFI Capacity Management Evaluation

5.1 Description

The TAFI 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 TAFI interface.

5.2 Objective

The objective of this evaluation is to determine the extent to which procedures to accommodate increases in TAFI system transaction volumes and users are being actively managed.

5.3 Entrance Criteria

- Global Entrance Criteria satisfied.
- Availability of documentation identified as input.
- Interview Guide / Questionnaire developed.
- Interviewees identified and scheduled.
- Detailed evaluation checklists developed.

5.4 Test Scope

The test scope will address the following sub-processes involved in evaluating the management processes and capabilities of BellSouth to support capacity changes in the TAFI process.

Objective: Capacity Management ***Test Technique: Inspection and Interview***	
Sub-Process	***Function***
TAFI Capacity Management	Data collection and reporting of business volumes, resource utilization, and performance monitoring.
	Data verification and analysis of business volumes, resource utilization, and performance monitoring.
	Systems and capacity planning.

Figure VI-VI: TAFI Capacity Management Test Scope

5.5 Test Activities

The test scope will address the following sub-processes and functions to evaluate TAFI capacity management.

1. Review procedural and other documentation related to TAFI capacity management.
2. Conduct interviews with key systems administration and support personnel as appropriate.
3. Document findings.
4. Resolve exceptions.

5.6 Exit Criteria

- Global Exit Criteria satisfied.
- Exception resolution activities and reports completed.
- Expected results versus actual test case results reported.
- Test report generated.
- Exit review completed.

6.0 M&R-6: ECTA Capacity Management Evaluation

6.1 Description

The ECTA 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 ECTA interface.

6.2 Objective

The objective of this evaluation is to determine the extent to which procedures to accommodate increases in the ECTA system transaction volumes and users are being actively managed.

6.3 Entrance Criteria

- Global Entrance Criteria satisfied.
- Availability of documentation identified as input.
- Interview Guide / Questionnaire developed.

- Interviewees identified and scheduled
- Detailed evaluation checklists developed.
- Test Plan and evaluation criteria defined and approved.

6.4 Test Scope

The test scope will address the following sub-processes involved in evaluating the management processes and capabilities of BellSouth to support capacity changes in the ECTA process.

Objective: Capacity Management ***Test Technique: Inspection and Interview***	
Sub-Process	***Function***
ECTA Capacity Management	Data collection and reporting of business volumes, resource utilization, and performance monitoring.
	Data verification and analysis of business volumes, resource utilization, and performance monitoring.
	System and capacity planning.

Figure VII-VII: ECTA Capacity Management Evaluation Test Scope

6.5 Test Activities

The test scope will address the following sub-processes and functions to evaluate ECTA capacity management.

1. Review procedural and other documentation related to ECTA capacity management.
2. Conduct interviews with key systems administration and support personnel as appropriate.
3. Document findings.
4. Resolve exceptions.

6.6 Exit Criteria

- Global Exit Criteria satisfied.
- Exception resolution activities and reports completed.

- Expected results versus actual test case results reported.
- Test report generated.
- Exit review completed.

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

7.1 Description

The M&R Performance Results Comparison is a comparative analysis of M&R performance results collected by KPMG test management tools and by BellSouth's OSS performance measurement system. The source results collected from M&R-1: TAFI Functional Test, M&R-2: ECTA Functional Test, M&R-3: ECTA Normal Volume Performance Test, and M&R-4: ECTA Peak Volume Performance Test will be compared to BellSouth's performance results; accuracy and trends will be identified; and disparities will be analyzed for significance.

7.2 Objective

The objective of the M&R Performance Results Comparison is to assess the accuracy of BellSouth's wholesale performance metrics results using Build test transactions.

7.3 Entrance Criteria

- Global Entrance Criteria satisfied.
- Results comparison strategy defined.
- Target M&R performance metrics identified.
- Keys required for BellSouth to separate Build transactions identified.
- TAFI/ECTA Functional Tests completed with disaggregated performance metrics reports (including raw data in electronic form).
- Functional tests will include faults where appropriate.
- ECTA Normal and Peak Volume Performance Tests completed with disaggregated performance metrics reports (including raw data in electronic form).
- Test execution scheduled.
- Test logs created and results reporting template completed.

- Test execution team staffed, scheduled, and trained.
- Test Plan and evaluation criteria defined and approved.
- Guidelines for measuring variances defined.

7.4 Test Scope

The test scope will address the following sub-processes and functions to compare performance results.

Objective: Performance ***Test Technique: Performance Comparison***	
Sub-Process	***Function***
Missed Repair Appointment	UNE Designed.
	UNE Non-Designed.
Percentage of Subsequent Reports	UNE Designed.
	UNE Non-Designed.
Maintenance Average Duration	UNE Designed.
	UNE Non-Designed.
Out of Service > 24 Hours	UNE Designed.
	UNE Non-Designed.
Repeat Troubles within 30 Days	UNE Designed.
	UNE Non-Designed.
OSS Response Interval	UNE Designed.
	UNE Non-Designed.
Average Answer Time	UNE Designed.
	UNE Non-Designed.

Figure VII-VIII: M&R Performance Results Comparison Test Scope

7.5 Test Activities

1. Acquire and format BellSouth performance data files.
2. Compare disaggregated BellSouth performance results with Build performance results.
3. Flag any unexplained variance(s) in results comparison and determine next steps in exception and resolution process.
4. Generate comparative analysis results reports.

7.6 Exit Criteria

- Global Exit Criteria satisfied.
- Comparative analysis report completed.
- Results variance findings documented.
- Exception report completed.
- Test cycle results summary report completed.
- Exit review completed.

8.0 M&R-8: TAFI Documentation Evaluation

8.1 Description

The TAFI Documentation Evaluation is an analysis of the BellSouth-provided documentation used by CLECs to interface and interact with the TAFI interface for maintenance and repair activities. This evaluation is intended to review the availability, accuracy, and completeness of BellSouth's maintenance and repair documentation using a variety of operational analysis techniques. This test uses records of observations from M&R-1: TAFI Functional Test and CLEC TAFI End User Training Manuals to identify exceptions in documentation and functionality described in the business rules.

8.2 Objective

The objective of the TAFI Documentation Evaluation is to assess whether the documentation provided by BellSouth adequately assists CLECs in understanding how to implement and use all of the TAFI functions available to them.

8.3 Entrance Criteria

- Global Entrance Criteria satisfied.

- TAFI documentation obtained.
- Teams staffed, scheduled, and trained.
- Documentation evaluation checklists completed.
- Test Plan and evaluation criteria defined and approved.
- Interview guide/questionnaire developed.
- Interviewees identified and scheduled.
- Exception reports due to documentation from M&R 1: TAFI Functional Test obtained.
- BellSouth and CLEC documentation order specialist and user contact information obtained.
- Process for logging incidents defined and accepted.

8.4 Test Scope

The test scope will address the following sub-processes and functions to evaluate TAFI documentation along with additional relevant information identified during the test.

Objective: Documentation ***Test Technique: Document Review and Interview***	
Sub-Process	***Function***
M&R Documentation	CLEC TAFI End-User Training and User Guide.
	CLEC Training Guide (M&R Sections).
	TAFI Online Help.
	Carrier Notifications on BellSouth's website.

Figure VII-IX: TAFI Documentation Evaluation Test Scope

8.5 Test Activities

1. Obtain relevant documentation needed to carry out business processes related to M&R.

2. Conduct documentation evaluation using documentation evaluation checklist.
3. Conduct interviews with BellSouth documentation specialists.
4. Conduct interviews with CLEC documentation users.
5. Log incidents noted during test.
6. Compile results.
7. Flag any exceptions or mismatched responses and determine next steps in execution resolution process.

8.6 Exit Criteria

- Global Exit Criteria satisfied.
- Documentation checklists completed.
- Interview summaries completed.
- Exception report(s) completed.
- Summary evaluation report completed.
- Exit review completed.

9.0 M&R-9: ECTA Documentation Evaluation

9.1 Description

The ECTA Documentation Evaluation is an analysis of the BellSouth-provided documentation used by CLECs to interface and interact with the ECTA interface for maintenance and repair activities. This evaluation is intended to review the accuracy, ease of use and conformance to ANSI standards of BellSouth's maintenance and repair documentation using a variety of operational analysis techniques. This test will use records of observations from M&R-2: ECTA Functional Test and CLEC ECTA End User Joint Implementation Agreement (JIA) to identify issues with documentation and functionality described in the business rules.

9.2 Objective

The objective of the ECTA Documentation Evaluation is to comment on whether the documentation provided by BellSouth adequately assists CLECs in understanding how to implement and use all of the ECTA functions available to them.

9.3 Entrance Criteria

- Global Entrance Criteria satisfied.
- ECTA documentation obtained.
- Teams staffed, scheduled and trained.
- Documentation evaluation checklist completed.
- Test Plan and defined and approved.
- Issues due to documentation from M&R-2: ECTA Functional Test obtained.
- Process for logging issues defined and accepted.

9.4 Test Scope

The test scope will address the following sub-processes and functions to evaluate ECTA documentation along with additional relevant information identified during the test.

Objective: Documentation ***Test Technique: Document Review and Interview***	
Sub-Process	***Function***
M&R Documentation	
	Joint Implementation Agreement (JIA) for Electronic Communications Trouble Administration (ECTA) Gateway for Local Service.

Figure VII-X: ECTA Documentation Evaluation Test Scope

9.5 Test Activities

1. Obtain relevant documentation needed to carry out business processes related to M&R.
2. Conduct documentation evaluation using documentation evaluation checklist.
3. Log incidents noted during testing.

4. Compile results.
5. Flag any exceptions or mismatched responses and determine next steps in execution resolution process.

9.6 Exit Criteria

- Global Exit Criteria satisfied.
- Documentation checklists completed.
- Interview summaries completed.
- Summary evaluation report completed.
- Exit review completed.

10.0 M&R-10: M&R Process Evaluation

10.1 Description

This evaluation is comprised of two major elements. The first (Sub-Test 1) evaluates the functional equivalence of BellSouth's M&R processes for wholesale and retail trouble reports. Process flows for wholesale and retail trouble management will be reviewed and evaluated along with technician methods and procedures (M&P) and job aids for wholesale trouble repair.

The second element (Sub-Test 2) involves the execution and observation of selected M&R test scenarios to evaluate BellSouth's performance in making repairs under the conditions of various wholesale maintenance scenarios.

10.2 Objective

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

10.3 Entrance Criteria

The entrance criteria for this test are presented by sub-test.

10.3.1 Entrance Criteria for Sub-Test 1

- Global Entrance Criteria satisfied

- Retail and Wholesale process flow documentation available.
- Retail and Wholesale Technician job aids (e.g. M&Ps) are available.

10.3.2 Entrance Criteria For Sub-Test 2

- Global Entrance Criteria satisfied.
- BellSouth's and KPMG's performance measurement tracking systems prepared to track test transactions.
- BellSouth test-bed and customer account data loaded and verified by Test Manager.
- Test scenarios selected and approved.
- Evaluation criteria, expected result files and test logs defined and approved.

10.4 Test Scope

The test scope will address the following sub-processes and functions to evaluate the M&R process.

Objective: Process Evaluation ***Test Technique: Inspection, Interview and Transaction Processing***	
Sub-Process	***Function***
1. End-to-End M&R Process	Compare process flow and work support documentation for retail and wholesale.
2. End-to-End Trouble Report Processing	Observe and assess trouble report processing under various wholesale maintenance conditions using BellSouth test facilities.

Figure VII-XI: M&R Process Test Scope

10.5 Test Activities

The test activities for this test are presented by sub-test.

10.5.1 Test Activities Sub-Test 1

1. Identify and obtain all process and work support (e.g. M&Ps) documentation available for review.
2. Review documentation and identify differences between wholesale and retail processes.
3. Interview BST personnel to ascertain parity in M&R process between retail and wholesale.
4. Flag any exceptions and determine next steps in exception resolution process.
5. Document process analysis results.

10.5.2 Test Activities Sub-Test 2

1. Confirm that test bed facilities are operational and introduce faults as needed.
2. Conduct circuit test if applicable for each test scenario.
3. Log test results.
4. Create and submit trouble ticket via TAFI or ECTA.
5. Periodically monitor each trouble report throughout its life.
6. Log significant events in the trouble report life cycle (error occurrences, corrections, trouble ticket submission time, time cleared, etc.)
7. Calculate time to repair measurements for each test scenario fault repaired.
8. Document observations.
9. Flag any exceptions or mismatched responses and determine next steps in exception resolution process.
10. Generate test results report.

10.6 Exit Criteria

- Global Exit Criteria satisfied.
- Exception resolution activities and reports completed.
- Expected results versus actual test case results reported.
- Test report generated.
- Exit review completed.

BEFORE THE PUBLIC SERVICE COMMISSION
OF
GEORGIA

RECEIVED
FEB 2 9 2000
GENERAL COUNSEL
GEORGIA

DOCKET NO. 8354

IN RE: Investigation into Development of Electronic Interfaces For BellSouth's Operational Support Systems (OSS)	)	**Petition To Intervene**

Comes Now, ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom ("ITC^DeltaCom"), pursuant to § 515-2-1.06 of the Rules of the Georgia Public Service Commission ("Commission") and respectfully petitions to intervene in the above-referenced proceeding. In support of its Petition, ITC^DeltaCom states as follows:

1. ITC^DeltaCom is a competitive local exchange carrier with its corporate headquarters located at 1791 O.G. Skinner Drive, West Point, Georgia 31833.

2. ITC^DeltaCom has actively participated in the KPMG administered Third Party Testing program which was ordered by the Georgia Public Service Commission ("Commission") in Docket No. 8354 on May 20, 1999. Specifically, ITC^DeltaCom has participated in the Third Party Testing by scheduling interviews with ITC^DeltaCom personnel and KPMG and by setting aside ITC^DeltaCom facilities to be used to assist KPMG for the OSS testing.

3. No party will be prejudiced by allowing this late intervention whereas ITC^DeltaCom's rights and interests may be substantially affected by decisions and orders by the Commission pursuant to this proceeding.

4. No other party can adequately represent ITC^DeltaCom's interests.

WHEREFORE, ITC^DeltaCom respectfully requests that the Commission grant the instant Petition to Intervene in full allowing ITC^DeltaCom to participate fully as a party of record including the right to present testimony and exhibits, cross-examine witnesses, and file briefs.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that I have served copies of the Petition to Intervene of ITC^DeltaCom Communications, Inc., d/b/a ITC^DeltaCom upon the following parties of record by first class mail, this 10th day of February, 2000.

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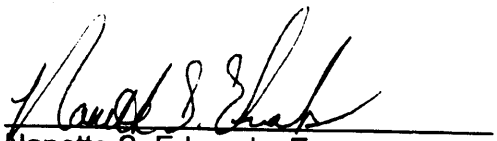

Nanette S. Edwards, Esq.

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February 18, 2000

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

Re: Docket No. 8354-U; Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems; Our File No. 6325/22020

Dear Ms. O'Leary:

This letter will serve as official notice that I shall no longer appear as counsel in the above-referenced matter. Please forward all correspondence to counsel for AT&T to Suzanne Ockleberry, Esquire, Law & Government Affairs, AT&T Communications of the Southern States, Inc., 1200 Peachtree Street, Suite 8077, Atlanta, Georgia 30309.

Thank you for your assistance in this matter.

Very truly yours,

MORRIS, MANNING & MARTIN, L.L.P.

Laureen McGurk Seeger

LMS/*td*
cc: Attached Distribution List
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RECEIVED
MAR 10 2000
GENERAL COUNSEL-
GEORGIA

March 7, 2000

VIA OVERNIGHT DELIVERY

Ms. Nicole Giugno
KPMG Consulting
270 Peachtree Street, N.E.
Suite 1050
Atlanta, Georgia 30303

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

Dear Ms. Giugno:

Per your request, ITC^DeltaCom hereby files this letter to identify the concerns that we have with the LNP test currently being conducted by KPMG in Georgia. As you know, ITC^DeltaCom has actively participated in Georgia's Third Party testing of BellSouth's Operational Support Systems ("OSS"). However, as a participant in the LNP test, ITC^DeltaCom has identified several deficiencies that we believe KPMG and the Commission should be aware of. These deficiencies in the test concern a number of key areas where ITC^DeltaCom has had, and continues to have, problems with BellSouth. These areas of concern will not be tested on the LNP orders submitted by KPMG. The result is BellSouth may pass the LNP test, but the customer affecting problems experienced by ITC^DeltaCom will go unaddressed.

The problem stems from the fact that the test lines that are being cutover do not involve any BellSouth cable pairs, but are lines that are terminated on jacks in BellSouth's central offices. Specifically, the LNP test does not capture the following problems:

- Due to the elimination of the outside plant facility (cable pair) from the cuts, the test does not reflect any issues that involve pending facility ("PF") orders and how that affects the Firm Order Confirmation ("FOC") date in relation with the Desired Due Date ("DDD").

- The test does not reflect any issues that arise when an order has to be placed into PF at the time of the cut, which usually happens when BellSouth chooses not to reuse the entire outside plant facility. Instead, BellSouth assigns the service to a different cable pair that has not been tested. When ITC^DeltaCom attempts to cut its customer over we discover that the cable pair is defective. This requires the cut to be called off and BellSouth's order is at that time placed in PF.

- The test will not reflect the problems we encounter when the integrity of the loops change after the cutover such as differences in circuit loss, circuit noise or the MilliAmp readings all of which can affect customer service.

- Unless there are inbound and outbound, local and long distance, On Net and Off Net and 911 test calls made immediately after the cutover, the test orders will not reflect any of the calling problems and issues that arise after real live cutovers. This includes the work and effort we have to go through with BellSouth to get these problems resolved, plus how the customer's service is adversely affected during this resolution.

While ITC^DeltaCom is pleased to see interest in the results of the cutover process, we have grave reservations that these mock cutovers will not address the real problems and issues that are experienced daily on live cutovers.

ITC^DeltaCom stands ready to work with KPMG, the Commission and the industry to address these concerns. Should you have any questions or need additional information, please contact me at (256) 382-3864.

Sincerely,

Brian Musselwhite
Regulatory Manager

cc: Commissioner Baker
Commissioner Burgess
Commissioner Durden
Commissioner McDonald
Commissioner Wise
Leon Bowles – Director Telecommunications
Parties of Record

CERTIFICATE OF SERVICE

This is to certify that I have served copies of ITC^DeltaCom's comments regarding the KPMG LNP test upon the following parties of record by first class mail, this 7th day of March, 2000.

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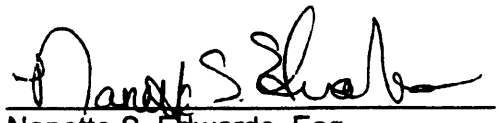

Nanette S. Edwards, Esq.

AT&T

Law & Government Affairs

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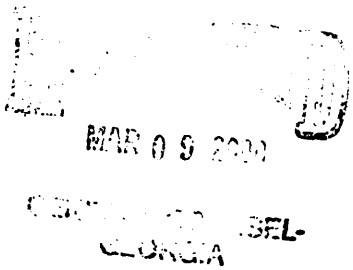
March 7, 2000



Christopher Casey
KPMG Consulting LLC
270 Peachtree Street, NE
10th Floor, Suite 1050
Atlanta, GA 30308

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

Dear Mr. Casey:

AT&T Communications of the Southern States, Inc. ("AT&T") hereby provides its Comments in response to the Supplemental Test Plan Version 1.1 ("STP") provided to the CLECs by KPMG for comment via electronic-mail on March 1, 2000.[1] In these comments AT&T addresses only the changes made by KPMG in Version 1.1 of the STP. Many of these changes are the result of individual comments by the parties on the initial version of the STP that was filed with the Georgia Public Service Commission on January 31, 2000. In its prior comments, AT&T provided recommendations and concerns covering thirteen (13) areas with supporting detail in two attachments. AT&T believes that the changes KPMG has made to incorporate AT&T's prior recommendations and concerns are appropriate and should be adopted in the final Supplemental Test Plan. In those instances where KPMG has declined to incorporate changes that would address AT&T's prior recommendations and concerns, AT&T strongly urges KPMG to amend the STP to include these prior recommendations. Additionally, KPMG has made several changes to the STP that raise new concerns. These areas including AT&T's recommendations for addressing the new concerns are discussed below. AT&T requests that KPMG amend the STP to include these new recommendations.

1. KPMG changed Appendix B: Resale Products for Functional Evaluation, to propose testing of those retail services that can be ordered electronically. KPMG did not propose to test those retail services which must be ordered manually. AT&T recommends that KPMG revise the Appendix to require testing of ***all*** retail services available for resale, not just those that can be ordered electronically. This addition is critical to provide the Georgia Commission with the complete picture of CLECs' experience in ordering services from BellSouth. Manual ordering is a key means by which CLECs provide service to their customers. Indeed, in some cases, it is the only

[1] See Attachment A for copy of electronic mail message from KPMG to CLECs.

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means by which they can order services for resale products. It is therefore essential to test BellSouth's manual ordering processes as well as their electronic ordering processes. Further, KPMG changed Appendix B to eliminate making any recommendation concerning whether the current volume of actual CLEC activities constitutes significant commercial usage. This change is appropriate.

2. KPMG's changes to various portions of the Performance Metrics Review Tests consist of the following:

- PMR2 - objective clarified to reflect that it "covers 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."
- PMR2 and PMR5 - an evaluation criteria is clarified to measure "Consistency between documented definitions and documented instructions for calculation."

These changes are insufficient to bring these tests into compliance with the FCC's guidance in the FCC Staff Letter to US West. Key remaining deficiencies include:

--Inadequate review of the accuracy of the raw data;
-- No evaluation of the process for developing standards;
--No evaluation of the process for developing metrics;
--Implementation test is limited to pseudo-CLEC test data, and does not include CLEC aggregate or retail data; and
--No review of SQM documentation process.

As the current evaluation falls short of what the FCC has indicated should be included in a third party test, AT&T reiterates its request that "The plan should be modified to comply with the FCC letter, as shown in Attachment B. (See Attachment B of AT&T's January 31, 2000 and Tab 4 of AT&T's November 5, 1999 filings.)

3. KPMG's changes in the Pre-Ordering, Ordering and Provisioning test section restructure and regroup tests in what appears to be an improved logical arrangement. However, some changes in this section do not address the following of AT&T's prior recommendations:

- The STP should be revised to require that the non-OSS99 interfaces used in the MTP be upgraded to OSS99 prior to initiating any transaction testing under the STP;
- All documentation to be reviewed should reflect the latest version of interfaces now in production, which currently is OSS99;
- The STP should be revised to provide a comprehensive evaluation of the manual ordering center process. (This version continues to reflect an evaluation of xDSL manual processing capabilities in isolation from other manual processes being

performed in the same centers and by the same personnel);

- The STP should be revised to test significant volumes of xDSL orders as required by the FCC;
- Each test should describe the type and scope of CLEC participation that will be included. (In the new PO&O 17, xDSL Process Parity Evaluation, no CLEC participation is proposed in a test whose objective is "to determine the degree to which the pre-order, order and provisioning environment supporting CLEC xDSL orders is on parity with BLS retail environment");
- The variance (in test results) should be determined between test performance and "measures and criteria identified by the GAPSC" as stated at page 3 of the STP.
- All information that could potentially result in an exception under any other test should be available to the Documentation Evaluation Test. (This version still calls for limiting the investigation to situations identified in Exceptions).

AT&T believes these changes and the others outlined in its January 31, 2000 filing with the Commission are necessary for the STP: 1) to conform to its objectives, 2) to represent the needs of the CLECs, and 3) to meet the requirements of the FCC. Accordingly, AT&T reiterates its request to KPMG to amend the STP to include these recommendations.

4. KPMG needs to clarify that where the testing of interfaces and or products and services has been combined into a single test description (PO&P 11, 12, 13, 14) the tracking and reporting of test results will be disaggregated by interface and or product and service rather than combined. Unless the results are disaggregated, poor performance by an interface or for a given product or service can be masked by combining it with good performance by or for other interfaces, products and services.

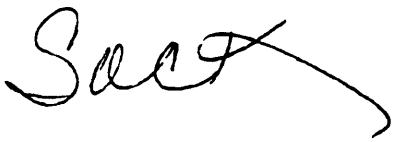
5. AT&T notes that KPMG revised the Objective Statement for PO&P11 to read "to validate the existence, functionality, and behavior of the interfaces and processes established by BLS for pre-ordering, ordering and provisioning transaction requests and responses," but retained the old language in PO&P12. KPMG should similarly revise and correct all Objective Statements.

6. In the Activities listing for PO&P 12, it appears that KPMG has omitted a step between steps 2 and 3. The omitted step should read "Receive transaction responses. Receipt date, time, response transaction type, and response condition (valid vs. reject) are logged." In this same listing, it also appears that KPMG unintentionally has included step 11, which now occurs as part of PO&P 13. KPMG should clarify this item.

7. KPMG's changes include reference to a High Speed Data Service Order Entry Gateway System (SOEG) (PO&P 12, 14, 16) and testing of ADSL wholesale

products (Scope @ page 28, and PO&P 16). AT&T is unfamiliar with the SOEG interface and notes that this is the first mention of ADSL wholesale products or SOEG ever to occur in association with this test. AT&T recommends that KPMG provide CLECs with a description of this interface, its use, the availability of the interface to CLECs, its supporting documentation and training, and the relationship of this interface and the ADSL wholesale products to the ordered testing. Once AT&T has had an opportunity to review these materials, it will be able to provide additional comments.

Respectfully Submitted,



SUZANNE W. OCKLEBERRY
Senior Regulatory Attorney

cc: Helen O'Leary, Executive Secretary
Commissioner Durden
Commissioner Burgess
Commissioner Baker
Commissioner McDonald
Commissioner Wise
Mr. Leon Bowles, Director, Telecommunications Division
Georgia Public Service Commission

McDonald,Christopher G (Chris) - LGA

Subject: FW: STP for CLEC commentary

Importance: High

GA_STP1.1_Draft_0301 00.pdf

-----Original Message-----
From: Casey, Christopher (US/Tyson's Tower)
[mailto:christophercasey@kpmg.com]
Sent: Wednesday, March 01, 2000 3:38 PM
To: 'bill.atkinson@mail.sprint.com'; 'drfuchs@mindspring.com'; 'mabrown@mediaone.com'; 'jkerkorian@mgcicorp.com'; 'rvjackson@netscape.net'; 'sr271lib@lga.att.com'; 'ttweedle@att.com'; 'nbekker@nextlink.com'; 'cboone@covad.com'; 'AWL@wsblaw.com'; 'bmusselwhite@itcdeltacom.com'; 'chudak@gfslaw.com'; 'bwells@gfslaw.com'; 'Milton McElroy (E-mail)'; 'Kathy Wilsonchu (E-mail)'; 'nancy.dillard@bellsouth.com'; 'bradbury@att.com'; 'jnovo@mpowercom.com'; 'tony.key@mail.sprint.com'; 'jim.a.lenihan@mail.sprint.com'; 'mrule@att.com'
Cc: Mayer, Robert H; Frey, David; Siegel, Jordana; Trudgian, Terrance E; US-BellSouth HPGA; Buljancevic, Aleksandra S
Subject: STP for CLEC commentary
Importance: High

Ladies and Gentlemen-

> Attached is the Supplemental Test Plan, Draft Version 1.1, for CLEC review
> and commentary. Version 1.1 addresses many of the comments provided by
> the CLEC community during KPMG's previous comment period.
>
As with the previous version, KPMG is soliciting CLEC comments on the Supplemental Test Plan, Draft Version 1.1.

> KPMG will accept CLEC comments on the Supplemental Test Plan, Draft
> Version 1.1, through the close of business on Monday, March 6, 2000.
>
> Comments should be forwarded to me (Christopher Casey) via email
> (christophercasey@kpmg.com) or US Mail at:
>
Christopher Casey
KPMG Consulting LLC
270 Peachtree Street NE
10th Floor, Suite 1050
Atlanta, GA 30308

If you have any questions or concerns, please feel free to contact me at (407) 492-7867.

Sincerely, Chris Casey

<<GA_STP1.1_Draft_030100.pdf>>

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****
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If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it, is prohibited and may be unlawful. When addressed to our clients any opinions or advice contained in this email are subject to the terms and conditions expressed in the governing KPMG client engagement letter.
****

CERTIFICATE OF SERVICE - Docket No. 8354-U

This is to certify that a copy of **"Comments of AT&T Communications of the Southern States, Inc. to Supplemental Test Plan Version 1.1"** 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 7th day of March, 2000.

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March 8, 2000

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GENERAL COUNSEL-
GEORGIA

VIA HAND DELIVERY
Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, Georgia 30334-5701

Re: Docket Nos. 6863-U, 7061-U, 7253-U, 8354-U.

Dear Ms. O'Leary:

This letter is written on behalf of Mpower Communications Corp. ("Mpower"), formerly known as MGC Communications, Inc. ("MGC"). MGC has been an active participant in the above-referenced Dockets. This letter is to inform you that Mpower likewise intends to continue this participation. Please take notice of this for purposes of the official service lists in these Dockets.

All further communications to Mpower relating to these Dockets should be sent to:

David I. Adelman, Esq.
Charles B. Jones, III, Esq.
Hayley B. Riddle, Esq.
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999 Peachtree Street, NE
Atlanta, Georgia 30309

Best regards.

Sincerely,

Charles B. Jones, III

CBJ:rac

cc: Parties of Record
John Kerkorian

Fred McCallum Jr.
General Counsel - Georgia

BellSouth Telecommunications, Inc.
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March 17, 2000

RECEIVED
MAR 17 2000
EXECUTIVE SECRETARY
G.P.S.C.

DELIVERED BY HAND

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

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 for filing 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 2.0 incorporating CLEC comments received subsequent to the STP Version 1.1 which was filed on March 2, 2000. I would appreciate your filing same and returning the extra copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

Thank you for your assistance in this regard.

Very truly yours,

Fred McCallum Jr.

Fred McCallum Jr.

FJM:nvd
Enclosures

cc: Parties of Record
Mr. Brian Rutter

201640/201646

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

~~Draft~~

Version ~~1.1~~2.*0*

Submitted by:

Copyrighted 2000

March 17, 2000

Updated Release Copy

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I. Document Control

A. Distribution

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Contact	Organization	Date Sent
David Burgess	Georgia Public Service Commission	
Leon Bowles	Georgia Public Service Commission	
Dennis Sewell	Georgia Public Service Commission	
Kathy Wilson-Chu	BellSouth	
Milton McElroy	BellSouth	
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Bennett Ross	BellSouth	
Claudia Fox	FCC	
Lisa Harvey	Florida Public Service Commission	
Stephanie Folse	Louisiania Public Service Commission	
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Frances Marshall	US Department of Justice	
Raymond Sears	KPMG	
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Mike Adderly	KPMG	
Carrie Thielemann	KPMG	
Ted Glickman	KPMG	
Gregory Pulaski	KPMG	
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
2.0	*March 17, 2000*	*Updated Release*

C. Revision Notes

Final Release 2.0 March 17, 2000	
Location	**Description of Change**
Test Plan Cover Page	Version and date
I. Document Control	
Page 1	Version, date, and reason
II. Introduction	
Page 4	B. Scope – Text and editorial changes
V. Pre-Ordering, Ordering, and Provisioning Test Section	
Page 26	A. Purpose - Text and editorial changes
Page 27	B. Organization - Text and editorial changes
Page 28	C. Scope - Text and editorial changes
Page 29	1.1, 1.2 - Text and editorial changes
Pages 33-34	2.1 - Text and editorial changes
Page 34	2.2 - Text and editorial changes
Page 35	Table V-2 - Text and editorial changes
Pages 36-37	2.5.2 - Text and editorial changes
Page 38	3.1, 3.3 - Text and editorial changes
Page 41	4.1 - Text and editorial changes
Page 42	4.2, 4.3, 4.4, Table V-4 - Text and editorial changes
Page 43	4.5, 4.5.1 - Text and editorial changes
Pages 46-48	Elimination of Test 6.0
Page 48-51	Revision of numbering to reflect Test 7.0 change to new Test 6.0
VI. Maintenance and Repair Test Section	
Page 53	1.1, 1.2 – Text and editorial changes
Page 54	1.6.1, 1.6.2.1 – Text and editorial changes
Pages 55-56	Table VI-2 – Text and editorial changes
Appendix C	
Page 83	Text and editorial changes

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 five test areas to organize and facilitate testing:

- Performance Metrics Review
- Pre-Order, Order & Provisioning
- Maintenance & Repair (*x*DSL)
- 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 *x*DSL 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 test will be conducted using the BLS interfaces in production for both electronic and manual order submission. These interfaces will include TAG (machine-to-machine) and EDI for resale products, ~~and web~~ and manual processes for *x*DSL products.

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
I	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 *x*DSL 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 *x*DSL 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 *x*DSL 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 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 *x*DSL 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 *x*DSL-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 where a range of quality values is possible, such as level of customer satisfaction.	Documentation defining change 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	CLEC transaction time is no greater than BLS Retail transaction time.

Evaluation Criteria Type	Description	Examples
	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

Criteria	Responsible Party
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; 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 covers 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

Criteria	Responsible Party
Interview guides/questionnaire developed	KPMG
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
	Validity of instructions for calculation of metrics	Consistency between documented definitions and documented instructions for calculation	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
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

Process Area	Sub Process/ Attribute	Evaluation Measure	Evaluation Technique	Criteria Type
	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
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

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 *x*DSL ~~wholesale~~ products. The purpose of the specified tests is to evaluate functionality, compliance with measurement agreements, procedures to accommodate increases in ~~wholesale~~ *x*DSL 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 Evaluation
- PO&P12: *x*DSL Functional Evaluation
- PO&P13: *Resale & xDSL* Provisioning Verification Evaluation ~~– Resale & xDSL~~
- PO&P14: *Resale & xDSL* Documentation Evaluation ~~– Resale & xDSL~~
- PO&P15: ~~Capacity Management Work Center Evaluation~~*Work Center Capacity Management Evaluation - xDSL*
- ~~PO&P16: xDSL Systems Capacity Management Evaluation~~
- PO&~~P17~~*P16*: *x*DSL 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
- *x*DSL-capable loops
- ~~ADSL wholesale products~~

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 *x*DSL services. Agreed upon interface business rules and formats negotiated between BLS and the CLECs will be included in the test transaction formats.

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

D. Test Process

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

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

1.1 Description

The EDI and TAG Resale Functional Evaluation will evaluate the functional elements of Pre-Ordering, Ordering, and Provisioning; the achievement of prescribed measures; and an analysis of performance in comparison to BLS's retail systems. 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 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 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 is to validate the existence, functionality, and behavior of the *electronic* interfaces and *electronic and manual* processes established by BLS for pre-ordering, ordering, and provisioning transaction requests and responses.

