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VIA HAND DELIVERY

REC'D TN
REGULATORY AUTH.
*00 AUG 22, 2000
OFFICE OF THE
EXECUTIVE SECRETARY

Guy M. Hicks
General Counsel

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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:

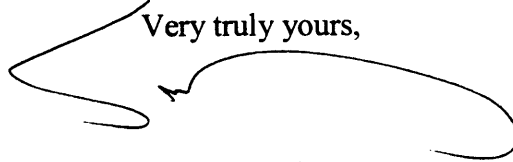
Enclosed please find fourteen copies of the following documents which have been filed with the Georgia Public Service Commission ("GPSC").

<u>Date Filed</u>	<u>Description of Document(s)</u>
July 12, 2000	KPMG Closure reports for Exceptions 14 and 30, including an attachment for the Exception 30 Closure report
July 12, 2000	KPMG Amended Exceptions 27, 28, 47 and 80
July 12, 2000	BST Responses to Exceptions 76, 79, 80 and 83; Amended Responses to 63, 78, 81, 84, 86, 89, 90, 92 and 93; and Second Amended Response to Exception 84
July 12, 2000	KPMG Exception 91 (Refiling)
July 12, 2000	KPMG Exception 95 and BST Response
July 12, 2000	BST Response to Petition to Establish Comprehensive Procedure to Further Local Competition in Georgia
July 21, 2000	KPMG Closure Report for Exceptions 2, 13, 17, 21, 36, 40, 51, 69 and 81
July 21, 2000	KPMG Interim Status Report

David Waddell, Executive Secretary
August 2, 2000
Page 2

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

Very truly yours,

A handwritten signature in black ink, consisting of a large, sweeping loop that starts under the word 'yours', goes up and over to the left, then loops back down and to the right, ending under the word 'Hicks'.

Guy M. Hicks

GMH:ch

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 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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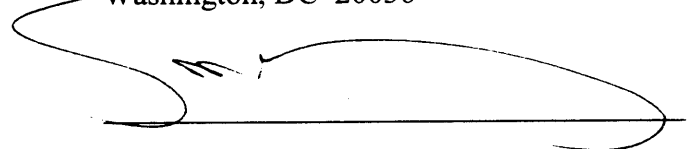
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July 12, 2000

RECEIVED

JUL 12 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**

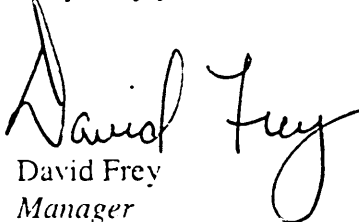
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG Consulting LLC's Closure Reports for Exceptions 14 and 30, including an attachment for the Exception 30 Closure Report.

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



CLOSURE REPORT FOR EXCEPTION 14

BellSouth Georgia OSS Testing Evaluation

Date: July 12, 2000

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

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

Summary of BellSouth Responses:

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

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

Summary of KPMG Re-test Activities:

KPMG's re-test activities consisted of: 1) an evaluation of BellSouth's responses to determine if they adequately addressed the concerns raised by KPMG in Exception 14; 2)

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



CLOSURE REPORT FOR EXCEPTION 14

BellSouth Georgia OSS Testing Evaluation

a review of the *CLEC TAFI User Guide (EP- Issue 1, March 2000)* posted to the BellSouth Interconnection Web site at http://www.interconnection.bellsouth.com/guides/guides_p.html on March 02, 2000; and 3) clarifying discussions with BellSouth representatives regarding the BellSouth responses.

KPMG Re-test Results:

During discussions with BellSouth representatives, KPMG clarified that the TAFI interface does not support electronic trouble reporting for designed circuits (including ISDN lines) or non-designed circuits that are not TN-based.

In reviewing the *CLEC TAFI User Guide (EP- Issue 1, March 2000)* KPMG located the following statement in *Section 3.2.1 Specific Exclusions*, "Although ISDN service provides two telephone numbers for its user, it is provisioned using a circuit ID. Therefore CLEC users wishing to report a problem on their customer's ISDN service must call the BRMC and report the problem manually."

Because BellSouth also uses the TAFI system for their retail customers, BellSouth employees are also unable to report retail designed circuit (or non-TN based) troubles via TAFI. BellSouth residential retail customer troubles are reported to the Residential Repair Center (RRC). If the trouble report involves a designed circuit (ISDN, etc.), the RRC manually reports the trouble to the Business Repair Center (BRC) for entry into the WFA system (just as a CLEC would call the BRMC). Retail business customer troubles are manually reported by BellSouth employees to the Maintenance Administrator (in the BRC), who enters the trouble tickets into WFA.

Finally, CLECs do have the option of building an interface to BellSouth's ECTA gateway which allows for submission of electronic trouble reports on designed circuits.

As a result of KPMG's experience during the re-test, KPMG believes that BellSouth has adequately addressed the issue identified in Exception 14.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, closes Exception 14.

Attachments: None.



CLOSURE REPORT FOR EXCEPTION 30

BellSouth Georgia OSS Testing Evaluation

Date: July 12, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth's change management process does not include a comprehensive mechanism for tracking change information.

Summary of Exception:

Through evaluation interviews and document reviews, KPMG has noted that BellSouth's change management process does not include adequate procedures and systems to track information related to change requests. Specifically, procedures and systems to track descriptions of proposed changes, key notification dates, and change status do not exist.

Although BellSouth maintains a *Change Request Log*, this mechanism does not adequately allow BellSouth to manage the status of change requests, or to ensure that notification intervals are met.

Summary of BellSouth Response:

"BellSouth will implement a short-term tracking solution as part of the revised Change Control Process. The Change Request Log will be expanded to include the various milestones identified in the interim process. TARGET DATE and ACTUAL DATE fields will be added to the log. The TARGET DATE will reflect the date which is based on the documented cycle time for each milestone. The ACTUAL DATE will reflect the date that BellSouth completed the milestone.

BellSouth is currently assessing implementing a more automated method of capturing this information for tracking purposes. This capability is currently targeted for Phase 3, which is tentatively scheduled for September 30, 2000."

Summary of KPMG Re-test Activities:

KPMG's retest activities consisted of: 1) an evaluation of BellSouth's response to determine if it adequately addressed the concerns raised by KPMG in Exception 30; 2) an interview with the BellSouth Change Control Team; 3) a review of BellSouth's updated policies and procedures; 4) a review of BellSouth's revised Change Request Log; 5) direct observation of BellSouth - CLEC change control meetings to ensure that the new tool is being used.



CLOSURE REPORT FOR EXCEPTION 30

BellSouth Georgia OSS Testing Evaluation

KPMG Re-test Results:

BellSouth has made significant improvements to its Change Request Log, which tracks the progress of each specific change.

BellSouth tracks and reports changes systematically using change request (CR) numbers. CR numbers are utilized in change management communications with CLECs to identify specific changes.

KPMG verified that the revised Change Request Log is designed to track and manage the various steps and milestones (and corresponding dates) through which change requests progress, from receipt through release and/or implementation. The Change Request Log also allows both BellSouth and CLEC users to easily identify the Type (1 – 6) of change requested, and to immediately learn the status (new, pending, scheduled, implemented, cancelled, validated defect, and/or workaround identified) of a discrete change request.

BellSouth has posted the revised Change Request Log on its Interconnection Services Web site. BellSouth also provides the revised Log to CLECs in advance of monthly BellSouth-CLEC change control status meetings. As a result, updates and/or changes to the BellSouth Change Request Log will be evident on a regular basis.

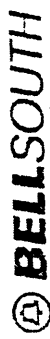
These new processes and procedures, properly applied on a continuing basis, should result in an adequate degree of management and adherence to published internal cycle times and external notification intervals in the tracking of change requests.

The Georgia Public Service Commission may wish to continue to monitor this situation to ensure continued proper use of the revised Change Request Log and new procedures, including potential enhancements proposed by BellSouth for Phase 3.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, closes Exception 30.

Attachments: BellSouth Change Request Log (version dated 4/00)

[illegible]



BELL SOUTH

CH Log #	S	T	Title	Error Band	Open & Validate CR (Target Band)	Open & Validate CR (Clear Date Band)	Open Validate CR (Clear Date Band)	Review CR for Assg. (Clarification or Best Detail)	Rev CR for Assg. (Star Band)	Rev CR for Assg. (Star Band)	Rev CR for Assg. (Actual Date)	Cancel CR Verify Date	Prepare for CRM (Target Band)	Prepare for CRM (Actual Date)	CR Mfg Data Used	Doc Clg. Rev. Mfg. Receipts (Target Band)	Doc Clg. Rev. Inv. Receipts (Actual Date)	Internal Change Mgmt Process (Target Band)	Internal Change Mgmt Process (Actual Date)	SPR (Actual Band)	Ref Pkg Verify (Target Band)	Ref Pkg Verify (Actual Band)	Ref Log Historical Band	Ref Log Target Band	Ref Log Actual Band	Soft Band	
E01029000 001	P	S	Electronically Order Routing to OSDA	27700		N/A	N/A	29700		N/A	30600	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A							
CRR002	P	S	Pre Order/Order Business Rules Discrepancies	31100	31200	N/A	N/A	31300	N/A	N/A	31600	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A							
CRR003	P	S	RFCN Business Rules and Error Messages	32000	31300	N/A	N/A	31300	N/A	N/A	31800	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A							
Scheduled CEs																											
E01081290001	S	S	The ability to order XDSL unbundled electronically ATT would not BST to mechanize the SI process for XDSL loops ordered through TAG	817299		N/A	N/A	816999							9/28/99					11/20/99					700 Target		
TAG081290002	S	S	TAG	817299		N/A	N/A								9/28/99					11/20/99					700 Target		
OSS011300 001	S	S	Migration as Specified for OSS99	111200		N/A	N/A	111300																	42000 Target		
TAG011700 001	S	S	Migration as Specified for OSS99	111700		N/A	N/A	111800																	42000 Target		421 e-mal
CRR006	S	S	VPTV WFOY (REOTYP CB or BBNET-WHPT-D)	320000	323100	N/A	N/A	323000	N/A	N/A	44000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A					57000 Target		421 e-mal
CRR007	S	S	VER field on Rejected SRTs for LAP	41400	41500	41600	41600	41400	41600	41600	41700	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A					42000 Target		421 e-mal
Implemented CE																											
E01081290001	I	S	Change the Error Code headings to match the terminology used.	917799											9/28/99					11/20/99					17999		
TAG080790001	I	S	ATT requested that BST document the business rules for TAS.	81799											9/28/99					11/20/99					17999		
CRR004	I	S	Live Class of Service	0072000	0074000	N/A	N/A	0074000	N/A	N/A	0078000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A					3128000		

Ch Log #	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117	118	119	120	121	122	123	124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140	141	142	143	144	145	146	147	148	149	150	151	152	153	154	155	156	157	158	159	160	161	162	163	164	165	166	167	168	169	170	171	172	173	174	175	176	177	178	179	180	181	182	183	184	185	186	187	188	189	190	191	192	193	194	195	196	197	198	199	200	201	202	203	204	205	206	207	208	209	210	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225	226	227	228	229	230	231	232	233	234	235	236	237	238	239	240	241	242	243	244	245	246	247	248	249	250	251	252	253	254	255	256	257	258	259	260	261	262	263	264	265	266	267	268	269	270	271	272	273	274	275	276	277	278	279	280	281	282	283	284	285	286	287	288	289	290	291	292	293	294	295	296	297	298	299	300	301	302	303	304	305	306	307	308	309	310	311	312	313	314	315	316	317	318	319	320	321	322	323	324	325	326	327	328	329	330	331	332	333	334	335	336	337	338	339	340	341	342	343	344	345	346	347	348	349	350	351	352	353	354	355	356	357	358	359	360	361	362	363	364	365	366	367	368	369	370	371	372	373	374	375	376	377	378	379	380	381	382	383	384	385	386	387	388	389	390	391	392	393	394	395	396	397	398	399	400	401	402	403	404	405	406	407	408	409	410	411	412	413	414	415	416	417	418	419	420	421	422	423	424	425	426	427	428	429	430	431	432	433	434	435	436	437	438	439	440	441	442	443	444	445	446	447	448	449	450	451	452	453	454	455	456	457	458	459	460	461	462	463	464	465	466	467	468	469	470	471	472	473	474	475	476	477	478	479	480	481	482	483	484	485	486	487	488	489	490	491	492	493	494	495	496	497	498	499	500	501	502	503	504	505	506	507	508	509	510	511	512	513	514	515	516	517	518	519	520	521	522	523	524	525	526	527	528	529	530	531	532	533	534	535	536	537	538	539	540	541	542	543	544	545	546	547	548	549	550	551	552	553	554	555	556	557	558	559	560	561	562	563	564	565	566	567	568	569	570	571	572	573	574	575	576	577	578	579	580	581	582	583	584	585	586	587	588	589	590	591	592	593	594	595	596	597	598	599	600	601	602	603	604	605	606	607	608	609	610	611	612	613	614	615	616	617	618	619	620	621	622	623	624	625	626	627	628	629	630	631	632	633	634	635	636	637	638	639	640	641	642	643	644	645	646	647	648	649	650	651	652	653	654	655	656	657	658	659	660	661	662	663	664	665	666	667	668	669	670	671	672	673	674	675	676	677	678	679	680	681	682	683	684	685	686	687	688	689	690	691	692	693	694	695	696	697	698	699	700	701	702	703	704	705	706	707	708	709	710	711	712	713	714	715	716	717	718	719	720	721	722	723	724	725	726	727	728	729	730	731	732	733	734	735	736	737	738	739	740	741	742	743	744	745	746	747	748	749	750	751	752	753	754	755	756	757	758	759	760	761	762	763	764	765	766	767	768	769	770	771	772	773	774	775	776	777	778	779	780	781	782	783	784	785	786	787	788	789	790	791	792	793	794	795	796	797	798	799	800	801	802	803	804	805	806	807	808	809	810	811	812	813	814	815	816	817	818	819	820	821	822	823	824	825	826	827	828	829	830	831	832	833	834	835	836	837	838	839	840	841	842	843	844	845	846	847	848	849	850	851	852	853	854	855	856	857	858	859	860	861	862	863	864	865	866	867	868	869	870	871	872	873	874	875	876	877	878	879	880	881	882	883	884	885	886	887	888	889	890	891	892	893	894	895	896	897	898	899	900	901	902	903	904	905	906	907	908	909	910	911	912	913	914	915	916	917	918	919	920	921	922	923	924	925	926	927	928	929	930	931	932	933	934	935	936	937	938	939	940	941	942	943	944	945	946	947	948	949	950	951	952	953	954	955	956	957	958	959	960	961	962	963	964	965	966	967	968	969	970	971	972	973	974	975	976	977	978	979	980	981	982	983	984	985	986	987	988	989	990	991	992	993	994	995	996	997	998	999	1000	1001	1002	1003	1004	1005	1006	1007	1008	1009	1010	1011	1012	1013	1014	1015	1016	1017	1018	1019	1020	1021	1022	1023	1024	1025	1026	1027	1028	1029	1030	1031	1032	1033	1034	1035	1036	1037	1038	1039	1040	1041	1042	1043	1044	1045	1046	1047	1048	1049	1050	1051	1052	1053	1054	1055	1056	1057	1058	1059	1060	1061	1062	1063	1064	1065	1066	1067	1068	1069	1070	1071	1072	1073	1074	1075	1076	1077	1078	1079	1080	1081	1082	1083	1084	1085	1086	1087	1088	1089	1090	1091	1092	1093	1094	1095	1096	1097	1098	1099	1100	1101	1102	1103	1104	1105	1106	1107	1108	1109	1110	1111	1112	1113	1114	1115	1116	1117	1118	1119	1120	1121	1122	1123	1124	1125	1126	1127	1128	1129	1130	1131	1132	1133	1134	1135	1136	1137	1138	1139	1140	1141	1142	1143	1144	1145	1146	1147	1148	1149	1150	1151	1152	1153	1154	1155	1156	1157	1158	1159	1160	1161	1162	1163	1164	1165	1166	1167	1168	1169	1170	1171	1172	1173	1174	1175	1176	1177	1178	1179	1180	1181	1182	1183	1184	1185	1186	1187	1188	1189	1190	1191	1192	1193	1194	1195	1196	1197	1198	1199	1200	1201	1202	1203	1204	1205	1206	1207	1208	1209	1210	1211	1212	1213	1214	1215	1216	1217	1218	1219	1220	122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[illegible]

(400)
Change Request Log

Date Change Made (Target Date)	Date Change Made (Actual Date)	Date Update Made (Target Date)	Date Update Made (Actual Date)	Review
				4.17.81 Investigating & pricing the feasibility of an entirely separate, non production testing environment.
				4.17 Being reviewed for acceptance.
				4.19 Being reviewed for acceptance.
				4.24 Being reviewed for acceptance.
				4.24 Being reviewed for acceptance.
				3.29.00 Non scheduled request to be returned to Step 4 of the CCP as input for "Prepare for Change Review Meeting" process.
				3.29.00 Non scheduled request to be returned to Step 4 of the CCP as input for "Prepare for Change Review Meeting" process.
				3.29.00 Non scheduled request to be returned to Step 4 of the CCP as input for "Prepare for Change Review Meeting" process.
				3.29.00 Non scheduled request to be returned to Step 4 of the CCP as input for "Prepare for Change Review Meeting" process.
				3.29.00 Non scheduled request to be returned to Step 4 of the CCP as input for "Prepare for Change Review Meeting" process.
				3.29.00 Subteam being formed to perform planning & analysis during 2000.
				3.29.00 Non scheduled request to be returned to Step 4 of the CCP as input for "Prepare for Change Review Meeting" process.
				3.29.00 The request is currently under review.

(4/00)
Change Request Log

Due Change Req# (Target Date)	Due Change Req# (Actual Date)	Due Update Only Req# (Target Date)	Due Update Only Req# (Actual Date)	Notes
				3 79 00 Team working to develop an electronic process.
				3 79 00 SST is looking at all fields identified as discrepancies, with exception to room & bldg, and looking at all impacts to all fields and applications. Looking to include in a release in near future. (Old log # DEF000100 0027)
N/A	N/A	TBD	TBD	3 79 00 Business rules under development. (Old log # DEF000200 0011)
				Scheduled for 7/01/00 Release.
				Scheduled for 7/01/00 Release.
				Scheduled for 4/29/00 Release.
				Scheduled for 4/29/00 Release.
				Workaround notification provided 4/3/00. Target Imp date 5/1/00.
				Workaround notification provided 4/7/00. Target Imp date 4/20/00.
				Implemented 12/99.
				Posted to web site 12/99
				3 79 Expedited change implemented 3/28/00. (Old log # DEF002200 0011)

(4/00)
Change Request Log

Due Change		Due Update		Due Update		Notes
Target Date	Actual Date	Target Date	Actual Date	Target Date	Actual Date	
						Implemented 4/15/00
						Workaround provided 3/2/00. Implemented 4/15/00 (Old log # DE100100-001)
						9/29/99 Change Request accepted for TAG only. CLECs agreed to cancel.
						9/29/99 Change Request combined with ED0812950001.
						4/7/00 Pending Cancellation Acknowledgment
						3/29 Pending Cancellation Acknowledgment
						4/7/00 Issue Resolved by Originating CLEC.
						4/13/00 Appeal in progress.
						4/20/00 Escalation in progress.
						4/20/00 Escalation in progress.
						4/19/00 Referred to ECS to report degradation in service.

(4/00)
Change Request Log

Date Change Made (Target Date)	Date Change Made (Actual Date)	Date Update Only (Target Date)	Date Update Only (Actual Date)	Notes
				4 21 00 Appeal in progress.
				4 21 00 Internal radiation in progress.

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 12th day of July 2000.



David Frey

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July 12, 2000

RECEIVED

JUL 12 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**

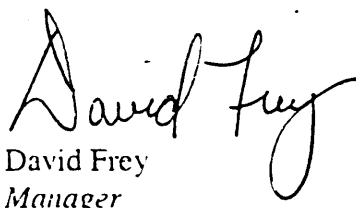
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG Consulting LLC's Amended Exceptions 27, 28, 47 and 80.

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

Thank you for your assistance in this regard.

Very truly yours,


David Frey
Manager

Enclosures

cc: Parties of Record





EXCEPTION 27 (Amended)

BellSouth Georgia OSS Testing Evaluation

Date: June 21, 2000

EXCEPTION REPORT

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

Exception:

BellSouth provided misidentified DUF records to KPMG.

During the period of November 18-20, 1999, KPMG completed 846 test calls (for which DUF files were expected) for the ADUF/ODUF Functional Usage Evaluation¹. As part of the evaluation, BellSouth provided DUF records for these calls. Through evaluation of these DUF records, KPMG has determined that BellSouth provided misidentified DUF records for certain test calls.

Misidentified DUF Records

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

Misidentified Toll Calls

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

¹ Access Daily Usage Files (ADUF) provide competitive local exchange carriers with records of intraLATA/interLATA calls originated from or terminated to CLEC end user lines. Optional Daily Usage Files (ODUF) provide competitive local exchange carriers with records of billable measured intraLATA local and toll calls, per use/per activation services, directory assistance messages and WATS & 800 service calls.



EXCEPTION 27 (Amended)

BellSouth Georgia OSS Testing Evaluation

Impact

Misidentified DUF records impact CLECs in the following ways:

- **Decrease in revenue.** A CLEC receiving incorrect ODUF information will not be able to bill end-user customers correctly for local and toll calls. Likewise, the absence of correct ADUF information will prevent CLEC from billing an inter-exchange carrier correctly. As a result, the CLEC will lose revenue.
- **Decrease in customer satisfaction.** Providing a CLEC with incorrect DUF records will cause the CLEC to incorrectly bill a customer for usage. This will likely result in a decrease in end-user satisfaction.



EXCEPTION 28 (Amended)

BellSouth Georgia OSS Testing Evaluation

Date: July 10, 2000

EXCEPTION REPORT

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

Exception:

BellSouth failed to deliver DUF¹ records for twenty-seven percent (27%) of the re-test calls for which records were expected.

Initial Exception:

BellSouth failed to deliver 46% of expected DUF records to KPMG.