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
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

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	
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
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

Process Area	Sub-Process	
	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
	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 *x*DSL Order Processing Functional Evaluation will evaluate the functional elements of the Pre-Ordering, Ordering, and Provisioning process for *x*DSL (Digital Subscriber Line) products as delivered to CLECs *through the* ~~over two~~ BLS-supported *manual process.* ~~interfaces: 1) High Speed Data Service Order Entry Gateway System (SOEG), or 2) manually.~~ Pre-ordering will include ~~submission~~ *the use* of *the Loop Make-Up (LMU) process to obtain loop make-up information. Pre-ordering will also include submission of* Service Inquiries *(SI)* to BellSouth to determine loop characteristics. This test cycle will be executed by submitting local service requests (LSRs) *(which are submitted concurrently with Service Inquiries)* for *x*DSL 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~~*a* 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 *x*DSL service. Other functional elements of the *x*DSL 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 *x*DSL products will be submitted manually, the related pre-orders will be submitted electronically or manually, depending on the information required. For a defined set of integrated transactions, information returned on the pre-order response will be used to populate fields on subsequent orders.~~ This activity is undertaken to simulate the ~~system related~~ activities of a CLEC ~~wishing to integrate~~ *integrating* the pre-order and order functions *for xDSL-capable loops.*

The *x*DSL 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 *x*DSL functional evaluation is to *validate the existence, functionality, and behavior of the manual interfaces established by BellSouth for pre-ordering and ordering of xDSL-capable loops.*~~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 *x*DSL 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 *x*DSL 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 *x*DSL Ordering functionality and performance

Table V-2: Test Target: xDSL Functional Evaluation

Submit a Service Inquiry	Submit Loop Inquiry	~~Accesibility of interface~~*Presence of functionality for manual process*
	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. *Timeliness 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.

Table V-2: Test Target: xDSL Functional Evaluation

	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

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. *Receive transaction response receipt date, time, response transaction type, and response condition.*
~~3.~~*4.* Match transaction response to original transaction. Verify that matching transaction can be found and record mismatches
~~4.~~*5.* Verify that transaction response contains expected data and flag non-expected errors
~~5.~~*6.* 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.~~*7.* Correct expected errors. Re-submittal date, time, and appropriate information are logged
~~7.~~*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. Record missing responses
~~8.~~*9.* Log documentation issues uncovered during transactions creation and submission process
~~9.~~*10.* Review status of pending orders. Verify and record accuracy of response
~~10.~~*11.* 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.~~*12.* ~~Verify correct provisioning on a sampling of orders that have been completed. Record results in appropriate provisioning log and activity checklist~~
~~12.~~*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: Resale & xDSL 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 EDI and TAG Functional Evaluation. 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&P12 *x*DSL ~~Manual Order Processing~~ Functional Evaluation. This analysis will focus on ~~electronic and~~ manually orderable *x*DSL products, and involves the physical inspection of BLS's provisioning process. To test the end-to-end provisioning process on *x*DSL 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 *x*DSL and Resale products

3.3 Entrance Criteria

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3
PO&P11 and PO&P12: EDI, TAG, and *x*DSL 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 *x*DSL capabilities (*x*DSL-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
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 *x*DSL and Resale products.

Table V-3: Test Target: Resale & xDSL 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

Table V-3: Test Target: Resale & xDSL Provisioning Verification Evaluation

Process Area	Sub-Process	Evaluation Measure
	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 *x*DSL 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&P14: Resale and xDSL Documentation Evaluation

4.1 Description

The Resale and *x*DSL 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 SOEC~~ interfaces, as well as the documentation provided by BLS to CLECs to manually order and provision *x*DSL 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 test will receive input from the PO&P11: EDI and TAG Resale Functional Evaluation exceptions report and the PO&P12: *x*DSL Functional Evaluation exceptions report. : 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 Resale and *x*DSL 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

Criteria	Responsible Party
All global entrance criteria satisfied	See Table III-3
All documentation pertaining to EDI, TAG, ~~SOEC,~~ 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: EDI and TAG Functional Evaluation, and from PO&P12: *x*DSL Functional 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: *Resale & xDSL* Documentation Evaluation~~— Resale & xDSL~~. 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 *x*DSL and Resale products.

Table V-4: Documentation to be Tested for PO&P14: Resale & xDSL 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: Resale and xDSL 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

*Table V-5: Test Target: **Resale and xDSL Documentation Evaluation***

Process Area	Sub-Process	Evaluation Measure
	Evaluate TAG Interface Documentation	Usability, comprehensiveness, and accuracy of documentation
	Evaluate *x*DSL 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 *x*DSL 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 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 *x*DSL (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 *x*DSL 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 *x*DSL products.

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

Process Area	Sub-Process	Evaluation Measure	Evaluation Technique	Criteria Type
*x*DSL 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

Process Area	Sub-Process	Evaluation Measure	Evaluation Technique	Criteria Type
	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 *x*DSL 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. *x*DSL 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 *x*DSL 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~~

Process Area	Sub-Process	Evaluation Measure	Evaluation Technique	Criteria Type
	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~~6.0 *Test PO&~~*P17*~~P16: xDSL Process Parity Evaluation*

~~7~~6.1 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~~ *BLS retail* *x*DSL ~~orders~~*customers*. 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~~6.2 Objective

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

~~7~~6.3 Entrance Criteria

Criteria	Responsible Party
All global entrance criteria	See Table III-3
Detailed *x*DSL Process Parity Evaluation Checklist developed	KPMG
Pre-order, order and provisioning process documentation available	BLS
Technical platforms specifications available	BLS
Databases specifications available	BLS

Criteria	Responsible Party
Data communications and interfaces specifications available	BLS
Interview guide/questionnaire developed	KPMG
Interviewees identified and schedule developed	BLS, KPMG

~~7~~6.4 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 *CLEC and retail* xDSL products.

Table V-87: Test Target: PO&~~P17~~P16 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
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~~6.5 Scenarios

Scenarios are not applicable to this test.

~~7~~6.6 Test Approach

~~7~~6.6.1 Inputs

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

~~7~~6.6.2 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~~6.6.3 Outputs

1. Completed xDSL Process Parity Evaluation Checklist
3. Interview summaries
4. Summary findings and conclusions

~~7~~6.7 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 *x*DSL 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 *x*DSL-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 *x*DSL 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 *xDSL over a CLEC Resale POTS line* and retail *x*DSL trouble reports. Process flows for wholesale *xDSL over a CLEC Resale POTS line* 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 *x*DSL 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 *trouble reporting and repair for* retail *xDSL lines* and wholesale *xDSL over a CLEC Resale POTS line*~~trouble reporting and repair for xDSL lines~~. The objective of Sub-Test 2 is to evaluate BLS's performance in making repairs to *x*DSL 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: *x*DSL	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: *x*DSL	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 *x*DSL products to evaluate BLS's performance in making repairs.

1.6 Test Approach

1.6.1 Inputs

1. Retail and wholesale *xDSL over a CLEC Resale POTS line* M&R process flow documentation (*x*DSL)
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 *xDSL over a CLEC Resale POTS line* 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 reports	Create trouble report	Functionality exists as documented	Document Review Transaction Generation	Existence Qualitative
	Modify trouble report	Functionality exists as documented	Document Review Transaction Generation	Existence Qualitative
	Create repeat report	Functionality exists as documented	Document Review Transaction Generation	Existence Qualitative
	Create subsequent report	Functionality exists as documented	Document Review Transaction Generation	Existence Qualitative
	Enter Multiple Trouble Reports	Functionality exists as documented	Document Review Transaction Generation	Existence Qualitative
	Enter and Retrieve Trouble Reports from Queues	Functionality exists as documented	Document Review Transaction Generation	Existence Qualitative
	Execute Supervisor Functions	Functionality exists as documented	Document Review Transaction Generation	Existence Qualitative
	Close Trouble Report	Functionality exists as documented	Document Review Transaction Generation	Existence Qualitative
	Cancel Trouble Report	Functionality exists as documented	Document Review Transaction Generation	Existence Qualitative
Access to test capability	Initiate port and loop-port test	Functionality exists as documented	Document Review Transaction Generation	Existence Qualitative

Process Area	Sub-Process	Evaluation Measure	Evaluation Technique	Criteria Type
	View port and loop-port test results	Functionality exists as documented	Document Review Transaction Generation	Existence Qualitative
Downstream System Reports	Retrieve LMOS recent status report	Functionality exists as documented	Document Review Transaction Generation	Existence Qualitative
	Obtain customer line record (BOCRIS)	Functionality exists as documented	Document Review Transaction Generation	Existence Qualitative
	Obtain Predictor results	Functionality exists as documented	Document Review Transaction Generation	Existence Qualitative
	View DLR (Display Line Record)	Functionality exists as documented	Document Review Transaction Generation	Existence Qualitative
	View SOCS pending order.	Functionality exists as documented	Document Review Transaction Generation	Existence Qualitative
Access error reports	Reset communications	Functionality exists as documented	Document Review Transaction Generation	Existence Qualitative
	Host request errors	Functionality exists as documented	Document Review Transaction Generation	Existence Qualitative
Trouble history	Retrieve Trouble History	Functionality exists as documented	Document Review Transaction Generation	Existence Qualitative
General	TAFI Usability	Functionality exists as documented	Document Review Transaction Generation	Existence Qualitative

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

Criteria	Responsible Party
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
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
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
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

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.

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.~~

AT&T

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Atlanta, GA 30309-3579

March 29, 2000

RECEIVED
APR 03 2000
GENERAL COUNSEL-
GEORGIA

Fred McCallum
General Counsel – Georgia
BellSouth Telecommunications, Inc.
Suite 376
125 Perimeter Center West
Atlanta, GA 30346

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

Dear Fred:

This letter is in response to the March 22, 2000, KPMG submission "at BellSouth's request" of BellSouth's proposed standards and benchmarks to be used in the Georgia OSS evaluation. BellSouth has filed the same set of standards and benchmarks that were rejected by the Florida Public Service Commission on March 20, 2000, in Docket No. 981834-TP and 960786-TL. It is AT&T's understanding that BellSouth has a practice in Georgia of incorporating other Commission decisions into the performance measures. Therefore, AT&T believes it would be more appropriate to use the standards and benchmarks recently ordered by the Florida Commission as the starting point for the Georgia evaluation.

Given the short time frame permitted for comment, AT&T requests written confirmation by Friday, March 31, 2000, that, in fact, BellSouth intends to use the standards and benchmarks ordered in Florida as the starting point for the Georgia Public Service Commission's consideration of this issue.

Very truly yours,

Suzanne W. Ockleberry

cc: David Frey, KPMG
David Burgess
Leon Bowles

Recycled Paper

Fred McCallum Jr.
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March 31, 2000

VIA FACSIMILE AND U.S. MAIL

Suzanne W. Ockleberry, Esquire
AT&T – Law and Government Affairs
1200 Peachtree Street
Suite 8100
Atlanta, Georgia 30309

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

Dear Suzanne:

This letter is in response to yours of March 29, 2000. In that letter AT&T demanded BellSouth's written confirmation by today that BellSouth intended to propose the standards and benchmarks ordered by the Florida Public Service Commission, as opposed to the standards that were actually submitted in this docket by KPMG on behalf of BellSouth. This will confirm that BellSouth intended to propose the standards that were filed by KPMG, and not the standards adopted by the Florida Commission. BellSouth strenuously disagrees with at least some portions of the Florida order. For these reasons, we do not believe that the Georgia Public Service Commission should use the standards and benchmarks adopted by the Florida Commission.

Very truly yours,

Fred McCallum Jr.

FJM:nvd

cc: The Honorable David Burgess
Mr. Leon Bowles
Mr. David Frey

203460

Sprint

3100 Cumberland Circle
Atlanta, GA 30339
Telephone: (404) 649-5145
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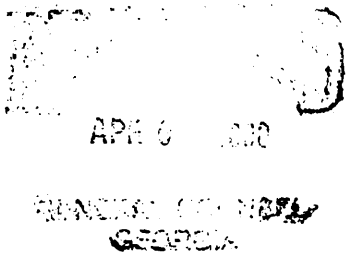
Benjamin W. Fincher
Attorney, State Regulatory

April 4, 2000



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

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

Dear Ms. O'Leary:

Under date of March 22, 2000, KPMG submitted BellSouth's proposed set of standards and benchmarks to be used in the BellSouth – Georgia OSS Evaluation in the above referenced docket. KPMG stated that it would receive comments on the proposal through March 29, 2000. By letter dated March 28, 2000, the Staff of the Georgia Public Service Commission extended the deadline for filing such comments to April 5, 2000.

Sprint Communications Company L.P., a party to this proceeding, hereby waives filing comments at this time. Sprint reserves its right, however, to continue its full participation in this docket.

Should you have any questions regarding this mattter, please feel free to contact me.

Sincerely,

Benjamin W. Fincher

BWF/de
Enclosures
cc: Christopher Casey
Leon Bowles
Parties of Record

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and exact copy of the within and foregoing in Docket No. 8354-U, via United States, first class mail, postage paid and properly addressed to the following:

Leon Bowles
Georgia Public Service Commission
47 Trinity Avenue
Atlanta, GA 30334-5701

Fred McCallum, Jr.
BellSouth Telecommunications, Inc.
Room 376
125 Perimeter Center West
Atlanta, GA 30346

David I. Adelman
Charles B. Jones, III
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Christopher Casey
David Frey
KPMG Consulting
Suite 1050, 270 Peachtree Street
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This 4th day of April, 2000.

Danielle Etzbach
Sprint Communications Company L.P.

MCI Telecommunications Corporation
1801 Pennsylvania Avenue, NW
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202 887 2380
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Karen T. Reidy
Attorney
Federal Law and Public Policy

RECEIVED
APR 07 2000
GENERAL COUNSEL-
GEORGIA

April 5, 2000

VIA HAND DELIVERY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
Office of the Secretary - Room TWB-204
445 Twelfth Street, SW
Washington, DC 20554

Re: Ex Parte: CC Docket No. 98-121

Dear Ms. Salas:

On April 5, 2000 I sent the attached letter and matrix to Jake Jennings of the Common Carrier Bureau's Policy and Program Planning Division. Please include this filing in the record of the above-referenced proceeding.

Two copies of this Notice are being submitted in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

Karen Reidy

Karen Reidy

Attachments

cc: Jake E. Jennings

MCI Telecommunications Corporation

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Karen T. Reidy
Attorney
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April 5, 2000

VIA HAND DELIVERY

Mr. Jake E. Jennings
Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Dear Mr. Jennings,

I am writing on behalf of MCI WorldCom to express our concern that the performance evaluation that is being conducted in Georgia, as part of KPMG's test of BellSouth's OSS, does not include some important measures, does not include some critical business rules and metric calculations, and does not set standards at a level that provides CLECs with service at parity or a meaningful opportunity to compete.

On March 22, 2000, KPMG submitted BellSouth's proposed set of analogs and benchmarks to be used in the Georgia OSS test being conducted as part of Docket No. 8354-U, *Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems*. A copy of the proposal is attached. In response to concerns raised by certain CLECs, the Director of the Telecommunications Section of the Georgia Public Service Commission issued a letter stating that the proposed standards will be applied only to the OSS test and would not be considered permanent. The fact that the standards will be "temporary" and used only for testing purposes does not excuse the deficiencies, nor does it alleviate competitors' concerns. The evaluation of BellSouth's performance must be meaningful, thorough, and rigorous if the test is to provide any worthwhile evidence of BellSouth's compliance with its obligations to open the local market in Georgia to competition.

Importance of Performance Evaluation as Part of Third-Party Test

The Commission has acknowledged the importance of a CLEC having the means to be as efficient and responsive a carrier as the BOC.[1] In encouraging BOCs to submit performance data in their section 271 applications, the Commission has noted that performance measurements are an especially effective means to provide "evidence of the quality and timeliness of the access provided by a BOC to requesting carriers."[2] The Commission also has repeatedly recognized that extensive and rigorous evaluation of the BOC's performance by the relevant state commission provides greater certainty that the local markets are open to competition.[3] The value of the evaluation in determining nondiscriminatory access depends on, among

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[1] *In re Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Services in the State of New York*, Memorandum Opinion and Order, CC Docket 99-925, ¶ 129 (Dec. 22, 1999)("New York 271 Order").
[2] *Id.*, ¶ 53.
[3] *Id.*, ¶ 54.

other factors,[4] what is being measured, how it is being measured, and the standard of comparison that is being set. The Georgia test is deficient in each of these areas.

Missing Measures and Insufficient Disaggregation

Loop Information

The pre-ordering phase of OSS generally includes those activities that a carrier undertakes to gather and verify the information necessary to provide a service to a customer. One key pre-order function that is not being measured is the average response time for loop qualification information. The manual processes associated with loop qualification are not even being measured. The Commission has previously explained that "... a BOC's duty to provide nondiscriminatory access to OSS extends beyond the interface component to encompass all of the processes and databases used by the BOC in providing service to itself and its customers."[5] Both the Commission and the Department of Justice have acknowledged that having access to detailed information about available loops is necessary for carriers to provide a prospective customer certain advanced services.[6] Compliance with section 271 requires a BOC to provide equivalent access to the loop qualification functionality and information that is available to itself, including compliance with the obligations regarding nondiscriminatory access to this information as enunciated in the Commission's UNE Remand rules.[7] As the Commission stated, " BOCs have had sufficient notice that their section 271 obligation to provide nondiscriminatory access to OSS extends to loop qualification information."[8] Thus, this measure should be included in the performance evaluation being conducted by KPMG.

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[4] The proposal does not address validation of the accuracy of the raw data, how the raw data is collected, the method and systems used to process the raw data into a report, or an evaluation of other conditions that determine the credibility of the data. Thus, we are not providing comment on these issues in this letter, except to emphasize how crucial it is to ensure the evidence is credible and the need for these issues to be thoroughly addressed by the independent third party as part of the test.

[5] New York 271 Order, ¶ 141.

[6] *Id. See also* Evaluation of the United States Dept. of Justice, *In re the Application of Bell Atlantic New York, et al, for Authorization to Provide In-Region, InterLATA Services in New York,* CC Docket No. 99-295, p. 25 (filed Nov. 1, 1999).

[7] New York 271 Order, ¶ 140. Since the UNE Remand Order was not in effect at the time Bell Atlantic submitted its application, the Commission determined that Bell Atlantic's approach of framing its application to comply with the former rule 319 was reasonable. However, future applicants will be required to comply with the Commission's UNE Remand Order. *Id.*, ¶31. *See In re Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, Third Report and Order, CC Docket No. 96-98, ¶¶ 425-31 (released November 5,1999)(UNE Remand Order)["[A]t a minimum, incumbent LECs must provide ... to requesting carriers the following: (1) the composition of the loop material, including but not limited to, fiber optics, copper; (2) the existence, location and type of any electronic or other equipment on the loop, including but not limited to, digital loop carrier or other remote concentration devices, feeder/distribution interfaces, bridge taps, load coils, pair-gain devices, distributers in the same or adjacent binder groups; (3) the loop length, including the length and location of each type of transmission media; (4) the wire guage(s) of the loop; and (5) the electrical parameters of the loop, which may determine the suitability of the loop for various technologies...an incumbent LEC should not be permitted to deny a requesting carrier access to loop qualification information for particular customers simply because the incumbent is not providing xDSL or other services from a particular end office....and may not filter or digest such information to provide only that information that is useful in the provision of a particular type of xDSL that the incumbent choose to offer."] *See also In re Deployment of Wireline Services Offering Advanced Telecommunications Capability and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, Third and Fourth Report and Orders respectively, CC Docket Nos. 98-147 and 96-98 (released December 9, 1999).

[8] New York 271 Order, ¶ 141, n. 423.

Response times to requests, errors, and database access

BellSouth's response time to requests for the provision of network engineering records should be measured, as well as the response times to all available query types, including "Rejected Queries." The number of instances of competitor queries producing no response at all, "Percentage Time Outs," should also be measured and compared.[9] In addition to the pre-order functions, KPMG should measure the duration for clearing NXX loading errors in end offices, tandems, and E911 selective routers. Because NXX loading errors can preclude calls from being completed, the continuance of such errors has a significant competitive impact. Also, in order for a competitor to change the address listed in the E911 database for a customer whose number has been ported, the number in the database must be "unlocked." Given how critical it is to have an accurate database in emergency situations, the time frame to unlock the numbers in the 911 database should be evaluated.

Trunk Augmentation

The evaluation of BellSouth's performance in responding to trunk resizing requests by competitors should be measured. This measurement of ILEC responsiveness to augmenting their trunks inbound from the ILEC to the CLEC is critical to CLEC service quality, but is currently not being measured. BellSouth's delay would only be noted in instances where the CLEC, choosing not to forgo new customers, is forced to suffer service degradation to the point of persistent blocking.[10]

All modes of responding to inbound to CLEC trunk resizing requests should be measured. When a CLEC sends a trunk resizing request via an Access Service Request (ASR), the interval to be measured is the time from the receipt of that request to when BellSouth sends the CLEC a Firm Order Confirmation (FOC). However, when CLECs email or fax Trunk Group Service Requests (TGSR), the interval to be measured is the amount of time from when the TGSR is received to when BellSouth sends the CLEC an ASR. A competitor's ability to ramp up in the market is seriously affected by the length of time customer orders are put on hold awaiting ILEC commitments to augment their inbound trunks to a competitor's switches, making this interval a competitively critical measure.[11]

Diaggregation

Certain reported metrics should be disaggregated to a greater extent in order to achieve a parity comparison between the wholesale product and the retail product it most resembles. A certain level of disaggregation is also essential to detecting discrimination that specifically targets a product that promises successful CLEC market penetration and to ensuring that CLECs have the ability to offer service level agreements equal to those offered by BellSouth for similarly sized and situated customers. Disaggregation by product is important for both provisioning and maintenance intervals.

Specifically, MCI WorldCom proposes that flow through for UNE-loop and UNE-combinations should be measure separately. OSS Interface availability should be reported by interface type, while Speed of Answer in Ordering Center should be reported by center. "UNE Design" should be broken down into xDSL 2-wire, xDSL 4-wire and the loop/transport/mux combination (often referred to as enhanced

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[9] Whether a time out occurs would be determined by establishing an interval beyond which no valid response would be expected to be returned. The interval should be set to the longest time that a CLEC would ever have to wait for an actual query response. In the New York Carrier-to-Carrier guidelines the intervals are 330 seconds for telephone number availability and reservation and 60 seconds for all other query types.

[10] When BOCs delay trunk resizing, CLECs often sacrifice new customers in order to spare their current customers the service degradation.

[11] Due to the importance of this measure, a similar metric recently was added in the New York Carrier-to-Carrier proceeding.

extended links or "EELs"). Local interconnection trunks should be measured by capacity type (i.e., DS0, DS1 and DS3). Collocation should be measured by type, i.e., physical, virtual, cageless, as well as augmentation (major or minor) of existing collocation.

Defining the Measures

There is no discussion on how the measures are actually defined or the accompanying business rules, both of which are important evidence as to whether the reported measures are an accurate reflection of BellSouth's performance. Definitions and business rules determine factors such as what data is included or excluded from a metric. For example, only scheduled or pre-announced down times should be excluded from the OSS Interface Availability metric.[12] Definitions and business rules also establish the start and end point for measuring an interval. One of the most significant examples of this relates to the provisioning of loops and collocation. Since the installation of a quality loop and useable collocation, as well as notification that the order is completed, allow a CLEC to serve the customer, the end time for the measuring loops and collocation intervals should be when an acceptable product is delivered and the CLEC is notified.[13] Another example, The Mean Held Order Interval, demonstrates the importance of both the exclusion and interval factors. This metric should not only reflect the intervals for completed orders, it should encompass past due orders that are still pending or have been cancelled, using the time of reporting as the end-time for measuring the intervals for pending orders. This discourages BellSouth from attempting to keep this interval low by intentionally failing to complete an order after the due date is missed. These are just some examples of metrics and factors that demonstrate the importance of having complete and accurate definitions and associated business rules established prior to the testing, in order to ensure the test results provide valuable, credible evidence.

Standards

The standards by which BellSouth's performance will be measured are too low. For example, since these orders are being submitted as part of the third party test, claims of CLEC errors causing orders to reject and fail to flow through are not applicable. Therefore, BellSouth's systems should be able to provide flow-through rates of 99% and 85% for UNE-platform and UNE-loop orders that are designed to flow through, respectively.[14] Reject intervals and Firm Order Confirmation Timeliness should be subject to a 95% on-time standard, with the determination of on-time performance being based on a comparison to the time a BellSouth retail representative must wait to know an order is rejected or provide a customer with a due date.[15] Partially mechanized orders should have a shorter benchmark time than fully manual orders. It is also critical that a function that has been labeled as "parity by design" be verified by KPMG.

There is no justification for augments of existing collocations to take the same amount of time of as building a completely new collocation. For instance, augments to add DSLAMs and splitters for line sharing should not be subjected to the same intervals as building a whole new collocation arrangement. Thus, while the Average Arrangement Time (AAT) for major augments are 60 days, the AAT for minor augment should only be 30 days. The AAT should also depend on the type of collocation being requested (i.e., 90 calendar days for physical, 60 calendar days for virtual, 45 calendar days for cageless).

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[12] Excluded down times should still be noted and down times should never be scheduled between 6 am and midnight. All periods of interface unavailability during those times should be included in the metric.

[13] The end time for repair duration, as well as provisioning, should be the time the CLEC is notified. *See In Re Performance Measurements and Reporting Requirements for Operational Support Systems, Interconnection, and Operator Services and Directory Assistance*, Notice of Proposed Rulemaking, CC Docket No. 98-56, ¶¶ 53, 82 (released April 17, 1998).

[14] *See* New York 271 Order, ¶ 168.

[15] The standard that was set in New York was a 95% return of mechanized orders within 2 hours, and a 95% of electronically submitted orders with manual intervention in 24 hours of submission. *Id.*, ¶ 180. The California PUC adopted even stricter standards of 20 minutes and six hours for such processing.

Furthermore, there is also no reason for BellSouth to take 30 business days to respond to a request for collocation. A more reasonable time would be 10 days.

Please let us know if you have any questions.

Sincerely,

Karen Reidy

Karen Reidy

Attachment

cc: Claudia Fox
Anu Seam, Department of Justice
Chairman Robert Durden, Georgia PSC
Commissioner Stan Wise, Georgia PSC
Commissioner Robert Baker, Georgia PSC
Commissioner Lauren McDonald, Georgia PSC
Commission David Burgess, Georgia PSC
Leon Bowles, Georgia PSC
Christopher Casey, KPMG
Fred McCallum, Jr., BellSouth

BellSouth Telecommunications Inc. Georgia OSS Evaluation Analogs and Benchmarks			
BST SQM Category	MEASURES AND SUB-METRICS	Retail Analogue	Benchmark
Pre-Ordering	**Percent Response Received within "X" seconds** Average Response Time – Customer Service Record Average Response Time – Due Date Avail Average Response Time – Address Validation Average Response Time – Product and Service Availability Average Response Time – Tel. No Availability and Reservation	Parity w/ retail where applicable.	
	OSS Interface Availability		99.5%
Ordering	**Percent Flow-Through Service Request** • Residence • Business • UNE • Specials		90% 80% 80% 0%
	Percent Rejected Service Request	Diagnostic	Diagnostic.
	Reject Interval (Mechanized)		95% in 1 hr
	• Reject Interval (Non-Mechanized and Partially Mechanized)		85% < 48 hrs
	Firm Order Confirmation Timeliness (Mechanized) (Non-Mechanized and Partially Mechanized)		95% < 4 hrs 85% <48 hrs
	Speed of Answer in Ordering Center	Parity with retail	
Provisioning	**Mean Held Order Interval**		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business*	
	• UNE Non-Design	Retail Residence and Business*	
	• UNE Design	Retail Design*	
	• Local Interconnection Trunks	Parity with retail	
	Average Jeopardy Notice Interval (Mechanized)		
	• Resale Residence		95% >=24 hrs
	• Resale Business		95% >=24 hrs
	• Resale Design		95% >=24 hrs
	• UNE Loop and Port Combos		95% >=24 hrs
	• UNE Non-Design		95% >=24 hrs
	• UNE Design		95% >=24 hrs
	• Local Interconnection Trunks		95% >=24 hrs
	% of Orders given jeopardy notice (Mechanized)		

BellSouth Telecommunications Inc. Georgia OSS Evaluation Analogs and Benchmarks			
BST SQM Category	MEASURES AND SUB-METRICS	Retail Analogue	Benchmark
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business*	
	• UNE Non-Design	Retail Residence and Business*	
	• UNE Design	Retail Design*	
	• Local Interconnection Trunks	Parity with retail	
	Percent Missed Installation Appointments		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business*	
	• UNE Non-Design	Retail Residence and Business*	
	• UNE Design	Retail Design*	
	• Local Interconnection Trunks	Parity with retail	
	Order Completion Interval		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business*	
	• UNE Non-Design	Retail Residence and Business*	
	• UNE Design	Retail Design*	
	• Local Interconnection Trunks	Parity with retail	
	Average Completion Notice Interval – (Mech)		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business*	
	• UNE Non-Design	Retail Residence and Business*	
	• UNE Design	Retail Design*	
	• Local Interconnection Trunks	Parity with retail	
	Percent Provisioning Troubles within 30 Days		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business*	

BellSouth Telecommunications Inc. Georgia OSS Evaluation Analogs and Benchmarks			
BST SQM Category	MEASURES AND SUB-METRICS	Retail Analogue	Benchmark
	• UNE Non-Design	Retail Residence and Business*	
	• UNE Design	Retail Design*	
	• Local Interconnection Trunks	Parity with retail	
	Total Service Order Cycle Time	Diagnostic	Diagnostic
Maintenance	**Customer Trouble Report Rate**		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business*	
	• UNE Non-Design	Retail Residence and Business*	
	• UNE Design	Retail Design*	
	• Local Interconnection Trunks	Parity with retail	
	Percent Missed Repair Appointments		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business*	
	• UNE Non-Design	Retail Residence and Business*	
	• UNE Design	Retail Design*	
	• Local Interconnection Trunks	Parity with retail	
	Maintenance Average Duration		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business*	
	• UNE Non-Design	Retail Residence and Business*	
	• UNE Design	Retail Design*	
	• Local Interconnection Trunks	Parity with retail	
	Percent Repeat Troubles within 30 Days		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business*	
	• UNE Non-Design	Retail Residence and Business*	
	• UNE Design	Retail Design*	
	• Local Interconnection Trunks	Parity with retail	

BellSouth Telecommunications Inc. Georgia OSS Evaluation Analogs and Benchmarks			
BST SQM Category	MEASURES AND SUB-METRICS	Retail Analogue	Benchmark
	Out of Service > 24hrs		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business*	
	• UNE Non-Design	Retail Residence and Business*	
	• UNE Design	Retail Design*	
	• Local Interconnection Trunks	Parity with retail	
	OSS Interface Availability		
	• All systems except ECTA	Parity with retail	
	• ECTA		99.5%
	OSS Response Interval and %		
	• TAFI (Front End)	Parity with retail	
	• CRIS, DLETH, DLR, OSPCM, LMOS, LMOSUP, MARCH, Predictor, SOCS, LNP (Parity by Design)	Parity by Design	
	Average Answer Time – Repair Center	Parity with retail	
Billing	**Invoice Accuracy**	Parity with retail	
	Mean Time To Deliver Invoices	Parity with retail	
	Usage Data Delivery Accuracy	Parity with retail	
	Usage Data Delivery Timeliness	Parity with retail	
	Usage Data Delivery Completeness	Parity with retail	
	Mean Time to Deliver Usage	Parity with retail	
Operator Services (Toll)	**Average Speed to Answer**	Parity by Design	
	% Answered in "X" Seconds	Parity by Design	
Directory Assistance	**Average Speed to Answer**	Parity by Design	
	% Answered in "X" Seconds	Parity by Design	
E911	**Timelinesss**	Parity by Design	
	Accuracy	Parity by Design	
	Mean Interval	Parity by Design	
Trunk Group	**Trunk Group Service Report (Percent Trunk Blockage)**	Parity with retail	

BellSouth Telecommunications Inc. Georgia OSS Evaluation Analogs and Benchmarks			
BST SQM Category	MEASURES AND SUB-METRICS	Retail Analogue	Benchmark
Performance (Blockage)	Any 2 hour period in 24 hours where CLEC blockage exceeds BST blockage by more than 0.5% = a miss using trunk groups 1, 3, 4, 5, 10, 16 for CLECs and 9 for BST.		
	Trunk Group Service Report (Percent Trunk Blockage)	Parity with retail	
LNP	**Average Disconnect Timeliness Interval**		UD
	Percent Missed Installation Appointments	Retail Residence and Business*	
	FOC Mechanized		95% < 4 hrs
	% Reject Service Request	Diagnostic	Diagnostic
	Average Reject Interval Mechanized		95% in 1 hr
	TSOC	Diagnostic	Diagnostic
	% Flow Through		TBD
Customer Coordinated Conversions	**Coordinated Customer Conversions – UNE Loop**		95% ≤ 15min
	Coordinated Customer Conversions – LNP		95% ≤ 15 min
Collocation +	**% of Due Dates Missed** **% of Due Dates Met**		=<10%CommitDates =>90%Commit.Dates
	Average Response Time		30 Bus Days
+A contract with each CLEC required.	**Average Arrangement Time**		90 Bus Days Ordinary; 130Bus Days Extraordinary

*** The retail analog for UNE Loop Port Combinations and UNE Non-Design is Retail Residence Dispatch and Retail Business Dispatch transactions for the particular month. The retail analog for UNE Design is Retail Design Dispatch.**

Note: Analogs and Benchmarks will be re-evaluated 6 months after implementation and periodically thereafter to validate applicability.

AT&T

Law & Government Affairs

Suite 8100
1200 Peachtree Street, N.E.
Atlanta, GA 30309-3579

April 5, 2000

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GENERAL COUNSEL-
GEORGIA

BY HAND DELIVERY

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

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

Dear Ms. O'Leary:

Enclosed please find an original and fifteen (15) copies of the "Comments of AT&T's Communications of the Southern States, Inc." in the above-referenced docket. I have also enclosed a diskette containing the document. 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

Recycled Paper

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

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

COMMENTS OF AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.

COMES NOW, AT&T Communications of the Southern States, Inc. ("AT&T") and submits these comments, by and through its counsel, pursuant to the Georgia Public Service Commission's ("Commission") letter dated March 28, 2000 seeking comments from the industry on the analogs and benchmarks that KPMG filed on behalf of BellSouth Telecommunications, Inc. ("BST") on March 22, 2000. AT&T responds as follows:

Introduction

AT&T applauds the Commission Staff's decision to allow more than one week for the industry to review the proposed analogs and benchmarks, also referred to collectively as "standards", that KPMG filed on behalf of BST for use in the third party test of BST's Operational Support Systems ("OSS"). AT&T also supports the Commission Staff's clarification that the analogs and benchmarks used for the third party test will not automatically be adopted as the permanent standards for use in comparing BST's performance results to those for CLECs. AT&T welcomes the opportunity to participate in a generic proceeding for determining, not only the appropriate analogs and benchmarks, but other key requirements that are necessary to establish an effective

performance measures methodology in Georgia. Shown below are AT&T's comments concerning KPMG's and BST's proposed standards for use in the OSS test.

1. **The level of disaggregation in BST's proposal is inadequate, preventing meaningful comparisons.**

"Disaggregation" in the context of a performance measures methodology means to break down results to such a degree that "like-to-like" comparisons of results can be made. An effective performance measurement plan allows for meaningful comparisons of performance results between the performance BST provides for itself and its affiliates and the performance it provides to CLECs. Appropriate performance comparisons are necessary for this Commission to determine whether BST is meeting its obligations to provide to CLECs nondiscriminatory access to services, facilities, and capabilities.

The BST proposal does not provide for meaningful "like-to-like" comparisons. As a result, the proposed standards create a fundamental and fatal flaw in the overall performance measurement methodology. The inability to appropriately monitor BST's performance for its retail operations and its affiliates and compare that to the performance BST provides to CLECs is a flaw that will prevent KPMG and the Commission from discerning whether or not BST is discriminating. A sufficient degree of disaggregation must be established before meaningful performance standards can be established. The inadequacies of BST's proposed disaggregation include:

--BST proposes to compare all Unbundled Network Elements-Platform ("UNE-P") to retail POTS dispatch. However, UNE-P migrations, as well as many other UNE-P order types, do not require dispatch. Therefore, this is not a "like-to-like" comparison. If BST's proposal were adopted, based on the February, 2000

CLEC- aggregate Georgia performance results as reported by BST, the standard BST would use for providing UNE-P would be between 8 and 10 days, while its actual requirements for performing non-dispatch provisioning would actually require only ½ day to under 2 days.[1] Clearly, using this dissimilar and inappropriate standard prevents any meaningful comparison of performance. BST should be required to disaggregate the performance results so that the Commission can observe and monitor according to orders that require dispatch and those that do not.

--BST's Product Interval Guide lists twenty-six complex resale services with intervals ranging from four days to twenty-five days. The Product Interval Guide indicates that other intervals should be negotiated. However, in its proposal, BST lumps the retail equivalent of these services into a single category (Retail design) for comparative purposes. In BST's proposed standards for comparisons to UNE orders, BST further proposes to compare its performance for CLECs only against retail design dispatch orders. To illustrate the effect of this proposed standard, in February, 2000, BellSouth's average completion interval for all retail design dispatch (less than 10 circuits) was 26.68 days, while its average interval for UNE design was 13.32 days.[2] This two-fold difference in results is still another compelling indicator that these are not comparable processes and products and should not be used for comparative purposes. BST should be required to disaggregate by differing volume and product types as described in Exhibit A.

[1] BST's Order Completion Intervals for Retail POTS Dispatch in February in Georgia were 8.29 days for residence and 10 days for business. Its Order Completion Intervals for non-dispatch were 1.87 days for residence and 1.97 days for business. This data comes from BST's February, 2000 published performance reports that are available from BST's website.

--The value of disaggregation is further illustrated by BST's February, 2000 performance results report. Throughout 1999, BST reported its flow-through results at an aggregate product level, consistently reporting results of +90%. In February, 2000, BST disaggregated its flow-through report as follows:

Residence (resale)	94.24% flow-through	136,255 issued orders
Business (resale)	52.02% flow-through	1,840 issued orders
UNEs	59.10% flow-through	487 issued orders
Aggregate	93.05% flow-through	138,582 issued orders

Clearly, BST's previous aggregation of its results masked its poor performance in business resale and in UNE order flow-through. Such disaggregation should not be allowed to continue in other areas of BST's SQM.

--BST's proposal fails to provide for disaggregation of xDSL products and services, in spite of the Commission's obvious interest in this area. BST should be required to disaggregate its various xDSL offerings.

AT&T recommends that the Commission adopt the disaggregation shown in Exhibit A. The levels of product and volume disaggregation provided in AT&T's proposal are taken from BST's Products and Services Interval Guide that it has established for CLECs, and therefore, represents a useful alternative to BST's more limited proposal.

2. **BST's proposal is inadequate compared to the standards contained in the Florida Third Party Test Plan.**

Significantly, when BST filed its proposed analogs and benchmarks in Georgia, AT&T assumed that it would use, as a starting point, the analogs and benchmarks ordered

[2] BST's standards for UNEs also are discriminatory and woefully inadequate compared to other jurisdictions. See item 3 below.

by the Florida Public Service Commission.[3] Indeed, the Florida standards were the result of a multi-month process that included several workshops, as well as a review of separate proposals from CLECs, KPMG, and BST. BST proposed in Georgia much of what was rejected in Florida and did not even include in its Georgia proposal items it proposed in Florida. Indeed, a comparison of BST's Georgia proposal with the standards ordered in Florida highlights the inadequacies of the Georgia proposal.

For example, BST did not offer in all cases the same level of disaggregation and standards that it offered for the Florida third party test. BST offered significantly more product disaggregation in Florida than in Georgia. Additionally, in Florida, BST offered a twenty-four hour interval for partially and non-mechanized rejections, but offered forty-eight hours in Georgia. It also offered a retail analog for jeopardies, but in Georgia offered a benchmark of 95% > 24 hours. To further illustrate the deficiencies of this proposal, BST's lowest or worst interval for returning a jeopardy notice in February was 173.45 hours, or over 7 times longer than that to which BST wants to be held accountable.[4]

In addition, BST is attempting to have this Commission agree to analogs and benchmarks that the Florida Public Service Commission considered and rejected. Key differences between BST's Georgia proposal and the standards that will be used in the Florida third party test include:[5]

---

[3] The standards ordered by the Florida Public Service Commission are attached as Exhibit B.

[4] 173.45 was the interval for residence resale. The business interval was 274.23 hours, the resale design interval was 603.62 hours, the UNE non-design interval was 441.96 hours, the UNE design interval was 235.02 hours, for an average interval of 223.22 hours.

[5] While the Florida Staff Recommendation did not address all of AT&T's concerns, AT&T did not oppose the Staff Recommendation for Standards for the following key reasons: 1) KPMG is evaluating the **adequacy** of BST measures, including the standards, and making recommendations for change as part of the test, 2) the Florida Public Service Commission has established a separate proceeding to address

Measurement	Florida Test Plan	BST Georgia Proposal
Pre-Order Responsiveness	Requires parity with retail	Requires parity with retail "where applicable."
Flow-Through	The Commission established 95% for residence and deferred creating a benchmark until KPMG had completed its analysis of flow-through including comparing CLEC and retail flow-through.	BST offered the following: Residence—90% Business-----80% UNEs--------80% Specials-------0%
Rejection Interval	97% of mechanized < 1hour 85% of partially and non-mechanized < 24 hours	95% of mechanized in 1 hour 85% of partially and non-mechanized < 48 hours
FOC Interval	95% of mechanized < 3 hours 85% of partially and non-mechanized < 36 hours	95% of mechanized , 4 hours 85% of partially and non-mechanized < 48 hours
Product Disaggregation (The greater level of disaggregation also created different standards)	Includes the following: Resale residence Resale business Resale design Resale PBX Resale Centrex Resale ISDN UNE Loop and Port Combos UNE 2-wire with NP(non-design) UNE 2-wire w/o NP (non-design) UNE loop other with NP(non-design) UNE loop other w/o NP (non-design) UNE other (non-design) UNE 2-wire with NP(design) UNE 2-wire w/o NP (design) UNE loop other with NP(design) UNE loop other w/o NP (design UNE other (design) Local interconnection trunks Switching Local Transport	Resale residence Resale business Resale design UNE Loop and Port Combos UNE non-design UNE design Local interconnection trunks
Jeopardy Notice Interval	95% > 48 hours	95% >24 hours
Standards	Disaggregates by dispatch and non-dispatch	Compares to retail dispatch only.

permanent performance measures. The first workshop in the permanent proceeding was held on March 30, 2000, and 3) KPMG is tracking 17 additional measures as part of the test.

The Georgia Public Service Commission should utilize the analogs and benchmarks from the Florida third party test as the minimum starting point for its consideration, as AT&T stated in its letter of March 29, 2000 to BST (attached as Exhibit C).[6] Further, as the Georgia test does not include a review of the adequacy of measures, which would allow for adjustments to the analogs and benchmarks, AT&T recommends the Commission adopt the analogs and benchmarks, with attendant disaggregation, as described in Exhibit A.

3. **BST's Proposed Analogs and Benchmarks are inadequate when compared to those required of other RBOCs.**

BST has yet to put a performance measures proposal before this or any Commission recently that compares adequately to the performance plans of other RBOCs that have been or are currently being reviewed by the FCC. In key areas, BST's Georgia proposal does not compare to those provided by other RBOCs. Key differences between BST's Georgia proposal and the requirements in Texas and New York include:[7]

Measure	BST-Georgia proposal	Texas	New York
Flow-Through	Residence—90% Business-----80% UNEs--------80% Specials-------0%	Parity	95% for all (SQM also includes an improvement plan)
Rejection Interval	95% of mechanized in 1 hour 85% of partially and non-mechanized < 48 hours	97% of mechanized in 1 hour 97% of partially mechanized in 5 hours	95% of flow-through in 2 hours 95% of partial within 24 hours. 95% of non-mechanized within 48

[6] BST's response to AT&T's letter is attached as Exhibit D.

[7] This analysis only addresses illustrative analogs, benchmarks, and disaggregation. Similar gaps exist in the number and types of performance measures and associated business rules. For example, BST offers a single hot cut measure, while the Texas plan offers at least seven more hot cut measures (LNP and loop) than BST. The New York plan of November, 1999 provides ten hot cut measures. This is not to say that the plans offered by Bell Atlantic in New York and SWBT in Texas are adequate. Indeed, AT&T has concerns with the adequacies of these plans. AT&T's discussion in this document is for comparison purposes only and should not be construed as AT&T's endorsement of these plans.

			hours.
FOC Interval	95% mechanized < 4 hours 85% partially and non-mechanized < 48 hours	95% simple < 5 hours 95% complex < 24 95% manual < 24 hours	95% mechanized in 2 hours 95% partial within 24 hours. 95% non-mechanized within 48 hours. (Other intervals exist but include facilities check
Order Completion Interval-UNEs	--UNE Non-design-compare to retail Residence and Business Dispatch (February **8-10 days)** --UNE Design-compare to retail Design-Dispatch (February--**26.68 days**) (SL2 analog loops are included in BST's UNE design category)	95% within "X" days --2 Wire Analog and Digital and INP (1-10) – 3 **Days** --2 Wire Analog and Digital and INP (11-20) – 7 Days --2 Wire Analog and Digital and INP (20+) – 10 Days --DS1 loop(includes PRI) (1-10) – 3 Days --DS1 loop(includes PRI) (11-20) – 7 Days --DS1 loop(includes PRI) (20+) – 10 Days --XDSL loop (1-10) – 3 Days --XDSL loop (11-20) – 7 Days --XDSL loop (20+) – 10 Days --Switch Ports – Analog Port – 2 Days --Switch Ports – BRI Port (1-50) – 3 Days --Switch Ports – BRI Port (50+) – 5 Days --Switch Ports – PRI Port (1-20) – 5 Days --Switch Ports – PRI Port (20+) – 10 Days --DS1 Trunk Port (1 to 10) – 3 Days --DS1 Trunk Port (11 to 20) – 5 Days --DS1 Trunk Port (20+) – ICB Dedicated Transport (DS0, --DS1, and DS3) (1 to 10) – 3 Days	Parity with retail and based on interval guide. Following are excerpts from interval guide (which is part of BA SQM) Disaggregates by product, volume and, whether dispatch or non-dispatch. Interval guide has extensive disaggregation and includes the following:: --Hot cut (1-9 lines) in **5 days** --DSL (1-5 qualified loops) in **6 days**

	--UNE-P- Compare to retail Residence and Business Dispatch (February **8-10 days**)	--Dedicated Transport (DS0, DS1, and DS3) (11 to 20) – 5 Days --Dedicated Transport (DS0, DS1, and DS3) (20+) and all other types – ICB --Combos-Compare to retail, by dispatch and no dispatch	--UNE-P Migrations in **2 days**

4. **AT&T's recommended Disaggregation, Analogs, and Benchmarks provide a reasonable, but effective method by which the Commission and KPMG can evaluate BST's performance in the third party test.**

BST has not sufficiently supported analogs or benchmarks for its measures.[8] As such, AT&T requests that the Commission reject BST's proposal and adopt for use in the test AT&T's recommended disaggregation, analogs, and benchmarks as described in Exhibit A. AT&T's proposal draws on plans adopted in other jurisdictions modified to reflect BST's specific products and services.[9] Further, in response to BST's position that it has no analogous function for a loop migration, AT&T offers benchmarks for the Average Completion Interval measure, again based on the benchmarks in the Texas Performance Plan. For other provisioning measures, AT&T recommends retail analogs, again generally based on those of Texas, but modified to reflect BST's products and services.

5. **Additional measures are needed to conduct a sufficient evaluation of BST's performance during the test.**

[8] Indeed, in workshops, in filings, and before the Commission in Florida, BST complained that some of the analogs and benchmarks recommended by the Staff and KPMG were too stringent and should instead be based on BST's current performance for these measures. BST subsequently filed in Georgia even less stringent standards for the Georgia test. However, BST's argument overlooks the purpose of the Georgia test, which is not to confirm that BST is capable of achieving what it is already achieving, but instead to allow the Commission to determine ..."the enhancements necessary to bring its OSS into compliance with the requirements of the Federal and State acts." See Order, p. 1, Georgia Public Service Commission, June 28, 1999, Docket No. 8354-U, initiating the plan for Georgia's third party test.

[9] See footnote 7 for a discussion of analogs and benchmarks in other jurisdictions.

AT&T requests that the Commission consider the use of additional measures for the test to evaluate some of the areas not covered by BST's SQM.

--BST does not have measures in place to evaluate the following issues in the hot cut process:

1) whether the cut was performed too early,
2) whether the cut was performed too late,
3) whether the FOC was issued in time to allow the CLEC to timely activate the number porting process, and perform other essential activities,
4) whether the customer's service was impaired or taken out during the cut-over,
5) how long it took to restore the customer's service if interrupted during provisioning,
6) whether BST appropriately updated its orders when the CLEC cancelled or supplemented its hot cut order[10],
7) if the CLEC were notified of the cut so they can timely port the number,
8) whether the customer was disconnected from BST's switch before the loop was cut, or the CLEC had ported the numbers.
9) whether a trigger (when feasible) was set in BST's switch so that late switch translation disconnects would not affect the customer, etc.

--BST has no measures in place to evaluate the kinds of ordering and provisioning problems that recently arose in New York.

--BST has no measures to evaluate the provision of loop-make up information or acceptance testing for xDSL loops, in addition to the disaggregation issues already mentioned.

--BST has no change management measures.

The following seventeen additional measures were adopted in Florida for KPMG to investigate the feasibility of using in its role as a CLEC during testing. These could be

[10] As noted in KPMG's Exception 22 dated Feburary 15, 2000 in the Georgia Third Party Test, Docket 8354-U, "BellSouth disconnected retail accounts on loop migration orders without re-connecting the UNE-loop component."

used as a starting point for Georgia in evaluating other critical areas of BST's performance.

1. Percent Service Loss from Early and Late Cuts
2. Percent of hot cuts not working when initially provisioned
3. Percent completions or attempt without notice of with less than 24 hours notice
4. Percent order accuracy
5. Percent of orders cancelled or supplemented at the request of BellSouth
6. Percent and timeliness of EDI and TAG LSR acknowledgements
7. Provisioning troubles prior to loop acceptance
8. Percent orders canceled after missed due date
9. Percent found OK/test OK
10. CLEC center call abandonment rate
11. Average notification of interface/OSS outage
12. Percent of change management notices and documentation sent on time
13. Percent of software certification failures and software problem resolution
14. Percent billing errors corrected in X days
15. Look Make-up information timeliness
16. Provisioning trouble reports prior to service order completion
17. Coordinated customer conversions s a percentage on-time

Conclusion

For the reasons stated above, the Commission should not adopt BST's proposed analogs and benchmarks for the third party test. Instead, AT&T urges the Commission to adopt the analogs and benchmarks for the third party test that are contained in Exhibit A.

This fifth day of April, 2000.

Respectfully submitted,

Suzanne W. Ockleberry

AT&T Communications of
the Southern States, Inc.
1200 Peachtree St. NE, Suite 8100
Atlanta, Georgia 30309
404-810-7175

CERTIFICATE OF SERVICE - Docket No. 8354-U

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

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This 5th day of April, 2000.

Suzanne W. Ockleberry

A

Part 1 - Disaggregation, Analogs and Benchmarks for Georgia Third Party Test

A. Product	Benchmark/Analog Benchmark--95% within x Days unless otherwise noted for Order or Average Completion Interval Measure	Retail Analog For other provisioning and maintenance and repair measures
UNE Loops		
2 Wire analog voice grade loop non-designed (SL1)	3 days for 1-5 lines 7 days for 6-14 lines 10 days for 15+ lines	Retail POTS
2 Wire analog voice grade loop designed (SL2)	Same as above	Retail POTS
4 Wire analog voice grade loop	Same as above	Retail POTS
4 Wire DS1 & PRI digital loop	Same as above	DS1
2 Wire ISDN digital loop	Same as above	ISDN
4 Wire 56 OR 64 Kbps digital loop	Same as above	DS1
ADSL-2 Wire (asymmetrical digital subscriber line loop)	Same as above	DS1
HDSL-2 Wire & 4 Wire (high bit rate digital subscriber line loop)	Same as above	DS1
Unbundled Copper Loop	Same as above	DS1
UNE Ports		
2 Wire analog line port	3 days	Retail POTS
2 Wire analog DID trunk port	5 days	DID
2 Wire ISDN digital line side port	5 days	ISDN
4 Wire ISDN DS1 digital trunk port	5 days	ISDN
UNE Combinations		
Analog Loop and Port	Retail POTS	Retail POTS
Digital Loop and Port	3 days for 1-5 lines 7 days for 6-14 lines 10 days for 15+ lines	DS1
Loop and Transport	Same as above.	DS1
LNP		
Simple Services	5 days for 1-50 numbers 10 days for 50+ numbers	
DID	same as above	
Other Complex Services	same as above	
Resale-Simple		
Local Exchange Line -Residence	Retail Analog	Retail Analog
Local Exchange Line-Business	Retail Analog	Retail Analog
Call Waiting Deluxe	Retail Analog	Retail Analog
Caller ID	Retail Analog	Retail Analog
Enhanced Caller ID	Retail Analog	Retail Analog
MemoryCallÆ	Retail Analog	Retail Analog
Optional Calling Plan	Retail Analog	Retail Analog
PBX Trunks	Retail Analog	Retail Analog
RingMasterÆ	Retail Analog	Retail Analog
Other Line features	Retail Analog	Retail Analog

A. Product	Benchmark/Analog Benchmark--95% within x Days unless otherwise noted for Order or Average Completion Interval Measure	Retail Analog For other provisioning and maintenance and repair measures
Resale-Complex		
AccuPulseÆ*	Retail Analog	Retail Analog
Centrex/Essx	Retail Analog	Retail Analog
Direct Inward Dial (DID)*	Retail Analog	Retail Analog
FlexServÆ *	Retail Analog	Retail Analog
FCO/FX	Retail Analog	Retail Analog
Frame Relay	Retail Analog	Retail Analog
Hunting	Retail Analog	Retail Analog
ISDN/BRI	Retail Analog	Retail Analog
ISDN/PRI	Retail Analog	Retail Analog
LightGateÆ	Retail Analog	Retail Analog
MegaLinkÆ	Retail Analog	Retail Analog
MultiServÆ	Retail Analog	Retail Analog
SMARTPathÆ	Retail Analog	Retail Analog
SMARTRingÆ	Retail Analog	Retail Analog
SynchroNetÆ	Retail Analog	Retail Analog
Tie lines	Retail Analog	Retail Analog
WATS	Retail Analog	Retail Analog

B. Pre-Order OSS Responsiveness	C. Maintenance & Repair OSS Responsiveness
1. Feature Function Availability/Service Availability 2. Facility Availability Qualification of Loops for Advanced Digital Services 3. Street Address Validation 4. Appointment Scheduling 5. Customer Service Records 6. Telephone Number 7. Rejected or Failed Queries (regardless of type)	1. Create (or confirm logging of) a Maintenance Request 2. Obtain Status 3. Obtain Test Results 4. Cancel Request 5. Rejected of Failed Queries (regardless of type) 6. Clearance Notification Closure Notification

Part 2 - AT&T Proposal for Standards for BellSouth Measures

BellSouth Measure	Analog/Benchmark
1. Average Response Time and Response Interval (Pre-Ordering) 2. Interface Availability (Pre-Ordering) 3. Interface Availability (Maintenance & Repair) 4. Response Interval (Maintenance & Repair)	(See Section D above re: interface, company, and geographic disaggregation) 1. Retail analogs by function. See Section B above. 2. 99.5 % availability for all OSS interfaces. 3. 99.5% availability for all OSS interfaces. 4. Retail analogs by function. See Section C above.
1. Percent Flow-through Service Requests 2. Percent Rejected Service Requests 3. Reject Interval 4. Firm Order Confirmation Timeliness 5. Speed of Answer in Ordering Center 6. LNP- Percent Rejected Service Request 7. LNP- Reject Interval Distribution & Average Reject Internal 8. LNP- Firm Order Confirmation Timeliness	(See Section D above re: interface, company, and geographic, and volume disaggregation, and Section A for product disaggregation) 1. 98% flow-through, (with an improvement plan if BST's current methodology is not rejected by the Commission.) 2. Diagnostic 3. 95% or greater within: mechanized-- 1 hour, partially mechanized—5 hours, non-mechanized--24 hours 4. 95% or greater within: mechanized-- 1 hour, partially mechanized—5 hours, non-mechanized--24 hours 5. 95% within 20 seconds, 100% within 30 seconds 6. Diagnostic 7. 95% or greater within: mechanized-- 1 hour, partially mechanized—5 hours, non-mechanized--24 hours 8. 95% or greater within: mechanized-- 1 hour, partially mechanized—5 hours, non-mechanized--24 hours
1. Mean Held Order Interval & Distribution Intervals 2. Average Jeopardy Notice Interval & % of Orders Given Jeopardy Notices 3. Percent Missed Installation Appointments 4. Average Completion Interval 5. Average Completion Notice Interval 6. Coordinated Customer Conversions 7. % Provisioning Troubles w/i 30 days of Service Order Activity 8. Total Service Order Cycle Time 9. LNP- Percent Missed Installation Appointments	(See Section A above for product specific disaggreation, benchmark or retail analog) (See Section D above re: company, and geographic, dispatch, and volume disaggregation) 1. Retail Analog 2. Retail Analog 3. Retail Analog 4. Benchmark 5. Retail Analog 6. 100% within 15 minutes 7. 8. Retail analog 9. 95% within 30 minutes

10. LNP- Average Disconnect Timeliness Interval 11. LNP-Total Service Order Cycle Time	10.
1. Missed Repair Appointments 2. Customer Trouble Report Rate 3. Maintenance Average Duration 4. Percent Repeat Troubles w/i 30 days) 5. Out of Service > 24 Hours 6. Average Answer Time - Repair Centers	(See Section A above for product specific disaggregation and retail analog) (See Section D above re: company, and geographic, dispatch, and volume disaggregation) 1. Retail Analog 2. Retail Analog 3. Retail Analog 4. Retail Analog 5. Retail Analog 6. 95% within 20 seconds, 100% within 30 seconds
1. Invoice Accuracy 2. Mean Time to Deliver Invoices 3. Usage Data Delivery Accuracy 4. Usage Data Delivery Completeness 5. Usage Data Delivery Timeliness 6. Mean Time to Deliver Usage	(See Section D above re: interface and company disaggregation) 1. Retail Analog 2. 100% within 10 calendar days 3. Retail Analog 4. Retail Analog 5. Retail Analog 6. Retail Analog
1. Average Speed to Answer (Toll) 2. Percent Answered within "X" Seconds (Toll) 3. Average Speed to Answer (DA) 4. OS-4. Percent Answered within "X" Seconds (DA)	(See Section D above re: company, and geographic disaggregation) 1. >90% of calls answered within 10 seconds 2. >90% of calls answered within 10 seconds 3. >90% of calls answered within 10 seconds 4. >90% of calls answered within 10 seconds
1. E-911. Timeliness 2. E-911. Accuracy 3. E-911 Mean Interval	(See Section D above re: company and geographic disaggregation) 1. 99% completed in 24 hours 2. 99.99 accuracy 3. 99% completed in 24 hours
1. Trunk Group Performance-Aggregate 2. Trunk Group Performance-CLEC Specific 3. Trunk Group Service Report 4. Trunk Group Service Detail	(See Section D above re: company and geographic disaggregation) Blockage of < 1% occurs 95% of the time (disaggregated to the trunk group level). (Implementation requires modification of the measure)
1. Collocation Average Response Time 2. Collocation Average Arrangement Time 3. Collocation % of Due Dates Missed	(See Section D above re: company and geographic disaggregation) 1. 95% within 10 calendar days 2. Physical-90 calendar days, virtual 60 calendar days 3. 0 misses of committed due date

B

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory.	DOCKET NO. 981834-TP
In re: Consideration of BellSouth Telecommunications, Inc.'s entry into interLATA services pursuant to Section 271 of the Federal Telecommunications Act of 1996.	DOCKET NO. 960786-TL ORDER NO. PSC-00-0563-PAA-TP ISSUED: March 20, 2000

The following Commissioners participated in the disposition of this matter:

JOE GARCIA, Chairman
J. TERRY DEASON
SUSAN F. CLARK
E. LEON JACOBS, JR.
LILA A. JABER

NOTICE OF PROPOSED AGENCY ACTION
ORDER APPROVING RETAIL ANALOGS, BENCHMARKS AND STATISTICAL METHODOLOGY

BY THE COMMISSION:

NOTICE is hereby given by the Florida Public Service Commission that the action discussed herein is preliminary in nature and will become final unless a person whose interests are substantially affected files a petition for a formal proceeding, pursuant to Rule 25-22.029, Florida Administrative Code.

BACKGROUND

On December 10, 1998, the Florida Competitive Carriers Association (FCCA), the Telecommunications Resellers, Inc. (TRA), AT&T Communications of the Southern States, Inc. (AT&T), MCImetro Access Transmission Services, LLC (MCImetro), WorldCom

DOCUMENT NUMBER-DATE
03517 MAR 20 00
FPSC-RECORDS/REPORTING

Technologies, Inc. (WorldCom), the Competitive Telecommunications Association (Comptel), MGC Communications, Inc. (MGC), and Intermedia Communications Inc. (Intermedia) (collectively, "Competitive Carriers") filed their Petition of Competitive Carriers for Commission Action to Support Local Competition in BellSouth's Service Territory.

On December 30, 1998, BellSouth Telecommunications, Inc. (BellSouth) filed a Motion to Dismiss the Petition of the Competitive Carriers for Commission Action to Support Local Competition in BellSouth's Service Territory. BellSouth requested that we dismiss the Competitive Carriers' Petition with prejudice. On January 11, 1999, the Competitive Carriers filed their Response in Opposition to BellSouth's Motion to Dismiss.

By Order No. PSC-99-0769-FOF-TP, issued April 21, 1999, we denied BellSouth's Motion to Dismiss. In addition, we denied the Competitive Carriers' request to initiate a rulemaking proceeding to establish expedited dispute resolution procedures for resolving interconnection agreement disputes. We also directed our staff to provide more specific information and rationale for its recommendation on the remainder of the Competitive Carriers Petition.

By Order No. PSC-99-1078-FOF-TP, issued May 26, 1999, we granted, in part, and denied, in part, the petition of the Florida Competitive Carriers Association to support local competition in BellSouth's service territory. Specifically, we established a formal administrative hearing process to address unbundled network elements (UNE) pricing, including UNE combinations and deaveraged pricing of unbundled loops. We also ordered that Commissioner and staff workshops on Operations Support Systems (OSS) be conducted concomitantly in an effort to resolve OSS operational issues. We indicated that the request for third-party testing of OSS was to be addressed in these workshops. These workshops were held on May 5-6, 1999. We also ordered a formal administrative hearing to address collocation and access to loop issues, as well as costing and pricing issues.

On May 28, 1999, FCCA and AT&T filed a Motion for Independent Third-Party Testing of BellSouth's OSS. BellSouth filed its Response to this Motion by the FCCA and AT&T on June 16, 1999.

That same day, FCCA and AT&T filed a Supplement to the Motion for Third-Party Testing. On June 17, 1999, ACI Corp. (ACI) filed a Motion to Expand the Scope of Independent Third-Party Testing. On June 28, 1999, BellSouth responded to the Supplement filed by FCCA and AT&T. On June 29, 1999, BellSouth responded to ACI's Motion to Expand the Scope of Independent Third-Party Testing. By Order No. PSC-99-1568-PAA-TP, issued August 8, 1999, we denied the motion. Upon our own motion, we approved our staff's recommendation to proceed with Phase I of third-party testing of BellSouth's OSS. Phase I of third-party testing required a third party, in this case KPMG, to develop a Master Test Plan (MTP) that would identify the specific testing activities necessary to demonstrate non-discriminatory access and parity of BellSouth's systems and processes.

By Order No. PSC-00-0104-PAA-TP, issued January 11, 2000, we approved the KPMG MTP and initiated Phase II of third-party testing of BellSouth's OSS. In order to initiate testing, we must approve interim performance metrics to be used during the course of testing to assess the level of service BellSouth is providing to ALECs. There are three components to the development of performance metrics. The first component is the performance metrics themselves and the calculations. The second component is retail analogs and performance target benchmarks. The third component is the statistical methodology to be used in analysis of test results. By Order No. PSC-00-0260-PAA-TP, issued February 8, 2000, we approved the interim performance metrics and their calculations. This Order addresses the retail analogs and benchmarks and the statistical methodology that should be used during the OSS third-party testing. Once interim performance metrics standards are established, KPMG can begin to define the process for capturing the required measurement data.

KPMG RETAIL ANALOGS AND BENCHMARKS

Performance standards, also known as retail analogs and benchmarks, are the yardstick by which the existence of nondiscrimination or parity will be determined during the OSS third-party testing. During the development of the master test plan, several ALECs filed comments regarding the adequacy and completeness of the performance metrics and standards proposed by BellSouth. In response, our staff initiated a process for

obtaining input regarding the metrics to be used for the purposes of testing. An Interim Performance Metrics Work Group, comprised of representatives of Commission staff, BellSouth, and the ALEC community, was established. This work group participated in three workshops and had four opportunities for comment regarding the retail analogs and benchmarks. Workshops were held on December 1 and 17, 1999; and January 28, 2000. The resulting retail analogs and benchmarks are shown in Attachment I which, by reference, is incorporated herein.

In establishing these retail analogs and benchmarks, KPMG has opted for retail analogs whenever possible to allow parity determinations to be made against actual BellSouth performance. In those cases where no retail analogs were available, benchmarks were developed based on input from BellSouth and the ALECs. We have reviewed BellSouth's historical performance and benchmarks that were established in other jurisdictions. We find that the approved benchmarks represent reasonable OSS performance standards that will afford ALECs a meaningful opportunity to compete in the local exchange market. The approved retail analogs and benchmarks address the products and services BellSouth currently provides to ALECs. During the duration of the test, additional products may become available. In that event, we will consider any necessary changes or revisions to the performance measures or standards.

We find that the interim retail analogs and benchmarks used during testing can serve as the starting point for developing permanent analogs and benchmarks once testing proves whether or not the standards are adequate. Based on the foregoing, the retail analogs and benchmarks developed by KPMG, as set forth in Attachment I, are hereby approved.

KPMG STATISTICAL METHODOLOGY

KPMG's proposed statistical methodology is based upon the joint efforts of BellSouth and ALEC statisticians. The methodology has evolved from work begun in other jurisdictions and incorporates two important safeguards which help ensure that the Florida tests yield a fair evaluation of the performance of BellSouth's OSS systems. These safeguards are based upon the comments and suggestions received at the staff workshop held on January 28, 2000. In order to include these safeguards in the statistical

methodology already approved in Order No. PSC-00-0104-PAA-TP, Appendix C of the Master Test Plan shall be amended as shown in Attachment II which, by reference, is incorporated herein.

The first safeguard to be included in KPMG's statistical methodology takes into consideration, and attempts to balance, the business risks both BellSouth and the ALECs could be exposed to due to the sampling process. This safeguard protects ALECs from the risk that the tests show that parity exists when in fact it does not exist. Conversely, it also protects BellSouth from the risk that the test shows that parity does not exist when, in fact, it does. While the risk of reaching an incorrect conclusion cannot be eliminated entirely in a sampling environment, the statistical methodology proposed by KPMG strives to equalize and minimize the likelihood of either erroneous conclusion.

The second safeguard incorporated into KPMG's proposed methodology is the inclusion of a method to detect the presence of measurement bias which could occur during testing. This bias could arise if KPMG's test transactions are handled differently in BellSouth's OSS systems than the transactions originating from the general ALEC community. KPMG's proposed methodology includes a statistical comparison of the aggregate ALEC data to the retail analogs and benchmarks as well as a comparison of their own test results to the retail analogs and benchmarks. This dual comparison of the performance provided by BellSouth to both KPMG and the general ALEC community provides a basis to detect if the KPMG test results are representative of the experiences of the ALEC community as a whole.

KPMG's proposed statistical methodology will provide a fair and balanced evaluation of the performance of BellSouth's OSS systems. Based on the foregoing, the statistical methodology developed by KPMG, as set forth in Attachment II, is hereby approved. These dockets shall remain open to address the issues raised in FCCA's Petition for Commission Action to Support Local Competition in BellSouth's Service Territory and BellSouth's compliance with Section 271.

Therefore, it is

ORDERED by the Florida Public Service Commission that the retail analogs and benchmarks developed by KPMG, as set forth in Attachment I which, by reference, is incorporated in the body of this Order, are hereby approved. It is further

ORDERED that the statistical methodology developed by KPMG, as set forth in Attachment II which, by reference, is incorporated in the body of this Order, is hereby approved. It is further

ORDERED that the provisions of this Order, issued as proposed agency action, shall become final and effective upon the issuance of a Consummating Order unless an appropriate petition, in the form provided by Rule 28-106.201, Florida Administrative Code, is received by the Director, Division of Records and Reporting, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on the date set forth in the "Notice of Further Proceedings" attached hereto. It is further

ORDERED that in the event this Order becomes final, these dockets shall remain open.

By ORDER of the Florida Public Service Commission this 20th day of March, 2000.