KPMG completed 1,017² test calls during the ODUF/ADUF Functional Usage Evaluation. BellSouth failed to deliver DUF records for forty-six percent of the test calls for which records were expected. Representative occurrences of calls with no corresponding DUF record are detailed in the tables shown below. The list include numerous call types including Calling Card Calls, Information Provider (900) Calls, Local Calls, Directory Assistance Calls, WATS Calls, Long Distance Calls, and Operator Services Calls.

Calling Card Calls

Thirteen completed Calling Card calls were found to have no corresponding DUF record.

Missing Completed Calling Card DUF Records (Representative List)

Date	Connect Time	To Number	Duration (minutes)	From Number
Nov 20	13:53	603 382-9705	1	770 933-8170
Nov 20	10:35	734 214-0024	1	706 236-9492
Nov 20	10:26	941 454-0643	15	912 741-6728
Nov 18	18:16	770 719-3611	3	912 741-7059
Nov 18	16:31	770 419-4300	2	706 722-2879
Nov 18	16:29	914 763-3670	1	706 236-9677

¹ Access Daily Usage Files (ADUF) provide competitive local exchange carriers with records of intraLATA/interLATA calls originated from or terminated to CLEC end user lines. Optional Daily Usage Files (ODUF) provide competitive local exchange carriers with records of billable measured intraLATA local and toll calls, per use/per activation services, and directory assistance messages. Enhanced Optional Daily Usage Files (EODUF) provide competitive local exchange carriers with records of local calls originating from resold Flat Rate Business and Residential lines.

² 1017 test calls were made resulting in an expectation that 846 calls would have corresponding DUF records. 171 of the test calls made were not billable.



EXCEPTION 28 (Amended)
BellSouth Georgia OSS Testing Evaluation

Date	Connect Time	To Number	Duration (minutes)	From Number
Nov 18	16:28	912 927-1626	1	706 236-9492
Nov 18	16:27	423 755-4880	18	706 722-6207
Nov 18	16:25	914 763-3670	1	706 236-9677
Nov 18	14:26	703 525-3367	1	770 933-8526
Nov 18	13:23	770 413-9398	1	912 746-7876
Nov 18	13:08	770 719-3611	1	912 746-7876

Information Provider Calls

Eight completed Information Provider calls were found to have no corresponding DUF record.

Missing Information Provider DUF Records (All Included)

Date	Connect Time	To Number	Duration (minutes)	From Number
Nov 20	13:19	900 680-4400	8	770 933-8170
Nov 20	13:18	900 407-1600	2	770 933-8170
Nov 20	09:15	900 484-7000	1	706 722-4953
Nov 20	10:40	900 786-6600	1	706 236-9492
Nov 18	18:25	900 656-5000	21	912 741-7059
Nov 18	15:25	900 407-1600	1	770 933-8526
Nov 18	15:26	900 656-5000	23	706 236-9677
Nov 18	15:36	900 860-0030	21	706 236-9492

Local Calls

Sixty-eight completed Local calls were found to have no corresponding DUF record.

Missing Local Call DUF Records (Representative List)

Date	Connect Time	To Number	Duration (minutes)	From Number
Nov 18	13:50	404 633-5251	1	770 322-8438
Nov 18	10:25	706 722-4181	1	706 722-6207
Nov 18	10:30	706 722-4955	2	706 722-2879
Nov 18	11:50	770 933-8523	1	770 933-8526
Nov 19	15:14	404 633-5251	2	404 633-3674
Nov 19	09:51	706 236-9492	13	706 236-7042
Nov 19	10:34	706 722-2879	4	706 722-4087
Nov 20	08:39	404 633-5251	3	770 322-8438
Nov 20	10:44	404 633-5740	1	404 633-5809
Nov 20	09:38	706 236-9492	1	706 236-9677
Nov 20	10:08	770 933-8526	1	770 933-8523



EXCEPTION 28 (Amended)

BellSouth Georgia OSS Testing Evaluation

Directory Assistance

Fifteen directory assistance (“411” and “NPA 555-1212”) calls were found to have no corresponding DUF record.

Missing Directory Assistance DUF Records (Representative List)

Date	Connect Time	From Number	Local / Long Distance	Call Completion
Nov 18	15:00	706 236-9492	Local	Yes
Nov 18	15:10	706 236-9492	Local	Yes
Nov 18	15:25	706 236-9492	LD	Yes
Nov 18	14:53	706 236-9677	Local	Yes
Nov 18	15:01	706 236-9677	LD	Yes
Nov 18	13:55	912 741-5953	LD	Yes
Nov 18	14:13	912 741-5953	Local	Yes
Nov 18	17:13	912 741-7059	Local	No
Nov 18	17:27	912 741-7059	LD	Yes
Nov 19	08:54	706 236-9677	Local	Yes

WATS Calls

Thirty-one completed WATS (“800”, “877”, “888”) calls were found to have no corresponding DUF record.

Missing WATS DUF Records (Representative List)

Date	Connect Time	To Number	Duration (minutes)	From Number
Nov 18	12:07	888 699-2364	1	404 633-5981
Nov 18	15:16	888 255-7669	1	706 236-9677
Nov 18	14:56	800 284-4886	2	770 933-8526
Nov 18	18:29	800 207-4512	1	912 741-6758
Nov 18	13:06	800 888-8000	1	912 746-7876
Nov 19	11:30	800 207-4512	1	404 633-3674
Nov 19	11:40	800 888-4848	2	706 236-9042
Nov 19	10:47	888 820-2265	3	706 722-4181
Nov 19	12:06	888 624-6633	1	706 722-4955
Nov 19	14:36	877 762-2667	1	770 933-8170
Nov 20	10:42	603 382-9705	56	404 633-5251
Nov 20	10:36	800 888-8000	1	706 236-9492

Long Distance Calls

One hundred eighty-five completed long distance calls were found to have no corresponding DUF record.



EXCEPTION 28 (Amended)

BellSouth Georgia OSS Testing Evaluation

Missing Long Distance DUF Records (Representative List)

Date	Connect	To	Duration	From
Nov 18	09:33	912 471-9199	1	404 633-5981
Nov 18	17:00	912 741-7059	3	706 722-4181
Nov 18	15:45	770 933-8170	4	706 722-4955
Nov 18	15:57	706 722-4181	3	770 933-8523
Nov 19	12:06	603 382-9705	3	706 236-9312
Nov 19	09:22	603 382-9705	1	706 236-9677
Nov 19	09:21	603 382-9705	7	706 722-2879
Nov 19	15:07	415 863-8500	1	706 722-4087
Nov 20	10:03	603 382-9705	1	706 722-4953
Nov 20	10:26	912 741-6758	1	770 933-8526
Nov 20	10:02	404 633-5740	1	912 741-4774
Nov 20	09:46	404 633-5740	1	912 741-5953

BellSouth's Investigation/Resolution Activities:

Upon investigation of the issues identified in Exception 28, BellSouth determined that the missing DUF records were the result of the following two issues:

- 1) The process for identifying CLEC usage does not recognize service order activity that is completed, but still in a "pending" status.
- 2) The usage error correction status did not capture and recycle all erred usage through the billing system after a guide had been created.

Due to the fact that a disproportionate number of the test lines used to place the test calls were still in pending status, BellSouth asserted that the test results reflected a disproportionate number of missing records. BellSouth requested and KPMG agreed to conduct a re-test that included a mix of test lines in different stages of status.

KPMG's Re-testing Results:

During the period of April 25-27, 2000, KPMG completed 1821 test calls on test lines that had order activity on some lines and no order activity on others. DUF records were expected for 1348 of these test calls. **KPMG determined that BellSouth failed to deliver DUF³ records for twenty-seven percent (27%) of the test calls for which records were expected.**

³ Access Daily Usage Files (ADUF) provide competitive local exchange carriers with records of intraLATA/interLATA calls originated from or terminated to CLEC end user lines. Optional Daily Usage Files (ODUF) provide competitive local exchange carriers with records of billable measured intraLATA local and toll calls, per use/per activation services, and directory assistance messages. Enhanced Optional Daily Usage Files (EODUF) provide competitive local exchange carriers with records of local calls originating from resold Flat Rate Business and Residential lines.



EXCEPTION 28 (Amended)

BellSouth Georgia OSS Testing Evaluation

Representative occurrences of calls with no corresponding DUF record are detailed in the tables below.

Intralata Toll

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration
4046333616	7067821076	4046333616	4/27/2000	9:05:22	0:01:02
7702269019	7066879983	7702269019	4/26/2000	11:32:32	0:01:12
4046330247	7067820745	4046330247	4/26/2000	13:32:40	0:01:26
7067224955	9122378723	7067224955	4/26/2000	15:32:00	0:00:16
9127450679	9124533122	9127450679	4/26/2000	09:52:30	00:00:30
9127550766	9124526219	9127550766	4/26/2000	10:00:18	00:00:33
9127389836	9124538174	9127389836	4/25/2000	14:36:30	00:00:25

Local (Operator Assisted/Completed)

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration
4046334121	4042920897	4046334121	4/26/2000	9:55:20	0:00:37
7062955097	7063689160	7062955097	4/26/2000	10:07:38	0:00:28
7062955097	7063689160	7062955097	4/26/2000	10:10:45	0:00:58
7067224181	7067224141	7067224181	4/26/2000	10:25:00	0:00:52
7067224181	7067740284	7067224181	4/26/2000	10:28:00	0:01:47
4046333616	4042925919	4046333616	4/26/2000	12:55:15	0:00:30
7708599604	7705416524	7708599604	4/25/2000	13:25:40	0:00:51
4046335809	4045775215	4046335809	4/25/2000	14:14:45	0:00:20
7067224955	7067299740	7067224955	4/26/2000	15:25:00	0:01:03
9127550766	9129537584	9127550766	4/26/2000	09:29:40	00:01:10
9127550766	9129294077	9127550766	4/26/2000	10:07:16	00:03:01

Busy Verify

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration
7068239986	7067224181	7067224181	4/26/2000	14:05:00	0:00:41
7067224955	7067226642	7067226642	4/26/2000	15:07:00	0:00:45

Optional Calling Services

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration
4046333674	*69	4046333674	4/27/2000	10:55:14	0:00:14
7067224955	*69	7067224955	4/25/2000	15:36:25	0:00:29
7067226642	*66	7067226642	4/26/2000	8:55:25	0:00:42
4046335809	*66	4046335809	4/25/2000	13:33:42	0:00:22



EXCEPTION 28 (Amended)
BellSouth Georgia OSS Testing Evaluation

Credit Requests⁴

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration
4046333616	0	4046333616	4/27/2000	9:06:20	0:03:03
7067224953	0	7067224953	4/25/2000	14:26:00	0:00:21
7068239986	0	7068239986	4/26/2000	14:47:00	0:00:15

Toll Free

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration
7063689160	8003460152	8003460152	4/26/2000	8:52:11	0:00:10
4046330247	8002844889	8002844889	4/26/2000	9:17:40	0:01:28
4046333616	8007890371	8007890371	4/27/2000	10:40:28	0:02:08
7067226207	8775669425	8775669425	4/26/2000	11:17:55	0:11:20
7067224955	8006315660	8006315660	4/27/2000	11:35:00	0:00:17
7062369443	8008888000	8008888000	4/27/2000	11:37:34	0:00:25
4046330247	8007890371	8007890371	4/26/2000	13:10:47	0:02:19
7062959584	8003615660	8003615660	4/26/2000	14:19:32	0:00:08
7708599604	8002844886	8002844886	4/25/2000	16:00:37	0:00:13
7063689160	8004245824	8004245824	4/26/2000	16:59:47	17:00:18
9127436502	8003460152	8003460152	4/26/2000	08:27:04	00:00:56
9127450679	8003460152	8003460152	4/26/2000	08:27:50	00:00:08
9127436502	8003460152	8003460152	4/26/2000	08:28:51	00:00:09
9127550766	8003460152	8003460152	4/26/2000	08:35:35	00:00:09
9127415953	8003460152	8003460152	4/25/2000	08:37:35	00:00:05
9127414774	8007301008	8007301008	4/27/2000	10:58:25	00:00:15
9127550766	8003460152	8003460152	4/25/2000	11:00:15	00:00:10
9127450679	8003460152	8003460152	4/25/2000	11:01:15	00:00:18
9127389836	8003460152	8003460152	4/25/2000	11:09:48	00:00:07
9127450679	8003460152	8003460152	4/26/2000	11:46:00	00:00:20
9127450679	8004576490	8004576490	4/26/2000	12:15:42	00:02:37
9127550766	8003460152	8003460152	4/26/2000	12:57:02	00:00:08
9127550766	8007721213	8007721213	4/26/2000	14:46:59	00:10:32
9127389836	8888783256	8888783256	4/25/2000	15:52:49	00:01:17

Directory Assistance

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration
7067224181	7064110000	7067224181	4/26/2000	10:34:00	0:01:17
7067224181	7064110000	7067224181	4/26/2000	10:40:00	0:03:55
7062369443	7064110000	7062369443	4/26/2000	11:27:55	0:00:13
4046333616	4044110000	4046333616	4/26/2000	13:10:14	0:00:32
7067224955	7064110000	7067224955	4/26/2000	15:27:00	0:00:52

⁴ The test caller received confirmation from the operator that a credit would be issued.



EXCEPTION 28 (Amended)
BellSouth Georgia OSS Testing Evaluation

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration
7067224955	7064110000	7067224955	4/26/2000	15:29:00	0:00:56
9127440749	9124110000	9127440749	4/27/2000	11:09:33	00:00:10

Information Provider

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration
7063689160	9004204200	7063689160	4/26/2000	10:29:14	0:16:15
7702269019	9004071600	7702269019	4/26/2000	11:29:07	0:02:08
4046330247	9007866600	4046330247	4/26/2000	13:30:32	0:01:28
7068239986	9006565000	7068239986	4/26/2000	14:23:00	0:11:47
7708599604	9006565000	7708599604	4/25/2000	14:32:19	0:17:51
9127450679	9004847000	9127450679	4/26/2000	09:48:30	00:01:30
9127550766	9004847000	9127550766	4/26/2000	09:53:58	00:00:02
9127550766	9004847000	9127550766	4/26/2000	09:54:52	00:00:27
9127550766	9009328437	9127550766	4/26/2000	09:58:00	00:01:35
9127389836	9009328437	9127389836	4/25/2000	13:57:47	00:02:37

Long Distance

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration
7067224955	9416861317	7067224955	4/26/2000	9:05:00	0:01:35
7702269019	7037230846	7702269019	4/25/2000	9:26:33	0:00:20
7702269019	7037253569	7702269019	4/25/2000	9:45:30	0:00:39
4046333616	7037230846	4046333616	4/26/2000	9:51:45	0:00:15
4046335809	7039673944	4046335809	4/25/2000	9:59:57	0:00:03
4046330247	3106527760	4046330247	4/26/2000	10:16:16	0:01:44
7067224181	7065549600	7067224181	4/27/2000	10:18:00	0:00:18
7067224983	7065544455	7067224983	4/25/2000	10:38:00	0:06:00
7705416524	9127414774	7705416524	4/25/2000	10:42:40	0:00:58
4046334121	4046994943	4046334121	4/26/2000	11:00:21	0:05:46
7062369443	2197639364	7062369443	4/27/2000	11:05:25	0:05:21
7067224181	9735652426	7067224181	4/27/2000	11:21:10	0:00:34
7067224181	9735652426	7067224181	4/27/2000	11:21:10	0:34:00
7067226207	7067389173	7067226207	4/26/2000	11:35:20	0:03:28
7063689160	3045295211	7063689160	4/26/2000	11:47:45	0:01:20
7067224953	7037230846	7067224953	4/26/2000	13:24:00	0:00:25
7067224953	7709339530	7067224953	4/26/2000	14:40:30	0:01:01
7067224953	9545876362	7067224953	4/26/2000	14:43:00	0:02:53
7062950681	3105538900	7062950681	4/25/2000	14:48:02	0:00:25
4046335809	5136624811	4046335809	4/26/2000	15:09:53	0:00:50
7708599604	5136845133	7708599604	4/25/2000	15:14:59	0:12:51
7067226207	7067369889	7067226207	4/26/2000	15:17:55	0:00:01
7067226207	7067903860	7067226207	4/26/2000	15:18:00	0:04:49
4043206215	4049673944	4043206215	4/27/2000	15:33:14	0:01:33



EXCEPTION 28 (Amended)

BellSouth Georgia OSS Testing Evaluation

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration
7067224953	7062369443	7067224953	4/26/2000	15:43:15	0:00:31
7063689160	2158256112	7063689160	4/26/2000	17:11:08	0:06:26
9127415953	4046333616	9127415953	4/25/2000	09:24:45	00:02:00
9127415953	7709339074	9127415953	4/25/2000	10:44:54	00:00:21
9127450679	7039053549	9127450679	4/25/2000	11:02:33	00:02:33
9127550766	4043258391	9127550766	4/25/2000	11:03:00	00:00:30
9127415953	9124642426	9127415953	4/27/2000	11:15:45	00:00:08
9127550766	8502659336	9127550766	4/26/2000	12:58:30	00:09:27
9127450679	7706565691	9127450679	4/26/2000	13:29:00	00:01:10
9127450679	7063689160	9127450679	4/26/2000	15:11:00	00:00:20
4046330247	5135551212	4046330247	4/26/2000	9:30:58	0:00:47
4046330247	5135551212	4046330247	4/26/2000	9:37:18	0:00:16
7067226207	9735551212	7067226207	4/26/2000	11:03:25	0:00:34
4046335981	7065551212	4046335981	4/25/2000	13:42:03	0:02:00
7062950681	3045551212	7062950681	4/25/2000	15:22:45	0:00:12
7063689160	5185551212	7063689160	4/26/2000	15:42:07	0:00:15
7063689160	5185551212	7063689160	4/26/2000	15:47:30	0:00:19
7708599604	5135551212	7708599604	4/25/2000	15:50:00	0:00:45
9127440984	6365551212	9127440984	4/27/2000	09:03:42	00:00:47
9127440749	2125551212	9127440749	4/25/2000	11:25:29	00:01:25
9127550766	8505551212	9127550766	4/26/2000	14:16:49	00:01:49
9127550766	9045551212	9127550766	4/26/2000	14:22:55	00:00:18
9127450679	7275551212	9127450679	4/26/2000	14:32:00	00:00:30

Impact

Failure to deliver DUF records impacts CLECs in the following ways:

- **Decrease in revenue.** A CLEC not receiving accurate DUF records will not be able to appropriately bill the end-users or inter-exchange carriers, which will decrease revenue.
- **Inaccurate forecasting.** A CLEC will not be able to make accurate usage and revenue projections for its customer base.



EXCEPTION 47 (Amended)
BellSouth Georgia OSS Testing Evaluation

Date: July 10, 2000

EXCEPTION REPORT

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

Exception:

During the re-test period, thirteen percent (13%) of partially-mechanized CLRs delivered by BellSouth were inaccurate.

Initial Exception:

BellSouth delivers inconsistent and inaccurate Clarification (CLR) responses to Local Service Requests (LSRs).

BellSouth generates CLR responses to LSRs that contain errors or omissions relative to BellSouth ordering documentation. In response to LSRs submitted via TAG and EDI, KPMG has received inconsistent and inaccurate CLR responses. These deficiencies can be divided into two groups.

Category 1 – BellSouth returned inconsistent responses to orders. In these cases, BellSouth delivered CLRs in response to LSRs that had previously received FOCs on identically-populated orders.

Category 2 – BellSouth returned inaccurate responses to orders. In these cases, BellSouth delivered erroneous or unclear CLRs on the orders submitted.

The following tables detail examples of these inconsistencies and inaccuracies.

Category 1 – BellSouth returned inconsistent responses to orders¹.

Ref #	PON*VER	CC	Order Type	LSR Date Sent	Response Rcvd	CLR Comment
1	605A214PTJ000004 VER 00	9994	MB/V	2/8/00	FOC	N/A
2	427A314PEJ101001 VER 05	9994	MB/V	3/6/00	CLR	"TTB USOC is not valid for MB REQTYPE"

¹ Exception 47 has been amended to address inaccurate Clarifications. References to inaccurate Firm Order Confirmations have been removed from this exception and inserted into Amended Draft Exception 99.



EXCEPTION 47 (Amended)
BellSouth Georgia OSS Testing Evaluation

KPMG's Observation: In both Ref #1 and #2, the "feature detail" field was populated with the *TTB USOC* code, following BLS ordering documentation (*LEO Guide*). As a result, Ref # 2 should have received an FOC.

Ref #	PON*VER	CC	Order Type	LSR Date Sent	Response Rcvd	CLR Comment
3	606A123PTM101003 VER 02	9991	FB/C	2/24/00	FOC	N/A
4	606A123PEM101006 VER 00	9991	FB/C	3/1/00	CLR	"Reference of call option not valid for this activity type"

KPMG Response: Ref #3 and Ref #4 had the TC OPT field populated with "21," a valid entry for this REQ ACT TYPE according to BellSouth's *LEO Guide*. As a result, Ref # 4 should have received an FOC.

Category 2 - BellSouth returned inaccurate responses to orders.

Ref #	PON*VER	CC	Order Type	LSR Date Sent	Response Rcvd	CLR Comment
5	454A126PEF00004 VER 00	9991	JB/R	01/12/00	CLR	"Please provide Suite-Room-Flr info on listing order."

KPMG's Observation: Per BellSouth's *LEO Guide, Directory Listing section, pg., 203*, for REC/ACT type of JB/R, the "Suite," "Room" and "Floor" fields are optional. Based on the *LEO Guide*, this order should not have received a CLR.

Ref #	PON*VER	CC	Order Type	LSR Date Sent	Response Rcvd	CLR Comment
6	453A126PTF100003 VER 00	9991	JB/R	12/07/99	CLR	"REQ Type JB not valid for Port Loop Combos"
7	452A216PTF100001 VER 00	9991	JB/R	12/07/99	CLR	

KPMG's Observation: According to BellSouth's *LEO Guide*, Loop-port combinations with directory assistance are valid order types (Order Type JB/R). For Ref #6 and Ref #7, Loop-port combination orders with directory assistance received Clarifications from BellSouth's LCSC representative. After KPMG called the LCSC regarding the CLR, the representative later completed both orders.