BLANCA S. BAYÓ, Director
Division of Records and Reporting

By: Kay Flynn
Kay Flynn, Chief
Bureau of Records

(S E A L)

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NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing that is available under Section 120.57, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing will be granted or result in the relief sought.

Mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing.

The action proposed herein is preliminary in nature. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal proceeding, in the form provided by Rule 28-106.201, Florida Administrative Code. This petition must be received by the Director, Division of Records and Reporting, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on April 10, 2000.

In the absence of such a petition, this order shall become final and effective upon the issuance of a Consummating Order.

Any objection or protest filed in this docket before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Pre-Ordering	Average Response Time – Telephone Number Availability and Reservation		
	• Average Response Time – Cust. Serv Record	Parity with retail	
	• Average Response Time – Due Date Avail	Parity with retail	
	• Average Response Time – Address Validation	Parity with retail	
	• Average Response Time – Prod & Serv. Avail	Parity with retail	
	• Average Response Time – Telephone Number Availability and Reservation	Parity with retail	
	OSS Interface Availability		99.5%*
Ordering	Percent Flow-Through Service Request		
	• Residence		85%
	• Business		TBA
	• UNE		TBA
	• Special		TBA
	Percent Rejected Service Request	Diagnostic*	Diagnostic*
	Reject Interval		
	• Mechanized		87% <= 1 hr
	• Non-Mechanized and Partially Mechanized		85% < 24 hrs
	Firm Order Confirmation Timeliness		
	• Mechanized		95% <= 3 hrs
	• Non-Mechanized and Partially Mechanized		85% < 36 hrs
	Speed of Answer in Ordering Center	Parity with retail*	
	[illegible]		
Provisioning	Mean Held Order Interval		
	• Resale Residence	Parity with retail*	
	• Resale Business	Parity with retail*	
	• Resale Design	Parity with retail*	
	• Resale PBX	Parity with retail*	
	• Resale Centrex	Parity with retail*	
	• Resale ISDN	Parity with retail*	
	• UNE Loop and Port Combos	Retail Residence and Business	

Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Provisioning Combined	• UNE 2w Loop with NP – Non-Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design	Retail Residence and Business	
	• UNE Loop Other with NP Non-Design	Retail Residence and Business	
	• UNE Loop Other without NP Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop with NP – Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Design	Retail Design	
	• UNE Loop Other with NP – Design	Retail Design	
	• UNE Loop Other without NP – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1 or DS3 as appropriate	
	Average Jeopardy Notice Interval (Mechanized)		95% >=48 Hrs.
	• Resale Residence		95% >=48 Hrs.
	• Resale Business		95% >=48 Hrs.
	• Resale Design		95% >=48 Hrs.
	• Resale PBX		95% >=48 Hrs.
	• Resale Centrex		95% >=48 Hrs.
	• Resale IDSN		95% >=48 Hrs.
	• UNE Loop and Port Combos		95% >=48 Hrs.
	• UNE 2w Loop with NP – Non-Design		95% >=48 Hrs.
	• UNE 2w Loop without NP – Non-Design		95% >=48 Hrs.
	• UNE Loop Other with NP Non-Design		95% >=48 Hrs.
	• UNE Loop Other without NP Non-Design		95% >=48 Hrs.
	• UNE Other Non Design		95% >=48 Hrs.
	• UNE 2w Loop with NP – Design		95% >=48 Hrs.
	• UNE 2w Loop without NP – Design		95% >=48 Hrs.
	• UNE Loop Other with NP – Design		95% >=48 Hrs.
	• UNE Loop Other without NP – Design		95% >=48 Hrs.

Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Provisioning continued	• UNE Other Design		85% >=48 Hrs
	• Local Interconnection Trunks		95% >=48 Hrs
	• Switching	Retail POTS	
	• Local Transport	Retail DS1, or DS3 as appropriate	
	% of Orders Given Jeopardy Notice (Mechanized)		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design	Retail Residence and Business	
	• UNE Loop Other with NP Non-Design	Retail Residence and Business	
	• UNE Loop Other without NP Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop with NP – Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Design	Retail Residence and Business	
	• UNE Loop Other with NP – Design	Retail Design	
	• UNE Loop Other without NP – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1, or DS3 as appropriate	
	Percent Missed Installation Appointments		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	

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Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Provisioning - Combined	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design	Retail Residence and Business	
	• UNE Loop Other with NP Non-Design	Retail Residence and Business	
	• UNE Loop Other without NP Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop with NP – Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Design	Retail Residence and Business	
	• UNE Loop Other with NP – Design	Retail Design	
	• UNE Loop Other without NP – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1, or DS3 as appropriate	
	Order Completion Interval		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design	Retail Residence and Business	
	• UNE Loop Other with NP Non-Design	Retail Residence and Business	
	• UNE Loop Other without NP Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop with NP – Design	Retail Residence and Business	

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Florida OSS Third Party Testing
Performance: Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Provisioning Continued	• UNE 2w Loop without NP – Design	Retail Residence and Business	
	• UNE Loop Other with NP – Design	Retail Design	
	• UNE Loop Other without NP – Design	Retail Design	
	▪ UNE Other Design	Retail Design	
	▪ Local Interconnection Trunks	Parity with retail	
	▪ Switching	Retail POTS	
	• Local Transport	Retail DS1 or DS3 as appropriate	
	Average Completion Notice Interval (Mechanized)		
	▪ Resale Residence	Parity with retail	
	▪ Resale Business	Parity with retail	
	▪ Resale Design	Parity with retail	
	▪ Resale PBX	Parity with retail	
	▪ Resale Centrex	Parity with retail	
	▪ Resale ISDN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design	Retail Residence and Business	
	▪ UNE Loop Other with NP Non-Design	Retail Residence and Business	
	▪ UNE Loop Other without NP Non-Design	Retail Residence and Business	
	▪ UNE Other Non Design	Retail Residence and Business	
	▪ UNE 2w Loop with NP – Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Design	Retail Residence and Business	
	▪ UNE Loop Other with NP – Design	Retail Design	
	▪ UNE Loop Other without NP – Design	Retail Design	
	▪ UNE Other Design	Retail Design	
	▪ Local Interconnection Trunks	Parity with retail	
	▪ Switching	Retail POTS	
	▪ Local Transport	Retail DS1 or DS3 as appropriate	
	Percent Provisioning Troubles within 30 Days		
	• Resale Residence	Parity with retail	

Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Provisioning Continued	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design	Retail Residence and Business	
	• UNE Loop Other with NP Non-Design	Retail Residence and Business	
	• UNE Loop Other without NP Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop with NP – Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Design	Retail Residence and Business	
	• UNE Loop Other with NP – Design	Retail Design	
	• UNE Loop Other without NP – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1, or DS3 as appropriate	
	Total Service Order Cycle Time	Diagnostic	
Maintenance	Customer Trouble Report Rate	Parity with retail	
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop – Non-Design	Retail Residence and Business	

Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Maintenance Continued	• UNE Loop Other – Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop – Design	Retail Residence and Business	
	• UNE Loop Other – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1, or DS3 as appropriate	
	Customer Trouble Report Rate		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale ISDN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop – Non-Design	Retail Residence and Business	
	• UNE Loop Other – Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop – Design	Retail Residence and Business	
	• UNE Loop Other – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1,or DS3 as appropriate	
	Maintenance Average Duration		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	

Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Maintenance / Centrigued	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop – Non-Design	Retail Residence and Business	
	• UNE Loop Other – Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop – Design	Retail Residence and Business	
	• UNE Loop Other – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1 or DS3 as appropriate	
	Percent Repair Troubles within 30 Days		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop – Non-Design	Retail Residence and Business	
	• UNE Loop Other – Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop – Design	Retail Residence and Business	
	• UNE Loop Other – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1, or DS3 as appropriate	

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Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Maintenance Continued	Out of Service > 24hrs	Parity with retail	
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale ISDN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop – Non-Design	Retail Residence and Business	
	• UNE Loop Other – Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop – Design	Retail Residence and Business	
	• UNE Loop Other – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1 or DS3 as appropriate	
	OSS Interface Availability	Parity with retail*	99.5%*
	• All systems except ECTA		
	• ECTA		
	OSS Response Interval and %	Parity with retail*	
	• TAFI (Front End)	Parity by Design*	
	• CRIS, DLETH, DLR, OSPCH, LMOS, LMOSUP, MARCH, Predictor, SOCS, LNP (Parity by Design)		
	Average Answer Time – Repair Center	Parity with retail	
Billing	Invoice Accuracy	Parity with retail*	
	Mean Time To Deliver Invoices	Parity with retail*	
	Usage Data Delivery Accuracy	Parity with retail	

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DOCKETS NOS. 981834-TP, 960786-TL
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Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Billing	Usage Data Delivery Completeness	Parity with retail	
	Usage Data Delivery Timeliness	Parity with retail	
	Mean Time to Deliver Usage	Parity with retail	
Operator Services (Toll)	Average Speed to Answer	Parity by Design	
	% Answered in "x" Seconds	Parity by Design	
Directory Assistance	Average Speed to Answer	Parity by Design	
	% Answered in "x" Seconds	Parity by Design	
E911	Timeliness	Parity by Design	
	Accuracy	Parity by Design	
	Mean Interval	Parity by Design	
Trunk Group Performance (Blocking)	Trunk Group Service Report (Percent Trunk Blockage) Any 2 hour period in 24 hours where CLEC blockage exceeds BST blockage by more than 0.5% = a miss using trunk groups 1, 3, 4, 5, 10, 18 for CLECs and 9 for BST.	Parity with retail	
	Trunk Group Service Report (Percent Trunk Blockage)	Parity with retail	
Ordering	Average Disconnect Timeliness Interval		85% < 15 min
	Percent Missed Installation Appointments	Retail Residence and Business	
	FOC (Mechanized)		95% <= 3 hrs
	Non-Mechanized and Partially Mechanized		85% < 36 hrs
	% Reject Service Request	Diagnostic	Diagnostic
	Average Reject Interval (Mechanized)		97% <= 1 hr
	Non-Mechanized and Partially Mechanized		85% < 24hrs
	TSOC	Diagnostic	Diagnostic

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Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
[redacted]	% Flow Through		85%
	Coordinated Customer Conversions – UNE Loop		85% < 15 min*
	Coordinated Customer Conversions – LNP		85% < 15 min*
	Average Response Time	This is being addressed in FPSC Docket 960600	
	Average Arrangement Time	This is being addressed in FPSC Docket 960600	
	% of Due Dates Missed		95% < Commit Date

* Denotes a retail analog or benchmark that has previously been approved by the Florida Public Service Commission.
TBA– Denotes a benchmark that will be established following further analysis by KPMG.

Appendix C: Statistical Approach

A. Overview

This test will rely on standard statistical methods to evaluate BST 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. Measures

The measures (metrics and their associated standards) that will serve as parameters for testing will be listed in Appendix D.

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 BellSouth is performing adequately. The possibility of an error arises if this hypothesis is rejected when it is true (Type I error) or is accepted when it is false (Type II error). ~~An attempt will be made to balance Type I and Type II errors as much as it feasible.~~ The hypothesis tests will balance Type I and Type II errors whenever feasible.

E. Parity Tests and Non-Parity Tests

There are two basic types of tests. Parity tests compare a BellSouth 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.

Non-parity 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.~~ The tests will compare KPMG pseudo-CLEC performance measurements to the analogs/benchmarks described in Appendix D. The tests will also compare aggregate CLEC performance measurements to the analogs/benchmarks described in Appendix D. Conclusions will be drawn from the outcomes of these statistical hypothesis tests.

AT&T

Law & Government Affairs

Suite 8100
1200 Peachtree Street, N.E.
Atlanta, GA 30309-3579

March 29, 2000

Fred McCallum
General Counsel – Georgia
BellSouth Telecommunications, Inc.
Suite 376
125 Perimeter Center West
Atlanta, GA 30346

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

Dear Fred:

This letter is in response to the March 22, 2000, KPMG submission "at BellSouth's request" of BellSouth's proposed standards and benchmarks to be used in the Georgia OSS evaluation. BellSouth has filed the same set of standards and benchmarks that were rejected by the Florida Public Service Commission on March 20, 2000, in Docket No. 981834-TP and 960786-TL. It is AT&T's understanding that BellSouth has a practice in Georgia of incorporating other Commission decisions into the performance measures. Therefore, AT&T believes it would be more appropriate to use the standards and benchmarks recently ordered by the Florida Commission as the starting point for the Georgia evaluation.

Given the short time frame permitted for comment, AT&T requests written confirmation by Friday, March 31, 2000, that, in fact, BellSouth intends to use the standards and benchmarks ordered in Florida as the starting point for the Georgia Public Service Commission's consideration of this issue.

Very truly yours,

Suzanne W. Ockleberry

cc: David Frey, KPMG
David Burgess
Leon Bowles

Recycled Paper

Fred McCallum Jr.
General Counsel - Georgia

BellSouth Telecommunications, Inc.
Legal Department
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Telephone 770-391-2416
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March 31, 2000

VIA FACSIMILE AND U.S. MAIL

Suzanne W. Ockleberry, Esquire
AT&T – Law and Government Affairs
1200 Peachtree Street
Suite 8100
Atlanta, Georgia 30309

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

Dear Suzanne:

This letter is in response to yours of March 29, 2000. In that letter AT&T demanded BellSouth's written confirmation by today that BellSouth intended to propose the standards and benchmarks ordered by the Florida Public Service Commission, as opposed to the standards that were actually submitted in this docket by KPMG on behalf of BellSouth. This will confirm that BellSouth intended to propose the standards that were filed by KPMG, and not the standards adopted by the Florida Commission. BellSouth strenuously disagrees with at least some portions of the Florida order. For these reasons, we do not believe that the Georgia Public Service Commission should use the standards and benchmarks adopted by the Florida Commission.

Very truly yours,

Fred McCallum Jr.

FJM:nvd

cc: The Honorable David Burgess
Mr. Leon Bowles
Mr. David Frey

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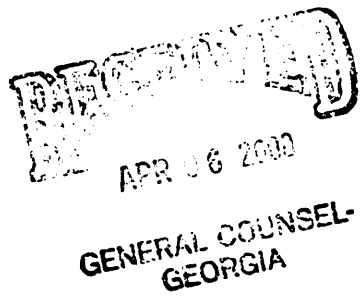
April 5, 2000



Via Hand Delivery

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

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

Dear Ms. O'Leary:

Enclosed for filing are an original and fifteen (15) copies, along with a diskette containing an electronic version in Microsoft Word, of the Comments of Covad Communications Regarding Proposed Analogs and Benchmarks for Georgia OSS Evaluation on behalf of Covad Communications.

Please acknowledge your receipt of the enclosed by date-stamping the two(2) extra copies and returning them to the undersigned VIA the delivering courier.

Thank you for your assistance with this matter.

Very truly yours,

Charles V. Gerkin, Jr.

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

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

ATLANTA, GEORGIA

In re:	)	
	)	
Investigation into Development of Electronic	)	
Interfaces for BellSouth Telecommunications,	)	Docket No. 8354-U
Inc.'s Operational Support Systems	)	

COVAD COMMUNICATIONS COMPANY'S COMMENTS ON PROPOSED ANALOGS AND BENCHMARKS FOR GEORGIA OSS EVALUATION

Comes Now, DIECA Communications, Inc. d/b/a Covad Communications Company ("Covad"), and makes the following comments on the Analogs and Benchmarks proposed by BellSouth Telecommunications, Inc. ("BellSouth") with respect to the Georgia OSS evaluation. Pursuant to the Georgia Public Service Commission ("GPSC") staff's letter dated March 29, 2000, Covad understands that the performance metric analogs and benchmarks ("BellSouth's Proposed Benchmarks") are intended for use only during the Georgia OSS evaluation and that they will not be permanent performance measures. Covad believes that permanent performance measures should be developed in a cooperative manner among the Commission, BellSouth, and the CLECs. Only then will the performance measures drive process improvements that increase competition in Georgia.

Nonetheless, given the importance of the Georgia OSS evaluation, it is imperative that this Commission adopt performance measures for use in that test that are accurate and thoroughly assess the quality of BellSouth's performance in provisioning xDSL loops. To that end, Covad makes the following comments and suggestions.

I. BellSouth's Proposal is Consistently Less Rigorous Than What Was Adopted in Florida

Covad attaches for the Commission's review a copy of the Florida OSS third party

performance metric analogs and benchmarks adopted for the third party OSS test in Florida. A side by side comparison of BellSouth's Georgia proposal shows that in almost every benchmark in which a percentage is proposed by BellSouth, that percentage is lower than what is required in Florida. For example, in the following areas BellSouth has proposed that it be required only to meet a certain percentage of satisfactory completion within a certain time frame. In all of these examples, BellSouth proposes for Georgia a lower benchmark than what is required in Florida:

Area of Inquiry	**BellSouth Georgia Proposed Benchmark**	**Benchmarks Required in Florida**
Ordering – Percent Flow-Through Service Request (Residence)	90%	95%
Ordering – Reject Interval (Mechanized)	95% in 1 hr.	97% <= 1 hr.
Order – Reject Interval (Non-Mechanized and Partially Mechanized)	85% < 48 hrs.	85% < 24 hrs.
Ordering – Firm Order Confirmation Timeliness (Mechanized)	95% < 4 hrs.	95% <= 3 hrs.
Ordering – Firm Order Confirmation Timeliness (Non-Mechanized and Partially Mechanized)	85% < 48 hrs.	85% < 36 hrs.
LNP – FOC (Mechanized)	95% < 4 hrs.	95% <= 3 hrs.
LNP – Average Reject Interval (Mechanized)	95% in 1 hr.	97% <= 1 hr.

At a minimum, Georgia consumers should be given service that is at least that what is guaranteed for Florida consumers and CLECs.

II. Missing Measurements for Performance Critical to Covad

Perhaps the most outstanding problem with BellSouth's Georgia proposal is that it fails to measure various aspects of performance which are critical to Covad's business plan. Each of these will be addressed by general category.

A. Ordering.

Although BellSouth has proposed a measure for reject interval for non-mechanized and partially mechanized ordering, that interval is not satisfactory. BellSouth should be required to reject orders that are submitted in a non-mechanized or a partially mechanized fashion 95 percent of the time within 24 hours. A rejection of an order is critical to Covad so it can begin to assess

the problems with an order and work to provide its customers with service. Additionally, although BellSouth's proposal would measure the firm order confirmation timeliness, it sets a very low standard for itself. BellSouth proposes that it be required to return a FOC within 48 hours 85 percent of the time. Covad proposes that BellSouth be required to return a FOC within 24 hours 95 percent of the time. Until Covad has that FOC, it cannot communicate with its customers about when a customer's loop will be delivered. Furthermore, Covad cannot begin to schedule its order flow until it receives the FOC from BellSouth.

Additionally, BellSouth has repeatedly shown that it is unwilling to commit to actually delivering loops on the days those loops are scheduled to be delivered. Therefore, BellSouth changes delivery dates for loops almost as a routine matter. BellSouth itself, as the KPMG test has shown (see Closure Report for Exception 8, dated February 10, 2000, attached as Exhibit B), will assign a FOC date and then later contend that there are no facilities or that there is some other problem with the line. Because BellSouth should be able to return a FOC date in very short order, the benchmark for this aspect of performance should be much higher than proposed by BellSouth.

One glaring absence in the BellSouth proposal is a comparison of the FOC delivery interval for the BellSouth retail service to the FOC delivery interval for CLEC xDSL loops. Covad believes that BellSouth either gives its ADSL customers an instant FOC date or provides one shortly thereafter. In comparison, Covad and other CLECs are forced to wait days for a FOC date. BellSouth proposes that it be required to deliver only 85 percent of its FOC dates within 48 hours. Covad believes that BellSouth should be required to deliver at least 95 percent of its FOC dates within 24 hours. Additionally, the interval that is counted in this measure is critical. Covad believes that the test should evaluate from the time when the order is delivered to BellSouth to the time that the FOC date is returned to the CLEC. BellSouth forces CLECs ordering designed loops to wait for a local service request (five to seven business days) before the order is even transmitted to the local carrier service center, where the FOC date is assigned. The FOC date delivery timeliness should be measured from when an order is placed with

BellSouth (irrespective of the type of service ordered) to the actual delivery of a FOC.

B. Provisioning

Also missing from BellSouth's proposal are a number of measures of performance which are very important to Covad. These include average jeopardy notice interval for non-mechanized provisioning, percentage of orders given jeopardy notice for non-mechanized provisioning, manual order completion notifications, manual pending facilities status updates, manual pending facilities relief updates, the percentage of loops cooperatively tested by BellSouth and Covad, and percentage of loops actually delivered on the due date. Most importantly, from an end-user perspective, Covad believes BellSouth should be measured on how quickly it delivers an xDSL loop from order to provisioning, disaggregated to focus on xDSL loops. Covad proposes the following measures for the KPMG test of BellSouth's systems in this area.

Area of Inquiry	**Proposed Benchmark/Analogue**
Average Jeopardy Notice Interval (Non-Mechanized)	95% <= 24 hours
Manual Order Completion Notifications	99% within 24 hours of xDSL loop delivery
Manual Pending Facilities Status Updates	95% <= 24 hours of notification by BellSouth outside plant engineers
Manual Pending Facilities Relief Update	95% <= 24 hours of notification by BellSouth outside plant engineers
Percentage of xDSL loops Cooperative Tested by BellSouth and Covad	99%
Percentage of Loops delivered on due date (as assigned in original FOC date)	95%
xDSL Loop Delivery Interval (order to completion of delivery)	5 business days

For a number of measures, BellSouth suggests that it be measured with parity against "parity with retail." In its testing, KPMG and the Commission will have to carefully monitor how this is interpreted. For example, BellSouth refuses to provide ADSL service to any customer beyond 12,000 feet from the central office or when potential customers' loops require conditioning to support xDSL services. Covad, on the other hand, does provide service to customers beyond 12,0000 feet from the central office and to customers whose loops require

conditioning. Therefore, no comparison between BellSouth's ADSL provisioning and Covad's xDSL provisioning is possible. The correct retail analog for the service that BellSouth offers would be to compare how long it takes BellSouth to condition a loop when it must do so for voice or for another service. That loop installation interval should then be compared to the intervals Covad and other CLECs experience in receiving xDSL loops in need of conditioning from BellSouth.

III. The Focus of the OSS Evaluation on xDSL Loops

In correspondence between Covad and KPMG, Covad has reiterated its belief that every aspect of loop pre-ordering, ordering, and provisioning is critical to Covad's success. As a result of KPMG's questioning, Covad suggested that KPMG evaluate each of the following milestones in the pre-ordering, ordering, and provisioning process. For the Georgia OSS evaluation to be thorough, KMPG must assess what the comparable BellSouth milestone is, what service that milestone is found in, how timely/accurate BellSouth is in achieving that milestone for its own retail offerings (both ADSL and other types of services), and whether BellSouth offers comparable timely/accurate service to CLECs. Among the areas of primary concern that Covad suggested KPMG evaluate are the following:

(1) Address Validation;

(2) Loop pre-qualification, including the amount of time it takes to ascertain the following information about the loop: (1) the composition of the loop material, including, but not limited to, fiber optics, copper; (2) the existence, location and type of any electronic or other equipment on the loop, including but not limited to, digital loop carrier or other remote concentration devices, feeder/distribution interfaces, bridge taps, load coils, pair-gain devices, disturbers in the same or adjacent binder groups; (3) the loop length, including the length and location of each type of transmission media; (4) the wire gauge(s) of the loop; and (5) the electrical parameters of the loop, which may determine the suitability of the loop for various technologies;

(3) Frequency and type of clarifications sought by BellSouth on orders;

(4) Timeliness of confirmation of orders, if any;

(5) Process for Local Service Inquiries, including method of requesting and responding to Local Service Inquiries;

(6) Interval for response to Local Service Inquiries;

(7) Accuracy and Timeliness of PON status report information on BellSouth website. For example, is the PON status report used by BellSouth's retail operation to obtain information about loop status?;

(8) Accuracy and Timeliness of report from the Complex Resale Group listing all loop orders being processed by the group. Again, is this how BellSouth's retail operation obtains information about loop status? Is this information delivered to BellSouth's retail operation in fewer days/hours?;

(9) FOC date delivery. This inquiry must include the interval in which the first FOC date is actually delivered to the CLEC, the method of delivery to the CLEC (i.e., facsimile), the accuracy of that FOC date, the number of times a FOC date is changed, the number of times a FOC date is missed and the interval in which the actual/final FOC date is delivered;

(10) Timeliness and accuracy of confirmation of loop delivery. This inquiry should include the method of confirmation of loop delivery (i.e., facsimile), the interval from the order to the confirmation of loop delivery, the accuracy of the confirmation of loop delivery (i.e., was a properly provisioned, functional loop actually delivered on the date of the confirmation);

(11) Jeopardy notification, including notice from BellSouth about the existence of load coils, excessive bridged taps, DAML, DLC, or the notice that no pairs are available or that loops are too long;

(12) Resolution of facilities issues including conditioning of loops (removing load coils and excessive bridged taps), no pairs available, and no copper available. Since BellSouth chooses not to offer ADSL service to customers with these problems, a parity measure is inadequate to evaluate BellSouth's performance;

(13) Timeliness and Accuracy of Facilities Released information. This inquiry should include how CLECs are informed that orders that were previously held for "pending facilities" or "no facilities" have been provisioned. Is this information accurate? What is the interval in which this information is delivered from notice of pending or no facilities to release notice? In other retail offerings where facilities problems may be encountered, how long does it take BellSouth to resolve those facility problems for itself.

For each of these areas of inquiry, KPMG must make a thorough analysis of how BellSouth performs its retail functions. With that knowledge, KPMG must then compare the BellSouth retail experience with the CLEC experience. If there is no retail analogue, KPMG should seek comment from the CLEC community on an appropriate benchmark. If a retail

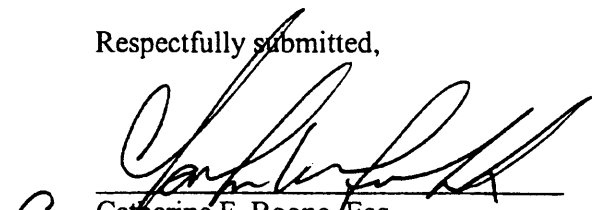
analogue exists, a comparison can be made to BellSouth's retail operations. If this analysis is properly conducted, the result will be clear evidence that the BellSouth systems favor BellSouth retail operations and discriminate against CLEC competitors.

IV. Re-evaluation of Benchmarks

In BellSouth's note following its proposal, it states that "Analogs and Benchmarks will be re-evaluated six months after implementation and periodically thereafter to validate applicability." Thus, BellSouth apparently believes that its Proposed Benchmarks will serve as a permanent performance measures. Covad again reiterates its belief that permanent performance measures should be addressed in a separate docket with full input from other CLECs, the Commission, BellSouth, and other interested parties. Moreover, the Georgia Public Service Commission staff has recently issued a letter stating its belief that any performance measures adopted for the Georgia OSS evaluation will be limited to that test. Covad believes that such a limitation on these performance measures must be made emphatic in the order of this Commission adopting any interim measures.

Dated: April 5, 2000

Respectfully submitted,



For Catherine F. Boone, Esq.
Georgia Bar No. 067710
Covad Communications Company
10 Glenlake Parkway, Suite 650
Atlanta, Georgia 30328

CERTIFICATE OF SERVICE

I do hereby certify that I have this _____ day of April, 2000 served counsel with **COVAD COMMUNICAITONS COMPANY'S COMMENTS ON PROPOSED ANALOGS AND BENCHMARKS FOR GEORGIA OSS EVALUATION** by depositing a copy of same in the United States Mail first class postage prepare, and addressed as follows:

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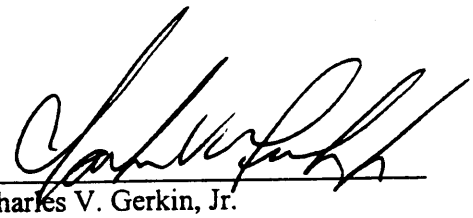

Charles V. Gerkin, Jr.

A

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory.	DOCKET NO. 981834-TP
In re: Consideration of BellSouth Telecommunications, Inc.'s entry into interLATA services pursuant to Section 271 of the Federal Telecommunications Act of 1996.	DOCKET NO. 960786-TL ORDER NO. PSC-00-0563-PAA-TP ISSUED: March 20, 2000

The following Commissioners participated in the disposition of this matter:

JOE GARCIA, Chairman
J. TERRY DEASON
SUSAN F. CLARK
E. LEON JACOBS, JR.
LILA A. JABER

NOTICE OF PROPOSED AGENCY ACTION
ORDER APPROVING RETAIL ANALOGS, BENCHMARKS AND STATISTICAL METHODOLOGY

BY THE COMMISSION:

NOTICE is hereby given by the Florida Public Service Commission that the action discussed herein is preliminary in nature and will become final unless a person whose interests are substantially affected files a petition for a formal proceeding, pursuant to Rule 25-22.029, Florida Administrative Code.

BACKGROUND

On December 10, 1998, the Florida Competitive Carriers Association (FCCA), the Telecommunications Resellers, Inc. (TRA), AT&T Communications of the Southern States, Inc. (AT&T), MCImetro Access Transmission Services, LLC (MCImetro), WorldCom

DOCUMENT NUMBER-DATE
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Technologies, Inc. (WorldCom), the Competitive Telecommunications Association (Comptel), MGC Communications, Inc. (MGC), and Intermedia Communications Inc. (Intermedia) (collectively, "Competitive Carriers") filed their Petition of Competitive Carriers for Commission Action to Support Local Competition in BellSouth's Service Territory.

On December 30, 1998, BellSouth Telecommunications, Inc. (BellSouth) filed a Motion to Dismiss the Petition of the Competitive Carriers for Commission Action to Support Local Competition in BellSouth's Service Territory. BellSouth requested that we dismiss the Competitive Carriers' Petition with prejudice. On January 11, 1999, the Competitive Carriers filed their Response in Opposition to BellSouth's Motion to Dismiss.

By Order No. PSC-99-0769-FOF-TP, issued April 21, 1999, we denied BellSouth's Motion to Dismiss. In addition, we denied the Competitive Carriers' request to initiate a rulemaking proceeding to establish expedited dispute resolution procedures for resolving interconnection agreement disputes. We also directed our staff to provide more specific information and rationale for its recommendation on the remainder of the Competitive Carriers Petition.

By Order No. PSC-99-1078-FOF-TP, issued May 26, 1999, we granted, in part, and denied, in part, the petition of the Florida Competitive Carriers Association to support local competition in BellSouth's service territory. Specifically, we established a formal administrative hearing process to address unbundled network elements (UNE) pricing, including UNE combinations and deaveraged pricing of unbundled loops. We also ordered that Commissioner and staff workshops on Operations Support Systems (OSS) be conducted concomitantly in an effort to resolve OSS operational issues. We indicated that the request for third-party testing of OSS was to be addressed in these workshops. These workshops were held on May 5-6, 1999. We also ordered a formal administrative hearing to address collocation and access to loop issues, as well as costing and pricing issues.

On May 28, 1999, FCCA and AT&T filed a Motion for Independent Third-Party Testing of BellSouth's OSS. BellSouth filed its Response to this Motion by the FCCA and AT&T on June 16, 1999.

That same day, FCCA and AT&T filed a Supplement to the Motion for Third-Party Testing. On June 17, 1999, ACI Corp. (ACI) filed a Motion to Expand the Scope of Independent Third-Party Testing. On June 28, 1999, BellSouth responded to the Supplement filed by FCCA and AT&T. On June 29, 1999, BellSouth responded to ACI's Motion to Expand the Scope of Independent Third-Party Testing. By Order No. PSC-99-1568-PAA-TP, issued August 8, 1999, we denied the motion. Upon our own motion, we approved our staff's recommendation to proceed with Phase I of third-party testing of BellSouth's OSS. Phase I of third-party testing required a third party, in this case KPMG, to develop a Master Test Plan (MTP) that would identify the specific testing activities necessary to demonstrate non-discriminatory access and parity of BellSouth's systems and processes.

By Order No. PSC-00-0104-PAA-TP, issued January 11, 2000, we approved the KPMG MTP and initiated Phase II of third-party testing of BellSouth's OSS. In order to initiate testing, we must approve interim performance metrics to be used during the course of testing to assess the level of service BellSouth is providing to ALECs. There are three components to the development of performance metrics. The first component is the performance metrics themselves and the calculations. The second component is retail analogs and performance target benchmarks. The third component is the statistical methodology to be used in analysis of test results. By Order No. PSC-00-0260-PAA-TP, issued February 8, 2000, we approved the interim performance metrics and their calculations. This Order addresses the retail analogs and benchmarks and the statistical methodology that should be used during the OSS third-party testing. Once interim performance metrics standards are established, KPMG can begin to define the process for capturing the required measurement data.

KPMG RETAIL ANALOGS AND BENCHMARKS

Performance standards, also known as retail analogs and benchmarks, are the yardstick by which the existence of nondiscrimination or parity will be determined during the OSS third-party testing. During the development of the master test plan, several ALECs filed comments regarding the adequacy and completeness of the performance metrics and standards proposed by BellSouth. In response, our staff initiated a process for

obtaining input regarding the metrics to be used for the purposes of testing. An Interim Performance Metrics Work Group, comprised of representatives of Commission staff, BellSouth, and the ALEC community, was established. This work group participated in three workshops and had four opportunities for comment regarding the retail analogs and benchmarks. Workshops were held on December 1 and 17, 1999; and January 28, 2000. The resulting retail analogs and benchmarks are shown in Attachment I which, by reference, is incorporated herein.

In establishing these retail analogs and benchmarks, KPMG has opted for retail analogs whenever possible to allow parity determinations to be made against actual BellSouth performance. In those cases where no retail analogs were available, benchmarks were developed based on input from BellSouth and the ALECs. We have reviewed BellSouth's historical performance and benchmarks that were established in other jurisdictions. We find that the approved benchmarks represent reasonable OSS performance standards that will afford ALECs a meaningful opportunity to compete in the local exchange market. The approved retail analogs and benchmarks address the products and services BellSouth currently provides to ALECs. During the duration of the test, additional products may become available. In that event, we will consider any necessary changes or revisions to the performance measures or standards.

We find that the interim retail analogs and benchmarks used during testing can serve as the starting point for developing permanent analogs and benchmarks once testing proves whether or not the standards are adequate. Based on the foregoing, the retail analogs and benchmarks developed by KPMG, as set forth in Attachment I, are hereby approved.

KPMG STATISTICAL METHODOLOGY

KPMG's proposed statistical methodology is based upon the joint efforts of BellSouth and ALEC statisticians. The methodology has evolved from work begun in other jurisdictions and incorporates two important safeguards which help ensure that the Florida tests yield a fair evaluation of the performance of BellSouth's OSS systems. These safeguards are based upon the comments and suggestions received at the staff workshop held on January 28, 2000. In order to include these safeguards in the statistical

methodology already approved in Order No. PSC-00-0104-PAA-TP, Appendix C of the Master Test Plan shall be amended as shown in Attachment II which, by reference, is incorporated herein.