EXCEPTION 47 (Amended)
BellSouth Georgia OSS Testing Evaluation

Ref #	PON*VER	CC	Order Type	LSR Date Sent	Response Rcvd	CLR Comment
8	433A124PTJ100001	9991	MB/M	11/19/99	CLR	"ACT of M is for inside Move...if ACT is M, LNA should be M as well."
9	353A222PTI000001 VER 03	8758	BB/V	2/10/00	CLR	"YPH must be 7 alphanumeric"
10	350A122PTI100002 VER 00	8758	BB/V	02/22/00	CLR	"YPH must be 7 alphanumeric"

KPMG's Observation: For Ref #8, the data field LNA= M is not a valid option when the ACT = M, according to BellSouth's *LEO Guide*, pg. 257. This order was populated according to the *LEO Guide's* instructions, yet received a CLR.

For Ref # 9 and 10, if the data value in field TOS = 2B (signifying a residential customer), entries into the YPH field are prohibited, according to the *LEO Guide*. The YPH field, for Ref #12 and Ref #13, was not populated with data, but these orders still received CLRs.

Ref #	PON*VER	CC	Order Type	LSR Date Sent	Response Rcvd	CLR Comment
11	443A224PTJ000004 VER 00	9991	MB/RS	1/14/00	CLR	"BI1 must be valid entry of A, D, L, N, P, R, U, V, W, Z"

KPMG's Observation: Ref #11 had the BI1 field populated with a valid entry ("M") for this REQTYPE, as outlined in BellSouth's *LEO Guide*. This order should not have received an FOC.

Ref #	PON*VER	CC	Order Type	LSR Date Sent	Response Rcvd	CLR Comment
12	415A213PTM000001 VER 00	9991	FB/RS	12/09/99	CLR	"This ACCT is not denied to be restored"

KPMG's Observation: The CSR provided by BLS for Ref # 12 indicated that the line was suspended 11/29/99. The CLR message received indicates that the line was not in suspended status. After KPMG called the LCSC regarding the CLR, the BellSouth LCSC worked the order to completion.



EXCEPTION 47 (Amended)
BellSouth Georgia OSS Testing Evaluation

Ref #	PON*VER	CC	Order Type	LSR Date Sent	Response Rcvd	CLR Comment
13	407A213PTM100003 VER 00	9991	FB/C	11/24/99	CLR	"Invalid FA code"
14	305A222PEH101001 VER 05	9994	AB/V	02/24/00	CLR	"RTR Entry is invalid for this RQTYPE"
15	301A212PEH100008 VER 00	9994	AB/A	02/2300	CLR	"RTR Entry is invalid for this RQTYPE"
16	121A121PEH100006 VER 00	9992	AB/C	02/2900	CLR	"RTR is incorrect"
17	121A121PEH100004 VER 00	9990	AB/D	02/25/00	CLR	"RTR is incorrect"
18	301A212PEH100008 VER 00	9994	AB/A	2/23/00	CLR	"RTR invalid entry for REQTYPE RH1989"

KPMG's Observation: According to BellSouth's LEO Guide, the feature code "RTR" is a valid entry for the REQ/ACT types for Ref #s 13 - 18. After KPMG called the LCSC regarding the CLRs, BellSouth LCSC representatives worked all of the orders to completion.

BellSouth's Investigation/Resolution Activities:

In response to Exception 47, BellSouth conducted re-training for the Local Carrier Service Center (LCSC) ordering representatives in order to reduce the number of inaccurate Clarifications (CLRs) issued. BellSouth performed the training on April 5, 2000.

KPMG's Re-testing Results:

Based on this training, KPMG reviewed representative-generated² CLRs received after April 5, 2000 for accuracy.

During the period between April 6 and April 28, 2000, KPMG received 61 partially-mechanized CLRs. Of those, 13% (8 out of 61) were determined to be inaccurate.

Detail regarding the eight inaccurate CLRs received after April 6 is presented below.

PON*VER	CC	Error Message	KPMG Comments
305A122PTH104001*15	9994	"Type of Service Invalid for User's Account"	KPMG entered a TOS = 1 on this UNE Loop order, based on BLS requirements.

² KPMG reviewed CLRs categorized as 'partially mechanized' (i.e., responses to electronically-submitted LSRs that fell out for manual handling).



EXCEPTION 47 (Amended)
BellSouth Georgia OSS Testing Evaluation

PON*VER	CC	Error Message	KPMG Comments
305A122PTH104002*00	9994	"Type of Service Invalid for User's Account"	KPMG entered a TOS = 1 on this UNE Loop order, based on BLS requirements.
305A212PEH102004*00	9994	"ACCTNUM must be a MISC acct number"	KPMG entered a dialable TN in the LOCBAN field according to BLS requirements for Loop migrations.
307A222PTH100014*05	9994	"I"	Representative confirmed that CLR was sent in error.
R042A12PEN000008*01	9990	"Need YPH & SIC and Dir Delivery Info"	A residential order does not require this information.
R042A12PTN100012*02	9990	"Need YPH & SIC and Dir Delivery Info"	A residential order does not require this information.
305A122PEH102010*06	9994	"Only DD change permitted on SUP 2"	KPMG entered a SUP = 04 To request a change to the DD and DFDT change. Per BLS documentation, a SUP of 04 is required to change a due date.
307A122PEH102003*12	9994	"Only DD change permitted on SUP 2"	KPMG entered a SUP = 04 To request a change to the DD and DFDT change. Per BLS documentation, a SUP of 04 is required to change a due date.

Impact

Inconsistencies and inaccuracies in BellSouth's ordering response process will impact CLECs in the following ways:

- **Disruption of the CLEC ordering process.** Based on published business rules and the receipt of confirmed service requests on particular order types, a CLEC may program their ordering application(s) to generate similar (or, in some cases, identical) transactions, when possible. Receipt of formatting or business rule errors on these transactions requires investigation and potential system modifications. This will disrupt a CLEC's ordering process.
- **Increase in operating costs.** The time and resources required to investigate inconsistent and/or inaccurate responses, and to re-submit orders which received inaccurate responses will increase a CLEC's operating costs.



EXCEPTION 47 (Amended)

BellSouth Georgia OSS Testing Evaluation

- **Decrease in customer satisfaction.** Inaccurate responses will require investigation and supplemental LSR issuance by a CLEC, delaying the provisioning of end-user service. This delay will result in a decrease in CLEC customer satisfaction.



EXCEPTION 80 (Amended)

BellSouth Georgia OSS Evaluation

Date: July 6, 2000

EXCEPTION REPORT

An exception has been identified as a result of the xDSL Functional Evaluation (PO&P12) and the Resale and xDSL Documentation Evaluation (PO&P14).

Exception:

BellSouth guidelines for submitting an order Service Inquiry (SI) and Loop Service Requests (LSR) do not provide complete, consistent information.

To request xDSL service for an end-user, CLECs submit order service inquiries (SIs) (to provide xDSL-capable loop information) and an LSR (to order xDSL service).

As part of xDSL testing, KPMG will submit order SIs and LSRs. In preparing to perform these testing activities, KPMG reviewed the *Unbundled ADSL Capable Loop & Unbundled HDSL Capable Loop - CLEC Information Package*.

Based on the document review, KPMG discovered the following deficiencies:

Unbundled ADSL Capable Loop & Unbundled HDSL Capable Loop - CLEC Information Package:

- The document does not provide formal business rules for required information for the order SI.
- The document provides no reference between LSR and pre-order SI (Loop Make-up) forms, though submission of both forms is required to order xDSL service.
- The document does not provide details regarding the submission method for SI and LSR forms (e.g., fax and/or e-mail).

Impact

The absence of complete guidelines for submitting xDSL order service inquiries and loop service requests impacts CLECs in the following ways:

- **Increase in operating costs.** Without sufficient guidance regarding submission of these SIs and LSRs, CLECs attempting to order xDSL services will likely experience significant errors, requiring CLECs to re-submit flawed SIs and LSRs. Consequently, CLECs will have to utilize more resources to complete the xDSL ordering process, which will increase CLEC operating costs.
- **Decrease in CLEC customer satisfaction.** Additionally, errors in submitting SIs and LSRs could lead to delays in service provisioning for the CLECs end-user. Provisioning delays will result in a decrease in CLEC customer satisfaction.

CERTIFICATE OF SERVICE

Docket No. 8354-U

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

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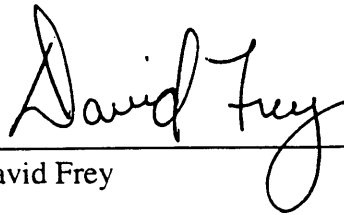
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This 12th day of July 2000.



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EXECUTIVE SECRETARY
G.P.S.C.

July 12, 2000

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

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

Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of BellSouth's Responses to Exceptions 76, 79, 80 and 83, Amended Responses to Exceptions 63, 78, 81, 84, 86, 89, 90, 92 and 93, and Second Amended Response to Exception 84.

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

Thank you for your assistance in this regard.

Very truly yours,

David Frey
Manager

Enclosures

cc: Parties of Record



BELLSOUTH'S RESPONSE TO EXCEPTION 76



June 27, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Provisioning Verification Test (O&P-5).

Exception:

KPMG encountered numerous BellSouth provisioning errors for Unbundled Network Element (UNE) orders.

During provisioning verification testing, data from confirmed Local Service Requests (LSRs) was compared to: a) post-order Customer Service Records (CSRs); b) switch translation data; and c) the BellSouth directory listing database.

Of the 279 UNE orders, which were validated, 119 post-order CSRs (43%) contained different information than their corresponding LSRs. Of the 119 orders, 46 (39%) were flow through and 73 (61%) were non-flow through¹.

Of the 315 Switch Translations for UNE lines, which were validated, 35 lines (11%) contained different information than their corresponding LSRs. Of the 35 lines, 22 (63%) were flow through and 13 (37%) were non-flow through.

Of the 138 Directory Listing for UNE orders, which were validated, 25 orders (17%) contained different information than their corresponding LSRs. Of the 24 orders, 10 (42%) were flow through and 14 (58%) were non-flow through.

Validation errors fell into the following categories: 1) Incorrect Features 2) Incorrect Address 3) Incorrect Provisioning 4) Other CSR Errors 5) Incorrect Directory Listings.

¹ KPMG's Flow Through Evaluation team, using an algorithm, determined whether an LSR actually flowed through BellSouth's systems or fell out for manual processing. BellSouth did not validate the algorithm used by KPMG to determine actual flow through.

BELLSOUTH'S RESPONSE TO EXCEPTION 76

The following table provides details regarding CSR, Switch Translation and Directory Listing provisioning errors:

CSR VERIFICATION							
Incorrect Features							
PON	VER	Req/Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
402E223PTM000002	3	FV	7702268258	9994	Missing Feature (NSY)	No	Do not agree. NSY was not ordered on LSR.
424A314PTJ000001	2	MV	6785790524882	9994	Missing Feature Code from order on BTN (RJ11C)	No	Do not agree. RJ11C is on the CSR.
443X224PEM000002	1	MRS	7707771814	9991	Missing Feature (CallerID)	No	Do not agree. Caller ID is on the CSR.
625A214PEJ100004	1	MC	6783932936441	9994	Incorrect Features	Yes	Agree. System defect #9256 corrected problem 5/20/00.
625A214PTJ100001	5	MC	7709538539932	9991	Missing Feature (HBY)	No	Agree. KPMG sent HBY error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification.
625A214PTJ100013	1	MC	7062920388	9991	Missing Feature (Hunting)	Yes	Agree. System defect #9256 corrected problem 5/20/00.
626A224PEJ100006	0	MC	7708501852613	9991	Missing Feature (HBY)	Yes	Agree. KPMG sent HBY error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification.
626A224PEJ101003	2	MC	7067246590649	9991	Missing Feature (HBY)	Yes	Agree. KPMG sent HBY error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification.
626A224PEJ101011	0	MC	7062359179255	9991	Missing Feature (HBY)	Yes	Agree. KPMG sent HBY error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification.
626A224PTJ100002	4	MC	7067244960	9991	Missing Feature (HBY); Incorrect address	No	Agree. KPMG sent HBY error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification.

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PON	VER	Req/ Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
626A224PTJ100013	0	MC	6785799353719	9991	Missing Feature (HBY)	Yes	Agree. KPMG sent HBY error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification.
626A224PTJ100014	1	MC	7062357249255	9991	Missing Feature (HBY)	Yes	Agree. KPMG sent HBY error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification.
626A224PTJ100017	0	MC	4046348771752	9991	Missing Feature (HBY)	Yes	Agree. KPMG sent HBY error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification.
627A214PTJ100007	1	MC	9127430461080	9991	Feature (HTG) not removed.	No	Agree. System defect #9256 corrected problem 5/20/00.
627A214PTJ101002	0	MC	7067246133543	9991	Feature (HTG) not removed.	No	Agree. System defect #9256 corrected problem 5/20/00.
406C213PTM100006	3	FV	7709338776	9991	Installed feature incorrectly (DRS).	No	Do not agree. CSR reflects DRS as ordered on LSR.
409A223PTM100001	5	FC	7067225636	9991	Missing Feature (ESX)	Yes	Unable to locate PON.
428A224PTJ100002	1	MV	4046342841417	9994	Missing 1 (one) TN and feature. Missing Directory Listing; Incorrect "Q" account listed.	No	Agree. Service rep error.
625A214PEJ100005	0	MC	9127434571318	9991	Incorrect Features	Yes	Agree. System defect #9256 corrected problem 5/20/00.
625A214PEJ100009	0	MC	7707771533133	9991	Incorrect Features	Yes	Agree. System defect #9256 corrected problem 5/20/00.
625A214PEJ100010	0	MC	6784419569837	9991	Incorrect Features	Yes	Agree. System defect #9256 corrected problem 5/20/00.
625A214PEJ101002	0	MC	7067248881302	9991	Missing Features (HBY)	Yes	Agree. KPMG sent HBY error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification.
625A214PTJ100008	0	MC	7067245832114	9991	Missing Features	Yes	Agree. System defect #9256 corrected problem 5/20/00.

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625A214PTJ100011	0	MC	7702269352130	9991	Incorrect Features	Yes	Agree. System defect #9256 corrected problem c 5/20/00.
626A224PEJ100015	0	MC	4043209327506	9991	Missing Features (HBY)	Yes	Agree. KPMG sent HBY error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarificati
626A224PEJ101012	0	MC	6783667751725	9991	Missing Features (HBY)	Yes	Agree. KPMG sent HBY error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarificati
626A224PTJ100007	6	MC	9127456926229	9991	LPIC not removed as ordered.	Yes	Agree. Service Rep error

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CSR VERIFICATION							
Incorrect Address							
PON	VER	Req/Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
301A212PEH100006	3	AA	404M382906906	9994	Incorrect address listing; Incorrect customer account number	No	Do not agree -Loops are not listed. Customer account number and CSR correct.
301A212PEH100008	1	AA	706U574638638	9994	Incorrect address listing; Incorrect customer account number.	No	Do not agree -Loops are not listed. Customer account number and CSR correct.
301A212PEH101001	2	AA	706U572929929	9994	Incorrect address listing; Incorrect customer account number	No	Do not agree -Loops are not listed. Customer account number and CSR correct.
305A112PTH100005	0	AV	7068283277531	9994	Incorrect address listing; Incorrect BAN2	Yes	
305A112PTH100007	1	AV	4049820492554	9994	Incorrect address listing	No	
305A122PEH100011	0	AV	6785790649915	9994	Incorrect address listing; Incorrect BAN2 sent by BLS.	No	
305A122PEH100013	0	AV	7707401850313	9994	Incorrect address listing	No	
305A222PEH101001	6	AV	7068280181715	9994	Incorrect address listing	No	
305A222PEH101009	2	AV	7062957961726	9994	Incorrect address listing	No	
305A222PTH100010	1	AV	4049829274034	9994	Incorrect address listing on CSRQ; missing "Q" account on CSR	No	
309A122PTH100008	0	AV	9127434147038	9994	Incorrect address listing	Yes	
317A122PEH000005	1	AM	770M420300300	9991	Incorrect address listing	No	
317A122PTH100006	1	AM	706U090761761	9991	Incorrect address listing	No	Do not agree -Loops are not listed. CSR address agrees with address on LSR.
317A122PTH101001	0	AM	404M360050050	9991	Incorrect address listing	No	
320A212PEF000008	0	JA	7702740804	9991	Incorrect address listing	No	
333A122PTI100002	0	BV	7062920457	9992	Incorrect address listing; incorrect "Q" account on CSRQ.	Yes	Do not agree. CSR address agrees with address on LSR. "Q" account number on CSR is correct.

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PON	VER	Req/ Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
350A112PTI100001	5	BV	7709338917	8758	Incorrect address listing; incorrect "Q" account on CSRQ.	No	
350A122PTI100002	4	BV	7709338286	8758	Incorrect address listing; Incorrect "Q" account on CSRQ	No	
359A112PEI100005	1	BV	4049299747	8758	Incorrect address listing	No	
384A225PTI100003	0	BV	6785790570	9992	Incorrect address listing	No	
395A213PEM100001	1	FA	7067247628	7050	Incorrect address listing	No	
428A124PEJ101009	0	MV	7707771988703	9994	Incorrect address listing (zip code)	Yes	
428A124PTJ100014	0	MV	6785790866511	9994	Incorrect address listing (zip code)	Yes	
432A214PEJ100005	2	MM	4042350641	9994	Address did not change on Move order.	No	Do not agree. CSR address agrees with address on LSR.
432A214PEJ100006	2	MM	7703910219219	9991	Incorrect address Listing	No	Do not agree. CSR address agrees with address on LSR.
432A214PTJ100004	5	MM	9127425789789	9991	Address did not change on Move order.	No	
433A124PEJ101005	2	MM	7704756050050	9991	Incorrect address listing (LOC).	No	Do not Agree. Listing is Non Pub, CSR LOC info agrees with LSR.
433A124PEJ101006	2	MM	9127508052443	9991	Incorrect address listing.	No	Do not agree. CSR address agrees with address on LSR.
433A124PTJ100001	1	MM	4046346772772	9991	Incorrect address listing. Move not completed; Incorrect MAN	No	Do not agree. KPMG requested subsequent address change.
601A222PTI000008	0	BV	7709338573	7727	Incorrect address listing.	No	
601A222PTI100002	0	BV	4049820283	8758	Incorrect address listing.	No	
435C114PTJ002019	0	MT	6785790954	9991	Incorrect LOC listing; no ADL added	No	Do not agree. CSR LOC info agrees with LSR. KPMG did not order AD
350D222PTI100001	2	BV	6785799295	7050	Incorrect address listing on CSRQ	No	
351A212PTI000001	3	BV	7709330248	8758	Incorrect address listing; Incorrect "Q" account.	No	

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333A122PTI101001	1	BV	7062389184	9992	Incorrect address listing; Incorrect "Q" account	No	Do not agree. CSR address agrees with address on LSR. Q account is correct
606A123PEM101006	3	FC	6786249526	9991	Incorrect address listing	No	Do not agree. CSR address agrees with address on LSR.

CSR VERIFICATION							
Incorrect Provisioning							
PON	VER	Req/Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
317A122PTH002004	0	AM	706U098477477	9991	Facilities were changed with no notification from BLS.	No	Agree. Service rep error.
395A213PTM100005	0	FA	7063780876	9994	Incorrect provisioned of cable pairs between lines on order.	Yes	
397A223PTM102002	0	FA	9127558205	9994	Incorrect provisioned of cable pairs between lines on order.	Yes	Agree. Service rep error.
398A213PTM100002	5	FV	7704423511	9994	No Ports provisioned; Incorrect LPIC; No 'Q' Account listed on CSR	No	
402A223PEM001001	4	FV	7707518546	9994	No Ports on post CSR; No CC Listed; No Q account	No	Do not agree. Partial Migration see TN 7707513634.
408A313PEM000002	0	FV	7068020367	9991	Missing lines; Incorrect Q account information	Yes	
409A223PTM100002	0	FC	9127425287	9991	Incorrect channel pair provisioned.	Yes	
423A114PEM100009	0	MV	4043215534	9994	No UNEs provisioned on account.	No	Do not agree. CSR agree with LSR.
604A224PEJ000003	0	MV	7707773279	9991	Provisioning not completed.	Yes	
604A224PTJ000004	1	MV	7709800484	9994	Provisioning not completed.	No	
398A213PEM000003	2	FV	7062339636	9994	Provisioning not completed.	No	
603A224PEJ100003	0	MD	4043216049506	9991	Ordered partial Disco - Disconnected full account	Yes	
610A224PTJ100016	0	MC	9127437960229	9991	Ordered change TN - BLS added a line.	Yes	Agree. System processed incorrectly. Feature 9556 pending change control process.
412A213PTM000003	0	FSS	7704751021	9991	Service not suspended	No	Agree. Service rep error.
438A214PEJ000004	0	MSS	9127466851637	9991	Service not suspended	No	

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PON	VER	Req/ Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
323A122PEH101006	0	AD	770M423949949	9991	Account not disconnected as ordered.	No	Do not agree. Account was disconnected and is Final.
801A215PTG100001	0	CW	4043214967	9991	Incorrect provisioning (line ordered disconnected – still active)	No	
402A223PTM000002	0	FV	6785790051	9994	Ordered Port – moved to resale; Partial Migration-BLS migrated entire order	No	Do not agree. Numbers migrated as specified on LSR.
615A122PTF102015	0	JA	9123140802	9991	CSR should be FINAL	No	
603A224PTJ100004	0	MD	7062953890255	9991	CSR Discrepancy- shows "FINAL" on order, only 1 line is disconnected of two.	Yes	Do not agree. Both lines on account are disconnected as requested on LSR.
305A122PEH102010	7	AV	7068280776	9994	Account should read "Final" but does not since migrating from BST.	No	

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CSR VERIFICATION							
Other CSR Errors							
PON	VER	Req/ Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
305A212PTH100002	0	AV	770740926722 1	9994	Post CSR reflects no UNEs.	No	
406A213PTM100002	1	FV	7707773250	9991	Wrong "Q" Account on CSR.	Yes	Do not agree. Q account CSR is correct.
382D225PEG101005	1	CD	7062357582	9991	No Misc. account number (BAN2)	Yes	
305A212PTF100013	0	JA	7702550806	9994	Missing RESH code on CSR	No	Do not agree. RESH cod is not applicable for this order type.
305A212PTF101008	5	JA	4042140689	9994	Missing RESH code on CSR	No	
373A215PEG100002	2	CV	7062950832	9992	No "Q" account listed, No CC Listed on CSR; TN Mismatch	No	
374A225PEG100006	0	CV	7062959709	7050	Incorrect BAN1	Yes	
444A214PEJ000002	0	MD	706234776974 4	9991	No "Q" account listed	Yes	Do not agree. CSR does reflect correct Q account.
406A213PEM100005	0	FV	4049296504	9991	Incorrect "Q" account on CSR.	Yes	Do not agree. CSR does reflect correct Q account.
406A213PTM100004	0	FV	7068283771	9991	Incorrect "Q" account on CSR	Yes	
301A112PEH100008	3	AA	912U304395	9994	Incorrect Customer Account Number	Yes	Do not agree. Customer account number on CSR correct. KPMG submitte digits following the customer account numbe The 3 digits following al BellSouth account numb are assigned and used by BellSouth. Customers h no reason and do not ass these 3 digits which are used by BellSouth.

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CSR VERIFICATION							
Incorrect Directory Listings (verified through CSR validation)							
PON	VER	Req/Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
301A112PEF101007	0	JA	4042140681	9994	Incorrect DL	No	
301A212PEF100002	1	JA	706U57292992 9	9994	Incorrect DL	No	Agree. Service rep error.
305A122PTH100012	0	AV	404982034756 4	9994	Incorrect DL	Yes	
307A222PTF102015	2	JA	7063140805	9994	Incorrect DL	No	
326A212PEI100003	2	BV	7062952450	9992	Incorrect DL	No	Agree. Service rep error.
326C222PEI100002	0	BV	7062952828	9992	Incorrect DL	Yes	Do not agree. CSR for D agrees with LSR.
333A122PEI100003	0	BV	7062929565	9992	Incorrect DL	Yes	
349A212PEI000004	5	BV	4049829424	7050	Incorrect DL	No	Do not agree. CSR for D agrees with LSR.
409A223PEM100003	0	FC	7709527166	9991	Incorrect DL	Yes	Agree. Service rep error
606A123PEM100002	0	FC	7062344197	9994	Incorrect DL	Yes	Agree. Service rep error
607A214PTJ101003	0	MC	706722769820 3	9991	Incorrect DL	Yes	Agree. LSR did not include a valid line activity for D. LEO IG was updated on 3/17/00 to clarify valid line activity codes for DL.
608A124PEJ101004	0	MC	706368944725 5	9991	Incorrect DL	No	Agree. Service rep error
325C222PEI001001	3	BV	7062955413	9992	Incorrect DL	No	Do not agree. CSR for D agrees with LSR.
435A114PEJ001003	0	MT	404634938232 7	9991	No Directory Listing; No ADL added	No	Do not agree. CSR Directory Listing agrees with LSR. KPMG did not order ADL.
435A114PTJ002002	0	MT	770777194135 9	9991	No Directory Listing; No ADL added	No	
403A223PEM100002	0	FV	7702269110	9994	Incorrect DL (out of order); Additional Line; Missing address information (RM & FLR#)	No	
405A312PEM001002	5	FV	9127461378	9994	Incorrect DL (out of order); Additional feature (nxmcr).	No	
428A224PEJ100003	1	MV	678579077415 0	9994	Incorrect DDA for DL.	No	
452A216PEF100002	0	JR	7707775840	9991	Incorrect DL	No	Agree. Service rep error
452A216PTF100003	0	JR	7067246195	9991	Incorrect DL	No	Agree. Service rep error
453C126PEF100001	1	JR	4046399935	9991	Incorrect DL	No	Do not agree. CSR for I agrees with LSR.
607C214PEJ101010	0	MC	770777144574 8	9991	Incorrect DL	Yes	Agree. LSR did not include a valid line activity for I. LEO IG was updated on

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							3/17/00 to clarify valid li activity codes for DL.
610A224PEJ100001	0	MC	770951562361 3	9991	Incorrect DL	No	
626A224PTJ101002	0	MC	706724496064 9	9991	Incorrect DL; Missing feature (HBY)	Yes	

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Directory Listing Verification - (through BLS Directory Listing Database Validation)							
PON	VER	Req/ Act	TN	OCN	Directory Listing Discrepancy	F/T	BellSouth Response
333A122PTI101001	1	BV	7062389184	9992	Database listing does not indicate "non-listed"	N	Do not agree. Database correct. Presence of the (sign on operator screen represents non-list.
350D222PTI100001	2	BV	6785799294	7050	Listed as Non-Published	N	Agree. Service rep error.
351A212PTI000001	3	BV	7709330793	8758	Address listed as "SE"	N	Agree. Service rep error.
403A223PEM100002	0	FV	7702260527	9994	Listing Not Found	N	Agree. Service rep error.
403A223PEM100004	0	FV	4043214029	9994	Wrong Name listed	Y	Agree. LSR did not include a valid line activity for DL. LEO IG was updated on 3/17/00 to clarify valid line activity codes for DL.
403A223PTM100003	0	FV	7067220159	9994	Listing Not Found	Y	Agree. Service rep error.
405A312PEM001002	5	FV	9127461378	9994	Name listed backwards	N	Agree. Service rep error.
406A213PTM100001	0	FV	7068020476	9991	Listing Not Found - should say "non-published."	Y	Do not agree. Database correct. This TN is an auxiliary line. KPMG did not request a listing of any type for this TN.
406A213PTM100004	0	FV	7068280329	9991	Listing Not Found - should say "non-published."	Y	Do not agree. Database correct. This TN is an auxiliary line. KPMG did not request a listing of any type for this TN.
409X223PEM100004	0	FC	7062951121	9991	Listing Not Found - should say "non-published."	Y	
452A216PEF100002	0	JR	7707775840	9991	Listed as Non-Published	N	Agree. Service rep error.
452A216PEF100003	0	JR	7067246195	9991	Listed as Non-Published	N	Unable to locate PON
453C126PEF100001	1	JR	4046399935	9991	Wrong Name listed	N	Agree. Service rep error.
455A116PTF100004	0	JR	7067241358	9991	Listing Not Found	N	Do not agree. Database listing agrees with LSR.
607C214PEJ101010	0	MC	6786241459	9991	Listing Not Found	Y	Duplicate PON - include in "verified through CSR validation" section of this exception
626A224PTJ101002	0	MC	7067244960	9991	Listed as Non-Published	Y	Agree. LSR did not include a valid line activity for DL. LEO IG was updated on 3/17/00 to clarify valid line activity codes for DL.
615A122PEF102017	1	JA	7702550802	9991	Incorrect Street Address	N	Agree. Service rep error.

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PON	VER	Req/ Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
428A124PEJ100010	0	MV	7709552899	9994	Database listing does not indicate "non-listed"	Y	Agree. Unable to determine why order did not post to database
610A224PEJ100001	0	MC	7709561097	9991	Name listed backwards	N	Agree. Service rep error.
428A124PTJ100002	1	MV	6785790883	9994	Database listing does not indicate "non-listed"	N	Unable to locate PON
610A224PTJ100016	0	MC	9127551751	9991	Listing Not Found	Y	Agree. LSR did not include a valid line activity for DL LEO IG was updated on 3/17/00 to clarify valid line activity codes for DL.
428A124PTJ100008	2	MV	7067225360	9994	Database listing does not indicate "non-listed"	Y	Do not agree. Database is correct. Presence of the @ sign on operator screen represents non-list
428A124PTJ100006	1	MV	7062323092	9991	Database listing does not indicate "non-listed"	N	Do not agree. Database is correct. Presence of the @ sign on operator screen represents non-list
325C222PEI001001	3	BV	7062955413	9992	Listing Not Found	N	Agree. Service rep error

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Switch Translation Verification							
PON	VER	Req/ Act	TN	OCN	Switch Translation Discrepancy	F/T	BellSouth Response
626A224PTJ100007	6	MC	9127456926	9991	Should not have a PIC or LPIC	Y	Agree. Service rep error.
625A214PTJ100012	0	MC	7062369570	9991	Missing PIC and Hunting	N	Agree. Service rep error.
625A214PTJ100012	0	MC	7062369644	9991	Missing PIC and Hunting	N	DUPLICATE PON - Agree. See 7062369570 above. Service rep error
625A214PTJ100008	0	MC	7067245832	9991	No Hunting	Y	Agree. System defect #9256 corrected problem on 5/20/00.
625A214PEJ101002	0	MC	7067248881	9991	No Hunting	Y	
625A214PEJ101002	0	MC	7067244105	9991	No Hunting	Y	
625A214PEJ101002	0	MC	7067241016	9991	No Hunting	Y	Agree. System defect #9256 corrected problem on 5/20/00.
625A214PEJ100005	3	MC	9127434571	9991	No Hunting	Y	Agree. System defect #9256 corrected problem on 5/20/00.
438A214PEJ000004	0	MSS	9127466851	9991	Service Not Suspended	N	Do not agree. BST switch verification indicates service suspended.
412A213PEM000002	0	FSS	9127423859	9991	Service not suspended	N	Do not agree. BST switch verification indicates service suspended.
412A213PEM000002	0	FSS	9127424884	9991	Service not suspended	N	Agree. Service rep error.
409A223PTM100001	5	FC	7068280693	9991	No ESX	Y	Unable to locate PON
403A223PTM100005	1	FV	7062350229	9994	No NSS	N	
403A223PTM100005	1	FV	7062354725	9994	No NSS	N	
403A223PTM100005	1	FV	7062358913	9994	No NSS	N	Agree. Service rep error.
626A224PEJ101012	0	MC	6783667751	9991	Missing ESL and HBY	Y	Agree. KPMG sent HBY error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification. Do not agree. KPMG requested ESL be remove
626A224PEJ101012	0	MC	6783663825	9991	Missing ESL and HBY	Y	
626A224PEJ100015	0	MC	4043209322	9991	Missing ESL	Y	
626A224PEJ100015	0	MC	4043209327	9991	Missing ESL	Y	Do not agree. CSR agree with LSR. KPMG requested ESL be remove

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PON	VER	Req/ Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
625A214PEJ100010	0	MC	6784419569	9991	No HTY or HTG	Y	
625A214PEJ100010	0	MC	6784419570	9991	No HTY or HTG	Y	
625A214PEJ100010	0	MC	6784419571	9991	No HTY or HTG	Y	Agree. System defect #9256 corrected problem 5/20/00.
625A214PEJ100009	0	MC	7707771529	9991	No HTY or HTG	Y	
625A214PEJ100009	0	MC	7707771533	9991	No HTY or HTG	Y	
625A214PEJ100009	0	MC	7707771534	9991	No HTY or HTG	Y	Agree. System defect #9256 corrected problem 5/20/00.
603A224PEJ100003	0	MD	4043216049	9991	Switch Translation for line is still active.	Y	Do not agree. Switch verification indicates number not active.
428A224PTJ100002	1	MV	4046342861	9994	3 Way Call, Call Forwarding, Call Waiting	N	Agree. Service rep error.
412A213PTM000003	0	FSS	7704751021	9991	Service not suspended	N	Agree. Service rep error.
412A213PTM000003	0	FSS	7704750676	9991	Service not suspended	N	Do not agree. Switch verification shows line suspended..
406A213PTM100002	1	FV	7707773250	9991	Requested LPIC 5124, Received default 9199	Y	Agree. Service rep error.
625A214PTJ100011	0	MC	7702260649	9991	No Hunting	Y	
625A214PTJ100011	0	MC	7702269352	9991	No Hunting	Y	
625A214PTJ100011	0	MC	7702269902	9991	No Hunting	Y	Agree. System defect #9256 corrected problem 5/20/00.
402E223PTM000002	0	FV	7702268073	9994	No NSY	N	
402E223PTM000002	0	FV	7702268258	9994	No NSY	N	Do not agree. KPMG did not order NSY on the LSI

Impact

Inaccurate provisioning will affect CLECs in the following way:

- Decreased customer satisfaction.** If an account is not provisioned correctly, a CLEC's customer will receive the incorrect level or type of service. This will result in a decrease in CLEC customer satisfaction.

BELLSOUTH'S RESPONSE TO EXCEPTION 76

BellSouth Response

Many of the PONs provided in this exception contained similar discrepancies. BellSouth reviewed a large number of the PONs provided by KPMG in each category. BellSouth responses to individual PONs are included in the CSR Discrepancy column immediately below the KPMG note.

Summary of findings:

Category	Do not agree	Issue already corrected	Change pending prioritization	Service rep error	Unable to locate PON	Duplicate PON	Total PONs checked
Incorrect Features	4	9	11	2	1		27
Incorrect Address	12						12
Incorrect Provisioning	5		1	3			9
Other CSR Errors	5						5
Incorrect DL (through CSR validation)	5	2		7			14
DL Verification (through DL database validation)	6	2		11	3	1	23
Switch Translation Verification	6	6	1	7	1	1	22
Total PONs Checked	43	19	13	30	5	2	112

BellSouth's review of the sample PONs provided by KPMG and discussions regarding KPMG processes have revealed the following.

Of the 112 PONs reviewed, BellSouth found discrepancies on 62 PONs. Of the 62 PON discrepancies found, BellSouth changes already implemented would have prevented 19 (31%) of the discrepancies. BellSouth changes pending prioritization will prevent 13 (21%) of the discrepancies. Service rep training on directory listing orders expected to be completed by 6/30/00 will address another 25 (40%) of the discrepancies found.

KPMG has agreed to re-evaluate the PONs included in the Incorrect Address section. Based on the service type provisioned on the CSR, KPMG will look in either the Service & Equipment Listed sections of the CSR to review the end user address.

KPMG incorrectly assumed the customer account code and Q account provided on the PON would always be used by BellSouth. The Q account number used by BellSouth is returned to KPMG in the FOC. KPMG used directory assistance operator screen prints to for the directory listing database validation section. KPMG understanding of the screen prints is not accurate.

BELLSOUTH'S RESPONSE TO EXCEPTION 76

BELLSOUTH'S RESPONSE TO EXCEPTION 79



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EXCEPTION REPORT

Exception has been identified as a result of the Data Collection and Storage
Exception and Validation Review (PMR-1).

on:

Exception does not adequately retain certain source data¹ used in the calculation of
Service Quality Measurement (SQM) reports that are not generated wholly
manually by the Performance Measurement and Analysis Platform (PMAP).²

Exception are calculated to illustrate BellSouth's Operational Support System performance.
Exception month, as mandated by the Georgia Public Service Commission, BellSouth
Exception s performance measurement reports of SQM values for the CLECs engaged in
Exception activity with BellSouth in the state of Georgia.

Exception interviews, KPMG has learned that BellSouth does not adequately retain some
Exception source data used in the calculation of manual SQMs. The following table shows
Exception in Exception question and the associated storage duration.

Source Data System	SQM Affected	Retention Duration
Meridian Max	Speed of Answer in the Ordering Center (Ordering)	8 days
Mississippi Enterprise Management	Interface Availability (OSS)	Current month
Sum Automatic Call Distributor	Average Speed of Answer in Ordering Centers – Residence (Ordering)	60 days
Meridian Symposium	Average Answer Time in Repair Centers for Large Business (Maintenance & Repair)	2 days
Meridian Max	Average Answer Time in Repair Centers – Residence (Maintenance & Repair)	7 days
QMS	Average Speed to Answer - Toll (Operator Services Toll & Directory Assistance)	45 days

¹ The earliest instance of the data collected in the BellSouth OSS.
² Non-PMAP SQMs are also referred to as "manual SQMs."

BELLSOUTH'S RESPONSE TO EXCEPTION 79

BELLSOUTH'S RESPONSE TO EXCEPTION 80



June 26, 2000

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Pre-Order and EDI Order Documentation Evaluations (PRE-3, O&P-8 and O&P-9).

Exception:

BellSouth's pre-ordering and ordering documentation contains numerous errors and omissions in structure and format.

KPMG has identified numerous omissions and errors in the structure and format of BellSouth's pre-ordering and ordering documentation.

The following table provides details regarding these omissions and errors.

BellSouth Documentation Omissions and Errors	
Contact information for help desk, subject matter experts or escalations	The <i>Pre-Order Business Rules</i> , <i>Pre-Order Business Rules Data Dictionary</i> , <i>LEO Implementation Guide Volumes 1, 2 and 3</i> , <i>Pending Service Job Aid</i> , <i>Products and Services Interval Guide</i> , <i>CLEC Service Order Tracking System Guide</i> , <i>Local Number Portability Ordering Guide</i> , <i>Facilities Activation Requirements</i> and <i>Facilities Based Advisory Guide</i> documents do not contain contact information for BellSouth's Help Desk, Subject Matter Experts (SMEs) and Escalation contacts.
Purpose & Scope	The <i>Pending Service Order Job Aid</i> does not state purpose or intended scope.
	The <i>Pre-Order Business Rules Data Dictionary</i> does not state purpose or intended scope.
Reference to other relevant BellSouth documentation	<i>LEO Guide Volume 2</i> and <i>LEO Guide Volume 3</i> do not reference <i>LEO Guide Volume 1</i> to assist in the ordering of UNE products and services.
	The <i>Pre-Order Business Rules</i> and <i>Pre-Order Business Rules Data Dictionary</i> do not reference relevant sections of BellSouth's Web site.
	The <i>LEO Guide Volume 1</i> contains a reference on page 24 to the LSR error messages Web page on the BLS Web site. The Web page address is incorrect.
	<i>LEO Guide Volume 1</i> , page 25, references an "Ordering Guide (OG) for Business Rules" but does not state where to find this document.

BELLSOUTH'S RESPONSE TO EXCEPTION 80

	<i>LEO Guide Volume 2</i> , page 273, references the "CLEC Handbook." However, a document with this name does not exist on the BLS Web site. Additionally, section 2.2 references a section titled "Unbundled Network Element (UNE)," but no part of the document is labeled with this name.
	The <i>Local Number Portability Ordering Guide</i> , page v, references other sources of information in the "Introduction" section, however the reference is circular and references only the <i>LNP Guide</i> as a source for LNP ordering.
	The <i>Products and Services Interval Guide</i> states, "For convenience in viewing or printing this guide, go to the On-Line CLEC Customer Guides page and click on "Download Guide...". The BLS Web site address is not included in the instructions. Additionally, on page v, a note refers users to the Resale Matrix but does not specify its location.
	The <i>Pre-Order Business Rules, Version 4.0</i> "Change History" table states: "Added to COMMON HEADER FIELDS: which can be found on the following Web site: http://www.interconnection.bellsouth.com/guides/guides.html ." However, this revision was not included in the body of the document.
Contact information for reporting documentation errors or omissions	The <i>Pre-Order Business Rules and Pre-Order Business Rules Data Dictionary</i> , <i>LEO Implementation Guide Volumes 1, 2 and 3</i> , <i>Pending Service Job Aid</i> , <i>Products and Services Interval Guide</i> , <i>CLEC Service Order Tracking System Guide</i> , <i>Local Number Portability Ordering Guide</i> , <i>Facilities Activation Requirements</i> and <i>Facilities Based Advisory Guide</i> documents do not contain contact information for reporting documentation errors or omissions.
	Though <i>Local Service Request (LSR) Error Messages (TCIF7)</i> assist in error resolution, BLS ordering documentation does not provide descriptions of all error messages and potential steps for resolution.
Content consistent with intended use	The <i>Pre-Order Business Rules</i> do not identify the application of business rules to a specific BellSouth pre-order application (e.g., TAG or LENS).
Documents contain table of contents	The <i>Pending Service Order Job Aid</i> does not contain a Table of Contents.
	The <i>CLEC Service Order Tracking System (SOTS) User Guide</i> omitted all fourth level sections (e.g., 3.2.2.1) from the Table of Contents.
Documents are logically organized with clear page numbering and section labeling.	The <i>Pending Service Order Job Aid</i> does not contain page numbers.

BELLSOUTH'S RESPONSE TO EXCEPTION 80

The <i>CLEC Service Order Tracking System (SOTS) User Guide</i> contains several blank pages and the Revision Table does not indicate content changes or location of changes within the document.

Impact

Omissions and errors in BellSouth pre-order and order documentation will impact CLECs in the following way:

- **Increase in operating costs.** Omissions and errors in documentation may lead to errors in the pre-ordering and ordering processes. These errors will require CLECs to utilize additional resources to re-submit these queries and orders which will increase operating costs.

BellSouth Response

Contact information for help desk, subject matter experts or escalations

BellSouth does not have a Help Desk that supports CLEC documents. Questions and or issues should be referred to the Customer Support Manager, CSM, or the Account Team. The document owner would be contacted by the CSM or Account Team with the specific question/issue and the response would be forwarded back to the CLEC. For escalations, CLECs should use the Escalation process as documented in the Interim Change Control Process document.

The CLEC Service Order Tracking System User Guide will be updated as shown below: In the newly created "ABOUT THE SYSTEM" section to the user guide the following information will be included:

For user assistance consult this user guide and the computer based tutorial, which may be accessed via "HELP" button in the application.

For additional user assistance beyond that provided via "HELP" contact your BellSouth Account Team.

To report a suspected system or documentation problem CLECs will be directed to the Interim Change Control website.

Purpose & Scope

The Pending Order Job Aid was updated 5/31/00 to provide a purpose and scope.

The Pre-Order Business Rules document was updated 6/5/00 to provide a purpose and scope.

Reference to other relevant BellSouth

- LEO Guide Volume 2

BELLSOUTH'S RESPONSE TO EXCEPTION 80

BellSouth does make reference in the LEO-IG, Volume 2 to the LEO-IG, Volume 1 document (See the third line in the Introduction.) However, the second part of this exception is valid. The LEO-IG, Volume 3 does not reference Volume 1. This was modified in a May 2000 update of this document.

- Pre-Order Business Rules

References to other BellSouth documents was added to the Pre-Order Business Rules June 5, 2000.

- LEO Guide Volume 1

According to the LEO-IG, Volume 1, Issue 70, page 22, the web address for the Error Message Log is correct in that version of the document. BellSouth does not agree with this item in the exception.

- LEO Guide Volume 1, page 25

BellSouth agreed with this omission. It was corrected in the 4/28 update of the LEO-IG, Volume 1.

- LEO Guide Volume 2, page 273

BellSouth agrees there is mention of a CLEC Handbook which is not currently on the Interconnection website. The reference will be changed to "Operational Understanding" which does appear on the customer Guides pages.

The second part of this exception references section 2.2 in the LEO-IG Volume 3. Section 2.2 references grids in a section entitled "Unbundled Network Elements". This section will be updated to correctly reference the grids in section 2.5 entitled "the Product Ordering Guide". Both corrections were made on May 31, 2000.