The first safeguard to be included in KPMG's statistical methodology takes into consideration, and attempts to balance, the business risks both BellSouth and the ALECs could be exposed to due to the sampling process. This safeguard protects ALECs from the risk that the tests show that parity exists when in fact it does not exist. Conversely, it also protects BellSouth from the risk that the test shows that parity does not exist when, in fact, it does. While the risk of reaching an incorrect conclusion cannot be eliminated entirely in a sampling environment, the statistical methodology proposed by KPMG strives to equalize and minimize the likelihood of either erroneous conclusion.

The second safeguard incorporated into KPMG's proposed methodology is the inclusion of a method to detect the presence of measurement bias which could occur during testing. This bias could arise if KPMG's test transactions are handled differently in BellSouth's OSS systems than the transactions originating from the general ALEC community. KPMG's proposed methodology includes a statistical comparison of the aggregate ALEC data to the retail analogs and benchmarks as well as a comparison of their own test results to the retail analogs and benchmarks. This dual comparison of the performance provided by BellSouth to both KPMG and the general ALEC community provides a basis to detect if the KPMG test results are representative of the experiences of the ALEC community as a whole.

KPMG's proposed statistical methodology will provide a fair and balanced evaluation of the performance of BellSouth's OSS systems. Based on the foregoing, the statistical methodology developed by KPMG, as set forth in Attachment II, is hereby approved. These dockets shall remain open to address the issues raised in FCCA's Petition for Commission Action to Support Local Competition in BellSouth's Service Territory and BellSouth's compliance with Section 271.

Therefore, it is

ORDERED by the Florida Public Service Commission that the retail analogs and benchmarks developed by KPMG, as set forth in Attachment I which, by reference, is incorporated in the body of this Order, are hereby approved. It is further

ORDERED that the statistical methodology developed by KPMG, as set forth in Attachment II which, by reference, is incorporated in the body of this Order, is hereby approved. It is further

ORDERED that the provisions of this Order, issued as proposed agency action, shall become final and effective upon the issuance of a Consummating Order unless an appropriate petition, in the form provided by Rule 28-106.201, Florida Administrative Code, is received by the Director, Division of Records and Reporting, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on the date set forth in the "Notice of Further Proceedings" attached hereto. It is further

ORDERED that in the event this Order becomes final, these dockets shall remain open.

By ORDER of the Florida Public Service Commission this 20th day of March, 2000.

BLANCA S. BAYÓ, Director
Division of Records and Reporting

By: Kay Flynn
Kay Flynn, Chief
Bureau of Records

(S E A L)

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NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing that is available under Section 120.57, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing will be granted or result in the relief sought.

Mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing.

The action proposed herein is preliminary in nature. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal proceeding, in the form provided by Rule 28-106.201, Florida Administrative Code. This petition must be received by the Director, Division of Records and Reporting, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on April 10, 2000.

In the absence of such a petition, this order shall become final and effective upon the issuance of a Consummating Order.

Any objection or protest filed in this docket before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Pre-Ordering	Average Response Time – Telephone Number Availability and Reservation		
	• Average Response Time – Cust. Serv. Record	Parity with retail	
	• Average Response Time – Due Date Avail	Parity with retail	
	• Average Response Time – Address Validation	Parity with retail	
	• Average Response Time – Prod. & Serv. Avail	Parity with retail	
	• Average Response Time – Telephone Number Availability and Reservation	Parity with retail	
	OSS Interface Availability		99.5%*
Ordering	Percent Flow-Through Service Request		
	• Residence		95%
	• Business		TBA
	• UNE		TBA
	• Special		TBA
	Percent Rejected Service Request	Diagnostic*	Diagnostic*
	Reject Interval		
	• Mechanized		97% <= 1 hr
	• Non-Mechanized and Partially Mechanized		85% < 24 hrs
	Firm Order Confirmation Timeliness		
	• Mechanized		95% <= 3 hrs
	• Non-Mechanized and Partially Mechanized		85% < 36 hrs
	Speed of Answer in Ordering Center	Parity with retail*	
	Percent Mean Held Order Interval		
	• Resale Residence	Parity with retail*	
	• Resale Business	Parity with retail*	
	• Resale Design	Parity with retail*	
	• Resale PBX	Parity with retail*	
	• Resale Centrex	Parity with retail*	
	• Resale IDSN	Parity with retail*	
	• UNE Loop and Port Combos	Retail Residence and Business	

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Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Provisioning Continued	• UNE 2w Loop with NP – Non-Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design	Retail Residence and Business	
	• UNE Loop Other with NP Non-Design	Retail Residence and Business	
	• UNE Loop Other without NP Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop with NP – Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Design	Retail Residence and Business	
	• UNE Loop Other with NP – Design	Retail Design	
	• UNE Loop Other without NP – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1 or DS3 as appropriate	
	Average Jeopardy Notice Interval (Mechanized)		
	• Resale Residence		95% >=48 Hrs.
	• Resale Business		95% >=48 Hrs.
	• Resale Design		95% >=48 Hrs.
	• Resale PBX		95% >=48 Hrs.
	• Resale Centrex		95% >=48 Hrs.
	• Resale IDSN		95% >=48 Hrs.
	• UNE Loop and Port Combos		95% >=48 Hrs.
	• UNE 2w Loop with NP – Non-Design		95% >=48 Hrs.
	• UNE 2w Loop without NP – Non-Design		95% >=48 Hrs.
	• UNE Loop Other with NP Non-Design		95% >=48 Hrs.
	• UNE Loop Other without NP Non-Design		95% >=48 Hrs.
	• UNE Other Non Design		95% >=48 Hrs.
	• UNE 2w Loop with NP – Design		95% >=48 Hrs.
	• UNE 2w Loop without NP – Design		95% >=48 Hrs.
	• UNE Loop Other with NP – Design		95% >=48 Hrs.
	• UNE Loop Other without NP – Design		95% >=48 Hrs.

Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Provisioning Continued	• UNE Other Design		95% >=48 Hrs.
	• Local Interconnection Trunks		95% >=48 Hrs.
	• Switching	Retail POTS	
	• Local Transport	Retail DS1, or DS3 as appropriate	
	% of Orders Given Jeopardy Notice (Mechanized)		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design	Retail Residence and Business	
	• UNE Loop Other with NP Non-Design	Retail Residence and Business	
	• UNE Loop Other without NP Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop with NP – Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Design	Retail Residence and Business	
	• UNE Loop Other with NP – Design	Retail Design	
	• UNE Loop Other without NP – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1 or DS3 as appropriate	
	Percent Missed Installation Appointments		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	

Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Provisioning Continued	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design	Retail Residence and Business	
	• UNE Loop Other with NP Non-Design	Retail Residence and Business	
	• UNE Loop Other without NP Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop with NP – Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Design	Retail Residence and Business	
	• UNE Loop Other with NP – Design	Retail Design	
	• UNE Loop Other without NP – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1, or DS3 as appropriate	
	Order Completion Interval		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design	Retail Residence and Business	
	• UNE Loop Other with NP Non-Design	Retail Residence and Business	
	• UNE Loop Other without NP Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop with NP – Design	Retail Residence and Business	

Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Provisioning Continued	• UNE 2w Loop without NP – Design	Retail Residence and Business	
	• UNE Loop Other with NP – Design	Retail Design	
	• UNE Loop Other without NP – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1,or DS3 as appropriate	
	Average Completion Notice Interval (Mechanized)		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design	Retail Residence and Business	
	• UNE Loop Other with NP Non-Design	Retail Residence and Business	
	• UNE Loop Other without NP Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop with NP – Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Design	Retail Design	
	• UNE Loop Other with NP – Design	Retail Design	
	• UNE Loop Other without NP – Design	Retail Design	
	• UNE Other Design	Parity with retail	
	• Local Interconnection Trunks	Retail POTS	
	• Switching	Retail DS1,or DS3 as appropriate	
	• Local Transport		
	Percent Provisioning Troubles within 30 Days		
	• Resale Residence	Parity with retail	

Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Provisioning Continued	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop with NP – Non-Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Non-Design	Retail Residence and Business	
	• UNE Loop Other with NP Non-Design	Retail Residence and Business	
	• UNE Loop Other without NP Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop with NP – Design	Retail Residence and Business	
	• UNE 2w Loop without NP – Design	Retail Residence and Business	
	• UNE Loop Other with NP – Design	Retail Design	
	• UNE Loop Other without NP – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1, or DS3 as appropriate	
	Total Service Order Cycle Time	Diagnostic	Diagnostic
Maintenance	Customer Trouble Report Rate		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop – Non-Design	Retail Residence and Business	

Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Maintenance Continued	• UNE Loop Other – Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop – Design	Retail Residence and Business	
	• UNE Loop Other – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1, or DS3 as appropriate	
	Customer Trouble Report Rate		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop – Non-Design	Retail Residence and Business	
	• UNE Loop Other – Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop – Design	Retail Design	
	• UNE Loop Other – Design	Retail Design	
	• UNE Other Design	Parity with retail	
	• Local Interconnection Trunks	Retail POTS	
	• Switching	Retail DS1,or DS3 as appropriate	
	• Local Transport		
	Maintenance Average Duration	Parity with retail	
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX		

Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Maintenance Continued	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop – Non-Design	Retail Residence and Business	
	• UNE Loop Other – Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop – Design	Retail Residence and Business	
	• UNE Loop Other – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1,or DS3 as appropriate	
	Percent Repeat Troubles within 30 Days		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop – Non-Design	Retail Residence and Business	
	• UNE Loop Other – Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop – Design	Retail Residence and Business	
	• UNE Loop Other – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1, or DS3 as appropriate	

Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Maintenance Continued	Out of Service > 24hrs		
	• Resale Residence	Parity with retail	
	• Resale Business	Parity with retail	
	• Resale Design	Parity with retail	
	• Resale PBX	Parity with retail	
	• Resale Centrex	Parity with retail	
	• Resale IDSN	Parity with retail	
	• UNE Loop and Port Combos	Retail Residence and Business	
	• UNE 2w Loop – Non-Design	Retail Residence and Business	
	• UNE Loop Other – Non-Design	Retail Residence and Business	
	• UNE Other Non Design	Retail Residence and Business	
	• UNE 2w Loop – Design	Retail Residence and Business	
	• UNE Loop Other – Design	Retail Design	
	• UNE Other Design	Retail Design	
	• Local Interconnection Trunks	Parity with retail	
	• Switching	Retail POTS	
	• Local Transport	Retail DS1,or DS3 as appropriate	
	OSS Interface Availability		
	• All systems except ECTA	Parity with retail*	99.5%*
	• ECTA		
	OSS Response Interval and %		
	• TAFI (Front End)	Parity with retail*	
	• CRIS, DLETH, DLR, OSPCM, LMOS, LMOSUP, MARCH, Predictor, SOCS, LNP (Parity by Design)	Parity by Design*	
	Average Answer Time – Repair Center	Parity with retail	
Billing	Invoice Accuracy	Parity with retail*	
	Mean Time To Deliver Invoices	Parity with retail*	
	Usage Data Delivery Accuracy	Parity with retail	

Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Billing Continued	Usage Data Delivery Completeness	Parity with retail	
	Usage Data Delivery Timeliness	Parity with retail	
	Mean Time to Deliver Usage	Parity with retail	
Operator Services (Toll)	Average Speed to Answer	Parity by Design	
	% Answered in "X" Seconds	Parity by Design	
Directory Assistance	Average Speed to Answer	Parity by Design	
	% Answered in "X" Seconds	Parity by Design	
E911	Timeliness	Parity by Design	
	Accuracy	Parity by Design	
	Mean Interval	Parity by Design	
Trunk Group Performance (Blockage)	Trunk Group Service Report (Percent Trunk Blockage) Any 2 hour period in 24 hours where CLEC blockage exceeds BST blockage by more than 0.5% = a miss using trunk groups 1, 3, 4, 5, 10, 16 for CLECs and 9 for BST.	Parity with retail	
	Trunk Group Service Report (Percent Trunk Blockage)	Parity with retail	
LNP	Average Disconnect Timeliness Interval	Retail Residence and Business	95% < 15 min
	Percent Missed Installation Appointments		95% <= 3 hrs 85% < 36 hrs
	FOC (Mechanized) Non-Mechanized and Partially Mechanized	Diagnostic	Diagnostic
	% Reject Service Request		97% <= 1 hr 85% < 24hrs
	Average Reject Interval (Mechanized) Non-Mechanized and Partially Mechanized	Diagnostic	Diagnostic
	TSOC		

Florida OSS Third Party Testing
Performance Metric Analogs and Benchmarks
For BellSouth Telecommunications Inc.

Category	Measures And Sub-Metrics	Retail Analogue	Benchmark
Customer Coordinated Conversions Collocation	% Flow Through		95%
	Coordinated Customer Conversions – UNE Loop		95% < 15 min*
	Coordinated Customer Conversions – LNP		95% < 15 min*
	Average Response Time	This is being addressed in FPSC Docket 980800	
	Average Arrangement Time	This is being addressed in FPSC Docket 980800	
	% of Due Dates Missed		90% < Commit Date

* Denotes a retail analog or benchmark that has previously been approved by the Florida Public Service Commission
TBA – Denotes a benchmark that will be established following further analysis by KPMG.

Appendix C: Statistical Approach

A. Overview

This test will rely on standard statistical methods to evaluate BST 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. Measures

The measures (metrics and their associated standards) that will serve as parameters for testing will be listed in Appendix D.

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 BellSouth is performing adequately. The possibility of an error arises if this hypothesis is rejected when it is true (Type I error) or is accepted when it is false (Type II error). ~~An attempt will be made to balance Type I and Type II errors as much as it feasible.~~ The hypothesis tests will balance Type I and Type II errors whenever feasible.

E. Parity Tests and Non-Parity Tests

There are two basic types of tests. Parity tests compare a BellSouth 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 perform nce 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.

Non-parity 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.~~ The tests will compare KPMG pseudo-CLEC performance measurements to the analogs/benchmarks described in Appendix D. The tests will also compare aggregate CLEC performance measurements to the analogs/benchmarks described in Appendix D. Conclusions will be drawn from the outcomes of these statistical hypothesis tests.

B

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

[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.

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RECEIVED
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EXECUTIVE SECRETARY
G.P.S.C.

April 6, 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 April 6, 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 is provided in the table in section 4.0. Each item presented in the table in section 4.0 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 85% of planned orders for EDI and TAG functional testing. KPMG has submitted approximately 95% of pre-orders via TAG. Outstanding orders are pending issue/exception resolution.

- Pre-order and order volume testing: KPMG received CLEC data on forecasted pre-order and order volumes by interface.

- Performance measurement reporting: KPMG has completed calculations of PMAP-generated SQM values for the KPMG CLEC for November 1999, December 1999, and January 2000.

- Change management: KPMG received BellSouth's March 14, 2000 *Interim Change Control Process* documentation, and has begun re-testing activities for Exception #2 based on this revised process. Re-testing activities have also included additional interviews with BellSouth Change Control staff members. BellSouth's *Change Control Process* documentation will be considered "final" when consensus is reached between BellSouth and the CLEC community.

- Flow-through evaluation: KPMG continues to research 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.

- Billing: KPMG has scheduled a re-test of the ODUF/ADUF usage functional test.

- Provisioning verification: KPMG is continuing provisioning verification activities for transactions initiated during TAG and EDI functional testing. Verification activities include site inspections, validation of switch translations, Directory Listing confirmation, Line Number Portability confirmation, and post-activity Customer Service Record runs by BellSouth personnel.

- On March 22, 2000, KPMG, at the request of BellSouth, filed a set of analogs and benchmarks proposed by BellSouth for use in the *BellSouth Georgia OSS Evaluation.* KPMG and the Georgia Public Service Commission will receive written comments from CLECs on this filing through April 5, 2000.

3.0 Key Upcoming Activities

- KPMG expects to file the next interim status report during the week of May 8, 2000.

4.0 Master Test Plan Specific Item Status

Ref[1]	Item	Status	Issues	Next Step/Resolution
I-2	Test bed development	• Provisioning and validation of the INP accounts is 100% complete. Provisioning and validation of the ISDN and CENTREX accounts is 96% complete.	• A number of the original test bed specifications were changed to: a) reflect that ISDN-to-UNE and CENTREX-to-UNE conversions are not electronically orderable; and b) support INP service requests.	• KPMG is waiting for one additional CSR from BLS to complete the ISDN and CENTREX test bed accounts.
		• Provisioning and validation of the LNP test bed is 100% complete.	• None.	• N/A.
		• Provisioning and validation of the RSIMMS volume test bed (for use in normal/peak volume tests) is 100% complete.	• The RSIMMS volume test bed has been reconfigured to mitigate the effects of the "live customer" accounts.	• N/A.
I-6	EDI functional testing	• KPMG has issued the following exceptions, related to EDI functional testing, that remain open: Exceptions 4, 9, 18, 22, 26, 31 & 32. Additionally, KPMG has submitted five draft exceptions to BLS that will be publicly issued if the information is substantiated by the BLS response. *(These exceptions and draft exceptions also apply to TAG.)*	• The status of exceptions and draft exceptions is detailed in section IV-5 Exceptions.	• All exceptions must be closed for purposes of the test before reports can be finalized.

Ref[1]	Item	Status	Issues	Next Step/Resolution
		• KPMG is proceeding with EDI functional testing for all UNE product types. Approximately 85% of planned orders have been submitted.	• KPMG uncovered the following: 1) A system limitation processing UNE-to-UNE migration service requests; 2) A timeliness deficiency in delivery of Functional Acknowledgements (FAs) in response to service requests via EDI; 3) A system limitation effecting the migration of a customer's Billing Telephone Number (BTN) on Loop-Port Combination service requests; 4) A potential issue with processing Hunting addition and deletion requests for Port and Loop-Port Combinations; 5) A system limitation processing TN changes in association with Outside Move service requests; 6) A timeliness deficiency in delivery of fully- and partially-mechanized Clarifications (CLRs); 7) A timeliness deficiency in delivery of Missed Appointment (MA) notices in response to service requests that could not be provisioned on the confirmed due date; 8) Missing or extraneous data elements and data values on service order responses (FOCs, CNs, CLRs).	• BLS is in the process of investigating and resolving these issues. KPMG will re-test, as appropriate.

Ref[1]	Item	Status	Issues	Next Step/Resolution
			• The following issues presented in the 3/03/00 interim status report remain open[1]: 1) A potential issue 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) 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 continues to receive a small number of faxed CLRs, MAs, and FOCs in response to electronically-submitted service requests; 5) A problem with the delivery of timely Completion Notices (CNs); 6) The absence of adequate documentation on the process for returning Status messages on confirmed service requests; 7) An increasing number of inaccurate or erroneous CLRs generated by ordering representatives.	• BLS is in the process of investigating and resolving these issues. KPMG will re-test, as appropriate.
			• KPMG is researching the following: A potential lack of BLS system order validation on UNE port and port-loop combination service requests with an LPIC of 5124 (BLS).	• KPMG and BLS are investigating this issue.

[1] In its 3/03/00 Interim Status Report, KPMG indicated that a BLS system problem handling coordinated hot-cut requests on non-designed (SL1) loop service requests had been uncovered. This system problem pertained to TAG only and should not have been included in section I-6 EDI functional testing.

Ref[1]	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 will begin submitting these migrations when appropriate documentation is made publicly available.	• BLS is in the process of developing documentation to support this order type.
I-7	TAG functional testing	• KPMG has issued the following exceptions, related to TAG functional testing, that remain open: Exceptions 4, 9, 18, 22, 26, 31 & 32. Additionally, KPMG has submitted five draft exceptions to BLS that will be publicly issued if the information is substantiated by the BLS response. *(These exceptions and draft also apply to EDI.)*	• The status of exceptions and draft exceptions is detailed in section IV-5 Exceptions.	• All exceptions must be closed for purposes of the test before reports can be finalized.

Ref[1]	Item	Status	Issues	Next Step/Resolution
		• KPMG is proceeding with TAG functional testing for all UNE product types. Approximately 85% of planned orders have been submitted.	• KPMG uncovered the following: 1) A system limitation processing UNE-to-UNE migration service requests; 2) A timeliness deficiency in delivery of Functional Acknowledgements (FAs) in response to service requests via EDI; 3) A system limitation effecting the migration of a customer's Billing Telephone Number (BTN) on Loop-Port Combination service requests; 4) A potential issue with processing Hunting addition and deletion requests for Port and Loop-Port Combinations; 5) A system limitation processing TN changes in association with Outside Move service requests; 6) A timeliness deficiency in delivery of fully- and partially-mechanized Clarifications (CLRs); 7) A timeliness deficiency in delivery of Missed Appointment (MA) notices in response to service requests that could not be provisioned on the confirmed due date; 8) Missing or extraneous data elements and data values on service order responses (FOCs, CNs, CLRs).	• BLS is in the process of investigating and resolving these issues. KPMG will re-test, as appropriate.

Ref[1]	Item	Status	Issues	Next Step/Resolution
			• In addition, the following issues presented in the 3/03/00 interim status report remain open: 1) A potential issue 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) 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 continues to receive a small number of faxed CLRs, MAs, and FOCs in response to electronically-submitted service requests; 5) A problem with the delivery of timely Completion Notices (CNs); 6) The absence of adequate documentation on the process for returning Status messages on confirmed service requests; 7) An increasing number of inaccurate or erroneous CLRs generated by ordering representatives; 8) A system problem handling coordinated hot cut requests (with CHC field = Y and DFDT field blank) on non-designed (SL1) loop service requests.	• BLS is in the process of investigating and resolving these issues. KPMG will re-test, as appropriate.
			• KPMG is researching the following: A potential lack of BLS system order validation on UNE port and port-loop combination service requests with an LPIC of 5124 (BLS).	• KPMG and BLS are investigating this issue.

Ref[1]	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 will begin submitting these migrations when appropriate documentation is made publicly available.	• BLS is in the process of developing documentation to support this order type.
		• BLS does not support a blank space in a data element in TAG, Version 2. This defect prevents a two-word entry in the billing address fields. BLS indicates that TAG, Version 3 (OSS'99) supports two word entries. KPMG is not testing OSS'99 in GA. As a workaround, KPMG is inputting a one-word entry in the billing address fields.	• None.	• N/A.
	Pre-order functional testing	• KPMG has issued the following exceptions, related to Pre-Order functional testing, that remain open: Exceptions 1 and 24. Additionally, KPMG has submitted one draft exception to BLS that will be publicly issued if the information is substantiated by the BLS response.	• The status of exceptions and draft exceptions is detailed in section IV-5 Exceptions.	• All exceptions must be closed for purposes of the test before reports can be finalized.

Ref[1]	Item	Status	Issues	Next Step/Resolution
		• Approximately 95% of planned TAG pre-orders have been submitted.	• KPMG uncovered the following: 1) A system limitation in processing Customer Service Record Queries (CSRQs) for UNE Port and Port-Loop Combination customers; 2) A system limitation in processing Calculate Due Date (CDD) queries for Loop with Number Portability migrations, Stand-Alone Number Portability migrations, and Loop-Port Combination service requests; 3) Missing or extraneous data elements and data values on pre-order responses.	• BLS is in the process of investigating and resolving these issues. KPMG will re-test, as appropriate.
			• In addition, the following issues presented in the last status report remain open: 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 in the process of investigating and resolving these issues. KPMG will re-test, as appropriate.
I-8	CRIS/CABS invoicing functional test	• KPMG has issued the following exception, related to CRIS/CABS invoicing functional testing, that remains open: Exception 16. Additionally, KPMG has submitted two draft exceptions to BLS that will be publicly issued if the information is substantiated by the BLS response.	• The status of exceptions and draft exceptions is detailed in section IV-5 Exceptions.	• All exceptions must be closed for purposes of the test before reports can be finalized.

Ref[1]	Item	Status	Issues	Next Step/Resolution
II-1	Metrics	• KPMG has issued the following exceptions, related to Metrics (Performance Measures Evaluations), that remain open: Exceptions 3, 19 and 23. Additionally, KPMG has submitted six draft exceptions to BLS that will be publicly issued if the information is substantiated by the BLS response.	• The status of exceptions and draft exceptions is detailed in section IV-5 Exceptions.	• All exceptions must be closed for purposes of the test before reports can be finalized.
		• KPMG has completed calculations of PMAP-generated SQM values for the KPMG CLEC for November 1999, December 1999 and January 2000.	• KPMG has found some potential discrepancies between the values KPMG calculated and the values reported by BLS.	• BLS is in the process of investigating and resolving these issues. KPMG will re-test, as appropriate.
		• KPMG has begun updating the calculation validation programs to apply to February PMAP-generated SQM values for the KPMG CLEC.	• KPMG has found some potential discrepancies between the values KPMG calculated and the values reported by BLS.	• BLS is in the process of investigating and resolving these issues. KPMG will re-test, as appropriate.
		• KPMG continues to investigate the discrepancies found as a result of replication of the October and November non-PMAP-generated SQM values for the CLEC aggregate.	• KPMG found some discrepancies between the values KPMG calculated and the values reported by BLS.	• BLS is in the process of investigating and resolving these issues. KPMG will re-test, as appropriate.
		• KPMG continues to compare BLS raw data to KPMG CLEC data.	• KPMG has found some potential discrepancies between the BLS raw data and the KPMG CLEC data.	• BLS is in the process of investigating and resolving these issues. KPMG will re-test, as appropriate.
II-4	Volume Test	• LNP functionality has been established and tested in the RSIMMS environment.	• None.	• N/A.

Ref[1]	Item	Status	Issues	Next Step/Resolution
		• BLS has added auto reply functionality to the RSIMMS environment. This functionality allows BLS to track the receipt of functional acknowledgements from a CLEC, and to re-send responses as necessary.	• None.	• N/A.
		• KPMG received CLEC data on forecasted pre-order and order volumes by interface.	• KPMG is waiting for BLS to provide its revised data on expected transaction volumes.	• KPMG expects BLS to provide this data in the near future.
II-5	Change management	• KPMG has issued the following exceptions, related to Change Management, that remain open: Exceptions 2, 17 and 30.	• The status of exceptions and draft exceptions is detailed in section IV-5 Exceptions.	• All exceptions must be closed for purposes of the test before reports can be finalized.
		• KPMG received BLS's March 14, 2000 *Interim Change Control Process* documentation, and has begun re-testing activities for Exception 2 based on this revised process. Re-testing activities have also included additional interviews with BLS Change Control staff members.	• KPMG recognizes that the *Interim Process*, as delivered, does not represent a finalized change management program.	• BLS-CLEC meetings continue to take place in an effort to drive towards finalization of a revised change control process. BLS is targeting April 17, 2000 for full implementation of the finalized process.
III-1	Flow-Through Evaluation	• KPMG has issued the following exception, related to Flow Through, that remains open: Exception 21. Additionally, KPMG has submitted two draft exceptions to BLS that will be publicly issued if the information is substantiated by the BLS response.	• The status of exceptions and draft exceptions is detailed in section IV-5 Exceptions.	• All exceptions must be closed for purposes of the test before reports can be finalized.
		• KPMG completed its review of samples of LSR fallout.	• KPMG was investigating the categorization of LSR fall out.	• All questions raised during the review were resolved.

Ref[1]	Item	Status	Issues	Next Step/Resolution
		• KPMG continues to research 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.	• BLS's support of CLEC access and use of flow-through reports is not clearly understood or documented.	• KPMG has requested additional information regarding CLEC access to flow-through reports and related information. KPMG is evaluating this information.
		• KPMG continues to review documentation and training in support of the process for determining which LSRs fell out due to CLEC versus BLS causes.	• BLS has not provided KPMG with methods and procedures or training materials that document the error determination process. BLS indicates that service representatives receive on-the-job training, and are supervised by mentors to ensure cause determination is handled correctly.	• KPMG has requested additional information on documentation and training. KPMG will re-evaluate evaluation criteria for this portion of the review.
III-2	CLEC Participation – Ordering	• KPMG requested additional telephone numbers (TNs) from CLECs to submit loop directory listing (DL) orders.	• KPMG needed CLEC TNs from 9 COs to complete these ordering test activities.	• KPMG has received the necessary CLEC TNs. KPMG will submit loop DL orders using these TNs.
		• KPMG is continuing with UNE-LNP and CLEC-to-CLEC migration orders using CLEC-provided facilities.	• KPMG uncovered potential BLS system limitations with performing CLEC-to-CLEC migrations	• KPMG and BLS will continue to work to resolve this issue.
III-3	Capacity Management	• KPMG has issued the following exception related to Capacity Management that remains open: Exception 25.	• The status of exceptions and draft exceptions is detailed in section IV-5 Exceptions.	• All exceptions must be closed for purposes of the test before reports can be finalized.
		• KPMG conducted three interviews as part of re-testing activities related to Exception 25.	• None.	• KPMG and BLS will schedule additional interviews as part of further re-testing activities.
IV-1	TAFI functional testing	• KPMG has issued the following exceptions related to TAFI	• The status of exceptions and draft exceptions is detailed in section IV-5	• All exceptions must be closed for purposes of the test before reports

Ref[1]	Item	Status	Issues	Next Step/Resolution
		functional testing that remain open: Exceptions 6, 10, 11, 13 and 14. Additionally, KPMG has submitted one draft exception to BLS that will be publicly issued if the information is substantiated by the BLS response.	Exceptions.	can be finalized.
IV-2	ECTA functional testing	• KPMG has issued the following exceptions related to ECTA functional testing which remain open: Exceptions 12 and 15.	• The status of exceptions and draft exceptions is detailed in section IV-5 Exceptions.	• All exceptions must be closed for purposes of the test before reports can be finalized.
IV-3	ODUF/ADUF usage functional test	• KPMG has issued the following exceptions related to ODUF/ADUF usage functional testing that remain open: Exceptions 27, 28 and 29.	• The status of exceptions and draft exceptions is detailed in section IV-5 Exceptions.	• All exceptions must be closed for purposes of the test before reports can be finalized.
		• KPMG has scheduled a re-test of the ODUF/ADUF usage functional test.	• None.	• N/A.
IV-4	CRIS/CABS invoicing documentation evaluation	• KPMG has submitted one draft exception to BLS, that will be publicly issued if the information is substantiated by the BLS response.	• The status of exceptions and draft exceptions is detailed in section IV-5 Exceptions.	• All exceptions must be closed for purposes of the test before reports can be finalized.

Ref[1]	Item	Status	Issues	Next Step/Resolution
IV-5	Exceptions[2]	• KPMG is waiting to perform further re-testing activities related to Exception 1, regarding Pre-ordering.	• 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 to KPMG on 2/08/00. Business rule information regarding CDD query types was not included in the update. BLS expects to deliver new pre-order business rules on April 7, 2000 which will include the CDD business rules. KPMG will perform further re-testing activities subsequent to delivery of this documentation.
		• BLS provided KPMG with interim proposed change management procedures for 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.	• KPMG is currently reviewing these interim procedures as part of re-testing activities. KPMG recognizes that the *Interim Process*, as delivered, does not represent a finalized change management program.
		• KPMG forwarded a re-opening statement for Exception 3, regarding Metrics, to BLS on 3/29/00.	• 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.	• KPMG's re-opening statement indicated that BLS did not follow the process agreed to by KPMG and the GPSC in initially closing Exception 3, when filing a changed report with the GPSC in early March 2000. KPMG will evaluate BLS's response to the re-opening statement before deciding upon further action.

Ref[1]	Item	Status	Issues	Next Step/Resolution
		• KPMG initially indicated that a closure report for Exception 4, regarding Ordering & Provisioning, was being reviewed internally. However, based on further information, KPMG is planning additional re-testing activities.	• KPMG indicated that TAG and EDI do not provide the functionality required for submitting partial migration service requests for loop-port combinations.	• Upon further re-testing, KPMG discovered additional problems with submissions of partial migration service requests for loop-port combinations via TAG and EDI. As a result, KPMG will await further BLS system fixes before re-testing activities begin again.
		• KPMG is waiting to conduct re-testing activities related to Exception 6, regarding Maintenance and Repair.	• KPMG indicated that multiple instances of inaccuracies in TAFI documentation and deficiencies in distribution of updates have been identified.	• KPMG will evaluate BLS's updated TAFI documentation scheduled for release on 4/07/00.
		• KPMG filed a closure report for Exception 7, regarding Ordering and Provisioning, with the GPSC on 3/21/00.	• KPMG indicated that the BLS ECTA Gateway does not allow CLECs to process trouble reports for SL1 circuits.	• In its closure report, 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. This exception is now closed.
		• KPMG is currently engaged in re-testing activities related to Exception 9, regarding Ordering & Provisioning.	• KPMG indicated that BellSouth failed to deliver Firm Order Confirmations (FOCs) and Completion Notices (CNs) in response to electronic service order requests.	• BLS indicated to KPMG that a system fix has been implemented. KPMG will continue to compile its findings regarding this fix through the end of transaction testing. KPMG will determine further activities based on the analysis of this data.
		• KPMG is continuing re-testing activities related to Exception 10, regarding Maintenance and Repair.	• 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.*	• KPMG will continue re-testing activities after the release of updated TAFI documentation scheduled for 4/07/00.

Ref[1]	Item	Status	Issues	Next Step/Resolution
		• KPMG is continuing re-testing activities related to Exception 11, regarding Maintenance and Repair.	• 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.*	• KPMG will continue re-testing activities after the release of updated TAFI documentation scheduled for 4/07/00.
		• KPMG is continuing re-testing activities related to Exception 12, regarding Maintenance and Repair.	• KPMG indicated that the ECTA Gateway does not accurately notify CLECs when invalid information is entered into a trouble ticket.	• KPMG will perform re-testing activities after BLS implements the new version of ECTA, scheduled for 4/14/00.
		• KPMG is continuing re-testing activities related to Exception 13, regarding Maintenance and Repair.	• KPMG indicated that numerous undocumented messages intended for BellSouth are generated by TAFI during trouble report creation and processing.	• KPMG expects to perform re-testing activities after BLS implements the new version of TAFI, scheduled for 4/15/00.
		• KPMG forwarded the initial draft of a closure statement for Exception 14, regarding Maintenance and Repair, to the GPSC on 3/21/00. The GPSC asked KPMG for clarification of several points addressed in the closure statement.	• 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.*	• KPMG is clarifying several issues in its closure statement with BLS based on the GPSC's comments.
		• KPMG forwarded the initial draft of a closure statement for Exception 15, regarding Maintenance and Repair, to the GPSC on 3/21/00. The GPSC asked KPMG for clarification of several points addressed in the closure statement.	• KPMG indicated that under certain circumstances, BellSouth's ECTA gateway cannot adequately create trouble tickets.	• KPMG is clarifying several issues in its closure statement with BLS based on the GPSC's comments.
		• KPMG filed BLS's amended response to Exception 16, regarding Billing, with the GPSC on 3/24/00.	• KPMG indicated that BellSouth issued multiple bills containing erroneous information to KPMG.	• KPMG is evaluating BLS's amended response.