- Local Number Portability Ordering Guide

BellSouth disagrees with this item in the exception. The references listed were provided with the initial creation of the document to reflect the various documents/web resources that were utilized to create it. The LNP documents referenced would be items such as LNP Flow diagrams and narratives that were used as the basis for the guide.

- Products & Services Interval Guide

The web address was added in the two locations identified in the May 31, 2000 update to this guide.

Contact information for reporting documentation errors or omissions

Documentation errors or omissions should be referred as a defect through the Interim Change Control process. All CLEC documents will be updated to include this verbiage along with the website. A date is currently being negotiated for having all documents updated.

The Error Message Log for TCIF 7 and TCIF 9 appears on the customer guides page and provides a complete list of error codes, severity type, and an error message type. This log

BELLSOUTH'S RESPONSE TO EXCEPTION 80

provides the CLEC the most complete, yet, concise of understanding the error that was made and what needs to be corrected. The steps to take in correcting a specific error is directly related to the error code and the error message type (e.g. D4030-LACT Required means that the this service request should have been presented with a listing activity type, but it did not appear.)

The CLEC Service Order Tracking System User Guide will be updated to direct CLECs to the Interim Change Control website to report documentation errors or omissions.

Content consistent with intended use

The Pre-Order Business Rules documentation was updated on 6/5/00 to identify applicability by interface, e.g. TAG, LENS.

BellSouth implemented a documentation quality control checklist 5/31/00 to address the issues identified in this exception.

Documents contain table of contents

The *Pending Service Order Job Aid* was updated 6/12/00 and does contain a Table of Contents.

Documents are logically organized with clear page numbering and section labeling

The *Pending Service Order Job Aid* was updated on 6/12/00 and does currently contain page numbers.

BELLSOUTH'S RESPONSE TO EXCEPTION 83



July 7, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Metrics Definition Documentation and Implementation Verification and Validation Review (PMR-2).

Exception:

Exclusions listed in the "Exclusions" section of the *Service Quality Measurements Georgia Performance Reports (SQM Reports)* are not correctly applied when creating raw data or calculating SQMs.

Service Quality Measurements (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 Service Quality Measurements Georgia Performance Reports (SQM Reports)*.² KPMG is evaluating the application of data exclusions listed in the SQM documentation for each metric.

KPMG identified the following discrepancies regarding BellSouth's application of data exclusions (listed in the SQM reports) in raw data generation and SQM calculation:

1. Billing – Invoice Accuracy

The *SQM Reports* states that adjustments not related to billing errors are to be excluded from the calculation of this SQM. The queries used by BellSouth for this SQM to produce the raw data from CLEC records include conditional statements that exclude late payment charges and mandated adjustments. The queries used by BellSouth for this SQM to produce the raw data from BellSouth records do not include any equivalent conditional statements. Therefore, late payment charges and mandated adjustments are not excluded, and there are no steps in the calculation instructions that would exclude such records during the calculation of the SQM.

2. Billing – Mean Time to Deliver Invoices

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 the *Service Quality Measurements Georgia Performance Reports, Version 10/22/99* as a basis to perform this test. KPMG also took into consideration changes published in the 2/24/00 version.

BELLSOUTH'S RESPONSE TO EXCEPTION 83

The *SQM Reports* states that any invoices rejected due to formatting or content errors are to be excluded from the calculation of this SQM. BellSouth does not include any steps to apply the exclusion in the calculation of the SQM or the creation of the raw data for calculating the SQM.

Impact

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. Without accurate raw data or calculation instructions CLECs will have difficulty assessing the quality of service provided by BellSouth and conducting their business functions reliably.

BellSouth Response

Billing – Invoice Accuracy

The exclusions of adjustments are made by the Legacy systems owners to the raw data before it is transmitted to the Performance Measurement Group. BellSouth attempts to exclude any non-billing adjustments from its calculation for Billing Invoice Accuracy. Since adjustment data is derived from several sources, there are multiple queries that must be performed. The queries that are used to produce the raw data for Invoice Accuracy for BellSouth Interconnection aggregate are being updated to include the same conditional statements that are used in the queries for Invoice Accuracy for CLEC Interconnection. The June 2000 billing raw data will reflect the use of the new query logic for BellSouth Interconnection type adjustments. BellSouth Performance Measurement Group will correct the SQM Document in July 2000 to include the exclusions noting that the exclusions are actually made before the data is received.

BellSouth has pending CABs programming enhancements currently due to be implemented in July 2000. After the pending procedures are implemented, the Performance Measurements group plans to develop a mechanical feed to PMAP to capture only those Billing related errors or "Root Cause Analysis Codes" that directly reflect the quality of the CLEC Invoice Accuracy. BellSouth is reviewing the new manual procedures for exclusions and will send the procedure to KPMG.

Billing – Mean Time to Deliver Invoices

These exclusions are performed prior to processing by PMAP. These errors reflect transmission problems associated with the CLEC's equipment, or a customer's request that BellSouth retransmit data.

The SQM Document will be updated in the July 2000 version to amend the Exclusion to include "invoices resent due to customer requests".

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 63



June 26, 2000

EXCEPTION REPORT

An exception has been identified as a result of the TAG Pre-Order Functional Test (PRE-1) and the TAG Documentation Evaluation (PRE-3).

Exception:

KPMG discovered numerous inconsistencies between BellSouth's *TAG API Guide, Version 2.2.0.5* and *Pre-Order Business Rules, Version 3.0* document.

BellSouth currently supports multiple versions of the TAG pre-order interface. When a new version of TAG is released, BellSouth continues to support the previous version(s) of TAG for a certain period of time to allow CLECs the opportunity to upgrade their systems¹. For new versions of TAG BellSouth publishes a *TAG API Guide*, when necessary, which provides the technical specifications for TAG interface development or update by CLECs.

To facilitate pre-order submission via the TAG interface, BellSouth provides CLECs with a *Pre-Order Business Rules* document. This document lists and defines the data elements for each pre-order query and response, including usage and formatting requirements, and in some cases, valid entries. Certain data elements outlined in the *Pre-Order Business Rules* apply only to one specific version of TAG. The *Pre-Order Business Rules* do not define, for each data element or query type, the corresponding TAG release.

As part of testing activities, KPMG performed a review of the *TAG API Guide, Version 2.2.0.5*² and the *Pre-Order Business Rules, Version 3.0*. KPMG discovered numerous inconsistencies between the data elements found in the *TAG API Guide* and those included in the *Pre-Order Business Rules*. These inconsistencies fall into two categories:

1. A data element appears in the *TAG API Guide*, but not in the *Pre-Order Business Rules*.
2. A data element appears in the *Pre-Order Business Rules* but not in the *TAG API Guide*.

The following table provides a sample of these inconsistencies:

¹ The number of versions of TAG and the time period of support for previous versions vary based on the size of the release and other factors.

² KPMG used TAG, Version 2.2.0.5 through March 8, 2000.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 63

Query or Response Type	Query or Response Description	Data Element	Data Element in TAG API Guide but not in Pre-Order Business Rules	Data Element in Pre-Order Business Rules but not TAG API Guide	BellSouth Response
AVR	Address Validation Response: Single Address Verified	TRX-PURPOSE (Re-send Indicator)		X	The field is not present in the TAG interface software and as such the field should have and will be removed from the Pre-Order Business Rules.
AVR	Address Validation Response: Single Address Verified	HOUSENUMPREFIX	X		The field is not present in the TAG interface software and as such the field should and will be removed from the API Guide.
AVR	Address Validation Response: Single Address Verified	ADDRESSPATTERN	X		The reference to the field in the API Guide is appropriate and as such should have and will be added to the Pre-Order Business Rules.
AVR	Address Validation Response: Single Address Verified	ELEVATIONPATTERN	X		The reference to the field in the API Guide is appropriate and as such should have and will be added to the Pre-Order Business Rules.
AVR	Address Validation Response: Single Address Verified	UNITPATTERN	X		The reference to the field in the API Guide is appropriate and as such should have and will be added to the Pre-Order Business Rules.
TNAR-TN	Telephone Number Assignment – General Pool TNs	QTY Requested		X	The field is not present in the TAG interface

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 63

Query or Response Type	Query or Response Description	Data Element	Data Element in TAG API Guide but not in Pre-Order Business Rules	Data Element in Pre-Order Business Rules but not TAG API Guide	BellSouth Response
					software and as such the field should have and will be removed from the Pre-Order Business Rules.
TNAR-TN	Telephone Number Assignment – General Pool TNs	QTY Provided		X	The Pre-Order Business Rules will be clarified to state that in TAG, the quantity provided is returned as a function rather than as a discreet variable.
TNAR-DID	Telephone Number Assignment – Direct In Dial TNs	QTY Requested		X	The field is not present in the TAG interface software and as such the field should have and will be removed from the Pre-Order Business Rules.
TNAR-MLH	Telephone Number Assignment – Multi Line Hunt TNs	QTY-IN-TER		X	The Pre-Order Business Rules will be clarified to state that in TAG, the quantity provided is returned as a function rather than as a discreet variable.
TNAR-MLH	Telephone Number Assignment – Multi Line Hunt TNs	QTY-OUT-TER		X	The Pre-Order Business Rules will be clarified to state that in TAG, the quantity provided is returned as a function rather than as a

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 63

Query or Response Type	Query or Response Description	Data Element	Data Element in TAG API Guide but not in Pre-Order Business Rules	Data Element in Pre-Order Business Rules but not TAG API Guide	BellSouth Response
					discreet variable.
AAR	Appointment Availability Response	LSO-NPA-TTA		X	The field is not present in the TAG interface software and as such the field should have and will be removed from the Pre-Order Business Rules.
CDD	Calculate Due Date	All Data Elements	X		This field is in Version 3.0 of Pre-Order Business Rules for OSS99 and therefore the two documents are consistent.
TNAQ_MISC	Miscellaneous TN Assignment Query	All Data Elements		X ³	This field is in Version 3.0 of Pre-Order Business Rules for OSS99 and therefore the two documents are consistent.
TNAR_MISC	Miscellaneous TN Assignment Response	All Data Elements		X ³	This field is in Version 3.0 of Pre-Order Business Rules for OSS99 and therefore the two documents are consistent.

Impact:

Inconsistencies between BellSouth's *TAG API Guide* and *Pre-Order Business Rules* will affect CLECs in the following ways:

Increased operating costs. Consistency between BellSouth's *TAG API Guide* and *Pre-Order Business Rules* is necessary for a CLEC to successfully create and employ a TAG

³ BellSouth issued a Carrier Notification (SN91081657) on February 17, 2000 to announce the *Pre-Order Business Rules, Version 3.0*. This Notification indicated that the TNAQ-MISC and TNAR-MISC query types were implemented with OSS'99 (TAG, Version 3). This fact is not reflected in the *Pre-Order Business Rules*.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 63

interface. Inconsistency will increase the resources required to submit pre-order queries and interpret responses.

Decreased customer satisfaction. Delays in pre-order activities resulting from these inconsistencies.

Additional BellSouth Response

The Pre-Order Business Rules was developed as a generic document to support LENS, TAG and RoboTAG interfaces. The API Guide is specific to TAG. The Pre-Order Business Rules will be updated by 6/5 to reference applicable interfaces, e.g. LENS, TAG and to address the issues identified in this exception.

The HOUSENUMPREFIX data element is not valid and will be removed from the API Reference Guides 2.2.0.10 (Issue 7) and 7.1.1 (Issue 9). The guides will be posted on the Interconnection website on 7/14/00. Older versions of the API reference guide will not be updated since they are scheduled to be removed from the website in the near future.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 78



June 29, 2000

EXCEPTION REPORT

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

Exception:

BellSouth does not deliver timely Firm Order Confirmation (FOC) responses to flow through local service requests (LSRs).

Background: In response to a valid Local Service Request¹ (LSR), BellSouth returns a FOC. This FOC provides notification to the CLEC that its order is confirmed and provides a committed due date for completion of service provisioning. FOCs are generated for two types of service requests:

1. Flow Through

A flow through service request proceeds through back-end order validation systems to generate a FOC without any manual intervention.

2. Non Flow Through

A non-flow through service requests is submitted electronically and drops out for manual handling by a BellSouth ordering representative at some point during the order validation process prior to FOC generation.

BellSouth commits to returning 95% of FOCs for flow through service requests within four hours and to returning 85% of FOCs for non-flow through service requests within 48 hours.²

BellSouth Performance³: In response to LSRs submitted via TAG and EDI, BellSouth failed to deliver timely flow through FOCs.

- 83% of flow through FOCs were returned via the TAG interface within the specified timeframe⁴.

¹ According to the *BellSouth-Georgia Service Quality Measurements (SQMs), Draft Version 1.4, p.14*, a service request is not considered valid until it passes system edits to ensure all required fields are populated. An "Invalid" LSR will be returned to a CLEC as a Fatal Reject.

² These timeliness standards, proposed by BellSouth, have not yet been approved by the Georgia Public Services Commission.

³ This exception includes data for LSRs submitted through April 21, 2000. All Local Number Portability (LNP) service requests are *excluded* from this data set. Information on fully versus partially mechanized FOCs for LNP orders was not provided to KPMG.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 78

- 87% of flow through FOCs were returned via the EDI interface within the specified timeframe⁵.

The following tables provide a detailed breakdown of response time for flow through FOCs⁶.

Flow Through FOC Timeliness Summary

FOCs Received via TAG				
<4 hrs	4-24 hrs	24-36	36-48 hrs	48-72 hrs
38	1	1	3	3
82.6%	2.2%	2.2%	6.5%	6.5%
FOCs Received via EDI				
<4 hrs	4-24 hrs	24-36	36-48 hrs	48-72 hrs
47	3	2	0	3
87.0%	5.6%	3.7%	0.0%	3.7%

Flow Through FOC Detail – Untimely TAG FOCs

PON	VER	CC	4-24 hrs	24-36 hrs	36-48 hrs	48-72 hrs	BellSouth Response
602A214PTJ100002	00	9991	X				TAG Listener used by CLECs to receive responses from BellSouth not activated by KPMG to receive FOC. BellSouth sent response in less than 4 hrs. BellSouth also continued to resend response until KPMG activated their TAG Listener and acknowledgement was received. Receipt 2/9/00 10:40 FOC 2/9/00 10:56 Resend 2/9/00 11:45 Resend 2/9/00 12:15 Resend 2/9/00 16:45 Resend 2/10/00 05:16 Resend 2/10/00 09:46 ACK 2/10/00 09:47

⁴ Response timeliness improved after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness of response issues. For flow through FOCs received between 2/8/00 and 4/21/00, 91% were returned within four hours via TAG.

⁵ Response timeliness improved after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness issues. For flow through FOCs received between 2/8/00 and 4/21/00, 95% were received within four hours via EDI.

⁶ KPMG used Actual Flow Through data (provided by BellSouth as part of the Flow Through Evaluation) to determine whether FOCs were flow through or non-flow through.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 78

PON	VER	CC	4-24 hrs	24-36 hrs	36-48 hrs	48-72 hrs	BellSouth Response
409A223PTM100001	05	9991		X			PON is Non Flow Through and should not be included in this exception on flow through timeliness. Receipt 12/01/99
603A224PTJ100004	00	9991			X		TAG Listener used by CLECs to receive responses from BellSouth was not activated by KPMG to receive FOC. BellSouth sent response in less than 4 hrs. BellSouth also continued to resend response until KPMG activated their TAG Listener and acknowledgement was received. Receipt 2/9/00 15:57 FOC 2/9/00 16:32 Return feed 2/9/00 16:32 Return feed 2/9/00 17:15 ACK 2/10/00 09:47
409A223PTM100002	00	9991			X		PON is Non Flow Through and should not be included in this exception on flow through timeliness. Receipt 12/20/99
382A225PTH102002	00	9991			X		Mechanized service order incorrectly generated. Correction of Defect 9457 was implemented 4/29/00.
403A223PTM000001	01	9994				X	This account was established and used for Interface Testing for BellSouth. This PON should not be included in this exception on flow through timeliness. Receipt 12/06/99
309A222PTH100001	04	9994				X	PON is Non Flow Through and should not be included in this exception on flow through timeliness. Receipt 12/14/99
407A213PTM100003	03	9991				X	PON is Non Flow Through and should not be included in this exception on flow through timeliness. Receipt 12/06/99

Flow Through FOC Detail – Untimely EDI FOCs

PON	VER	CC	4-24 hrs	24-36 hrs	36-48 hrs	48-72 hrs	BellSouth Response
301A112PEH100008	03	9994	X				Appears to be delayed by the

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 78

PON	VER	CC	4-24 hrs	24-36 hrs	36-48 hrs	48-72 hrs	BellSouth Response
							VAN. Receipt 2/18/00 11:35 FOC 2/18/00 12:17
428A124PEJ100010	00	9994	X				Appears to be delayed by the VAN. Receipt 2/28/00 09:18 FOC 2/28/00 09:56
453C126PEF100001	00	9991	X				PON is Non Flow Through and should not be included in this exception on flow through timeliness. Receipt 1/14/00
606A123PEM100002	00	9991		X			PON is Non Flow Through and should not be included in this exception on flow through timeliness. Receipt 01/18/00
409A223PEM100003	00	9991		X			PON is Non Flow Through and should not be included in this exception on flow through timeliness. Receipt 1/17/00
326C222PEI100002	00	9992				X	PON is Non Flow Through and should not be included in this exception on flow through timeliness. Receipt 1/17/00
409X223PEM100004	00	9991				X	PON is Non Flow Through and should not be included in this exception on flow through timeliness. Receipt 11/30/99

Impact

The absence of timely FOCs will impact CLECs in the following way:

Decrease in Customer Satisfaction. The receipt of a timely FOC is a critical factor in a CLEC's ability to process an end-user's service request. Delays in the return of an FOC will slow the CLEC's ordering process and delay delivery of service to the end-user. If a CLEC is unable to deliver service to an end-user in a timely fashion, customer satisfaction will decrease.

BellSouth Response

The PONs provided were processed prior to the Flow Through report changes in February.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 78

Summary of the 8 TAG orders provided.

- 2 Appears KPMG failed to activate Listener to receive FOC.
- 1 System defect which was fixed on 4/29/00.
- 5 Non flow through orders received prior to SQM 02/2000 Flow Through report changes.

Summary of 7 EDI orders provided.

- 2 Appears to be delayed by the VAN.
- 5 Non flow through orders received prior to SQM 02/2000 Flow Through report changes.

BellSouth's investigation indicates that only 1 PON of the 101 PONs included in this KPMG test exceeded the commitment interval for timely FOC responses. BellSouth timeliness results for this test should be 99%.

Additional BellSouth Response

BellSouth investigated a number of PONs sent via EDI where there appeared to be a problem in receiving timely Firm Order Confirmations. Below are the results of the investigation:

PON 301A112PEH100008

BST sent: 855 on 2/11 at 17:47 (BellSouth's translated time)
BST received: 997 on 2/11 at 19:06 (KPMG's translated time)

BST sent: 865 on 2/18 at 11:11 (BellSouth's translated time)
BST received: 997 on 2/18 at 12:20 (KPMG's translated time)

BST sent: 865 on 2/18 at 17:09 (BellSouth's translated time)
BST received: 997 on 2/18 at 18:18 (KPMG's translated time)

BST sent: 865 on 3/02
BST did not receive a 997 for this transaction

PON 428A124PEJ100010

BST sent: 855 on 2/9 at 16:31 (BellSouth's translated time)
BST received: 997 on 2/9 at 17:39 (KPMG's translated time)
BST sent: 855 on 2/28 at 10:17 (BellSouth's translate time) FG#972
(sent 4 855's to KPMG at the same time)
BST sent: 855 on 2/28 at 12:25 (BellSouth's translate time) FG#979
BST did not receive a 997 for this transaction

BST regularly contacts the trading partner within 5 business days of a late 997. The e-mail would reflect all 997s which, as of the date of the e-mail, have not been received by BellSouth. BellSouth sent KPMG on approximately 3/07/00 a request for missing 997s. BST sent an e-mail to, and left a message for, the KPMG contact, Bill Weaver.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 78

CREATE DATE	INTERCHANGE CONTROL NUM	FUNCTION GRP CONTROL NUM	TRAN DOC SET ID
02/14/2000	584	644 865	422A114PEJ101001
02/15/2000	607	672 855	403A223PEM100004
02/16/2000	626	696 865	626A224PEJ100006
02/17/2000	652	726 865	625A214PEJ100005
02/19/2000	699	788 865	208A121PEN100002
		789 855	604D224PEJ002001
02/21/2000	715	808 865	443X224PEM000002
		809 855	412A213PEM000004
02/22/2000	732	834 865	334A312PEI000001
02/22/2000	743	849 865	325C222PEI001001
02/23/2000	764	876 865	305A122PEH100010
		878 855	418A313PEM100003
02/23/2000	765	879 865	349A212PEI000004
02/24/2000	772	889 855	305A222PEH101001
02/25/2000	798	929 855	350A212PEI100003
02/26/2000	815	951 865	349A222PEI000001
02/28/2000	830	970 865	R001X12PEN100001
		972 855	428A124PEJ100010
02/28/2000	834	977 865	309A122PEH100007
		979 855	428A124PEJ100010
02/28/2000	835	981 855	428A124PEJ101009
02/29/2000	852	1009 855	384D225PEI100003
02/29/2000	854	1011 865	349A212PEI000004
		1013 855	359A212PEI100002
03/01/2000	888	1059 865	301A212PEH100008
03/02/2000	910	1088 865	301A112PEH100008
		1090 855	615A122PEF100013
03/02/2000	916	1097 865	311A212PEH101001
		1099 855	324A112PEH101003

BST received a response from KPMG on 3/15/00 concerning the 997s that were not received. Listed below are the PONs identified as not received. (PONs not listed were located by KPMG.)

The following transactions were not received by KPMG.

CREATE DATE	INTERCHANGE CONTROL NUM	FUNCTION GROUP CONTROL#	TRAN DOC SET ID
02/14/2000	584	644 865	422A114PEJ101001
02/16/2000	626	696 865	626A224PEJ100006
02/23/2000	764	876 865	305A122PEH100010
		878 855	418A313PEM100003
02/23/2000	765	879 865	349A212PEI000004
02/28/2000	834	977 865	309A122PEH100007
		979 855	428A124PEJ100010

On 3/15/00 BellSouth reconciled the documents received. FG# 979 was listed as still missing. FG#972 was not listed, and considered received.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 78

On 3/15/00 BellSouth performed a resend of 855 FG#979. BellSouth received 997s for resend of FG#979 on 3/15/00 at 16:06 (KPMG's translated time).

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 81



June 21, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Maintenance and Repair ECTA Functional Test of Resale Lines (M&R-13).

Exception:

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

Examples of inaccurate notification are described as follows:

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

The repeatReport object of a trouble report submitted via the ECTA Gateway allows a CLEC to indicate whether the circuit has had other recent troubles, or is a recent installation. The repeatReport object is used to indicate to BellSouth maintenance personnel that this ticket should receive priority handling. During the course of functional testing, KPMG intentionally submitted an incorrect non-numeric value for the repeatReport object¹ while performing a "Modify" operation. The ECTA Gateway returned a normal successful Modify operation response. The ECTA Gateway did not indicate that any erroneous information had been included in this instance.

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

The commitmentTimeRequest object of a trouble report submitted via the ECTA Gateway allows a CLEC to request a time by which BellSouth will commit to clearing a trouble situation. During the course of functional testing, KPMG intentionally submitted an invalid value for the repeatReport object² while performing a "Create" operation. The ECTA Gateway returned a normal successful Create operation response. The ECTA Gateway did not indicate that any erroneous information had been included in this instance.

¹ Valid entries for repeatReport are 0 (Unspecified), 1 (Recent Installation), 2 (Repeat), 3 (both Recent Installation and Repeat), 4 (Chronic) and 5 (both Recent Installation and Repeat).

² The valid format for the commitmentTimeRequest is YYYYMMDDHHMMSSZ (for example, May 5, 2000 at 4:30 P.M. would be 20000505163000Z). The value of "April 30, 2000 12:31:00" was submitted on this transaction.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 81

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

The perceivedTroubleSeverity object of a trouble report submitted via the ECTA Gateway allows a CLEC to indicate whether or not the reported trouble affects the customer's service. The perceivedTroubleSeverity object is used to indicate to BellSouth maintenance personnel that a ticket should receive priority handling (based upon the degree to which the customer's service is affected). During the course of functional testing, KPMG intentionally submitted an incorrect value for the perceivedTroubleSeverity object³ while performing a "Modify" operation. The ECTA Gateway returned a normal successful Modify operation response. The ECTA Gateway did not indicate that any erroneous information had been included in this instance.

Impact

Failure of the ECTA Gateway to indicate to a CLEC that invalid values have been entered into trouble tickets will impact CLECs in the following ways:

- **Increase in operating costs.** Invalid trouble report entries could result in trouble tickets being improperly handled. This will, in turn, lead to workforce management disruptions and higher operating costs resulting from the allocation of CLEC personnel to re-submit trouble tickets.
- **Decrease in customer satisfaction.** Invalid trouble report entries could also lead to a delay in addressing CLEC troubles. Service delays will result to a decrease in CLEC customer satisfaction.

BellSouth Response

This exception is similar to Exception 12 and the following information applies to both.

The issue is who should provide attribute validation. BellSouth's position is that the Manager (CLEC) is responsible for insuring that their users enter correct information into their 'front end' system and that their system correctly translate the user's input to the ANSI standard values defined in the JIA which are transmitted to ECTA.

The ECTA interface has been operational in the Interexchange Carrier (IXC) environment for over five years⁴ and there are a total of 5 production clients using this system (3 IXC and 2 CLEC). Each of these production clients has been successfully reporting their customer's troubles without incident (due to the lack of error checking).

³ Valid entries for perceivedTroubleSeverity are 0 (Out of Service), 1 (Back in Service), 2 (Service Impairment), 3 (Non-Service Affecting Problem). For this transaction, KPMG submitted a value of 9.

⁴ The AT&T(IXC)-BellSouth ECTA JIA was approved on November 30, 1994.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 81

The OSS interfaces developed by BellSouth for CLEC's usage are governed by different national organizations. The complexities and resultant standards of the pre-order/order process (guided by OBF) are significantly more rigorous than the maintenance and repair process defined by ECIC. Each ECTA client is an active member of ECIC and together work to develop and approve the standards. If these clients want the Agent (BellSouth) to provide attribute error checking, they would should pursue this requirement in the ANSI standards.

The BellSouth ECTA developers have reviewed the ANSI standards and determined that error checking by the Agent (BellSouth) is not required.

If BellSouth were required to error check each attribute:

- This requirement would cause a major rewrite of the ECTA system at a significant investment of time and money. This additional cost would be passed on to the CLEC communities who may not want or need this capability.
- The programming overhead caused by the constant error checking will slow the system response time thereby delaying the information sent back to the CLEC. This overhead could require BellSouth to purchase additional ECTA processors should the volume of reports approach forecasted levels.
- Delivering attribute validation error messages will require the existing clients to reprogram their systems to react to these error messages. This will require acceptance of this change by these clients which included commitment of time and money on their part to implement. The existing ECTA users seem to be satisfied with the existing agreed upon process and may be reluctant to make such changes.

However, BellSouth will submit a request for via the Interim Change Control to be reviewed and prioritized for potential implementation in a future release.



June 20, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Metrics Definition Documentation and Implementation Verification and Validation Review (PMR-2).

Exception:

The information in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)* is inconsistent with the computational instructions provided by BellSouth¹ for five Service Quality Measurements (SQMs).

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 reports².

As part of the BellSouth-Georgia OSS Evaluation, KPMG is reviewing BellSouth's implementation of the definitions of the SQMs, as documented in the *SQM Reports*.³ KPMG is comparing the information in *SQM Reports* to the computational instructions in the *PMAP Raw Data User Manual*, or the instructions provided by BellSouth for manual SQMs, in order to assess their consistency.⁴

1. Provisioning – Total Service Order Cycle Time

Instructions provided by BellSouth to compute this SQM prescribe converting null values to 0.33 days for the `tsoct_dur` field. This is inconsistent with the *SQM Reports*, which specifies that these intervals should be computed as the difference between two time stamps expressed as date and time. Therefore, no approximation should be needed if the SQMs are computed as described in the *SQM Reports*.

2. Provisioning – Order Completion Interval

¹ The "computational instructions provided by BellSouth" either appeared in the *PMAP Raw Data User Manual*, or were provided by BellSouth for manual SQMs.

² These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform ("PMAP") Web site.

³ KPMG used the *SQM Reports, Version 10/22/99* as a basis to perform this test. KPMG also considered changes published in *Version 2/24/00*.

⁴ KPMG used instructions from the *PMAP Raw Data User Manual – Version 2.0.4 – December 15, 1999* and information provided by BellSouth personnel.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 84

Instructions provided by BellSouth to compute this SQM prescribe converting null values to 0.33 days for the **cmpld_dur** field. This is inconsistent with the *SQM Reports*, which specifies that these intervals should be computed as the difference between two time stamps expressed as date and time. Therefore, no approximation should be needed if the SQMs are computed as described in the *SQM Reports*.

3. Collocation – *Average Arrangement Time*

The *SQM Reports, Version 10/22/99* specifies that this SQM is computed in business days. *Version 2/24/00* does not specify whether it should be computed in business days or calendar days. The computational instructions provided by BellSouth call for computing this SQM in calendar days.

4. Operator Services/Directory Assistance – *Average Speed to Answer*

SQM Reports states that “Calls abandoned by customers are not reflected in the average speed to answer [...]”. The instructions provided by BellSouth to compute this SQM indicate that the time that abandoned calls stay in the queue is included in the numerator.

5. Billing – *Mean Time to Deliver Usage*

The computational instructions provided by BellSouth prescribe that usage records falling within the “30+” category of delivery duration be given a weight of 31.5. However, 31.5 does not necessarily represent an estimation of delivery duration for records that take significantly more than 30 days to deliver. Depending upon the actual delivery time of these records, this procedure could underestimate the SQM.

Impact

Inaccuracies and inconsistencies in SQM information and computation instructions may call into question the validity of the BellSouth’s reported SQM values. CLECs rely on BellSouth’s performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. If BellSouth’s reported SQM values are not correct, CLECs might not be able to conduct these functions reliably.

BellSouth Response

Provisioning – Total Service Order Cycle Time

The July update to the SQM will include an addition of the following: Business Rules: **“Orders that are worked on zero due dates are calculated with a .33 day interval (8 hours) in order to report a portion of a day interval.” The Calculation will be corrected to read: “ Σ (Completion Date of Service Order) (SOCS HIST –CD DATE) - (Date of Service Request Receipt) / (Count of Orders Completed in Reporting Period)”**

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 84

Provisioning – Order Completion Interval

The July update to the SQM will include an addition of the following:

Business Rules: “Orders that are worked on zero due dates are calculated with a .33 day interval (8 hours) in order to report a portion of a day interval.”

The calculation for Average Completion Interval will be corrected to:

“ Σ (Completion Date) – (Order Issue Date) / Σ (Count of Orders Completed in Reporting Period)”

Collocation – Average Arrangement Time

At one time BellSouth's standard collocation contract specified provisioning intervals in business days. The standard contract was later changed to days (i.e., calendar days). Because there was a mixture of customer contracts (some with business days, others with calendar days), an average was not appropriate, so BellSouth defaulted SQM reporting to calendar days. The reference to business days was deleted from the 2/24/00 SQM version based on the contract change. BellSouth will revise the Definition for the Average Arrangement Time measurement to clarify that the provisioning interval is measured in calendar days with the July, 2000 SQM update.

Operator Services/Directory Assistance – Average Speed to Answer

The Average Speed to Answer does consider the amount of time a call waits in queue, so BellSouth concurs that the referenced statement should be deleted from the SQM. The SQM has been revised, effective May 2000, and now shows “None” under Exclusions for the Average Speed to Answer measurement.

The second sentence of the Business Rules for Average Speed to Answer will be revised in the July 2000 SQM update to read as follows: “The length of each call is determined by measuring, using a scanning technique, and accumulating the elapsed time from the entry of a customer call into the BellSouth call management system queue until the customer call is abandoned or transferred to BellSouth personnel assigned to handle calls for assistance.”

Billing – Mean Time to Deliver Usage

BellSouth compiled a seven-month study to determine the number of invoices in the 30+ Category. As the attached results indicate, 0.22% fell into the 30+ Category. The 0.22% does not justify the expense involved to track and measure this portion of the component.

BellSouth has added a note to the SQM Documentation indicating to the CLECs that any invoice that falls in the 30+ Category will be given a weight of 31.5 days in the results calculations. This note has been posted to the Web.

MEAN TIME TO DELIVER USAGE RECORDS - ALL CLECs:

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 84

<u>MONTH</u>	<u>TOT.</u> <u>RECORDS</u>	<u>30+ RECORDS</u>	<u>% 30+ RECORDS</u>
Apr-00	23,393,595	25,360	0.1084%
Mar-00	25,880,349	19,165	0.0741%
Feb-00	21,554,135	22,270	0.1033%
Jan-00	19,598,574	32,478	0.1657%
Dec-99	19,221,788	72,724	0.3783%
Nov-99	18,323,210	106,678	0.5822%
Oct-99	18,357,512	46,172	0.2515%
TOTALS:	<u>146,329,163</u>	<u>324,847</u>	<u>0.2220%</u>

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86



July 7, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Metrics Calculation and Reporting Verification and Validation Review (PMR-5).

Exception:

KPMG cannot replicate six of BellSouth's reported Service Quality Measurements (SQMs).

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 reports¹.

As part of the BellSouth-Georgia OSS Evaluation, KPMG is attempting to replicate these reports (i.e., achieve exactly the same results as reported by BellSouth). To complete validation of the calculations, KPMG has relied on BellSouth's published *PMAP Raw Data User Manual*, where applicable, and the corresponding raw data,² along with technical assistance from BellSouth when necessary.

KPMG has been unable to replicate the following SQMs³:

1. ***Percent Provisioning Troubles within 30 days of Service Order Activity in the provisioning non-trunks category for the CLEC Aggregate and BellSouth Retail, and the provisioning trunks category for the CLEC Aggregate (October 1999).*** KPMG could not replicate the BellSouth retail customer or the CLEC customer SQMs for any of the product groupings.
2. ***Order Completion Interval in the provisioning category for the CLEC Aggregate and BellSouth Retail (October 1999).*** Using BellSouth's instructions, KPMG was

¹ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) web site.

² The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding raw data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site.

³ BellSouth provided KPMG with the raw data and technical instruction necessary to validate the calculations, since the information was not available via the PMAP site.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

unable to replicate any of the reports (POTS, UNE-Design, Non-UNE Design) for the "Dispatch" and "Non-Dispatch" categories.

Category	KPMG Calculations	BellSouth Report
POTS BellSouth Retail; Residence; < 10 Circuits; Dispatch; 3 Days	5.57%	5.47%
POTS BellSouth Retail; Residence; < 10 Circuits; Dispatch; > 5 Days	73.77%	74.23%
POTS BellSouth Retail; Residence; < 10 Circuits; Dispatch; Average Interval (Days)	10.01	10.42
POTS BellSouth Retail; Residence; ≥ 10 Circuits; Dispatch; 3 Days	9.76%	9.64%
POTS BellSouth Retail; Residence; ≥ 10 Circuits; Dispatch; 4 Days	6.10%	7.23%
POTS BellSouth Retail; Residence; ≥ 10 Circuits; Dispatch; > 5 Days	69.51%	68.67%
POTS BellSouth Retail; Residence; ≥ 10 Circuits; Dispatch; Average Interval (Days)	9.66	9.59

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
POTS BellSouth Retail; Business; < 10 Circuits; Dispatch; > 5 Days	68.32%	68.45%
POTS BellSouth Retail; Business; < 10 Circuits; Dispatch; Average Interval (Days)	11.51	11.75
POTS BellSouth Retail; Business; ≥ 10 Circuits; Dispatch; > 5 Days	71.85%	71.96%
POTS BellSouth Retail; Business; ≥ 10 Circuits; Dispatch; Average Interval (Days)	15.42	15.94
POTS CLEC Aggregate; Residence; < 10 Circuits; Dispatch; Average Interval (Days)	8.12	8.13
POTS CLEC Aggregate; Business; < 10 Circuits; Dispatch; > 5 Days	54.08%	54.24%
POTS CLEC Aggregate; Business; < 10 Circuits; Dispatch; Average Interval (Days)	8.44	8.51
POTS BellSouth Retail; Residence;	58.96%	60.08%

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
< 10 Circuits; Non-Dispatch; Same Day		
POTS BellSouth Retail; Residence; < 10 Circuits; Non-Dispatch; 1 Day	31.45	30.55%
POTS BellSouth Retail; Residence; < 10 Circuits; Non-Dispatch; 3 Days	3.77%	3.67%
POTS BellSouth Retail; Residence; < 10 Circuits; Non-Dispatch; Average Interval (Days)	0.89	0.88
POTS BellSouth Retail; Business; < 10 Circuits; Non-Dispatch; Same Day	62.68%	65.73%
POTS BellSouth Retail; Business; < 10 Circuits; Non-Dispatch; 1 Day	16.04%	14.73%
POTS BellSouth Retail; Business; < 10 Circuits; Non-Dispatch; 2 Days	3.80%	3.49%
POTS BellSouth Retail; Business; < 10 Circuits; Non-Dispatch; 3 Days	5.38%	4.93%

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
POTS BellSouth Retail; Business; < 10 Circuits; Non-Dispatch; 4 Days	2.42%	2.22%
POTS BellSouth Retail; Business; < 10 Circuits; Non-Dispatch; 5 Days	1.76%	1.61%
POTS BellSouth Retail; Business; < 10 Circuits; Non-Dispatch; > 5 Days	7.94%	7.29%
POTS BellSouth Retail; Business; < 10 Circuits; Non-Dispatch; Average Interval (Days)	1.75	1.63
POTS CLEC Aggregate; Business; < 10 Circuits; Non-Dispatch; Average Interval (Days)	2.281	2.280
Non-UNE Design BellSouth Retail; Design; < 10 Circuits; Dispatch; Average Interval (Days)	26.16	26.17
Non-UNE Design BellSouth Retail; Design; < 10 Circuits; Non-Dispatch; 0-5 Days	11.36%	11.23%
Non-UNE Design BellSouth Retail; Design;	33.80%	33.42%

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
< 10 Circuits; Non-Dispatch; 5-10 Days		
Non-UNE Design BellSouth Retail; Design; < 10 Circuits; Non-Dispatch; 10-15 Days	20.50%	20.27%
Non-UNE Design BellSouth Retail; Design; < 10 Circuits; Non-Dispatch; >= 30 Days	20.50%	21.37%
Non-UNE Design BellSouth Retail; Design; < 10 Circuits; Non-Dispatch; Average Interval (Days)	18.45	18.81
UNE-Design CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 0-5 Days	21.91%	21.02%
UNE-Design CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 5-10 Days	18.78%	18.24%
UNE-Design CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 10-15 Days	14.50%	13.91%
UNE-Design CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 15-20 Days	26.19%	24.73%

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
UNE-Design CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 20-25 Days	6.43%	7.42%
UNE-Design CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 25-30 Days	3.46%	4.02%
UNE-Design CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; >= 30 Days	8.73%	10.66%
UNE-Design CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; Average Interval (Days)	14.79	15.72
UNE-Design CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; 0-5 Days	66.17%	66.11%
UNE-Design CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; 5-10 Days	9.29%	9.27%
UNE-Design CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; 10-15 Days	8.06%	8.10%
UNE-Design CLEC Aggregate; UNE Non-Design;	14.33%	14.30%

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
Non-Dispatch; < 10 Circuits; Total Missed Appointments		
CLEC Aggregate; Business; Non-Dispatch; < 10 Circuits; End User Missed Appointments	2.88%	3.01%
CLEC Aggregate; Design; Non-Dispatch; < 10 Circuits; Total Missed Appointments	55.17%	58.62%
CLEC Aggregate; UNE Non-Design; Dispatch; < 10 Circuits; Total Missed Appointments	34.45%	34.73%
CLEC Aggregate; UNE Non-Design; Non-Dispatch; < 10 Circuits; Total Missed Appointments	5.65%	5.77%
CLEC Aggregate; UNE Non-Design; Non-Dispatch; < 10 Circuits; End User Missed Appointments	3.97%	4.09%

4. *Total Service Order Cycle Time in the Provisioning category for the CLEC Aggregate and BellSouth Retail (November 1999).* KPMG was unable to replicate the Fully Mechanized, Partially Mechanized, and Non-Mechanized reports, using BellSouth instructions.

Category	KPMG Calculations	BellSouth's Report
Fully Mechanized BellSouth Retail; Residence; < 10 Circuits Dispatch; 0-5 Days	22.98%	26.38%
Fully Mechanized BellSouth Retail; Residence;	38.10%	40.75%

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
< 10 Circuits Dispatch; 5-10 Days		
Fully Mechanized BellSouth Retail; Residence; < 10 Circuits Dispatch; 10-15 Days	21.65%	20.69%
Fully Mechanized BellSouth Retail; Residence; < 10 Circuits Dispatch; 15-20 Days	7.91%	6.11%
Fully Mechanized BellSouth Retail; Residence; < 10 Circuits Dispatch; 20-25 Days	3.60%	2.32%
Fully Mechanized BellSouth Retail; Residence; < 10 Circuits Dispatch; 25-30 Days	2.27%	1.44%
Fully Mechanized BellSouth Retail; Fully Mechanized Residence; < 10 Circuits Dispatch; > 30 Days	3.48%	2.31%
Fully Mechanized BellSouth Retail; Residence; < 10 Circuits Dispatch; Average Interval (Days)	9.98	8.80
Fully Mechanized BellSouth Retail; Residence; ≥ 10 Circuits Dispatch;	19.40%	21.05%

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
0-5 Days		
Fully Mechanized BellSouth Retail; Residence; >= 10 Circuits Dispatch; 5-10 Days	35.82%	36.84%
Fully Mechanized BellSouth Retail; Residence; >= 10 Circuits Dispatch; 10-15 Days	23.88%	22.81%
Fully Mechanized BellSouth Retail; Residence; >= 10 Circuits Dispatch; 15-20 Days	10.45%	7.02%
Fully Mechanized BellSouth Retail; Residence; >= 10 Circuits Dispatch; 20-25 Days	2.99%	3.51%
Fully Mechanized BellSouth Retail; Fully Mechanized Residence; >= 10 Circuits Dispatch; 25-30 Days	1.49%	1.75%
Fully Mechanized BellSouth Retail; Residence; >= 10 Circuits Dispatch; > 30 Days	5.97%	7.02%
Fully Mechanized BellSouth Retail; Residence; >= 10 Circuits Dispatch; Average Interval (Days)	10.91	10.84
Fully Mechanized	27.49%	27.63%

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
BellSouth Retail; Business; < 10 Circuits Dispatch; 0-5 Days		
Fully Mechanized BellSouth Retail; Business; < 10 Circuits Dispatch; 5-10 Days	34.76%	34.88%
Fully Mechanized BellSouth Retail; Business; < 10 Circuits Dispatch; > 30 Days	6.28%	6.05%
Fully Mechanized BellSouth Retail; Business; < 10 Circuits Dispatch; Average Interval (Days)	11.29	11.07
Fully Mechanized BellSouth Retail; Business; ≥ 10 Circuits Dispatch; 0-5 Days	13.49%	13.81%
Fully Mechanized BellSouth Retail; Business; ≥ 10 Circuits Dispatch; 15-20 Days	12.09%	11.90%
Fully Mechanized BellSouth Retail; Business; ≥ 10 Circuits Dispatch; 20-25 Days	6.51%	6.67%
Fully Mechanized BellSouth Retail; Business; ≥ 10 Circuits	21.86%	21.43%

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
Dispatch; > 30 Days		
Fully Mechanized BellSouth Retail; Business; ≥ 10 Circuits Dispatch; Average Interval (Days)	20.78	20.23
Fully Mechanized BellSouth Retail; Design; < 10 Circuits Dispatch; 5-10 Days	16.02%	16.18%
Fully Mechanized BellSouth Retail; Design; < 10 Circuits Dispatch; 10-15 Days	18.94%	19.13%
Fully Mechanized BellSouth Retail; Design; < 10 Circuits Dispatch; 25-30 Days	8.28%	8.18%
Fully Mechanized BellSouth Retail; Design; < 10 Circuits Dispatch; > 30 Days	23.93%	23.62%
Fully Mechanized BellSouth Retail; Design; < 10 Circuits Dispatch; Average Interval (Days)	25.42	25.12
Fully Mechanized BellSouth Retail; Design; ≥ 10 Circuits Dispatch; 0-5 Days	5.48%	6.82%
Fully Mechanized	20.55%	27.27%