Ref[1]	Item	Status	Issues	Next Step/Resolution
		• KPMG is currently planning re-testing activities related to Exception 17, regarding Change Management.	• 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.	• BLS is forwarding new procedures for updating the Interconnection Services Web site. KPMG will evaluate these new procedures as part of re-testing activities.
		• KPMG filed BLS's amended response to Exception 18, regarding Ordering and Provisioning, with the GPSC on 3/24/00.	• 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 is evaluating BLS's amended response to determine the necessary re-testing activities.
		• KPMG is re-testing items related to Exception 19, regarding Metrics.	• KPMG indicated that BLS does not adequately document changes in versions of the BLS Service Quality Measurements Performance Reports.	• KPMG is evaluating BLS's new change summary page which will be provided for altered SQM Performance Reports.
		• KPMG filed a closure report for Exception 20, regarding Maintenance and Repair, with the GPSC on 3/27/00.	• KPMG indicated that BLS technicians cannot initiate a Verify Repair Completion request.	• KPMG successfully executed Verify Repair Completion requests four times during re-testing activities. Based on the functionality demonstrated during KPMG's retest, BLS appears to have adequately addressed the issue identified in this exception. This exception is now closed.
		• KPMG is re-testing items related to Exception 21, regarding Flow-Through.	• KPMG indicated that Local Service Requests (LSRs) were improperly categorized for *Percent Flow Through Service Request Reports*.	• As part of re-testing activities, KPMG is attempting to replicate BLS's flow-through results based on the new categorization rules.

Ref[1]	Item	Status	Issues	Next Step/Resolution
		• KPMG is re-testing items related to Exception 22, regarding Ordering & Provisioning.	• KPMG indicated that BLS disconnected retail accounts on loop migration orders without re-connecting the UNE loop component.	• BLS indicated to KPMG that a system fix has been implemented. KPMG will continue to compile its findings regarding this fix through the end of transaction testing. KPMG will determine further activities based on the analysis of this data.
		• KPMG filed Exception 23, regarding Metrics, and BLS's response with the GPSC on 3/06/00.	• KPMG indicated that it cannot replicate five of BellSouth's reported Service Quality Measurements.	• KPMG is engaged in re-testing activities.
		• KPMG filed Exception 24, regarding Pre-Ordering, and BLS's response with the GPSC on 3/06/00.	• KPMG indicated that BellSouth's TAG API does not deliver timely responses to pre-order transactions.	• KPMG is preparing to re-test a new version of TAG API.
		• KPMG filed Exception 25, regarding Capacity Management, and BLS's response with the GPSC on 3/06/00. KPMG filed BLS's amended response to Exception 25 with the GPSC on 3/24/00.	• KPMG indicated that BLS's systems capacity management process does not include established ongoing procedures for forecasting business volumes and transactions.	• KPMG is conducting interviews with BLS personnel as part of re-testing activities.
		• KPMG filed Exception 26, regarding Ordering and Provisioning, and BLS's response with the GPSC on 3/06/00. KPMG filed BLS's amended response to Exception 26 with the GPSC on 3/24/00.	• KPMG indicated that BLS does not deliver timely Completion Notices (CNs).	• KPMG is evaluating BLS's amended response.

Ref[1]	Item	Status	Issues	Next Step/Resolution
		• KPMG filed Exception 27, regarding Billing, and BLS's response with the GPSC on 3/06/00. KPMG filed BLS's amended response to Exception #26 with the GPSC on 3/24/00.	• KPMG indicated that BLS provided incorrect DUF records to KPMG.	• KPMG is evaluating BLS's amended response.
		• KPMG filed Exception 28, regarding Billing, and BLS's response with the GPSC on 3/09/00. KPMG filed BLS's amended response to Exception #28 with the GPSC on 3/30/00.	• KPMG indicated that BLS failed to deliver 46% of expected DUF records to KPMG.	• KPMG is evaluating BLS's response.
		• KPMG filed Exception 29, regarding Billing, and BLS's response with the GPSC on 3/09/00.	• KPMG indicated that BLS did not deliver timely DUF records to KPMG.	• KPMG is clarifying the standards cited in this exception with BLS.
		• KPMG filed Exception 30, regarding Change Management, and BLS's response with the GPSC on 3/24/00.	• KPMG indicated that BLS's change management process does not include a comprehensive mechanism for tracking change information.	• KPMG is evaluating potential re-testing activities based on BLS's response.
		• KPMG filed Exception 31, regarding Ordering and Provisioning, and BLS's response with the GPSC on 3/30/00.	• KPMG indicated that BLS's electronic ordering systems do not adequately support CLEC requests for Directory Listings associated with UNE loop customers.	• KPMG is evaluating potential re-testing activities based on BLS's response.
		• KPMG filed Exception 32, regarding Ordering and Provisioning, and BLS's response with the GPSC on 3/30/00.	• KPMG indicated that BLS delivered FOCs on transactions after issuing CLRs	• KPMG is evaluating potential re-testing activities based on BLS's response.
		• KPMG filed Exception 33, regarding Ordering and Provisioning, and BLS's response with the GPSC on 3/30/00.	• KPMG indicated that BLS's *LEO Guide, Volume 1, Version N* does not define data element requirements and valid entries for loop service requests.	• KPMG is evaluating potential re-testing activities based on BLS's response.

Ref[1]	Item	Status	Issues	Next Step/Resolution
		• KPMG submitted a Draft Exception, regarding Ordering and Provisioning, to BLS on 3/07/00. KPMG received BLS's response on 3/13/00.	• KPMG indicated that BLS does not consistently provide CLECs with a service Due Date matching their Desired Due Date.	• KPMG is evaluating BLS's response to determine future activities.
		• KPMG submitted a Draft Exception, regarding Ordering and Provisioning, to BLS on 3/07/00. KPMG received BLS's response on 3/13/00.	• KPMG indicated that BLS's electronic ordering systems do not provide the functionality required for submitting partial migrations to UNE loops.	• KPMG is evaluating BLS's response to determine future activities.
		• KPMG submitted a Draft Exception, regarding Ordering and Provisioning, to BLS on 3/15/00. KPMG received BLS's response on 3/23/00.	• BLS failed to deliver electronic Missed Appointment notices when due dates were not met for confirmed service requests.	• KPMG is evaluating BLS's response to determine future activities.
		• KPMG submitted a Draft Exception, regarding Ordering and Provisioning, to BLS on 3/23/00. KPMG received BLS's response on 3/30/00.	• KPMG indicated that BLS's TAG interface does not process service requests for coordinated hot-cuts on non-designed loops as described in the *LEO Guide, Volume 1, Version 7N.*	• KPMG is awaiting BLS's response.
		• KPMG submitted a Draft Exception, regarding Ordering and Provisioning, to BLS on 3/23/00.	• KPMG indicated that it discovered numerous inconsistencies between BLS's *TAG API Guide, Version 2.2.0.5* and *Pre-Order Business Rules* documentation.	• KPMG is awaiting BLS's response.
		• KPMG submitted a Draft Exception, regarding Ordering and Provisioning, to BLS on 3/24/00.	• KPMG indicated that BLS delivered inconsistent and inaccurate responses to Local Service Requests.	• KPMG is awaiting BLS's response.
		• KPMG submitted a Draft Exception, regarding Ordering and Provisioning, to BLS on 3/28/00.	• KPMG indicated that BLS's *LEO Guide, Volume 1, Versions J-N* contains numerous revision-related errors.	• KPMG is awaiting BLS's response.
		• KPMG submitted a Draft Exception, regarding Ordering and Provisioning, to BLS on 3/30/00.	• KPMG indicated that it encountered numerous BLS provisioning errors for UNE orders.	• KPMG is awaiting BLS's response.

Ref[1]	Item	Status	Issues	Next Step/Resolution
		• KPMG submitted a Draft Exception, regarding Billing, to BLS on 3/13/00. KPMG received BLS's response on 3/23/00.	• KPMG indicated that BLS's ODUF/ADUF documentation is deficient.	• KPMG is evaluating BLS's response to determine future activities.
		• KPMG submitted a Draft Exception, regarding Billing, to BLS on 3/21/00. KPMG received BLS's response on 3/27/00.	• KPMG indicated that BLS issued multiple bills containing erroneous information to the KPMG CLEC.	• KPMG is evaluating BLS's response to determine future activities.
		• KPMG submitted a Draft Exception, regarding Billing, to BLS on 3/23/00.	• KPMG indicated that BLS's CRIS/CABS billing documentation is deficient in the breadth and depth of topical coverage.	• KPMG is awaiting BLS's response.
		• KPMG submitted a Draft Exception, regarding Billing, to BLS on 3/30/00.	• KPMG indicated that BLS incorrectly billed KPMG for usage charges for messages processed in the Augusta central office.	• KPMG is awaiting BLS's response.
		• KPMG submitted a Draft Exception, regarding Metrics, to BLS on 3/21/00.	• KPMG indicated that it cannot replicate four of BLS's reported Service Quality Measurements.	• KPMG is awaiting BLS's response.
		• KPMG submitted a Draft Exception, regarding Metrics, to BLS on 3/24/00.	• KPMG indicated that it cannot replicate seven of BLS's reported Service Quality Measurements.	• KPMG is awaiting BLS's response.
		• KPMG submitted a Draft Exception, regarding Metrics, to BLS on 3/24/00.	• KPMG indicated that BLS published incomplete KPMG Test CLEC Service Quality Measurement reports for the months of November 1999, December 1999, and Januray 2000 for the billing metric *Mean Time to Deliver Invoices.*	• KPMG is awaiting BLS's response.
		• KPMG submitted a Draft Exception, regarding Metrics, to BLS on 3/29/00.	• KPMG indicated that it cannot replicate BLS's reported values for the *"Provisioning – Service Order Accuracy"* Service Quality Measurement.	• KPMG is awaiting BLS's response.

Ref[1]	Item	Status	Issues	Next Step/Resolution
		• KPMG submitted a Draft Exception, regarding Metrics, to BLS on 3/29/00.	• KPMG indicated that BLS does not report certain Georgia Service Quality Measurements at the levels of dissaggregation specified in the Service Quality Measurements Georgia Performance Reports.	• KPMG is awaiting BLS's response.
		• KPMG submitted a Draft Exception, regarding Metrics, to BLS on 3/29/00.	• KPMG indicated that BLS has not provided KPMG with the raw data necessary to calculate values for the Service Quality Measurement *Mean Time to Deliver Invoices (Billing)* for the KPMG Test CLEC.	• KPMG is awaiting BLS's response.
		• KPMG submitted a Draft Exception, regarding Flow Through, to BLS on 3/21/00.	• KPMG indicated that BLS does not provide CLECs with comprehensive flow-through documentation.	• KPMG is awaiting BLS's response.
		• KPMG submitted a Draft Exception, regarding Flow Through, to BLS on 3/29/00.	• KPMG indicated that minor errors in categorizing LSRs for BLS's Flow Through Reports indicate the potential for future, material reporting errors.	• KPMG is awaiting BLS's response.
		• KPMG submitted a Draft Exception, regarding Maintenance and Repair, to BLS on 3/23/00.	• KPMG indicated that, during TAFI testing, it encountered multiple inconsistencies while accessing information in BLS's Service Order Communications System (SOCS).	• KPMG is awaiting BLS's response.
V-2	Provisioning Verification	• KPMG has submitted one draft exception to BLS that will be publicly issued if the information is substantiated by the BLS response.	• The status of exceptions and draft exceptions is detailed in section IV-5 Exceptions.	• All exceptions must be closed for purposes of the test before reports can be finalized.
		• KPMG has completed all BLS and CLEC interviews for Provisioning Verification.	• None.	• N/A.

Ref[1]	Item	Status	Issues	Next Step/Resolution
		• 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.	• KPMG has uncovered the following: 1) BLS is not accomplishing the timely completion of provisioning activities based on the FOC due date; 2) BLS has inaccurately provisioned customer accounts based on the service order; 3)BLS has not followed methods and procedures for performing "hot cuts"; 4) BLS has inaccurately completed customers' Directory Listing requests based on the service order; 5) BLS's UNE Center is not following methods and procedures for provisioning UNEs.	• BLS is investigating provisioning issues encountered to-date. KPMG verification activities will continue through the completion of EDI and TAG functional testing.
V-3	Pre-ordering, Ordering and Provisioning Documentation Review	• KPMG has issued the following exception related to Pre-Ordering, Ordering and Provisioning Documentation Reviews that remains open: Exception 33. Additionally, KPMG has submitted one draft exception to BLS that will be publicly issued or withdrawn.	• The status of exceptions and draft exceptions is detailed in section IV-5 Exceptions.	• All exceptions must be closed for purposes of the test before reports can be finalized.
		• As of April 3, 2000, BLS indicated that all issues on KPMG's *Documentation Issues Report* were forecasted for closure in release 7O of the *Local Exchange Ordering (LEO) Guide, Volume 1* or the next quarterly update of the *Products and Services Interval Guide.*	• See Section VII-1 for a list of the documentation issues that were not corrected in version 7O. BLS previously committed to updating these issues. • Also, see Section VIII-1 for a list of the documentation issues that BLS has committed to resolving in subsequent releases of the *Products and Services Interval Guide.*	• KPMG will work with BLS to identify and resolve outstanding documentation deficiencies.

Ref[1]	Item	Status	Issues	Next Step/Resolution
		• KPMG has completed an additional interview with CLEC personnel to understand BLS documentation clarity, accuracy and availability from the CLEC perspective.	• None.	• N/A.
V-4	ODUF/ADUF Documentation Evaluation	• KPMG has submitted one draft exception to BLS that will be publicly issued if the information is substantiated by the BLS response.	• The status of exceptions and draft exceptions is detailed in section IV-5 Exceptions.	• All exceptions must be closed for purposes of the test before reports can be finalized.
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 was not revised, and REFNUM was not listed as "001" on LN. BLS had previously committed to making these changes.
		• 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. BLS informed KPMG that this field is not necessary.	• In *LEO Guide, Version 7O*, a note was not added stating that the DRC is not required to have orders issued. BLS had previously committed to making this change.
		• 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 was not added stating ATN and EATN are required for LNP Full Migration when DL Form is populated. BLS had previously committed to making this change.
		• 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 was not marked as conditional on the LSR form for ReqType A, Activity Type A. BLS had previously committed to making this change.

Ref[1]	Item	Status	Issues	Next Step/Resolution
		• Data Element Definition: *Billing Account Number1* *Billing Account Number2* *Billing Indicator1* *Billing Indicator2*	• The documentation does not state: 1) when more than one BAN is required for an account type; 2) a CABS Account Number should be used with an SL2 Loop order; and 3) the BAN sequence when more than one BAN is to be used.	• In future versions of the *LEO Guide*, the documentation will state: 1) when more than one BAN is required for an account type; 2) that a CABS account Number should be used with an SL2 Loop order; and 3) the BAN sequence when more than one BAN is to be used.
		• Data Element Definition: *LIST* *LN*	• DL form, Section 7.1, third paragraph states Activity Type V is conditional for LNP. Documentation states for fields LIST (Section 7.3.2, page 203) and & LN (Section 7.3.3, page 205) ReqType B Activity V are required.	• In future versions of the *LEO Guide,* these fields will be defined as "required" for LNP Full Migrations.
VIII-1	*Product and Services Interval Guide* – Documentation Issues	• Data Definition: *Dispatch*	• BLS documentation does not contain definitions for order types requiring dispatch. Several ordering intervals (as defined in *the Product and Service Interval Guide*) are different based on whether an order requires a dispatch. The definition of what does and does not require dispatch needs to be documented for CLECs.	• BLS has committed to defining *Dispatch* in the next quarterly update of the *Products and Service Interval Guide.*

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 98% complete.	• None.	• BLS will continue to provision the remaining Resale accounts.
		• KPMG has provided the xDSL test bed specifications to BLS.	• None.	• BLS is working to provision the xDSL accounts.
VII-3	Detailed Test Plan Development	• KPMG completed initial development of the TAFI Functional Resale detailed test plan.	• The detailed test plan will be finalized subsequent to the GPSC's approval of the STP.	• KPMG will finalize the detailed test plans and begin testing activities.
		• KPMG is continuing development of the ECTA Functional Resale detailed test plan.		
		• KPMG is continuing development of the xDSL detailed test plans.		
		• Metrics detailed test plans have been developed and testing has begun.	• None.	• KPMG will modify Metrics detailed test plans as necessary based on direction from the GPSC.
VII-4	Metrics	• KPMG is continuing to replicate 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.	• KPMG is seeking clarifying information from BLS.
		• KPMG is continuing to review the definitions of PMAP-generated and non-PMAP-generated SQMs.	• KPMG is investigating some potential issues.	• KPMG is seeking clarifying information from BLS.
		• KPMG is comparing raw data in the early stages of processing to raw data in the latter stages of processing.	• KPMG is investigating potential issues	• KPMG is seeking clarifying information from BLS.

Ref[1]	Item	Status	Issues	Next Step/Resolution
		• KPMG is continuing to review the data flow process through legacy/source, PMAP, and other related BLS systems.	• KPMG is investigating some potential issues.	• KPMG is seeking clarifying information from BLS.
VIII-2	xDSL Testing	• Document and interview requests have been submitted to BLS.	• None.	• KPMG will review documentation upon receipt and conduct interviews.

Retyped for electronic transmission

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w> www.covad.com | F > 678.320.9433

April 6, 2000

VIA FACSMILE and U.S. MAIL
Mr. Glen Estell
President, BellSouth Interconnection Services, Inc.
Suite 4511, BellSouth Center
675 West Peachtree Street, NE
Atlanta, GA 30375

RE: BellSouth's Progress on Line Sharing

Dear Mr. Estell:

We represent the competitive local exchange carriers ("CLECs") who have been working with BellSouth since December to develop BellSouth's methods and procedures for providing unbundled access to the high frequency spectrum of a loop as a network element ("line sharing"). We have reached a critical point in the process and are writing you to express our concerns. As you know, BellSouth is obligated to provide us with access to line sharing on or before June 6, 2000 throughout the BellSouth region. A number of things have happened in recent days that we believe jeopardize BellSouth's ability to meet this deadline.

This week, BellSouth cancelled the weekly line sharing meeting that was scheduled for today and BellSouth also unilaterally cancelled meetings scheduled for next Wednesday and Thursday, April 12 and 13, 2000. BellSouth has explained that these cancellations flow from the need to do "internal regrouping" and to internally solve several problems that have arisen in the Controlled Introduction. As you may know, the first line provisioned in the Controlled Introduction was provisioned on the wrong day and resulted in a loss of voice service for that customer for eight hours. No data was ever passed over that line and the troubles apparently stemmed from improper wiring or lack of testing by BellSouth. Rather than discussing these problems openly in our weekly line sharing meetings, so that we could all collaboratively identify and resolve problems, BellSouth has elected to cancel the meeting. As you can imagine, these cancellations are very disruptive to the progress of the project and have caused us to reschedule travel for CLEC subject matter experts who were planning to be present for this week's and next week's discussions. These cancellations reveal a fundamental failure on BellSouth's part to work through problems in a collaborative way.

Over the past several weeks, we have been collectively frustrated by the lack of progress on line sharing. It appears that, although BellSouth is apparently meeting internally weekly and the CLECs are meeting with Tommy Williams and Eric Brockman weekly, we do not appear to be reaching closure on issues critical to this project time line. Moreover, we have been frustrated by the lack of decision making authority, the lack of subject matter expertise, and the lack of adherence to any time lines so far in the project.

Because we wish to work collaboratively and cooperatively with BellSouth to enable us access to line sharing on or before June 6, 2000, we propose the following. First, we believe it is critical that BellSouth and the data CLEC community meet next week, Thursday, April 13, 2000. At that meeting, we suggest that Jerry Hendrix, BellSouth's designated region-wide decision maker on line sharing, be present. We also request that subject matter experts be present at the meeting. We believe the meeting should be used to structure the next two months, to set firm deadlines, to make commitments to meet those deadlines, and to agree on priorities for proceeding. We propose that we jointly review the action item list, assign firm dates for completion of action items, and collectively adhere to commitments for future resolution of issues. From our perspective, many issues in the critical path of this project have not yet been resolved. We cannot continue to push deadlines on these issues.

Beyond next Thursday, it is imperative that BellSouth assign more resources, time and effort to line sharing. One of the continuing problems, from our perspective, it's the lack of BellSouth subject matter expertise present at the CLEC line sharing meetings. Generally, the CLECs propose issues for resolution at the meeting, which are then taken by the product manager for discussion by the internal BellSouth group. The internal BellSouth group's response is then delivered in some later CLEC meeting. If the CLECs have additional questions about the issue, then those follow up questions must again be relayed to BellSouth's internal team. This process wastes valuable time. BellSouth must make its subject matter experts available to discuss and reach consensus with the CLECs at the CLEC line sharing meetings. We are prepared to commit to a time line to meet goals for the project and we expect BellSouth to do the same.

Furthermore, we expect BellSouth to have someone present at all CLEC line sharing meetings to take meeting minutes, to publish those minutes and action items, and to publish closed-out action items. We must reach closure on issues that have been pending since January. It has been suggested that the CLECs were demanding too much subject matter expertise already. We view that as a management/resource issue for BellSouth to resolve. All of our companies are very small compared to BellSouth, and yet, we have managed to allocate the necessary resources to get this job done. We expect BellSouth to match that effort and commitment.

The FCC Order requires that we work collaboratively and we have attempted to do that and will continue to do so. This is an excellent opportunity for BellSouth to open up its process and to allow the CLECs to contribute to resolving problems BellSouth is experiencing not only in the Controlled Introduction, but in all areas of line sharing deployment.

We expect to hear, by the end of our meeting on Thursday, April 6, 2000, that you are willing to commit the time and resources to meet with us next Thursday and in the future to ensure that BellSouth meets its legal obligations to provide access to line sharing on or before June 6, 2000.

Sincerely,

Thomas Allen
Thomas E. Allen
J. Lans Chase

Richard Schell
Richard Schell
Rhythms Links, Inc.

Charles Polizzotti
Charles Polizzotti
NorthPoint Communications, Inc.

cc: Jerry Hendrix (via facsimile)
Tommy Williams (via facsimile)
Mark Cathey (via facsimile)

ERT#53/04100002.DOC

#239

#240

303 Peachtree Street, N.E.
Suite 2000
Atlanta, GA 30308

Telephone 404 222 3000
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April 13, 2000

RECEIVED
APR 1 3 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 Exceptions 34, 35, 36, 37, 38, 39 and 40 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

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

Date: March 10, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ODUF/ADUF Documentation Evaluation (BLG-6).

BellSouth's ODUF/ADUF documentation is deficient in the breadth and depth of topical coverage.

Background: The Daily Usage Feed (ODUF/ADUF) documentation test (BLG-6) evaluated DUF documentation provided by BellSouth for use by the CLECs. The objective of this test was to determine whether the DUF documentation provided by BellSouth adequately supports the CLECs in receipt and validation of BellSouth-provided local port (ODUF) and access (ADUF) usage records.

A major part of this documentation evaluation concentrated on KPMG's review of the breadth and depth of topical coverage. Topics considered were:

- Understanding DUF
- Set-up and Testing of DUF
- Receiving and Processing DUF
- Validating DUF
- Getting Help

During testing, KPMG determined that four of these five major topical areas addressed by the test were deficient:

Set-up and Testing of DUF. BellSouth's DUF documentation regarding the overall process flow and responsibilities for DUF set-up and testing was inadequate in the following ways:

1. Various departments are referenced for the set-up and testing of DUF. However, the department names are abbreviated and there is no explanation for the departments' responsibilities.
2. A set-up process flow is not available.
3. No description for the process for relaying the status of a DUF set-up to a CLEC is provided.
4. Information is provided that states that test data can be requested through a generic file. However, no information is provided regarding obtaining the generic file, or the requirements for submitting the generic file request.
5. Conflicting information is provided regarding the necessity of processing optional test data, or its intended purpose.

6. No explanation is provided regarding the distribution and/or communication of test results.
7. No outline is provided to detail DUF set-up and testing responsibilities and activities.
8. A Test Request Form is included in the documentation. Instructions on form completion and the associated responsibilities for completion are also included. However, another form is referenced, but not included, in the documentation.

Receiving and Processing DUF. BellSouth's DUF documentation regarding the overall process flow and responsibilities for receiving and processing DUF was inadequate in the following ways:

1. Transmission schedules and data retention periods are not provided.
2. Procedures for ADUF re-creation/re-sending are not clear.
3. No information is provided to assist with requesting changes to distribution media or documentation, or filing a change of address notification.

Validating DUF. BellSouth's DUF documentation regarding the overall process flow and responsibilities for validating DUF was inadequate in the following ways:

1. The primary tool by which a CLEC can validate the DUF records is the EMI standard which is published by the Alliance for Telecommunications Industry Solutions (ATIS). While CLECs are expected to obtain this tool directly from ATIS, BellSouth does exerpt and re-publish portions. These excerpts are inadequate to support DUF validation.
2. DUF records produced for each type of telephone call are not adequately defined in the documentation which hampers validation of received DUF files.

Getting Help. BellSouth's DUF documentation regarding the overall process flow and responsibilities for requesting help on DUF problems was inadequate in the following ways:

1. The process to be followed by a CLEC for placing trouble calls is not documented.
2. Escalation procedures are not documented.

Impact

Deficient DUF documentation impacts CLECs in the following ways:

Increase in operating costs. Deficient documentation will result in a more difficult and time-consuming billing process for the CLECs, requiring more labor resources and increasing operating costs.

Decrease in Customer Satisfaction. Deficient billing documentation will likely result in billing errors to CLEC customers. Incorrectly billing end-users will result in a decrease in CLEC customer satisfaction.

BELLSOUTH's RESPONSE TO EXCEPTION 34

BELLSOUTH

March 27, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ODUF/ADUF Documentation Evaluation (BLG-6).

BellSouth's ODUF/ADUF documentation is deficient in the breadth and depth of topical coverage.

Background: The Daily Usage Feed (ODUF/ADUF) documentation test (BLG-6) evaluated DUF documentation provided by BellSouth for use by the CLECs. The objective of this test was to determine whether the DUF documentation provided by BellSouth adequately supports the CLECs in receipt and validation of BellSouth-provided local port (ODUF) and access (ADUF) usage records.

A major part of this documentation evaluation concentrated on KPMG's review of the breadth and depth of topical coverage. Topics considered were:

- Understanding DUF
- Set-up and Testing of DUF
- Receiving and Processing DUF
- Validating DUF
- Getting Help

During testing, KPMG determined that four of these five major topical areas addressed by the test were deficient:

Set-up and Testing of DUF. BellSouth's DUF documentation regarding the overall process flow and responsibilities for DUF set-up and testing was inadequate in the following ways:

1. Various departments are referenced for the set-up and testing of DUF. However, the department names are abbreviated and there is no explanation for the departments' responsibilities.
2. A set-up process flow is not available.
3. No description for the process for relaying the status of a DUF set-up to a CLEC is provided.
4. Information is provided that states that test data can be requested through a generic file. However, no information is provided regarding obtaining the generic file, or the requirements for submitting the generic file request.
5. Conflicting information is provided regarding the necessity of processing optional test data, or its intended purpose.
6. No explanation is provided regarding the distribution and/or communication of test results.
7. No outline is provided to detail DUF set-up and testing responsibilities and activities.
8. A Test Request Form is included in the documentation. Instructions on form completion and the associated responsibilities for completion are also included. However, another form is referenced, but not included, in the documentation.

BELLSOUTH's RESPONSE TO EXCEPTION 34

Receiving and Processing DUF. BellSouth's DUF documentation regarding the overall process flow and responsibilities for receiving and processing DUF was inadequate in the following ways:

1. Transmission schedules and data retention periods are not provided.
2. Procedures for ADUF re-creation/re-sending are not clear.
3. No information is provided to assist with requesting changes to distribution media or documentation, or filing a change of address notification.

Validating DUF. BellSouth's DUF documentation regarding the overall process flow and responsibilities for validating DUF was inadequate in the following ways:

1. The primary tool by which a CLEC can validate the DUF records is the EMI standard which is published by the Alliance for Telecommunications Industry Solutions (ATIS). While CLECs are expected to obtain this tool directly from ATIS, BellSouth does exerpt and re-publish portions. These excerpts are inadequate to support DUF validation.
2. DUF records produced for each type of telephone call are not adequately defined in the documentation which hampers validation of received DUF files.

Getting Help. BellSouth's DUF documentation regarding the overall process flow and responsibilities for requesting help on DUF problems was inadequate in the following ways:

1. The process to be followed by a CLEC for placing trouble calls is not documented.
2. Escalation procedures are not documented.

Impact

Deficient DUF documentation impacts CLECs in the following ways:

Increase in operating costs. Deficient documentation will result in a more difficult and time-consuming billing process for the CLECs, requiring more labor resources and increasing operating costs.

Decrease in Customer Satisfaction. Deficient billing documentation will likely result in billing errors to CLEC customers. Incorrectly billing end-users will result in a decrease in CLEC customer satisfaction.

BellSouth Response

Set-up and Testing of DUF

ADUF and ODUF documentation will be revised to address these issues.

Receiving and Processing DUF

ADUF and ODUF documentation will be revised to address these issues.

BELLSOUTH's RESPONSE TO EXCEPTION 34

Validating DUF

As stated by KPMG, the EMI document produced by ATIS is the primary tool used by CLECs to validate DUF records. As such, information provided in the BellSouth documentation is not intended to serve in that role but only to supplement the information provided by ATIS.

Language will be added to the DUF documentation which clearly describes the intended supplemental role of these documents.

Getting Help

ADUF and ODUF documentation will be revised to address these issues.

BellSouth's Overall Response

All changes to be made to the ODUF documentation will be completed and updated to the Interconnection Web site no later than March 31, 2000. These modifications will address the concerns raised in the exception. BellSouth will create a new ADUF document similar to the ODUF document which will also address these same issues and concerns raised by KPMG. The ADUF document will be completed and added to the Web site on or before April 7, 2000.

A draft of the revised ODUF document is attached as illustrative of the changes which will be made by the dates listed above.

Date: March 14, 2000

EXCEPTION REPORT

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

Exception:

BellSouth issued multiple bills containing erroneous charges to KPMG.

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 KPMG contain erroneous information, such as: 1) Undocumented charges; 2) Incorrectly rated charges; and 3) Missing charges.

Undocumented Charges

USOC VE1R2: BellSouth billed the KPMG CLEC a one-time charge of $12.60 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.

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

Telephone Number	Account Number	Invoice Date
770 933-9530	770 Q85 8252-252	10/05/99
770 933-0190	770 Q85 8252-252	10/05/99

Incorrectly Rated Charges

USOC UEPLX: BellSouth inappropriately billed the KPMG CLEC for the one-time charge for Universal Service Order Code (USOC) UEPLX, Unbundled Voice Grade Loop. This USOC is listed in the rate spreadsheets created for the KPMG CLEC in lieu of an Inter-Connection Agreement with the following rates:

- $42.54 Non-recurring charge for the first service
- $31.33 Non-recurring charge for each additional service

Review of the invoice shows that BellSouth billed the KPMG CLEC the following:

- $42.54 Non-recurring charge for the first service
- $42.54 Non-recurring charge for each additional service.

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

Telephone Number	Account Number	Invoice Date
404 633-5740	770 Q97 9808 808	10/17/99
404 633-5251	770 Q97 9808 808	10/17/99

Missing Charges

USOC UEAL2: BellSouth did not bill the KPMG CLEC for the one-time charge for Universal Service Order Code (USOC) UEAL2, Unbundled Voice Grade SL1 Loop. This USOC is listed in the rate spreadsheets created for the KPMG CLEC in lieu of an Inter-Connection Agreement with the following rates:

- $42.54 Non-recurring charge for the first service
- $31.33 Non-recurring charge for each additional service

Review of the invoice shows that BellSouth did not bill the KPMG CLEC for these charges when applicable. Representative occurrences of this error are found on the following invoices:

Circuit	Account Number	Invoice Date
40.TYNU.526413	770 Q85 4226 226	10/05/99
40.TYNU.526414	770 Q85 4226 226	10/05/99

Unbilled Unbundled Loop: The KPMG CLEC submitted a Local Service Request to BellSouth for the migration of two SL1 Unbundled Analog Loops PON B141. The two Loops ordered had the following circuit IDs:

50.TYNU.000337...SB
50.TYNU.000338...SB

Of the two SL1 Loops ordered, only the circuit 50.TYNU.000337...SB appeared on the 10/5/99, 11/5/99 and 12/5/99 invoices[1] of the 706-Q85-4226-226 account. For the second circuit, BellSouth did not bill the appropriate monthly-recurring, pro-rated and non-recurring charges for the USOCs UEAL2 and UEAC2.

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

[1] KPMG reviewed bills for at least two cycles per PON. In some cases, when data was available, KPMG reviewed bills for 3 cycles.

documentation. By not adhering to documented rates, BellSouth potentially alters a CLEC's expected operating costs, and could affect CLEC budgetary planning and related activities.

- **Increased operating costs.** Regardless of the net monetary effect of incorrect charges upon a CLEC's bills, a CLEC will be forced to regularly reconcile these bills by 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's RESPONSE TO EXCEPTION 35

BELLSOUTH

April 4, 2000

EXCEPTION REPORT

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

Exception:

BellSouth issued multiple bills containing erroneous charges to KPMG.

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 KPMG contain erroneous information, such as: 1) Undocumented charges; 2) Incorrectly rated charges; and 3) Missing charges.

Undocumented Charges

USOC VE1R2: BellSouth billed the KPMG CLEC a one-time charge of $12.60 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.

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

Telephone Number	Account Number	Invoice Date
770 933-9530	770 Q85 8252-252	10/05/99
770 933-0190	770 Q85 8252-252	10/05/99

Incorrectly Rated Charges

USOC UEPLX: BellSouth inappropriately billed the KPMG CLEC for the one-time charge for Universal Service Order Code (USOC) UEPLX, Unbundled Voice Grade Loop. This USOC is listed in the rate spreadsheets created for the KPMG CLEC in lieu of an Inter-Connection Agreement with the following rates:

- $42.54 Non-recurring charge for the first service
- $31.33 Non-recurring charge for each additional service

Review of the invoice shows that BellSouth billed the KPMG CLEC the following:

- $42.54 Non-recurring charge for the first service
- $42.54 Non-recurring charge for each additional service.