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
BellSouth Retail; Design; ≥ 10 Circuits Dispatch; 5-10 Days		
Fully Mechanized BellSouth Retail; Design; ≥ 10 Circuits Dispatch; 10-15 Days	13.70%	18.18%
Fully Mechanized BellSouth Retail; Design; ≥ 10 Circuits Dispatch; 15-20 Days	19.18%	6.82%
Fully Mechanized BellSouth Retail; Design; ≥ 10 Circuits Dispatch; 20-25 Days	12.33%	20.45%
Fully Mechanized BellSouth Retail; Design; ≥ 10 Circuits Dispatch; 25-30 Days	1.37%	No Value ⁵
Fully Mechanized BellSouth Retail; Design; ≥ 10 Circuits Dispatch; > 30 Days	27.40%	20.45%
Fully Mechanized BellSouth Retail; Design; ≥ 10 Circuits Dispatch; Average Interval (Days)	34.19	27.30
Fully Mechanized CLEC Aggregate;	7.086	7.091

⁵ BellSouth did not report a value for this particular disaggregation level.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
Residence; < 10 Circuits Dispatch; Average Interval (Days)		
Fully Mechanized BellSouth Retail; Residence; < 10 Circuits Non-Dispatch; 0-5 Days	96.80%	98.46%
Fully Mechanized BellSouth Retail; Residence; < 10 Circuits Non-Dispatch; 5-10 Days	2.05%	1.22%
Fully Mechanized BellSouth Retail; Residence; < 10 Circuits Non-Dispatch; 10-15 Days	0.65%	0.24%
Fully Mechanized BellSouth Retail; Residence; < 10 Circuits Non-Dispatch; 15-20 Days	0.24%	0.05%
Fully Mechanized BellSouth Retail; Residence; < 10 Circuits Non-Dispatch; 20-25 Days	0.12%	0.01%
Fully Mechanized BellSouth Retail; Residence; < 10 Circuits Non-Dispatch; Average Interval (Days)	1.18	0.97
Fully Mechanized BellSouth Retail; Residence;	No Value ⁴	0.33

⁴ KPMG did not calculate a value for this particular disaggregation level.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
>= 10 Circuits Non-Dispatch; Average Interval (Days)		
Fully Mechanized BellSouth Retail; Business; < 10 Circuits Non-Dispatch; Average Interval (Days)	1.82	1.82
Fully Mechanized BellSouth Retail; Business; >= 10 Circuits Non-Dispatch; Average Interval (Days)	No Value ⁴	4.27
Fully Mechanized BellSouth Retail; Design; >= 10 Circuits Non-Dispatch; Average Interval (Days)	No Value ⁴	48.00
Fully Mechanized CLEC Aggregate; Residence; < 10 Circuits Non-Dispatch; 0-5 Days	83.95%	84.41%
Fully Mechanized CLEC Aggregate; Residence; < 10 Circuits Non-Dispatch; 10-15 Days	3.58%	3.15%
Fully Mechanized CLEC Aggregate; Residence; < 10 Circuits Non-Dispatch; Average Interval (Days)	2.18	2.13
Fully Mechanized CLEC Aggregate; UNE Design; < 10 Circuits	25.00%	50.00%

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
Non-Dispatch; 5-10 Days		
Fully Mechanized CLEC Aggregate; UNE Design; < 10 Circuits Non-Dispatch; 10-15 Days	75.00%	50.00%
Fully Mechanized CLEC Aggregate; UNE Design; < 10 Circuits Non-Dispatch; Average Interval (Days)	10.50	9.00
Fully Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits Non-Dispatch; 0-5 Days	45.00%	42.11%
Fully Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits Non-Dispatch; 5-10 Days	55.00%	57.89%
Fully Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits Non-Dispatch; Average Interval (Days)	4.62	4.75
Partially Mechanized CLEC Aggregate; Residence; < 10 Circuits; Non-Dispatch; 0-5 Days	66.34%	67.71%
Partially Mechanized CLEC Aggregate; Residence; < 10 Circuits; Non-Dispatch; 5-10 Days	24.75%	25.00%
Partially Mechanized	4.95%	3.13%

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
CLEC Aggregate; Residence; < 10 Circuits; Non-Dispatch; 10-15 Days		
Partially Mechanized CLEC Aggregate; Residence; < 10 Circuits; Non-Dispatch; 15-20 Days	2.97% ..	3.13%
Partially Mechanized CLEC Aggregate; Residence; < 10 Circuits; Non-Dispatch; Average Interval (Days)	4.50	4.34
Partially Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; 0-5 Days	70.97%	73.33%
Partially Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; 5-10 Days	19.35%	16.67%
Partially Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; 10-15 Days	9.68%	10.00%
Partially Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; Average Interval (Days)	4.71	4.70
Non-Mechanized CLEC Aggregate; Residence; < 10 Circuits;	52.13%	51.90%

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
Dispatch; 5-10 Days		
Non-Mechanized CLEC Aggregate; Residence; < 10 Circuits; Dispatch; Average Interval (Days)	9.62	9.63
Non-Mechanized CLEC Aggregate; Business; < 10 Circuits; Dispatch; 5-10 Days	40.80%	41.36%
Non-Mechanized CLEC Aggregate; Business; < 10 Circuits; Dispatch; 10-15 Days	20.11%	20.37%
Non-Mechanized CLEC Aggregate; Business; < 10 Circuits; Dispatch; 15-20 Days	10.34%	11.11%
Non-Mechanized CLEC Aggregate; Business; < 10 Circuits; Dispatch; 20-25 Days	3.45%	3.09%
Non-Mechanized CLEC Aggregate; Business; < 10 Circuits; Dispatch; 25-30 Days	3.45%	3.09%
Non-Mechanized CLEC Aggregate; Business; < 10 Circuits; Dispatch; > 30 Days	5.75%	4.94%
Non-Mechanized	11.36	10.95

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
CLEC Aggregate; Business; < 10 Circuits; Dispatch; Average Interval (Days)		
Non-Mechanized CLEC Aggregate; Business; ≥ 10 Circuits; Dispatch; Average Interval (Days)	55.00	35.00
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 0-5 Days	0.33%	No Value ⁵
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 5-10 Days	13.75%	11.60%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 10-15 Days	31.42%	27.62%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 15-20 Days	27.00%	33.98%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 25-30 Days	4.42%	5.25%
Non-Mechanized CLEC Aggregate;	9.49%	8.01%

⁵ BellSouth did not report a value for this particular disaggregation level.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
UNE Non-Design; < 10 Circuits; Dispatch; > 30 Days		
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; Average Interval (Days)	17.99	18.25
Non-Mechanized CLEC Aggregate; UNE Non-Design; ≥ 10 Circuits; Dispatch; 10-15 Days	62.50%	50.00%
Non-Mechanized CLEC Aggregate; UNE Non-Design; ≥ 10 Circuits; Dispatch; 15-20 Days	12.50%	16.67%
Non-Mechanized CLEC Aggregate; UNE Non-Design; ≥ 10 Circuits; Dispatch; 20-25 Days	12.50%	16.67%
Non-Mechanized CLEC Aggregate; UNE Non-Design; ≥ 10 Circuits; Dispatch; > 30 Days	12.50%	16.67%
Non-Mechanized CLEC Aggregate; UNE Non-Design; ≥ 10 Circuits; Dispatch; Average Interval (Days)	18.75	20.33
Non-Mechanized CLEC Aggregate; Residence; < 10 Circuits; Non-Dispatch;	86.94%	87.05%

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
0-5 Days		
Non-Mechanized CLEC Aggregate; Residence; < 10 Circuits; Non-Dispatch; Average Interval (Days)	2.68	2.67
Non-Mechanized CLEC Aggregate; Business; < 10 Circuits; Non-Dispatch; 0-5 Days	67.96%	68.86%
Non-Mechanized CLEC Aggregate; Business; < 10 Circuits; Non-Dispatch; 5-10 Days	25.41%	24.25%
Non-Mechanized CLEC Aggregate; Business; < 10 Circuits; Non-Dispatch; 15-20 Days	0.99%	1.11%
Non-Mechanized CLEC Aggregate; Business; < 10 Circuits; Non-Dispatch; Average Interval (Days)	4.01	3.95
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; 0-5 Days	14.09%	8.75%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; 5-10 Days	25.09%	18.93%
Non-Mechanized CLEC Aggregate:	28.18%	32.68%

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
UNE Non-Design; < 10 Circuits; Non-Dispatch; 10-15 Days		
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; 15-20 Days	19.90%	24.29%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; 20-25 Days	7.91%	9.46%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; 25-30 Days	2.22%	2.68%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; > 30 Days	2.60%	3.21%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; Average Interval (Days)	12.34	13.91
Non-Mechanized CLEC Aggregate; UNE Non-Design; ≥ 10 Circuits; Non-Dispatch; 10-15 Days	40.00%	50.00%
Non-Mechanized CLEC Aggregate; UNE Non-Design; ≥ 10 Circuits; Non-Dispatch;	40.00%	50.00%

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
15-20 Days		
Non-Mechanized CLEC Aggregate; UNE Non-Design; ≥ 10 Circuits; Non-Dispatch; 20-25 Days	20.00%	No Value ⁵
Non-Mechanized CLEC Aggregate; UNE Non-Design; ≥ 10 Circuits; Non-Dispatch; Average Interval (Days)	15.60	13.50

5. *Average Completion Notice Interval in the Provisioning category for BellSouth Retail (November 1999).* KPMG was unable to replicate the values for the Design product for the Dispatch category, using BellSouth instructions.

Category	KPMG Calculations	BellSouth's Report
BellSouth Retail; Design; < 10 Circuits; Dispatch; 0-1 Hour	26.79%	26.55%
BellSouth Retail; Design; < 10 Circuits; Dispatch; 4-8 Hours	2.88%	2.77%
BellSouth Retail; Design; < 10 Circuits; Dispatch; 12-24 Hours	13.35%	13.53%
BellSouth Retail; Design; < 10 Circuits; Dispatch; Average Completion Notice Interval (Hours)	156.72	152.25
BellSouth Retail; Design;	50.00%	42.50%

⁵ BellSouth did not report a value for this particular disaggregation level.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Category	KPMG Calculations	BellSouth's Report
>= 10 Circuits; Dispatch; 0-1 Hour		
BellSouth Retail; Design; >= 10 Circuits; Dispatch; 2-4 Hours	4.41%	5.00%
BellSouth Retail; Design; >= 10 Circuits; Dispatch; 4-8 Hours	17.65%	17.50%
BellSouth Retail; Design; >= 10 Circuits; Dispatch; 8-12 Hours	7.35%	10.00%
BellSouth Retail; Design; >= 10 Circuits; Dispatch; 12-24 Hours	2.94%	2.50%
BellSouth Retail; Design; >= 10 Circuits; Dispatch; > 24 Hours	17.65%	22.50%
BellSouth Retail; Design; >= 10 Circuits; Dispatch; Average Completion Notice Interval (Hours)	77.12	93.73

6. **Customer Trouble Report Rate in the Maintenance and Repair category for the CLEC Aggregate and BellSouth Retail (October 1999).** KPMG was unable to replicate the values for the UNE Non-Design product for the CLEC Aggregate, and the Residence and Business products for BellSouth Retail, using BellSouth instructions. KPMG noted that there were no records for these products after all of the exclusions were performed on the Lines in Service raw data file, causing the denominator in the *Trouble Report Rate* calculation to be zero.

Category	KPMG Calculations	BellSouth's Report

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

BellSouth Retail; Residence; Dispatch; Trouble Report Rate	No Value ⁶	1.90%
BellSouth Retail; Residence; Non-Dispatch; Trouble Report Rate	No Value ⁶	2.02%
BellSouth Retail; Residence; Total; Trouble Report Rate	No Value ⁶	3.92%
BellSouth Retail; Business; Dispatch; Trouble Report Rate	No Value ⁶	0.97%
BellSouth Retail; Business; Non-Dispatch; Trouble Report Rate	No Value ⁶	0.76%
BellSouth Retail; Business; Total; Trouble Report Rate	No Value ⁶	1.73%
CLEC Aggregate; UNE Non-Design; Dispatch; Trouble Report Rate	No Value ⁶	2.22%
CLEC Aggregate; UNE Non-Design; Non-Dispatch; Trouble Report Rate	No Value ⁶	1.10%
CLEC Aggregate; UNE Non-Design; Total; Trouble Report Rate	No Value ⁶	3.32%

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. KPMG's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the six applicable SQMs may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

⁶ Calculation required dividing by zero, therefore an error value resulted.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

BellSouth Response

Percent Provisioning Troubles within 30 days of Service Order Activity in the provisioning non-trunks category for the CLEC Aggregate and BellSouth Retail, and the provisioning trunks category for the CLEC Aggregate (October 1999).

This is the same issue as Exception 23.4 for November and December. The raw data for Provisioning Troubles in 30 days for months prior to March 2000 will not add back to the reports because of an error in the program, which assigned troubles called in by a CLEC customer that had changed providers during the month. The program assigned the trouble to the lowest numbered cust-id. This resulted in a small number of mismatched troubles. At the aggregate level the small error was not evident. KPMG without the help of the appropriate BellSouth SMEs would have difficulty replicating the reports for those months. Replicating the report would require the identification of those troubles in the report but not in the raw data and appropriately assigning these troubles to the correct CLEC. The code for Percent Provisioning within 30 days has been repaired and future months (March 2000 forward) will not have this problem. Re-running the previous reports with the new code would involve extensive programming and is extremely labor intensive, therefore, BellSouth asks that reports for March 2000 forward be used for validation.

Order Completion Interval in the provisioning category for the CLEC Aggregate and BellSouth Retail (October 1999).

BellSouth agrees that using the current raw data users manual KPMG was unable to replicate for the CLEC Aggregate and BellSouth Retail data for October for POTS, UNE-Design, and Non-UNE Design for the "Dispatch" and Non-Dispatch categories. Currently, the instructions to create the Order Completion Interval report using the exclusion "so_cmtt_cd = 'L'" will not yield results identical to the SQM reports. The SQM report performs additional exclusions, permitting supplementary "L" orders into the final report. Specifically, "L" orders with commitment dates from prior months are not being excluded. The raw data users manual instructions are correct. BellSouth provided additional instructions in a raw data query that should enable KPMG to duplicate the data referenced in this exception.

BellSouth has issued a system change request # 5330 that addresses the issue of exclusion of "so_cmtt_cd = 'L'" and is scheduled to be effective for March data. This change will enable the monthly reports to match results created using the Raw Data Users Manual. The "L" exclusion differences will no longer be an issue once the May reports are run with the fixed code.

Two categories, BellSouth was unable to replicate were:

1. BellSouth, Residence, < 10 circuits, Non-Dispatch (missing 11,712 in raw data)
2. BellSouth, Business, < 10 circuits, Non-Dispatch (missing 2,678 in raw data)

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

The reason 13,390 orders are not able to be replicated from Raw Data is because these records do not have an original commitment date. These orders are considered listing records. Since no provisioning work is required, an order is entered and marked complete at the same time, without a commitment date. Raw Data only selects orders where a valid commitment date exists. PMAP currently allows orders without a commitment to be passed through the system. A change request, # 5894, was opened in Issue Tracker on 5/25/00 to eliminate these records from the reports. Change request # 5894 is tentatively scheduled for completion by 7/15/00.

Missed Installation Appointments in the Provisioning category for the CLEC Aggregate and BellSouth Retail (October 1999).

The following changes will be made to the July 2000 Raw Data User Manual instructions for the calculation of Percent Missed Installation Appointments:

- 1.) The last line in Step 8 should read:
Include records where the **cmpltn_dt** >= **issu_dt**
(The code reflects this statement because an order can be issued and completed on the same day)
- 2.) The following instruction should be added to steps 5 and 9:
If the **num_items_worked_on** field is null or blank then replace it with a '1'
Filter on **num_items_worked_on** to include only the desired number of circuits (<10, >=10)

With the above changes to the instructions for PMI in the Raw Data Users Manual, the BellSouth retail customer and the CLEC customer sections of the PMI October 1999 report can be replicated. BellSouth Change Requests 5909, 5910, 5911 are addressing the above corrections.

The selection criterion is shown below.

The following steps were taken to replicate the denominator of the measure, or the Service Orders Met (steps 1 –6 from the user manual):

```
SELECT COUNT (DISTINCT SO_NBR)      --count of distinct service orders meeting
criteria (step 4&6)

FROM NODS_V_PR_OCI_TMP              --select from OCI table (step 1)

WHERE PROD_ID > 0                    --exclude prod_ids < 0 (step 2)
AND CMPLTN_DT IS NOT NULL            --exclude blank completion dates (step 2)
AND CMPLTN_DT - ISSU_DT >= 0         --exclude cmpltn_dt - issu_dt < 0 (step 2)
AND SO_TYPE_CD IN ('N','T','C','P')  --include so_type_cd in N,T,C,P (step 3)
AND STATUS IN ('CP','PC')           --include completed status (step 3)
AND HDLG_CD IN ('K','L','M','N','O', --include specified hdlg_cd (step 3)
                'P','DIS','NDS', 'CO','FAC','NTF','NPC','STN')
AND MISC_ACCT_CD IN ('A','B','C','D','H', --include specified misc_acct-cds (step 3)
```


BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

'M','N','P','R','S','U','V','W','X','Y','Z','0','1','2','3','4','5','6','7','8','9')
AND CMPLTN_DT >= '01-OCT-1999' --filter on the cmpltn_dt with in the reporting
month (step 3)
AND CMPLTN_DT < '01-NOV-1999'
AND SO_CMTT_TYPE_CD = 1 --filter on so_cmtt_type_cd of original
cmtt (step 3)
AND CUST_ID = 0 --fiter on customer (step 5)
AND STATE_ID = 'GA' --filter on state (step 5)
AND NVL(NUM_ITEMS_WORKED_ON,1) < 10 --assign '1' to null field of
num_items_worked on and filter
AND PROD_ID IN (1,7) --filter on particular prod_id (step 5)
AND HDLG_ID = 1 --fiter on hdlg_desc (step 5)

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

The following step were taken to replicate the numerator of the measure, or the Service Orders Missed (steps 7 –13 of the raw user manual):

```
SELECT COUNT(*)                                --count the number of records (step 11)

FROM NODS_V_PR_PMI_TMP A, NODS_V_PR_OCI_TMP B --join two files on common
fields (step 7)

WHERE B.CMPLTN_DT >= B.ISSU_DT                  --cmpltn_dt >= issu_dt (step
8)
AND B.SO_TYPE_CD IN ('N','T','C','P')           --filter on so_type_cd (step 8)
AND A.SO_MISSED_CMTT_CD IN ('CA','CB',
'CE','CD','CF','CI','CK','CL','CM','CO','CS','SP',
'SA','SL','SO','SO','SR','CX','CY','EB','EM','EO','NL') --filter on so_misshed_cmtt_cd (step 8)
AND B.HDLG_CD IN ('K','L','M','N','O','P',
'DIS','NDS','CO','FAC','NTF','NPC','STN')      --filter on hdlg_cd (step 8)
AND B.MISC_ACCT_CD IN ('A','B','C','D','H','M','N',
'P','R','S','U','V','W','X','Y','Z','0','1','2','3',
'4','5','6','7','8','9')
AND B.CMPLTN_DT >= '01-OCT-1999'               --filter on valid cmpltn_dt (step
8)
AND B.CMPLTN_DT < '01-NOV-1999'
AND B.SO_CMTT_TYPE_CD = 1                      --filter on so_cmtt_type_cd (step 8)
AND B.PROD_ID IN (4,6,9,10)                   --filter on prod_id (step 9)
AND B.CUST_ID > 0                             --filter on cust_id (step 9)
AND B.STATE_ID = 'GA'                         --filter on state (step 9)
AND NVL(B.NUM_ITEMS_WORKED_ON,1) < 10         --filter on
num_items_worked_on
AND B.HDLG_ID = 0                             --filter on hdlg_id (step 9)
AND B.SO_NBR IS NOT NULL                      --exclude records where so_nbr is null (step 7)
AND B.ISSU_DT IS NOT NULL                     --exclude records where issu_dt is null (step 7)
AND A.SO_NBR = B.SO_NBR                      --join the two files on so_nbr (step 7)
AND A.ISSU_DT = B.ISSU_DT                    --join the two files on issu_dt (step 7)
AND B.CMPLTN_DT > A.CMTT_DATE                 --cmpltn_dt must follow cmtt_dt (step 8)
```

Total Service Order Cycle Time in the Provisioning category for the CLEC Aggregate and BellSouth Retail (November 1999).

Under investigation

Average Completion Notice Interval in the Provisioning category for BellSouth Retail (November 1999).

The most current version of the Raw Data User Guide is missing a step needed to correctly recreate the report. An additional step will be added to the Raw Data Users Manual in the July 2000 update to the as shown below:

- Update the field num_items_worked_on to '1' where the field is null

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

The num_items_worked_on field is used to separate the Average Completion Notice Interval into the categories of < 10 Circuits and <= 10 Circuits on the report.

Using the new instructions provided above, the November 1999 report could be recreated using the November 1999 raw data. KPMG reported on 6/5/00 that they could replicate the *Average Completion Notice Interval* in the Provisioning category for BellSouth Retail (November 1999).

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 86

Customer Trouble Report Rate in the Maintenance and Repair category for the CLEC Aggregate and BellSouth Retail (October 1999).

In response to KPMG, the BellSouth Business and Residence reports for October 1999 cannot be replicated from the current October 1999 raw data table. The reason being that the data for BellSouth lines in service from NODS_LINE_CNT is not captured by the current procedure used to create the line count raw data.

The BellSouth lines are not captured in the raw data because the raw data procedure joins fields in NODS_LINE_CNT such as class_svc_cd and gen_class_svc_cd to the foreign key fields in the description tables. The fields are null for BellSouth lines in NODS_LINE_CNT and therefore are not captured by the procedure. These fields are null in NODS_LINE_CNT because the fields are not provided in the source table, STAG_MSA_COUNTS.