BELLSOUTH's RESPONSE TO EXCEPTION 35

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

Telephone Number	Account Number	Invoice Date
404 633-5740	770 Q97 9808 808	10/17/99
404 633-5251	770 Q97 9808 808	10/17/99

Missing Charges

USOC UEAL2: BellSouth did not bill the KPMG CLEC for the one-time charge for Universal Service Order Code (USOC) UEAL2, Unbundled Voice Grade SL1 Loop. This USOC is listed in the rate spreadsheets created for the KPMG CLEC in lieu of an Inter-Connection Agreement with the following rates:

- $42.54 Non-recurring charge for the first service
- $31.33 Non-recurring charge for each additional service

Review of the invoice shows that BellSouth did not bill the KPMG CLEC for these charges when applicable. Representative occurrences of this error are found on the following invoices:

Circuit	Account Number	Invoice Date
40.TYNU.526413	770 Q85 4226 226	10/05/99
40.TYNU.526414	770 Q85 4226 226	10/05/99

Unbilled Unbundled Loop: The KPMG CLEC submitted a Local Service Request to BellSouth for the migration of two SL1 Unbundled Analog Loops PON B141. The two Loops ordered had the following circuit IDs:

50.TYNU.000337...SB
50.TYNU.000338...SB

Of the two SL1 Loops ordered, only the circuit 50.TYNU.000337...SB appeared on the 10/5/99, 11/5/99 and 12/5/99 invoices[1] of the 706-Q85-4226-226 account. For the second circuit, BellSouth did not bill the appropriate monthly-recurring, pro-rated and non-recurring charges for the USOCs UEAL2 and UEAC2.

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 documented rates, BellSouth potentially alters a

[1] KPMG reviewed bills for at least two cycles per PON. In some cases, when data was available, KPMG reviewed bills for 3 cycles.

BELLSOUTH's RESPONSE TO EXCEPTION 35

CLEC's expected operating costs, and could affect CLEC budgetary planning and related activities.

Increased operating costs. Regardless of the net monetary effect of incorrect charges upon a CLEC's bills, a CLEC will be forced to regularly reconcile these bills by identifying and correcting the incorrect charges and discovering and disaggregating mislabeled charges. The necessity of an extensive validation of each bill.

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 non-recurring rate of $12.60 per month was authorized for use when this service was ordered by and provisioned for a customer.

Incorrectly Rated Charges:

USOC UEPLX: BellSouth methods and procedures do not support billing the additional charge, only the first charge. We will remove the additional charge reference from Interconnection Agreements and rate sheets.

Missing Charges:

USOC UEAL2: When the order that added these circuits was processed, the UEAL2 USOC 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 was added to the CRIS rate file for business classes of service on 2/23/00. This corrected the rates so that on a going forward basis, the proper rates will be used for non-recurring charges.

Unbilled Unbundled Loop: The billing system never received a service order that contained the circuit - 50.TYNU.000338..SB during the dates of the test. The service order, NPF3K268, that established this circuit completed 3/1/00. The service order that added the circuit - 50.TYNU.000337..SB did not have the circuit - 50.TYNU.000338..SB on the order. The two circuits on that order were 50.TYNU.000336..SB and 50.TYNU.000337..SB.

Date: March 20, 2000

EXCEPTION REPORT

An exception has been identified as a result of the TAFI Functional Tests (M&R-1 and M&R-12).

During TAFI interface testing, KPMG encountered multiple inconsistencies while accessing information in BellSouth's Service Order Communications System (SOCS).

As part of functional testing, KPMG accessed a variety of reports in BellSouth's downstream systems through the "additional data" menu in TAFI. When using the method described in the *CLEC TAFI End-User Training and User Guide* to view pending service orders in SOCS[1], KPMG received a variety of unexpected results.

In analyzing these test results, KPMG attempted to determine through BellSouth's Carrier Service Order Tracking System[2] (CSOTS) whether or not the particular status of a service order affected the results cited in this exception. Initially, KPMG believed that the inability to view particular service orders occurred because these orders were not in PD (Pending) Status. However, as the examples below indicate, PD Status was not the sole determinant of the results received.

The results are summarized in five categories:

1. **KPMG was unable to access an account.** A message indicating the account belonged to another company was displayed, despite the fact that the account was assigned to KPMG. This result occurred four times:

PON	TN	Date of TAFI entry	Time of TAFI entry	Status in CSOTS at time[3]	FOC Due Date	Date Complete	Req Acc Type[4]	Result/Response to SOCS Query
205A121PEN100004	7062357964	12/13/1999	12:15		1/24/2000	1/24/2000	EV	Unable to access account. *MSG: CPNI Data PCL MCH F (Mechanized Conversion) Full Restriction (Bill & CSR) customer has not yet given CPNI release*

[1] BellSouth's Service Order Communications System (SOCS) is a back-end system which issues a service order when adding or changing features, disconnecting service or migrating service. It is also used to verify the status of the order.

[2] BellSouth's Carrier Service Order Tracking Systems (CSOTS) is a back-end system which tracks and displays the progress of submitted service orders by CLECs.

[3] PD= Pending Dispatch; PF= Pending Facilities

[4] First letter denotes: C = Change; D = Disconnect; V = Migration; Second letter denotes: B = Loop with Number Portability; C= Number Portability; E = Resale; F = UNE Port; M = Loop/Port Combo;

No PON available	7707409480	1/6/2000	10:44	PF	N/A	N/A	N/A	Unable to access account *MSG: CPNI Data PCL MCH F (Mechanized Conversion) Full Restriction (Bill & CSR) customer has not yet given CPNI release.*
R004A31PEN100001	7067241169	2/29/2000	6:27	PD	3/14/2000	3/14/2000	EV	Unable to access account. *MSG: CPNI Data PCL MCH F (Mechanized Conversion) Full Restriction (Bill & CSR) customer has not yet given CPNI release.* *MSG: Our records indicate this account belongs to another company.*
R005F12PEN100001	4043254748	2/29/2000	6:32	PD	3/2/2000	3/2/2000	EV	Unable to access account. *MSG: CPNI Data PCL MCH F (Mechanized Conversion) Full Restriction (Bill & CSR) customer has not yet given CPNI release.* *MSG: Our records indicate this account belongs to another company.*

2. **KPMG was able to access an account, but SOCS service order data was unavailable.** This result occurred three times:

PON	TN	Date of TAFI entry	Time of TAFI entry	Status in CSOTS at time	FOC Due Date	Date Complete	Req Acc Type	Result/Response to SOCS Query
TB097E	6785799065	11/18/1999	4:28	N/A	N/A	N/A	N/A	Able to access account *MSG: "Project ACE Participant ACC Windows Only".* *MSG: SOCS service order data unavailable.*
428A124PTJ100002	6785790883	11/18/1999	4:34	-	12/1/1999	12/1/1999	MV	Able to access account *MSG: "Project ACE Participant ACC Windows Only".* *MSG: SOCS service order data unavailable.*
409A223PTM100001 *AF	7067225636	12/13/1999	-	-	12/2/1999	12/2/1999	FC	Able to access account *MSG: CPNI Data unavailable* *MSG: SOCS service order data unavailable*

3. **KPMG successfully accessed an account despite receiving a message stating that the account did not belong to KPMG.** In this case, SOCS service order data was unavailable. This result occurred once:

PON	TN	Date of TAFI entry	Time of TAFI entry	Status in CSOTS at time	FOC Due Date	Date Completed	Req Acc Type	Result/Response to SOCS Query
406A213PTM100002	7707773250	1/6/2000	10:45	-	12/28/1999	12/28/1999	FV	KPMG was able to access the account although the following message was received. *MSG: Our records indicate this account belongs to another company.* *No service order information was available.*

4. KPMG successfully accessed an account and viewed the information, however other anomalies occurred. Details are provided in the following table. This result occurred once:

PON	TN	Date of TAFI entry	Time of TAFI entry	Status in CSOTS at time	FOC Due Date	Date Completed	Req Acc Type	Result/Response to SOCS Query
329A212PT1700003	7062953503	1/14/2000	10:07	PD	12/28/1999	1/26/2000	BV	Successfully viewed service order information. However, an odd sequence preceded the viewing. After entering the TN, the following message was received. *MSG: CPNI data PCL MCH F (Mechanized Conversion) (Full restriction (Bill & CSR)) customer had not yet given CPNI release.* *TAFI then immediately forwarded testers to the trouble report screen. From here, testers were able to access the SOCS pending service information.*

5. **KPMG successfully accessed an account and was able to view the information as expected.** This result occurred five times:

PON	TN	Date of TAFI entry	Time of TAFI entry	Status in CSOTS at time	FOC Due Date	Date Completed	Req Act Type	Result/Response to SOCS Query
603A224PTJ100002	6785799054	11/18/1999	4:30	-	11/18/1999	11/20/1999	MD	Successfully viewed service order information
403A223PTM000001	9127490239	12/13/1999	12:14	-	12/9/1999	12/9/1999	FV	Successfully viewed service order information
406A213PTM100001	7068020718	12/13/1999	12:15	-	12/15/1999	12/15/1999	FV	Successfully viewed service order information
428A124PTJ100006	7062323092	1/14/2000	10:01	PD	12/27/1999	12/27/1999	MV	Successfully viewed service order information. *DISC in LMOS was displayed in the customer information window*
373A215PEG100002	7062954674	1/14/2000	10:01	PD	12/27/1999	12/27/1999	PV	Successfully viewed service order information. *DISC in LMOS was displayed in the customer information window*

Impact

Inconsistent pending service order information will impact a CLEC in the following way:

- **Decrease in Customer Satisfaction.** The inability of a CLEC to properly access their customer's account will result in the need to report trouble manually. This could lead to a slower response interval which would result in a decrease in CLEC customer satisfaction.

- **Increase in operating costs.** Additionally, upon discovering their inability to access a customer's account, a CLEC will have to expend additional resources investigating the problem and reporting trouble manually.

BELLSOUTH'S RESPONSE TO EXCEPTION 36

BELLSOUTH

April 4, 2000

EXCEPTION REPORT

An exception has been identified as a result of the TAFI Functional Tests (M&R-1 and M&R-12).

During TAFI interface testing, KPMG encountered multiple inconsistencies while accessing information in BellSouth's Service Order Communications System (SOCS).

As part of functional testing, KPMG accessed a variety of reports in BellSouth's downstream systems through the "additional data" menu in TAFI. When using the method described in the *CLEC TAFI End-User Training and User Guide* to view pending service orders in SOCS[1], KPMG received a variety of unexpected results.

In analyzing these test results, KPMG attempted to determine through BellSouth's Carrier Service Order Tracking System[2] (CSOTS) whether or not the particular status of a service order affected the results cited in this exception. Initially, KPMG believed that the inability to view particular service orders occurred because these orders were not in PD (Pending) Status. However, as the examples below indicate, PD Status was not the sole determinant of the results received.

The results are summarized in five categories:

1. **KPMG was unable to access an account.** A message indicating the account belonged to another company was displayed, despite the fact that the account was assigned to KPMG. This result occurred four times:

PON	TN	Date of TAFI entry	Time of TAFI entry	Status in CSOTS at time[3]	FOC Due Date	Date Complete	Req Acc Type	Result/Response to SOCS Query
205A121PEN100004	7062357964	12/13/1999	12:15		1/24/2000	1/24/2000	EV	Unable to access account. *MSG: CPNI Data PCL MCH F (Mechanized Conversion) Full Restriction (Bill & CSR)*

[1] BellSouth's Service Order Communications System (SOCS) is a back-end system which issues a service order when adding or changing features, disconnecting service or migrating service. It is also used to verify the status of the order.

[2] BellSouth's Carrier Service Order Tracking Systems (CSOTS) is a back-end system which tracks and displays the progress of submitted service orders by CLECs.

[3] PD= Pending Dispatch; PF= Pending Facilities

[4] First letter denotes: C = Change; D = Disconnect; V = Migration; Second letter denotes: B = Loop with Number Portability; C= Number Portability; E = Resale; F = UNE Port; M = Loop/Port Combo;

BELLSOUTH'S RESPONSE TO EXCEPTION 36

								customer has not yet given CPNI release
No PON available	7707409480	1/6/2000	10:44	PF	N/A	N/A	N/A	Unable to access account *MSG: CPNI Data PCL MCH F (Mechanized Conversion) Full Restriction (Bill & CSR) customer has not yet given CPNI release.*
R004A31PEN100001	7067241169	2/29/2000	6:27	PD	3/14/2000	3/14/2000	EV	Unable to access account. *MSG: CPNI Data PCL MCH F (Mechanized Conversion) Full Restriction (Bill & CSR) customer has not yet given CPNI release.* *MSG: Our records indicate this account belongs to another company.*
R005F12PEN100001	4043254748	2/29/2000	6:32	PD	3/2/2000	3/2/2000	EV	Unable to access account. *MSG: CPNI Data PCL MCH F (Mechanized Conversion) Full Restriction (Bill & CSR) customer has not yet given CPNI release.* *MSG: Our records indicate this account belongs to another company.*

2. **KPMG was able to access an account, but SOCS service order data was unavailable.** This result occurred three times:

PON	TN	Date of TAFI entry	Time of TAFI entry	Status in CSOTS at time	FOC Due Date	Date Complete	Req Acc Type	Result/Response to SOCS Query
TB097E	6785799065	11/18/1999	4:28	N/A	N/A	N/A	N/A	Able to access account *MSG: "Project ACE Participant ACC Windows Only".* *MSG: SOCS service order data unavailable.*
428A124PTJ100002	6785790883	11/18/1999	4:34	-	12/1/1999	12/1/1999	MV	Able to access account *MSG: "Project ACE Participant ACC Windows Only".* *MSG: SOCS service order data unavailable.*
409A223PTM100001 *AF	7067225636	12/13/1999	-	-	12/2/1999	12/2/1999	FC	Able to access account *MSG: CPNI Data unavailable* *MSG: SOCS service order*

								data unavailable

3. **KPMG successfully accessed an account despite receiving a message stating that the account did not belong to KPMG.** In this case, SOCS service order data was unavailable. This result occurred once:

PON	TN	Date of TAFI entry	Time of TAFI entry	Status in CSOTS at time	FOC Due Date	Date Completed	Req Acc Type	Result/Response to SOCS Query
406A213PTM100002	7707773250	1/6/2000	10:45	-	12/28/1999	12/28/1999	FV	KPMG was able to access the account although the following message was received. *MSG: Our records indicate this account belongs to another company.* *No service order information was available.*

4. KPMG successfully accessed an account and viewed the information, however other anomalies occurred. Details are provided in the following table. This result occurred once:

PON	TN	Date of TAFI entry	Time of TAFI entry	Status in CSOTS at time	FOC Due Date	Date Completed	Req Acc Type	Result/Response to SOCS Query
329A212PT1700003	7062953503	1/14/2000	10:07	PD	12/28/1999	1/26/2000	BV	Successfully viewed service order information. However, an odd sequence preceded the viewing. After entering the TN, the following message was received. *MSG: CPNI data PCL MCH F (Mechanized Conversion) (Full restriction (Bill & CSR)) customer had not yet given CPNI release.* *TAFI then immediately forwarded testers to the trouble report screen. From here, testers were able to access the SOCS pending service information.*

BELLSOUTH'S RESPONSE TO EXCEPTION 36

5. **KPMG successfully accessed an account and was able to view the information as expected.** This result occurred five times:

PON	TN	Date of TAFI entry	Time of TAFI entry	Status in CSOTS at time	FOC Due Date	Date Completed	Req Acc Type	Result/Response to SOCS Query
603A224PTJ100002	6785799054	11/18/1999	4:30	-	11/18/1999	11/20/1999	MD	Successfully viewed service order information
403A223PTM000001	9127490239	12/13/1999	12:14	-	12/9/1999	12/9/1999	FV	Successfully viewed service order information
406A213PTM100001	7068020718	12/13/1999	12:15	-	12/15/1999	12/15/1999	FV	Successfully viewed service order information
428A124PTJ100006	7062323092	1/14/2000	10:01	PD	12/27/1999	12/27/1999	MV	Successfully viewed service order information. *DISC in LMOS was displayed in the customer information window*
373A215PEG100002	7062954674	1/14/2000	10:01	PD	12/27/1999	12/27/1999	PV	Successfully viewed service order information. *DISC in LMOS was displayed in the customer information window*

Impact

Inconsistent pending service order information will impact a CLEC in the following way:

- **Decrease in Customer Satisfaction.** The inability of a CLEC to properly access their customer's account will result in the need to report trouble manually. This could lead to a slower response interval which would result in a decrease in CLEC customer satisfaction.

- **Increase in operating costs.** Additionally, upon discovering their inability to access a customer's account, a CLEC will have to expend additional resources investigating the problem and reporting trouble manually.

BellSouth Response

1. KPMG was unable to access an account.

In three of the four examples cited the tester attempted to use TAFI to enter a trouble report on a line that was being migrated to KPMG as a resold line (REQTYP E/ACT V) prior to the Service Order due date. (The fourth example does not provide the service order due date and, because of the consistent response, one can assume it is similar to the other three – due after the TAFI entry date.) These accounts were initially provisioned without a MAN or RESH on the CRIS record so KPMG could test migration, etc. TAFI correctly performed its CLEC validation processes and determined that the tester (with

OCN value 9990 in their TAFI profile) was not the 'owner' at the time of the TAFI transaction and denied access.

As information, the CLEC TAFI system validates that the user is allowed to access a given line by comparing the OCN value coded in the user's TAFI profile against the OCN value associated with the given line (and/or port/loop combo). When the CLEC user enters a telephone number, TAFI first looks to see if there are any service orders in SOCS for that line. (Note: In the normal course of events, SOCS only contains pending orders. Once an order is completed (closed) the information is migrated to other legacy systems – i.e., CRIS, LMOS Host, Billing, etc.) If a service order is found, TAFI then looks to see if it's 'due today or past due'. If the pending service order is due today or past due (i.e., NOT future due dated), TAFI then looks to see if there is an OCN value associated with the order (MAN or RESH). If an OCN value is found, TAFI uses this value for validating the user. If the service order is NOT due today or past due, or if no service order is found, TAFI then looks at the CRIS record for the OCN value. TAFI also pulls an LMOS DLR screen as a second source for the OCN value (should the CRIS data be unavailable). If the OCN associated with the line does not match the user's OCN value(s) coded in TAFI, TAFI will not allow the user to proceed and it displays the "... this account belongs to another company" message.

2. KPMG was able to access an account, but SOCS service order data was unavailable.

TAFI is the system used to process customer trouble reports and NOT a tool for CLECs to verify service orders. The ability to view a service order is used in the maintenance arena to ensure that when a customer is reporting a problem, they are not reporting something that has not been installed yet. Once a service order is completed, TAFI relies on the CRIS record to convey what had transpired.

On 706-722-5636 the service order was completed on 12/2 and the TAFI transaction took place on 12/13. Therefore, at the time of the TAFI transaction, there is no pending service order and TAFI correctly stated that service order data was unavailable.

The first example (678-579-9065) does not state when the service order was completed and therefore could be a similar situation.

In the second example (678-759-0883), the tester was able to access the account on 11/18. This account belonged to the KPMG CLEC at that time and the pending service order (due on 12/1) was converting the line to a port/loop combo. If this service order was in the system on 11/18, the tester should have been able to see it. The data provided above does not state when this order was issued and, if it was issued after 11/18 at 4:34, then TAFI responded correctly.

Note: Since TAFI is only a front end to the legacy systems, TAFI log files are available for the current month plus one month. (e.g., on March 23 the only TAFI transaction data available is for Feb 1 – Feb 29 and March 1 – March 23.) Therefore it is hard to determine exactly what and why something happened last November.

BELLSOUTH'S RESPONSE TO EXCEPTION 36

3. KPMG successfully accessed an account despite receiving a message stating that the account did not belong to KPMG.

The "SOCS service order data unavailable" message is correct since the service order was completed on 12/28 and the TAFI transaction took place on 1/6.

The system should not tell the user that the line "... belongs to another company" and then let the user have access to the account. Without the log files, its impossible to tell why this happened (see the last note in #2 above).

Note: This order converted the line to a UNE Port and these are provisioned and maintained in WFA. With release 2000.3, the system will tell the user to "Take the report in WFA-C or call the UNE Center" and then return the user to the initial trouble entry window to process the next report.

4. KPMG successfully accessed an account and viewed the information, however other anomalies occurred.

A CPNI warning message is broadcast at the beginning of each CLEC TAFI report. The system validated the user as owning this account on 1/14 and then jumped the user to the trouble report screen. The author suspects (because log data is not available for this instance) that TAFI provided several status line messages prior to providing the final trouble report screen. The TAFI recommendation was most likely '... needs further analysis' because (1) the service order was past due and (2) the order was migrating this service to a loop with number portability (which is not supported by TAFI). TAFI correctly displayed the service order data since the order was pending at the time of the TAFI transaction.

BELLSOUTH'S RESPONSE TO EXCEPTION 36

5. KPMG successfully accessed an account and was able to view the information as expected.

There are situations where a service order completes (i.e., the customer has the new service) but there may be some condition that keeps the order in SOCS. For example, the order is in the 'PCX' status waiting for the CRIS update to complete. Another situation is where the order is CRO'ed or SEQuenced with other orders and the other orders must complete before this order can be processed for billing. In these cases, the service order stays in SOCS until processed by the billing system. When the user access the TAFI Additional Data window and selects to view SOCS Pending Orders, TAFI will display any orders that SOCS has for the line. In the normal course of events, only pending orders are available so depending on the completion date and service order status, along with the instances cited above, the pending order may not always be viewable.

Date: March 24, 2000

EXCEPTION REPORT

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

Exception:

During the testing of the "supervisor" functions, KPMG was presented with an unfiltered list of all in-session TAFI users.

According to the *CLEC TAFI End-User Training and User Guide, Issue 6 (User Guide),* "individuals with 'supervisor' authority in their TAFI profile are given certain tools to manage the business." Supervisors can manage TAFI queues, re-assign queued reports and perform other functions.

As part of functional testing, KPMG executed a variety of supervisor functions, including the ability of a supervisor to re-assign reports in the queue from one user to another. This capability is used for load balancing purposes as well as to ensure that if a TAFI user has completed their shift, any tickets left in the queue can be addressed properly.

According to BellSouth personnel and the *User Guide,* when the supervisor accesses this function, they will be presented with a filtered list of internal CLEC users. However, during a test of this function, KPMG was presented with an unfiltered list that included all in-session users.

Impact

The ability of a supervisor to have access to all in-sessions users will impact CLECs in the following ways:

Decreased Productivity and Customer Satisfaction: Three possible outcomes could result from this situation:

1. *A supervisor can potentially assign a ticket to a user at a different CLEC.* If this were to happen, the ticket may never be processed, and the CLEC customer would be dissatisfied due to an unresolved trouble.

2. *A CLEC TAFI user potentially can receive a ticket that does not belong to their company.* This will create disruption and confusion for the CLEC TAFI user, which will result in decreased productivity.

3. *The Supervisor is required to filter through many names to determine and locate which of their employees are actually online.* This creates additional work and unnecessary confusion for the supervisor, which will result in decreased productivity.

Potential Security Violations: The ability of any supervisor to see employee names and user IDs of a competitor creates a potential security violation. In addition, supervisor access of this type creates the impression customer data and competitive information is not secure.

BELLSOUTH's RESPONSE TO EXCEPTION 37

BELLSOUTH

March 28, 2000

EXCEPTION REPORT

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

Exception:

During the testing of the "supervisor" functions, KPMG was presented with an unfiltered list of all in-session TAFI users.

According to the *CLEC TAFI End-User Training and User Guide, Issue 6 (User Guide),* "individuals with 'supervisor' authority in their TAFI profile are given certain tools to manage the business." Supervisors can manage TAFI queues, re-assign queued reports and perform other functions.

As part of functional testing, KPMG executed a variety of supervisor functions, including the ability of a supervisor to re-assign reports in the queue from one user to another. This capability is used for load balancing purposes as well as to ensure that if a TAFI user has completed their shift, any tickets left in the queue can be addressed properly.

According to BellSouth personnel and the *User Guide,* when the supervisor accesses this function, they will be presented with a filtered list of internal CLEC users. However, during a test of this function, KPMG was presented with an unfiltered list that included all in-session users.

Impact

The ability of a supervisor to have access to all in-sessions users will impact CLECs in the following ways:

Decreased Productivity and Customer Satisfaction: Three possible outcomes could result from this situation:

1. *A supervisor can potentially assign a ticket to a user at a different CLEC.* If this were to happen, the ticket may never be processed, and the CLEC customer would be dissatisfied due to an unresolved trouble.

2. *A CLEC TAFI user potentially can receive a ticket that does not belong to their company.* This will create disruption and confusion for the CLEC TAFI user, which will result in decreased productivity.

BELLSOUTH's RESPONSE TO EXCEPTION 37

3. *The Supervisor is required to filter through many names to determine and locate which of their employees are actually online.* This creates additional work and unnecessary confusion for the supervisor, which will result in decreased productivity.

Potential Security Violations: The ability of any supervisor to see employee names and user IDs of a competitor creates a potential security violation. In addition, supervisor access of this type creates the impression customer data and competitive information is not secure.

BellSouth Response

The initial design of the CLEC TAFI system responded as defined (a CLEC supervisor could only view his companies queued reports). When the system was enhanced to allow CLECs with multiple OCN values to have a single user_id, (i.e., their group_ID value began with ZX instead of ZR), the limitation on the supervisor function failed to get updated. In other words, CLEC supervisors that have a group_ID beginning with "ZR" (companies with one OCN value) work as advertised, while CLEC supervisors with a group_ID beginning with "ZX" (companies with multiple OCNs) can view unfiltered data. (The KPMG tester's group_ID began with ZX)

A software change to correct this issue is currently being negotiated and has been tentatively scheduled for May 20, 2000.

Date: March 7, 2000

EXCEPTION REPORT

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

Exception:

BellSouth does not consistently provide CLECs with a service Due Date (DD) matching their Desired Due Date (DDD).

When issuing Local Service Requests (LSRs), CLECs are required to input a DDD for service completion. BellSouth's *Product & Service Interval Guide Network & Carrier Services, Issue 2b, December 1999* provides CLECs with standard completion intervals for different service types. In response to an error-free LSR, BellSouth delivers a Firm Order Confirmation (FOC). This FOC contains the DD by which BellSouth commits to completing the CLEC's service request. According to the *Interval Guide*, if a CLEC has requested a DDD no shorter than the standard interval, BellSouth will attempt to commit to the same DD[1].

Approximately 20% of KPMG's transactions had a DD that was not compliant with the interval specified in the *Interval Guide*. In these instances, BellSouth's FOC DDs can be broken down as follows:

1) **BellSouth provided KPMG with an FOC DD later than the LSR DDD for 15% of service requests receiving an FOC.** A table of these transactions appears below.

FOC DD Later than LSR DDD

PON	VER	CC	LSR DDD	FOC DD	DD – DDD (Business Days)	REQTYP ACT
307A122PEK100001	04	9994	12/20/99	12/21/99	1	AB/V
395A213PEM100001	00	9994	1/21/00	1/24/00	1	FB/A
406A213PTM100001	00	9991	12/14/99	12/15/99	1	FB/V
406A213PTM100004	00	9991	1/21/00	1/24/00	1	FB/V
419A223PTM100002	00	9991	12/20/99	12/21/99	1	FB/D
428A124PTJ100006	01	9994	12/24/99	12/27/99	1	MB/V
428X224PEJ101001	00	9994	2/15/00	2/16/00	1	MB/V

[1] "BellSouth will make every effort to accommodate service requests utilizing these intervals." From BellSouth's *Product & Service Interval Guide Network & Carrier Services, Issue 2b, December 1999, Page V*

PON	VER	CC	LSR DDD	FOC DD	DD – DDD (Business Days)	REQTYP ACT
603A224PTJ100002	00	9991	11/16/99	11/20/99	1	MB/D
326C222PEI100002	00	9992	1/26/00	1/28/00	2	BB/V
404A223PTM100001	03	9991	12/09/99	12/13/99	2	FB/V
444A214PEJ000002	00	9991	1/21/00	1/25/00	2	MB/D
445A124PEJ100003	00	9991	1/14/00	1/18/00	2	MB/D
603A224PTJ100004	00	9991	2/16/00	2/18/00	2	MB/D
604A224PEJ000003	00	9994	2/7/00	2/09/00	2	MB/V
605A214PTJ000004	00	9994	2/15/00	2/17/00	2	MB/V
309A222PTH100001	04	9994	12/23/99	12/28/99	3	AB/V
626A224PTJ101002	00	9991	1/06/00	1/11/00	3	MB/C
445D124PEJ100001	00	9991	12/14/99	12/20/99	4	MB/D
329A212PTI100003	00	9992	12/21/99	12/28/99	5	BB/V
433A124PEH100002	00	9991	12/22/99	12/29/99	5	MB/M
603A224PEJ100003	00	9991	1/19/00	1/26/00	5	MB/D
440A124PTJ000002	00	9991	11/30/99	12/21/99	15	MB/SS

2) **BellSouth provided KPMG with an FOC DD earlier than the LSR DDD for 5% of service requests receiving an FOC.** A table of these transactions appears below.

FOC DD Earlier than LSR DDD

PON	VER	CC	LSR DDD	FOC DD	DD – DDD (Business Days)	REQTYP ACT
395A213PEM100001	01	9994	1/21/00	1/18/00	-3	FB/A
415A213PTM000001	00	9991	12/14/99	12/09/99	-3	FB/RS
452A216PTF100003	00	9991	12/22/99	12/17/99	-3	JB/R
626A224PTJ100002	04	9991	12/16/99	12/13/99	-3	MB/C
407A213PTM100003	03	9991	12/09/99	12/07/99	-2	FB/C
456A216PEF100002	00	9991	12/22/99	12/20/99	-2	JB/R
606A123PEM100004	00	9991	2/17/00	2/15/00	-2	FB/C
438A214PTJ000002	00	9991	2/15/00	2/14/00	-1	MB/SS

Impact

CLECs should be reasonably assured of receiving confirmed due dates (FOC DD) matching their requested due dates (LSR DDD) when the requests are interval-compliant. CLECs are likely to provide their customers with an anticipated service delivery date in line with BellSouth's standard intervals. The receipt of an FOC DD different than an LSR DDD will force a CLEC to notify their customers of this change. Late DDs may result in decreased customer satisfaction. (e.g. a new account is not established on time, directory assistance information is not available on time).

The occurrence of an FOC DD earlier than the LSR DDD places an additional burden on a CLEC. Early completion of the CLEC's order may result in a disruption to the end user's service, (e.g. service is suspended prior to the customer's requested date, a new account is established and billing initiated prior to the customer's requested date) which will result in decreased CLEC customer satisfaction. To move the DD back to the requested DDD, the CLEC would be forced to issue a supplemental service request.

BELLSOUTH's RESPONSE TO EXCEPTION 38

BELLSOUTH

March 9, 2000

EXCEPTION REPORT

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

Exception:

BellSouth does not consistently provide CLECs with a service Due Date (DD) matching their Desired Due Date (DDD).

When issuing Local Service Requests (LSRs), CLECs are required to input a DDD for service completion. BellSouth's *Product & Service Interval Guide Network & Carrier Services, Issue 2b, December 1999* provides CLECs with standard completion intervals for different service types. In response to an error-free LSR, BellSouth delivers a Firm Order Confirmation (FOC). This FOC contains the DD by which BellSouth commits to completing the CLEC's service request. According to the *Interval Guide*, if a CLEC has requested a DDD no shorter than the standard interval, BellSouth will attempt to commit to the same DD[1].

Approximately 20% of KPMG's transactions had a DD that was not compliant with the interval specified in the *Interval Guide*. In these instances, BellSouth's FOC DDs can be broken down as follows:

1) **BellSouth provided KPMG with an FOC DD later than the LSR DDD for 15% of service requests receiving an FOC.** A table of these transactions appears below.

FOC DD Later than LSR DDD

PON	VER	CC	LSR DDD	FOC DD	DD – DDD (Business Days)	REQTYP ACT
307A122PEK100001	04	9994	12/20/99	12/21/99	1	AB/V
395A213PEM100001	00	9994	1/21/00	1/24/00	1	FB/A
406A213PTM100001	00	9991	12/14/99	12/15/99	1	FB/V
406A213PTM100004	00	9991	1/21/00	1/24/00	1	FB/V
419A223PTM100002	00	9991	12/20/99	12/21/99	1	FB/D
428A124PTJ100006	01	9994	12/24/99	12/27/99	1	MB/V
428X224PEJ101001	00	9994	2/15/00	2/16/00	1	MB/V

[1] "BellSouth will make every effort to accommodate service requests utilizing these intervals." From BellSouth's *Product & Service Interval Guide Network & Carrier Services, Issue 2b, December 1999, Page V*

BELLSOUTH's RESPONSE TO EXCEPTION 38

PON	VER	CC	LSR DDD	FOC DD	DD – DDD (Business Days)	REQTYP ACT
603A224PTJ100002	00	9991	11/16/99	11/20/99	1	MB/D
326C222PEI100002	00	9992	1/26/00	1/28/00	2	BB/V
404A223PTM100001	03	9991	12/09/99	12/13/99	2	FB/V
444A214PEJ000002	00	9991	1/21/00	1/25/00	2	MB/D
445A124PEJ100003	00	9991	1/14/00	1/18/00	2	MB/D
603A224PTJ100004	00	9991	2/16/00	2/18/00	2	MB/D
604A224PEJ000003	00	9994	2/7/00	2/09/00	2	MB/V
605A214PTJ000004	00	9994	2/15/00	2/17/00	2	MB/V
309A222PTH100001	04	9994	12/23/99	12/28/99	3	AB/V
626A224PTJ101002	00	9991	1/06/00	1/11/00	3	MB/C
445D124PEJ100001	00	9991	12/14/99	12/20/99	4	MB/D
329A212PTI100003	00	9992	12/21/99	12/28/99	5	BB/V
433A124PEH100002	00	9991	12/22/99	12/29/99	5	MB/M
603A224PEJ100003	00	9991	1/19/00	1/26/00	5	MB/D
440A124PTJ000002	00	9991	11/30/99	12/21/99	15	MB/SS

2) **BellSouth provided KPMG with an FOC DD earlier than the LSR DDD for 5% of service requests receiving an FOC.** A table of these transactions appears below.

FOC DD Earlier than LSR DDD

PON	VER	CC	LSR DDD	FOC DD	DD – DDD (Business Days)	REQTYP ACT
395A213PEM100001	01	9994	1/21/00	1/18/00	-3	FB/A
415A213PTM000001	00	9991	12/14/99	12/09/99	-3	FB/RS
452A216PTF100003	00	9991	12/22/99	12/17/99	-3	JB/R
626A224PTJ100002	04	9991	12/16/99	12/13/99	-3	MB/C
407A213PTM100003	03	9991	12/09/99	12/07/99	-2	FB/C
456A216PEF100002	00	9991	12/22/99	12/20/99	-2	JB/R
606A123PEM100004	00	9991	2/17/00	2/15/00	-2	FB/C
438A214PTJ000002	00	9991	2/15/00	2/14/00	-1	MB/SS

Impact

CLECs should be reasonably assured of receiving confirmed due dates (FOC DD) matching their requested due dates (LSR DDD) when the requests are interval-compliant. CLECs are likely to provide their customers with an anticipated service delivery date in line with BellSouth's standard intervals. The receipt of an FOC DD different than an LSR DDD will force a CLEC to notify their customers of this change. Late DDs may result in decreased customer satisfaction. (e.g. a new account is not established on time, directory assistance information is not available on time).

BELLSOUTH's RESPONSE TO EXCEPTION 38

The occurrence of an FOC DD earlier than the LSR DDD places an additional burden on a CLEC. Early completion of the CLEC's order may result in a disruption to the end user's service, (e.g. service is suspended prior to the customer's requested date, a new account is established and billing initiated prior to the customer's requested date) which will result in decreased CLEC customer satisfaction. To move the DD back to the requested

BellSouth Response

FOC DD Later than LSR DDD

PON	VER	LSR DDD	FOC DD	DD – DDD (Business Days)	BellSouth Response
307A122PEK100001	04	12/20/99	12/21/99	1	Agree, LSR processed late by LCSC. First available DD provided on FOC since DDD could not be met.
395A213PEM100001	00	1/21/00	1/24/00	1	Disagree, PON processed in timely manner. First available DD mechanically assigned.
406A213PTM100001	00	12/14/99	12/15/99	1	Disagree, PON processed in timely manner. First available DD mechanically assigned.
406A213PTM100004	00	1/21/00	1/24/00	1	Disagree, PON processed in timely manner. First available DD mechanically assigned.
419A223PTM100002	00	12/20/99	12/21/99	1	Agree, LSR processed late by LCSC. First available DD provided on FOC since DDD could not be met.
428A124PTJ100006	01	12/24/99	12/27/99	1	Disagree, PON processed in timely manner. First available DD mechanically assigned.
428X224PEJ101001	00	2/15/00	2/16/00	1	Disagree, PON processed in timely manner. First available DD mechanically assigned.
603A224PTJ100002	00	11/16/99	11/20/99	1	Disagree, PON processed in timely manner. First available DD mechanically assigned.
326C222PEI100002	00	1/26/00	1/28/00	2	Disagree, PON processed in timely manner. First available DD mechanically assigned.
404A223PTM100001	03	12/09/99	12/13/99	2	Disagree, PON process in timely manner. First available DD mechanically assigned.
444A214PEJ000002	00	1/21/00	1/25/00	2	Disagree, PON processed in timely manner. First available DD mechanically assigned.
445A124PEJ100003	00	1/14/00	1/18/00	2	Disagree, PON processed in timely manner. First available DD mechanically assigned.

BELLSOUTH's RESPONSE TO EXCEPTION 38

FOC DD Later than LSR DDD

PON	VER	LSR DDD	FOC DD	DD – DDD (Business Days)	BellSouth Response
603A224PTJ100004	00	2/16/00	2/18/00	2	Disagree, PON processed in timely manner. First available DD mechanically assigned.
604A224PEJ000003	00	2/7/00	2/09/00	2	Disagree, PON processed in timely manner. First available DD mechanically assigned.
605A214PTJ000004	00	2/15/00	2/17/00	2	Disagree, PON processed in timely manner. First available DD mechanically assigned.
309A222PTH100001	04	12/23/99	12/28/99	3	Disagree, PON clarified 12/17/99 for invalid Reqtyp/Acttyp combination. No response received. PON cancellec by system 1/02/00. No FOC was ever sent.
626A224PTJ101002	00	1/06/00	1/11/00	3	Disagree, PON processed in timely manner. First available DD mechanically assigned.
445D124PEJ100001	00	12/14/99	12/20/99	4	Disagree, PON processed in timely manner. First available DD mechanically assigned.
329A212PTI100003	00	12/21/99	12/28/99	5	Agree, LSR processed late by LCSC First available DD provided on FOC since DDD could not be met.
433A124PEH100002	00	12/22/99	12/29/99	5	Agree, LSR processed late by LCSC First available DD provided on FOC since DDD could not be met.
603A224PEJ100003	00	1/19/00	1/26/00	5	Disagree, PON processed in timely manner. First available DD mechanically assigned
440A124PTJ000002	00	11/30/99	12/21/99	15	Agree, LSR processed late by LCSC First available DD provided on FOC since DDD could not be met.

BELLSOUTH's RESPONSE TO EXCEPTION 38

FOC DD Earlier than LSR DDD

PON	VER	LSR DDD	FOC DD	DD – DDD (Business Days)	BellSouth Response
395A213PEM100001	01	1/21/00	1/18/00	-3	Agree, Service Rep provided incorrect DD. All center personnel covered on due dates for Ports on 1/20/00.
415A213PTM000001	00	12/14/99	12/09/99	-3	Agree, incorrect DD assigned by Service Rep in LCSC
452A216PTF100003	00	12/22/99	12/17/99	-3	Agree, incorrect DD assigned by Service Rep in LCSC.
626A224PTJ100002	04	12/16/99	12/13/99	-3	Disagree, PON clarified 12/13/99 due to Call Waiting Deluxe being invalid with Caller ID. No response received. PON cancelled by system 12/29/99. No FOC was ever sent..
407A213PTM100003	03	12/09/99	12/07/99	-2	Agree, incorrect DD assigned by Service Rep in LCSC
456A216PEF100002	00	12/22/99	12/20/99	-2	Agree, incorrect DD assigned by Service Rep in LCSC
606A123PEM100004	00	2/17/00	2/15/00	-2	Agree, incorrect DD assigned by Service Rep in LCSC
438A214PTJ000002	00	2/15/00	2/14/00	-1	Agree, incorrect DD assigned by Service Rep in LCSC

Additional BellSouth Response

All Service Representatives in the Local Carrier Service Center were covered March 9, 2000 to ensure LSR DDD is used to determine service order DD. This would resolve the issue of FOC DD being earlier than LSR DDD.

BellSouth has a single application that is used to manage customer due dates for both retail and wholesale centers. Due dates are assigned as a result of error free service orders being submitted to BellSouth. It is possible for a due date to be available during the creation of an LSR and not available when the service order is generated in BellSouth systems.

Date: March 7, 2000

EXCEPTION REPORT

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

Exception:

BellSouth's electronic ordering systems do not provide the functionality required for submitting partial migrations to UNE Loops.

As part of functional testing activities, KPMG successfully submitted service requests for partial migrations[1] to UNE Ports and UNE Combinations. KPMG assumed that the business rules for partial migrations of UNE Loops were similar to those for partial migrations of other services. KPMG submitted service requests for Loop partial migrations via both TAG and EDI[2].

KPMG received error messages in response to these submitted Loop partial migration service requests. KPMG Help Desk representatives coordinated with BellSouth's Customer Support Manager (CSM) to resolve these errors. KPMG initially believed that the error messages stemmed from a documentation error (i.e., that documentation relating to UNE Ports and UNE Loop-Port Combinations should also apply to UNE Loop service requests). However, after several cycles of submitting supplemental service requests and receiving additional errors, BellSouth representatives informed KPMG that BellSouth's electronic ordering systems do not support partial migrations of UNE loops.

Impact

The inability to submit partial migrations for UNE Loops via electronic interfaces could impact CLECs in the following ways:

- **Increase in operating costs.** The inability to order this service via mechanized processes will force a CLEC to submit manual service orders to obtain a customer's

[1] According to BellSouth's Interconnection Services Web site, a partial migration is the conversion of one or more, but not all, of the lines of an existing multi-line account from one local exchange carrier to another.

[2] BellSouth ordering documentation contains few specific references to partial migration service requests. According the documentation, either the Account Number (AN) or Account Telephone Number (ATN) *and* either the Existing Account Number (EAN) or Existing Account Telephone Number (EATN) data elements are required for partial migrations to UNE Ports and UNE Loop-Port Combinations. These fields are designated as "Not Applicable" (NA) for Loop orders by the *BellSouth Local Exchange Ordering (LEO) Guide, Volume 1, Issue 7N, January 2000*, Sections 4.3.1.5; 4.3.1.6; 5.5.3.2; 5.5.3.3. (Migrations to UNE Port = REQ TYPE F, ACT TYPE V. Migrations to UNE Loop-Port Combos = REQ TYPE M, ACT TYPE V. Migrations to UNE Loops = REQ TYPE A, ACT TYPE V).

desired service type. As manual submission requires more person-hours per order, increases in labor resources will be required.

- **Decrease in customer satisfaction.** If a CLEC is forced to submit orders manually, a CLEC's order fulfillment/completion process will necessarily be slowed. The inability to fulfill service orders in a timely fashion will negatively impact customer perception of a CLEC service quality.

BELLSOUTH's RESPONSE TO EXCEPTION 39

BELLSOUTH

March 9, 2000

EXCEPTION REPORT

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

Exception:

BellSouth's electronic ordering systems do not provide the functionality required for submitting partial migrations to UNE Loops.

As part of functional testing activities, KPMG successfully submitted service requests for partial migrations[1] to UNE Ports and UNE Combinations. KPMG assumed that the business rules for partial migrations of UNE Loops were similar to those for partial migrations of other services. KPMG submitted service requests for Loop partial migrations via both TAG and EDI[2].

KPMG received error messages in response to these submitted Loop partial migration service requests. KPMG Help Desk representatives coordinated with BellSouth's Customer Support Manager (CSM) to resolve these errors. KPMG initially believed that the error messages stemmed from a documentation error (i.e., that documentation relating to UNE Ports and UNE Loop-Port Combinations should also apply to UNE Loop service requests). However, after several cycles of submitting supplemental service requests and receiving additional errors, BellSouth representatives informed KPMG that BellSouth's electronic ordering systems do not support partial migrations of UNE loops.

Impact

The inability to submit partial migrations for UNE Loops via electronic interfaces could impact CLECs in the following ways:

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[1] According to BellSouth's Interconnection Services Web site, a partial migration is the conversion of one or more, but not all, of the lines of an existing multi-line account from one local exchange carrier to another.

[2] BellSouth ordering documentation contains few specific references to partial migration service requests. According the documentation, either the Account Number (AN) or Account Telephone Number (ATN) *and* either the Existing Account Number (EAN) or Existing Account Telephone Number (EATN) data elements are required for partial migrations to UNE Ports and UNE Loop-Port Combinations. These fields are designated as "Not Applicable" (NA) for Loop orders by the *BellSouth Local Exchange Ordering (LEO) Guide, Volume 1, Issue 7N, January 2000*, Sections 4.3.1.5; 4.3.1.6; 5.5.3.2; 5.5.3.3. (Migrations to UNE Port = REQ TYPE F, ACT TYPE V. Migrations to UNE Loop-Port Combos = REQ TYPE M, ACT TYPE V. Migrations to UNE Loops = REQ TYPE A, ACT TYPE V).

BELLSOUTH's RESPONSE TO EXCEPTION 39

- **Increase in operating costs.** The inability to order this service via mechanized processes will force a CLEC to submit manual service orders to obtain a customer's desired service type. As manual submission requires more person-hours per order, increases in labor resources will be required.

- **Decrease in customer satisfaction.** If a CLEC is forced to submit orders manually, a CLEC's order fulfillment/completion process will necessarily be slowed. The inability to fulfill service orders in a timely fashion will negatively impact customer perception of a CLEC service quality.

BellSouth Response

BellSouth does not support partial migrations of Loops (Reqtyp A) manually or electronically. Verbiage will be added to the LEO-IG to define applicability of AN and ATN by Reqtyp with the next scheduled upgrade of the document on March 17, 2000.

Date: March 8, 2000

EXCEPTION REPORT

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

Exception:

BellSouth's TAG interface does not process service requests for coordinated hot cuts on non-designed loops as described in the *Local Exchange Ordering Implementation Guide, Volume 1, Version 7N (LEO Guide).*

Background: When ordering non-designed (SL1) or designed (SL2) loops from BellSouth, CLECs are provided with the option of requesting coordination of provisioning activities between BellSouth's UNE-Center and CLEC technicians. This coordination, called a "coordinated hot cut," is designed to ensure a smooth transition between the disconnection of an end user's BellSouth retail service and the new installation of the end user's UNE loop service with a CLEC.

A CLEC indicates its preference for hot cut coordination within two specific data elements on a Local Service Request (LSR):

1. **Coordinated Hot Cut (CHC).** This field identifies that the end customer is requesting a near seamless cut-over activity.

2. **Desired Frame Due Time (DFDT).** This field identifies the specific desired time for the coordinated hot-cut.

According to BellSouth's *LEO Guide*, for Loop Service (REQ TYPE = A) and Loop Service with Number Portability (REQ TYPE = B) service requests where the CLEC desires manual coordination of SL1 loops, a CHC may be requested without requesting a specific DFDT[1].

KPMG Order Activity: KPMG submitted service requests via TAG and EDI for SL1 loops with manual coordination and no specific DFDT. In response to orders submitted via BellSouth's EDI interface, KPMG received Firm Order Confirmations (FOCs). In response to similarly populated orders submitted via BellSouth's TAG interface, KPMG received an error message indicating that a specific DFDT was required.

Details on a sample of KPMG orders submitted via TAG and EDI are presented in the following tables. Each of the following SL1 Loop with Number Portability service

[1] BellSouth's *Local Exchange Ordering (LEO) Implementation Guide, Volume 1, Issue 7N, Sections 4.3.1.14 and 4.3.1.16.*

requests was populated as follows: 1) the CHC field was populated with "Y" (Yes); 2) the DFDT field was left blank. While the EDI service requests received FOCs, the TAG service requests generated errors.

Orders Submitted via TAG - Errors Received

PON	CC	Order Type	LSR Date Sent	Response Rcvd
601A222PTI000008 VER = 00	8758	BB/V Loop with NP migration	2/26/00	Error Code TAG1100VAL: "DFDT required when the CHC field is populated"
350D222PTI100001 VER = 00	7050	BB/V Loop with NP migration	3/3/00	Error Code TAG1100VAL: "DFDT required when the CHC field is populated"
305A112PTH100001 VER = 00	9994	AB/V Loop migration	11/24/00	Error Code TAG1100VAL: "DFDT required when the CHC field is populated"

Orders Submitted via EDI – FOCs Received

PON	CC	Order Type	LSR Date Sent	Response Rcvd
349A212PEI1000004 VER = 05	7050	BB/V Loop with NP migration	3/7/00	FOC
305A122PEH100011 VER = 00	9994	AB/V Loop migration	2/29/00	FOC

Impact

Increased operating costs. The inability of BellSouth's TAG interface to process service requests for SL1 loop hot cut coordination, as described in the *LEO Guide*, will increase the duration of the ordering process by requiring a supplemental service request to address orders receiving errors. Increased ordering time for error management will require CLECs to utilize additional resources, thereby incurring additional costs, during the ordering process.

BELLSOUTH's RESPONSE TO EXCEPTION 40

BELLSOUTH

March 28, 2000

EXCEPTION REPORT

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

Exception:

BellSouth's TAG interface does not process service requests for coordinated hot cuts on non-designed loops as described in the *Local Exchange Ordering Implementation Guide, Volume 1, Version 7N (LEO Guide).*

Background: When ordering non-designed (SL1) or designed (SL2) loops from BellSouth, CLECs are provided with the option of requesting coordination of provisioning activities between BellSouth's UNE-Center and CLEC technicians. This coordination, called a "coordinated hot cut," is designed to ensure a smooth transition between the disconnection of an end user's BellSouth retail service and the new installation of the end user's UNE loop service with a CLEC.

A CLEC indicates its preference for hot cut coordination within two specific data elements on a Local Service Request (LSR):

1. **Coordinated Hot Cut (CHC).** This field identifies that the end customer is requesting a near seamless cut-over activity.

2. **Desired Frame Due Time (DFDT).** This field identifies the specific desired time for the coordinated hot-cut.

According to BellSouth's *LEO Guide*, for Loop Service (REQ TYPE = A) and Loop Service with Number Portability (REQ TYPE = B) service requests where the CLEC desires manual coordination of SL1 loops, a CHC may be requested without requesting a specific DFDT[1].

KPMG Order Activity: KPMG submitted service requests via TAG and EDI for SL1 loops with manual coordination and no specific DFDT. In response to orders submitted via BellSouth's EDI interface, KPMG received Firm Order Confirmations (FOCs). In response to similarly populated orders submitted via BellSouth's TAG interface, KPMG received an error message indicating that a specific DFDT was required.

---

[1] BellSouth's *Local Exchange Ordering (LEO) Implementation Guide, Volume 1, Issue 7N, Sections 4.3.1.14 and 4.3.1.16.*

BELLSOUTH's RESPONSE TO EXCEPTION 40

Details on a sample of KPMG orders submitted via TAG and EDI are presented in the following tables. Each of the following SL1 Loop with Number Portability service requests was populated as follows: 1) the CHC field was populated with "Y" (Yes); 2) the DFDT field was left blank. While the EDI service requests received FOCs, the TAG service requests generated errors.

Orders Submitted via TAG - Errors Received

PON	CC	Order Type	LSR Date Sent	Response Rcvd
601A222PTI000008 VER = 00	8758	BB/V Loop with NP migration	2/26/00	Error Code TAG1100VAL: "DFDT required when the CHC field is populated"
350D222PTI100001 VER = 00	7050	BB/V Loop with NP migration	3/3/00	Error Code TAG1100VAL: "DFDT required when the CHC field is populated"
305A112PTH100001 VER = 00	9994	AB/V Loop migration	11/24/00	Error Code TAG1100VAL: "DFDT required when the CHC field is populated"

Orders Submitted via EDI – FOCs Received

PON	CC	Order Type	LSR Date Sent	Response Rcvd
349A212PEI1000004 VER = 05	7050	BB/V Loop with NP migration	3/7/00	FOC
305A122PEH100011 VER = 00	9994	AB/V Loop migration	2/29/00	FOC

Impact

Increased operating costs. The inability of BellSouth's TAG interface to process service requests for SL1 loop hot cut coordination, as described in the *LEO Guide*, will increase the duration of the ordering process by requiring a supplemental service request to address orders receiving errors. Increased ordering time for error management will require CLECs to utilize additional resources, thereby incurring additional costs, during the ordering process.

BellSouth Response

The TAG interface did not support coordinated hot cuts on non-designed loops prior to Release 2.2.0.6 which was implemented on 2/29/00. If this capability was tested using a lower version, e.g. 2.2.0.5 the transaction was not successful.

BELLSOUTH's RESPONSE TO EXCEPTION 40

CERTIFICATE OF SERVICE
Docket No. 8354-U

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

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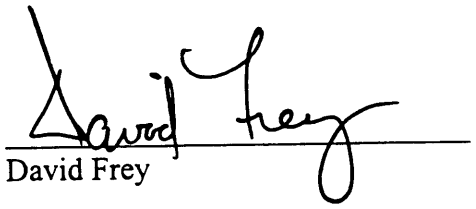
This 13th day of April 2000.



David Frey

KPMG Consulting LLC
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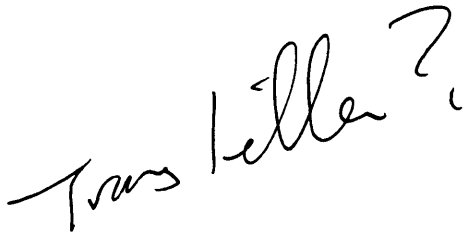

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Telephone 404 222 3000
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April 20, 2000

RECEIVED
APR 20 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 Exceptions 41, 42, 43 and 44 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: March 21, 2000

EXCEPTION REPORT

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

Exception:

BellSouth does not provide Competitive Local Exchange Carriers (CLECs) with adequate flow through information.

Comprehending the flow through process is critical to CLECs for ensuring the timely and accurate provisioning of service requests[1]. However, based on all information currently available from BellSouth, CLECs are unable to accurately understand and utilize flow through reporting. BellSouth does not provide adequate information to CLECs regarding flow through in the following areas:

1) Detailed documentation regarding expected flow through does not exist.

2) BellSouth's flow through reporting cannot be validated.

1) Detailed documentation regarding expected flow through does not exist. While BellSouth's *Service Quality Measures* document does provide a list of products that will flow through if the transaction does not contain errors, the document does not provide any detail regarding Requisition/Activity types for the transactions[2]. Even though a product is listed as flow through, a service order requesting this product may not necessarily flow through due to the transactions Requisition/Activity type.

2) BellSouth's flow through reporting cannot be validated. While BellSouth provides raw data in support of other quality metrics, it does not provide this data to support flow through reporting. The only documentation provided on the Performance Metrics (PMAP) Web site, *BellSouth Service Quality Measurements – Regional Performance Reports (SQM)*, is inadequate for CLECs to attempt to validate any ordering information received with BellSouth's flow through reports. Examples of data necessary to validate order flow through information include identification of orders which:

- Are electronically submitted but fallout by design for manual processing;
- Flow through or fallout for manual processing due to errors;
- Did not flow through for CLEC caused issues but for which the CLEC did not receive a request for clarification;

---

[1] Flow through is defined as "the ability for a Local Service Request (LSR) to pass electronically from a CLEC into BellSouth's SOCS system and generate an FOC without manual intervention."- *BellSouth - Georgia OSS Evaluation Master Test Plan version 3.0, Appendix D-2.*

[2] *BellSouth Service Quality Measurements – Regional Performance Reports (09/21/1999)*; Attachment BellSouth Flow through Analysis for CLECs LSRs placed via TAG or EDI, pages 10 - 12

- Did not flow through due to BellSouth caused issues.

Without a clear understanding of how the flow through reports are prepared and the necessary data, CLECs are unable to validate the flow through reports.

Impact:

The lack of adequate flow through information will impact CLECs in the following ways:

Decreased customer service. Logically, CLECs expect transactions which flow through to receive responses more quickly than transactions which are ineligible for flow through. The lack of comprehensive flow through information prevents CLECs from determining when responses should be expected. As a result, CLECs cannot consistently set expectations with their customers for timely service, which could result in a decrease in customer satisfaction.

Inability to efficiently manage orders. The lack of adequate flow through information hinders CLECs' opportunities to learn from and improve order submissions (and, therefore, overall flow through rates). By improving the accuracy of order submissions, CLECs will increase flow through, resulting in a greater number of orders processed per hour and the need for fewer resources dedicated to the ordering process.

BELLSOUTH's RESPONSE TO EXCEPTION 41

BELLSOUTH

April 6, 2000

EXCEPTION REPORT

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

Exception:

BellSouth does not provide Competitive Local Exchange Carriers (CLECs) with adequate flow through information.

Comprehending the flow through process is critical to CLECs for ensuring the timely and accurate provisioning of service requests[1]. However, based on all information currently available from BellSouth, CLECs are unable to accurately understand and utilize flow through reporting. BellSouth does not provide adequate information to CLECs regarding flow through in the following areas:

1) Detailed documentation regarding expected flow through does not exist.

2) BellSouth's flow through reporting cannot be validated.

1) Detailed documentation regarding expected flow through does not exist. While BellSouth's *Service Quality Measures* document does provide a list of products that will flow through if the transaction does not contain errors, the document does not provide any detail regarding Requisition/Activity types for the transactions[2]. Even though a product is listed as flow through, a service order requesting this product may not necessarily flow through due to the transactions Requisition/Activity type.

2) BellSouth's flow through reporting cannot be validated. While BellSouth provides raw data in support of other quality metrics, it does not provide this data to support flow through reporting. The only documentation provided on the Performance Metrics (PMAP) Web site, *BellSouth Service Quality Measurements – Regional Performance Reports (SQM)*, is inadequate for CLECs to attempt to validate any ordering information received with BellSouth's flow through reports. Examples of data necessary to validate order flow through information include identification of orders which:

- Are electronically submitted but fallout by design for manual processing;
- Flow through or fallout for manual processing due to errors;

---

[1] Flow through is defined as "the ability for a Local Service Request (LSR) to pass electronically from a CLEC into BellSouth's SOCS system and generate an FOC without manual intervention."- *BellSouth - Georgia OSS Evaluation Master Test Plan version 3.0, Appendix D-2.*

[2] *BellSouth Service Quality Measurements – Regional Performance Reports (09/21/1999)*; Attachment BellSouth Flow through Analysis for CLECs LSRs placed via TAG or EDI, pages 10 - 12

- Did not flow through for CLEC caused issues but for which the CLEC did not receive a request for clarification;
- Did not flow through due to BellSouth caused issues.

Without a clear understanding of how the flow through reports are prepared and the necessary data, CLECs are unable to validate the flow through reports.

Impact:

The lack of adequate flow through information will impact CLECs in the following ways:

Decreased customer service. Logically, CLECs expect transactions which flow through to receive responses more quickly than transactions which are ineligible for flow through. The lack of comprehensive flow through information prevents CLECs from determining when responses should be expected. As a result, CLECs cannot consistently set expectations with their customers for timely service, which could result in a decrease in customer satisfaction.

Inability to efficiently manage orders. The lack of adequate flow through information hinders CLECs' opportunities to learn from and improve order submissions (and, therefore, overall flow through rates). By improving the accuracy of order submissions, CLECs will increase flow through, resulting in a greater number of orders processed per hour and the need for fewer resources dedicated to the ordering process.

BellSouth Response:

1) An additional matrix showing the req types, activity types and any other parameters which can flow through will be added to the LEO-IG by or before April 28, 2000.
2) Starting with the April 15, 2000 posting for March, 2000 data, BellSouth will provide each CLEC access to their individual raw data file via the CLEC PMAP web site. The raw data file will contain information relative to each LSR's CC, PON, and VER issued by that CLEC during the report period. The information will be in .txt file format and will contain CC, PON, & VER, the notes time stamp, the notes type, the note (description), with the error code included in the note field. LSRs included are: LSRs that flowed through; LSRs that were electronically submitted but fell out by design for manual processing; LSRs that fell out for manual processing due to errors; LSRs that did not flow through for CLEC caused issues for which the CLEC did not receive a request for clarification (for example, a small error which BST may occasionally correct for the CLEC to help attain their desired due date, which will then be counted by default as a BST error); and LSRs that did not flow through due to BellSouth caused issues. An explanation of the file including the fields contained within the files will be provided on the first page each CLEC's .txt file. CLECs will be notified at least one week in advance of posting of the raw data files that the files are available.

Date: March 23, 2000

EXCEPTION REPORT

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

Exception:

BellSouth published incomplete KPMG Test CLEC Service Quality Measurement (SQM) reports for the months of November 1999, December 1999, and January 2000 for the billing metric *Mean Time to Deliver Invoices.*

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports[1].

As part of the BellSouth-Georgia OSS Evaluation, KPMG is attempting to validating the consistency of the data that BellSouth uses to produce KPMG Test CLEC SQM reports with the corresponding data that KPMG collects using its own test management tools. For the billing metric *Mean Time to Deliver Invoices*, KPMG compared the raw data[2] BellSouth used to calculate SQM values with the data KPMG compiled using the bills[3] it received from BellSouth.

KPMG found that for the three months in question, although it received its CABS bills from BellSouth, the raw data BellSouth used to produce the SQM reports did not contain any CABS bill information. As a result, the published SQM reports do not show any values for the *Mean Time to Deliver CABS Invoices*.

Impact: Incomplete SQM Reports

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. Incomplete SQM reports do not provide CLECs with all the information they require for these purposes.

---

[1] These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.

[2] BellSouth provided KPMG with the raw data, since the information was not available via the PMAP web site.

[3] BellSouth electronically sends KPMG CRIS and CABS bills for the KPMG Test CLEC.

BELLSOUTH's RESPONSE TO EXCEPTION 42

BELLSOUTH

April 17, 2000

EXCEPTION REPORT

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

Exception:

BellSouth published incomplete KPMG Test CLEC Service Quality Measurement (SQM) reports for the months of November 1999, December 1999, and January 2000 for the billing metric *Mean Time to Deliver Invoices*.

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports[1].

As part of the BellSouth-Georgia OSS Evaluation, KPMG is attempting to validating the consistency of the data that BellSouth uses to produce KPMG Test CLEC SQM reports with the corresponding data that KPMG collects using its own test management tools. For the billing metric *Mean Time to Deliver Invoices*, KPMG compared the raw data[2] BellSouth used to calculate SQM values with the data KPMG compiled using the bills[3] it received from BellSouth.

KPMG found that for the three months in question, although it received its CABS bills from BellSouth, the raw data BellSouth used to produce the SQM reports did not contain any CABS bill information. As a result, the published SQM reports do not show any values for the *Mean Time to Deliver CABS Invoices*.

Impact: Incomplete SQM Reports

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. Incomplete SQM reports do not provide CLECs with all the information they require for these purposes.

BellSouth Response

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[1] These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.

[2] BellSouth provided KPMG with the raw data, since the information was not available via the PMAP web site.

[3] BellSouth electronically sends KPMG CRIS and CABS bills for the KPMG Test CLEC.

BELLSOUTH's RESPONSE TO EXCEPTION 42

BellSouth provided the necessary data files to KPMG, however the data provided did not include Interconnection accounts for the KPMG CLEC. BellSouth's policy has been to exclude all test accounts from the data that is published with the final CLEC aggregate reported for the SQM Billing measures. (Note: Test accounts are routinely used to test and track new service offerings, system enhancements, etc.) The KPMG CLEC accounts reflected a single billing name and were excluded in the normal process as BellSouth test accounts.

Additionally, billing account numbers are not required by the PMAP system to produce the SQM results and were not provided with data files.

After further discussions and clarification of requests with KPMG, data files will be updated to include KPMG test accounts and this information will be provided to the internal PMAP group. The billing account numbers will be added to original data files and will be provided to KPMG. Reports to reflect the new SQM values resulting from adding the KPMG test accounts will be provided to KPMG. The SQM reports will not be changed to reflect the addition of billing account numbers.

Date: March 29, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Performance Measures Evaluation test.

Exception:

BellSouth has not provided KPMG with the raw data necessary to calculate values for the Service Quality Measurement ("SQM"), *Mean Time to Deliver Invoices* (Billing), for the KPMG Test CLEC.

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.[1]

As part of the BellSouth-Georgia OSS Evaluation, KPMG is reviewing the adequacy and completeness of the raw data for calculating SQMs, as specified in BellSouth's *Service Quality Measurements Georgia Performance Reports*.[2]

BellSouth did not provide KPMG with the raw data necessary to calculate the SQM value for *Mean Time to Deliver Invoices* in the Billing category for November 1999, December 1999, and January 2000, at the level of disaggregation specified in the *SQM Georgia Performance Reports*.

Impact

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. Without receiving complete raw data for calculating performance measure values as at the levels of disaggregation specified in the *SQM Georgia Performance Reports*, the CLECs are unable to assess the quality of service provided by BellSouth and conduct their business functions reliably.

[1] These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) web site.

[2] KPMG used BellSouth's *Service Quality Measurements Georgia Performance Reports, Version 10/22/99* as the basis for performing this test.

BELLSOUTH's RESPONSE TO EXCEPTION 43

BELLSOUTH

April 17, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Performance Measures Evaluation test.

Exception:

BellSouth has not provided KPMG with the raw data necessary to calculate values for the Service Quality Measurement ("SQM"), *Mean Time to Deliver Invoices* (Billing), for the KPMG Test CLEC.

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.[1]

As part of the BellSouth-Georgia OSS Evaluation, KPMG is reviewing the adequacy and completeness of the raw data for calculating SQMs, as specified in BellSouth's *Service Quality Measurements Georgia Performance Reports*.[2]

BellSouth did not provide KPMG with the raw data necessary to calculate the SQM value for *Mean Time to Deliver Invoices* in the Billing category for November 1999, December 1999, and January 2000, at the level of disaggregation specified in the *SQM Georgia Performance Reports*.

Impact

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. Without receiving complete raw data for calculating performance measure values as at the levels of disaggregation specified in the *SQM Georgia Performance Reports*, the CLECs are unable to assess the quality of service provided by BellSouth and conduct their business functions reliably.

BellSouth Response

BellSouth would like to note that this Exception, No. 62, is a repeat of Exception No. 57, therefore the same statement applies.

---

[1] These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) web site.

[2] KPMG used BellSouth's *Service Quality Measurements Georgia Performance Reports, Version 10/22/99* as the basis for performing this test.

BELLSOUTH's RESPONSE TO EXCEPTION 43

BellSouth provided the necessary data files to KPMG, however the data provided did not include Interconnection accounts for the KPMG CLEC. BellSouth's policy has been to exclude all test accounts from the data that is published with the final CLEC aggregate reported for the SQM Biling Measure. (Note: Test accounts are routinely used to test and track new service offerings, system enhancements, etc.) The KPMG CLEC accounts reflected a single billing name and were excluded in the normal process as BellSouth test accounts.

Additionally, billing account numbers are not required by the PMAP system to produce the SQM results and were not provided with data files.

After further discussions and clarification of requests with KPMG, data files will be updated to include KPMG test accounts and this information will be provided to the internal PMAP group. The billing account numbers will be added to original data files and will be provided to KPMG. Reports to reflect the new SQM values resulting from adding the KPMG test accounts will be provided to KPMG. The SQM reports will not be changed to reflect the addition of billing account numbers.

Date: April 11, 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) and the preparation activity for the EDI/TAG Normal and Peak Volume Performance Tests (O&P-3 and O&P-4).

Exception:

KPMG was unable to change the telephone number (TN) of a resale auxiliary[1] line in certain instances.

KPMG submitted Local Service Requests (LSRs) to change the number of an auxiliary line on a resale account. KPMG received a Clarification (CLR) message indicating that the "Account is Final".

As explanation, BellSouth stated that their Local Exchange Service Order Generator (LESOG) system checked the status of the TNs associated with the transaction (the main number[2], the current auxiliary number and the new auxiliary number), and found that the current auxiliary number had once been a main account number for an account that had been terminated. The main account number remained tagged in the LESOG system as a "Final Account," although this was no longer relevant.

The following table details the specific orders for which KPMG received this error message.

Purchase Order Number	VER	"Final Account" CLR Message – Date Rcvd
219A221PTN100006 (CC = 9991)	01	2/18/00 Account is Final
509Y101RTN100001* (CC = 9991)	00	2/17/00 Account is Final
509Y104RTN100001* (CC = 9991)	00	2/17/00 Account is Final
509Y106RTN100001* (CC = 9991)	00	2/17/00 Account is Final
509Y107RTN100001* (CC = 9991)	00	2/17/00 Account is Final

**Denotes an RSIMMS Order*

[1] Auxiliary line(s) are all line(s) in addition to the main account number.

[2] The main account number is the number used by BellSouth for tracking and billing purposes.

As a result of these errors, KPMG discovered that the number of an auxiliary line cannot be changed on a resale account if the current auxiliary number was previously a main account number for an account that is now inactive.

Impact

The inability to change the telephone number of a resale auxiliary line under these circumstances will impact CLECs in the following way:

Decrease in Customer Satisfaction. If a customer is unable to change their to change TN upon request, the CLEC may be required to disconnect and then re-establish service to accomplish the change. The inability to easily make the change for the end-user will result in a decrease in CLEC customer satisfaction.