This issue was uncovered in December 1999. A change request was submitted (#5172) to the issue tracker on 12/2/1999 and was closed in June 2000. This change will be effective for May reports available in June.

KPMG was not able to replicate the CLEC aggregate reports for UNE Non-Design because the instructions provided in the raw data user manual are incorrect. The instruction for replicating this metric will be updated in the July 2000 Raw Data Users Manual. In step 6 the instructions should read as follows:

Exclude records where ckt_stat = 'IP'

The instructions are incorrect because the ckt_stat can be null or blank. Using the new instructions the report can be replicated correctly.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 89



July 6, 2000

EXCEPTION REPORT

An exception has been identified as a result of the activities associated with the Metrics Data Integrity Verification and Validation Test (PMR-4).

Exception:

Raw data¹ used in the calculation of BellSouth Service Quality Measurement (SQM) reports are not accurately derived from or supported by their component early-stage data².

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.³

As part of the BellSouth-Georgia OSS Evaluation, KPMG is validating the integrity of the raw data used in the calculation of SQM values reported by BellSouth. KPMG conducts this validation by reviewing: (a) the accuracy of the data (by comparing a sample of raw data values with their early-stage counterparts); and (b) the completeness of the data (by analyzing whether a consecutive block of early-stage data is entirely accounted for in the raw data).

In the cases where a raw data field used to calculate the SQMs is a derived field, KPMG uses BellSouth's instructions to validate that the derived field was correctly calculated from the data components.

For the SQMs below, KPMG discovered discrepancies with the accuracy of BellSouth's raw data.

1. Collocation (October 1999) - *Average Response Time, Average Arrangement Time, and Percent Due Dates Missed*

Each entry in the following table details an individual record for which the early-stage data values and raw data values did not match for the particular field.

¹ Raw Data refers to the data used to calculate and validate the SQMs reported on the PMAP Web site.

² Early-stage data refers to the data that is extracted from BellSouth's various source systems. Early-stage data is processed into the raw data. Depending upon the SQM, the raw data are used either to generate the SQM report directly, or to validate calculations of the SQM values performed by other systems.

³ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) Web site.

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Field Name	Early-Stage Data Value	Raw Data Value
AUG/EXCLUDE	A	Not marked
FIRM ORDER RECEIVED	10/19/99	10/20/99
FIRM ORDER RECEIVED	7/26/99	7/27/99
FIRM ORDER RECEIVED	7/13/99	7/12/99
BONAFIDE APPLICATION RECEIPT	9/29/99	10/4/99
SPACE AVAILABLE TO CLEC	10/2/99	10/15/99

2. Trunking (September 1999) – *Trunk Group Service Report (Percentage of Trunks Blocked Over a One-Month Period)*

The BellSouth-reported derived raw data values for OBSVD_BLK (percentage of trunks blocked over a one-month period) did not agree with the values calculated by KPMG using the instructions BellSouth provided. BellSouth's derived raw data values and KPMG's calculated values were based on the same early-stage data.

The table below lists the BellSouth-reported derived raw data values and the KPMG-calculated values for this SQM.

TGSN	BellSouth-Reported Derived Raw Data Values	KPMG-Calculated Values
AC158303	11.36%	7.83%
AC151325	9.55%	23.31%
AC189333	20.04%	21.49%
AC198084	6.11%	7.21%
AC199608	0.00%	1.25%
AC202703	0.53%	0.65%
AC203042	0.00%	0.01%
AC203657	3.94%	3.95%
AC204674	0.01%	0.04%
AC204913	0.00%	0.08%
AC205420	0.02%	0.06%
AC206974	2.23%	2.30%
AC208035	0.00%	0.02%
AC208787	0.01%	0.06%
AC213664	0.18%	0.24%
AC205717	0.19%	0.33%
AC212373	40.21%	46.21%

3. Pre-Ordering (January 26 to 30, 2000)⁴ – *OSS Response Interval for CLECs*

⁴ These discrepancies were found for the HALCRIS system on the LENS server.

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Each entry in the following table details an individual record for which the early-stage data values and raw data values did not match for the particular field.

Field Name	Early-Stage Data Value	Raw Data Value
Total number of accesses (NUM_TOTAL)	17,621	17,608
Total number of accesses (NUM_TOTAL)	22,448	22,446
Total number of accesses (NUM_TOTAL)	46,060	46,059
Total number of accesses (NUM_TOTAL)	27,196	27,178
Total number of accesses (NUM_TOTAL)	4,831	4,830
Total access time in milliseconds (MS_TOTAL)	123,489,827	123,425,722
Total access time in milliseconds (MS_TOTAL)	172,354,311	172,345,481
Total access time in milliseconds (MS_TOTAL)	470,806,049	470,800,540
Total access time in milliseconds (MS_TOTAL)	304,602,647	304,112,319
Total access time in milliseconds (MS_TOTAL)	49,453,702	49,348,092
Total number of accesses that took more than 6 seconds (HIGH_TOTAL)	7,077	7,072
Total number of accesses that took more than 6 seconds (HIGH_TOTAL)	12,001	11,993
Total number of accesses that took more than 6 seconds (HIGH_TOTAL)	1,654	1,653

4. Ordering (October 1999) – *Speed of Answer in Ordering Centers*⁵ for BellSouth Retail Business Service Centers

Each entry in the following table details an individual record for which the early-stage data values and raw data values did not match for the particular field.

Field Name	Testing Date	Early-Stage Data Value	Raw Data Value
Number of calls handled	10/18/99	1,918	1,916
Number of calls handled	10/28/99	1,586	1,589

5. Ordering (October 1999) – *Percent Rejected Service Requests, Reject Interval*

A sample record⁶ from BellSouth's raw data file was categorized as a partially mechanized order, whereas the LEO source legacy system identified the data as a mechanized order⁷.

⁵ KPMG compared raw data records with the earlier-stage data for the population of raw data records provided by BellSouth.

⁶ A record is identified by a Operating Company Number (OCN), Purchase Order Number (PON), and Version Number (VER) combination. All these fields are proprietary information.

⁷ Please note that KPMG cannot provide any more details due to the proprietary nature of the record identifier information.

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Further, the BellSouth-reported derived raw data value for REJECT_DURATION for a sample record did not agree with the value calculated by KPMG (using BellSouth's instructions.)

The following table details an individual record for which the early-stage data value and raw data value did not match for the particular field.

Field Name	Early-Stage Value	Raw Data Value
Reject Duration	43.8 hours	44 hours

6. Ordering (October 1999) – *Firm Order Confirmation Timeliness* for Trunks

KPMG received history information for a sample of raw data records from BellSouth's EXACT legacy system, both in database format and log screens. The information in the two source formats was not consistent.

In the log screens reviewed, KPMG found 14 ASRs (Access Service Requests) in a sample of 36 ASRs where the same ASR was associated with different ACNAs (Access Customer Name Abbreviations), PONs (Purchase Order Numbers), and VERs (Version Numbers)⁷.

7. Provisioning (October 1999) – *Coordinated Customer Conversions*

Two records in the raw data sample had the same ORDER number, but different DUE DATE COMPLETE values. KPMG was able to validate one of the DUE DATE COMPLETE dates against the early-stage WFA logs, but not the other.

The following table details the two records in the raw data sample with the same ORDER number, but different DUE DATE COMPLETE values.

DDCOMP	CUT START	CUT COMPLETE	Validated?
10/22/99	1332	1357	Yes
10/25/99	1332	1357	No

8. Provisioning (October 1999) – *Percent Provisioning Troubles within 30 Days of Service Order Activity*

The early-stage data from BellSouth's ICAIS/BARNEY system did not agree with the raw data values for "trouble date" field for six non-trunk service orders.

Each entry in the following table details an individual record for which the early-stage data values and raw data values did not match for the particular field.

Field Name	Early-Stage Value	Raw Data Value
Trouble Date	10/22/99	10/25/99
Trouble Date	10/7/99	10/5/99

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Trouble Date	10/26/99	10/25/99
Trouble Date	10/11/99	10/5/99
Trouble Date	10/14/99	10/17/99
Trouble Date	10/7/99	10/1/99

9. Provisioning (October 1999) – *Held Order Interval for Trunks, Order Completion Interval and Distribution.*

The early-stage date from BellSouth's ICAIS/BARNEY system did not agree with the raw data values for the: (a) "so_missed_cmtt_cd" field (used to derive the appointment reason dimension) for five trunk service orders in the raw data file "Held Order Interval for Trunks"; and (b) "status" field for 17 service orders in the raw data files "Held Order Interval for Trunks & Non-Trunks, and Order Completion Interval and Distribution".

Each entry in the following table details an individual record for which the early-stage data values and raw data values did not match for the particular field.

Field Name	Early-Stage Value	Raw Data Value
So missed cmtt cd	SR	NL
So missed cmtt cd	CS	NL
So missed cmtt cd	CD	NL
So missed cmtt cd	CD	NL
So missed cmtt cd	SP	NL
Status	CA	PD
Status	CA	PD
Status	PC	MA
Status	PC	AO
Status	CA	MA
Status	CA	AO
Status	CA	MA
Status	CP	MA
Status	CP	MA
Status	PD	CP
Status	PD	CP
Status	PD	CP
Status	PD	CP
Status	PD	CP
Status	PC	CP
Status	PC	CP
Status	PC	CP

10. Billing (October 1999) – *Invoice Accuracy* for the CLEC aggregate

The early-stage data showed that the records of type "16x," which should have been excluded from the calculation of *Total Billed Revenues* (per documentation provided by BellSouth), were not excluded.

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11. Billing (January 2000) – *Mean Time to Deliver Invoices for CLECs (CABS)*

The raw data value for the MAILED DATE field for one billing account in the 1/25/00 billing period (from a sample consisting of 3 ACNAs and 3 OCNS, where each ACNA and OCN is associated with more than one billing account number) did not match the corresponding early-stage data from the CSR Verification Reports⁸.

KPMG calculated a value of the “number of calendar days” using BellSouth’s provided instructions and the MAILED DATE early-stage data value from CSR Verification Reports. KPMG’s calculated value did not match BellSouth’s reported value.

Field Name	KPMG-Calculated Value	BellSouth-Reported Value
Number of Calendar Days	3 days	6 days

Impact

CLECs rely on BellSouth’s performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. If the data from which SQMs are calculated is not reliable, the accuracy of BellSouth-reported SQM values may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

BellSouth Response

1. Collocation (October 1999) - *Average Response Time, Average Arrangement Time, and Percent Due Dates Missed*

Field Name	Early-Stage Data Value	Raw Data Value	Reference No.	Correct Value
AUG/EXCLUDE	A	Not marked	ATLNGAEP-ATX-01	A
FIRM ORDER RECEIVED	10/19/99	10/20/99	LLBNGAMA-NVE-02	10/19/99
FIRM ORDER RECEIVED	7/26/99	7/27/99	SMYRGAMAPF-01-HGA	7/26/99
FIRM ORDER RECEIVED	7/13/99	7/12/99	ATLNGAEP-ATX-01	7/13/99
BONAFIDE APPLICATION RECEIPT	9/29/99	10/4/99	SVNHGAWB-BWI-01	9/29/99
SPACE AVAILABLE TO CLEC	10/2/99	10/15/99	SMYRGAMAPF-01-HGA	10/4/99

Collocation is a manual process for BellSouth. The discrepancies associated with the above application/order requests were due to either (1) typographical errors, or (2) documentation errors. The typographical errors were primarily caused by data being

⁸ Please note that KPMG cannot provide any more details due to the proprietary nature of the record identifier information.

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tracked on Excel spreadsheets with no built-in edit process. BellSouth is testing a web-based order interface that will also serve as a collection point for tracking dates. Tentative implementation is scheduled for late 2000. BellSouth has also modified the application distribution sheet to reflect "Bona Fide" date rather than "Certified" date to avoid confusion on manual database entry.

2. Trunking (September 1999) – *Trunk Group Service Report (Percentage of Trunks Blocked Over a One-Month Period)*

BellSouth uses in their calculation of the monthly trunk blocking percentage, the time consistent busy hour (TCBH) for each trunk group. The TCBH is the hour with the highest usage for the month. KPMG used in their calculation, the maximum blocking hour for each trunk group, which is the hour with the highest blocking percentage for the month. This difference in the formula explains several of the differences in the blocking percentage derived by BellSouth and KPMG. In most cases, the TCBH and the maximum blocking hour will be the same. However, due to variations in calling and usage patterns, such as call duration, the TCBH may be different from the maximum blocking hour. The following table shows the hour used by BellSouth and the hour used by KPMG in their calculations, with explanations of each difference.

TGSN	BellSouth-Reported Derived Raw Data Values and the TCBH used in the calculation	KPMG-Calculated Values and the maximum blocking hour used in the calculation	Reason for Discrepancy
AC158303	11.36% (hour 21)	7.83% (hour 21)	The TCBH and the maximum blocking hour are the same for this group. The reason for the discrepancy is the KPMG calculation was based on a 19-day study period and the BellSouth calculation was based on a 10-day study period. We have no explanation as to why the BellSouth calculation did not include the entire study period.
AC151325	9.55% (hour 20)	23.31% (hour 21)	Different hour used.
AC189333	20.04% (hour 21)	21.49% (hour 21)	BellSouth continues to obtain the BellSouth derived percentage using the same hour as KPMG. We ask that KPMG check their calculation.
AC198084	6.11% (hour 10)	7.21% (hour 10)	The TCBH and the maximum blocking hour are the same for this group. The reason for the discrepancy is the KPMG calculation was based on a 12-day study period and the BellSouth calculation was based on a 17-day study period. The entire study period data was apparently not delivered to KPMG.
AC199608	0.00% (hour 10)	1.25% (hour 15)	Different hour used.
AC202703	0.53% (hour 10)	0.65% (hour 11)	Different hour used.
AC203042	0.00% (hour 16)	0.01% (hour 17)	Different hour used.
AC203657	3.94%	3.95%	BellSouth is not confident in the data generated for this trunk group and

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			therefore does not feel either calculation is accurate.
AC204674	0.01% (hour 15)	0.04% (hour 11)	Different hour used.
AC204913	0.00% (hour 15)	0.08% (hour 9)	Different hour used.
AC205420	0.02% (hour 14)	0.06% (hour 15)	Different hour used.
AC206974	2.23% (hour 15)	2.30% (hour 16)	Different hour used.
AC208035	0.00% (hour 21)	0.02% (hour 1)	Different hour used.
AC208787	0.01% (hour 10)	0.06% (hour 8)	Different hour used.
AC213664	0.18% (hour 16)	0.24% (hour 15)	Different hour used.
AC205717	0.19% (hour 13)	0.33% (hour 12)	Different hour used.
AC212373	40.21% (hour 11)	46.21% (hour 10)	Different hour used.

3. Pre-Ordering (January 26 to 30, 2000)⁹ – *OSS Response Interval* for CLECs

The differences in the “early-stage” data and the “raw” data are due to questionable entries in the data file. Each entry in the “early stage” data that was not counted in the “raw” data contains a “Processing site dequeue time” that is listed as a negative number that is less than 10,000,000 milliseconds. Since the program that generates the “raw” data expects spaces to lie between each field, and since this massive number leaves no space between itself and the preceding field, these rows are rejected. Also, these rows occasionally also have “Total contract time” fields (fields used to calculate ‘MS_TOTAL’) that are less than 10,000,000 milliseconds, making these entries very questionable.

4. Ordering (October 1999) – *Speed of Answer in Ordering Centers*¹⁰ for BellSouth Retail Business Service Centers

The early stage data value in question for these dates, 2 calls missed in ALM and 3 calls missed in FL, were the result of human error. The calculation of adding alternate option calls manually to the switch data is currently being reviewed. Although October 1999 was the first full month BellSouth began the alternate option process and the number of calls missed is very low, BellSouth strives to have perfect data on the reports. As BellSouth converts GEO by GEO to a new switch, there is a method to retrieve alternate option calls separately from the NCO (Calls Offered) data. BellSouth plans to eliminate the manual process and keep alternate option data separately. This process change will enhance quality control by reducing the need for manual additions.

5. Ordering (October 1999) – *Percent Rejected Service Requests, Reject Interval*

There are two parts to the response to Draft Exception 107.5:

1) Record 1: cc = ‘7574’ and pon = ‘26017’ ver = 0

The LEO source system data identifies the LSR as Mechanized (LSR.manual_code = ‘MECH’) because the LSR was electronically submitted through LENS (LSR.system_init_id = ‘WEB’). A manual code indicating Mechanized does not preclude an LSR from being a Partially Mechanized LSR. Partially Mechanized LSRs

⁹ These discrepancies were found for the HALCRIS system on the LENS server.

¹⁰ KPMG compared raw data records with the earlier-stage data for the population of raw data records provided by BellSouth.

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are any electronically submitted LSR requiring manual handling. An LSR presence in LON is evidence of manual handling; thus, any LSR with a PON that can be found in both systems, LEO and LON, is reclassified as a Partially mechanized LSR.

2) Record 2: cc = '7727' and pon = 'DLT99BRS15076N' ver = 1

The reject duration for Partially Mechanized LSRs that are Manually Claimed Rejects is the interval between the timestamp when the AUDIT.notes contain the string 'Claimed By' and the time when an LSR is created in LEO. For this LSR the interval would indeed be 43.8 as reported in the Early Stage value (PMAP raw data) for each instance of this LSR.

6. Ordering (October 1999) – *Firm Order Confirmation Timeliness* for Trunks

KPMG found duplicate PONs because the number sequence for an ASR can be duplicated in each of five sites. The sites are:

CAT – NC / SC

GAT – GA

NFT – North FL

SFT – South FL

IOA – AL, TN, KY, LA, MS

The ASR number is composed of ten digits and includes critical information that identifies when the request was submitted. The Format for an ASR is:

*Year

*Julian Calendar Date

*Sequential Number of the ASR (in the order received by EXACT. The first ASR of the day in each site will begin with 00001)

Example: ASR # 0012500018

00 = Year

125 = Julian Calendar Date

00018 = ASR number 18

BellSouth took the ASRs supplied by KPMG and selected the records from EXACT in the October Barney snapshot. A number of records with the same ASR number were included when the query was run but only one matched the record in question from raw data. These records are available for review by KPMG upon request.

7. Provisioning (October 1999) – *Coordinated Customer Conversions*

The order in question, CO11M357, was completed in error by the technician on 10/22/1999. It was then completed correctly on 10/25/1999. (WFA-C log notes available upon request.)

The data to create the Coordinated Customer Conversion report for 10/22/1999 was pulled on 10/25/1999 prior to the correction done in WFA-C by the technician on

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10/25/1999. Data for this report is routinely collected beginning at 7:00am ET. Since the order was completed in WFA-C again on 10/25/1999, it was selected for processing for the 10/25/1999 Coordinated Customer Conversion report.

8. Provisioning (October 1999) – *Percent Provisioning Troubles within 30 Days of Service Order Activity*

BellSouth agrees that the early-stage data from BellSouth's ICAIS/BARNEY system did not agree with the raw data values for "trouble date" field for six non-trunk service orders for October 1999 *Percent Provisioning Troubles within 30 Days of Service Order Activity*.

In October, the stored procedure which creates the Troubles With 30 Days raw data table had an error in it that incorrectly derived the trbl_date from the date that the order was completed, rather than when the trouble ticket was closed. This error was caused by a rewrite in the program when trying to fix a space problem and was corrected in an additional rewrite for November data. As this report had additional changes that affected October data, it is still necessary to start with the March 2000 report to recreate this measure. BellSouth will provide KPMG with March 2000 data for *Percent Provisioning Troubles within 30 Days of Service Order Activity* for KPMG to revalidate early stage data and raw data.

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9. Provisioning (October 1999) – *Held Order Interval for Trunks, Order Completion Interval and Distribution.*

KPMG could not replicate the BellSouth October 1999 report for Held Order Interval for Trunks. Specifically KPMG could not get BellSouth's ICAIS/BARNEY data to agree with raw data values for the following fields.

- 1.) The 'so_missed_cmtt_cd' field did not match for the following five service orders from ICAIS/BARNEY to raw data: ('NO1MTCP0', 'NO85N2Y9', 'NOB4GHY7', 'NO83B1R1', 'NO3WTR51')
- 2.) The 'status' field for the following 17 service orders did not match from ICAIS/BARNEY to raw data: ('CO6MGHF9', 'COC7JLV3', 'NO3X2QG6', 'NO6G2K01', 'NO8MDNW9', 'NODJ7T32', 'NOF8K257', 'NP2X9380', 'CO6923J6', 'NO1MTCP0', 'NO3WTR51', 'NO83B1R1', 'NO85N2Y9', 'NOB4GHY7', 'CO6T77R5', 'COBL5BP2', 'COCJQ7B2')

During the data transformation from ICAIS/BARNEY to raw data all null values from the field missed_appt_code are assigned a value of 'NL' in the 'so_missed_cmtt_cd' field. The service orders 'NO1MTCP0', 'NO85N2Y9', 'NOB4GHY7', 'NO83B1R1', and 'NO3WTR51' have an 'NL' value in raw data indicating that the associated field in ICAIS/BARNEY is null or has no value. Therefore, when a comparison between ICAIS/Barney and raw data is conducted, there will be a discrepancy for the 'so_missed_cmtt_cd' field. In ICAIS/Barney the field will be blank, and in raw data the field is populated with a value of 'NL' as dictated by the program code.

BellSouth was unable to replicate the discrepancies identified by KPMG for the 'status' field for the 17 service orders listed above. Queries were run in the ICAIS/BARNEY and raw data databases. The results from these queries show that the 'status' field matches for 14 distinct service orders. There were three service orders that were exceptions. These service orders fell out of raw data because they possess a cmplt_n_dt (completion date) that is prior to the end of the reporting period (10/31/1999). These three service orders are addressed at the end of this response.

Under each heading below is the SQL query that was run by BellSouth to select records from ICAIS/BARNEY and raw data tables respectively. Below each query is a table containing the results generated when the queries were run. The query results show that the status fields are the same in ICAIS/BARNEY and raw data.

ICAIS/BARNEY

Order_number	issue_date	Telephone_number	status
CO6923J6	7/14/99	404 S04-0440	MA
CO6MGHF9	9/24/99	404 N13-8002	PD
COC7JLV3	6/22/99	404 M27-7120	PD
NO1MTCP0	9/9/99	404 M27-4088	PD
NO3WTR51	9/7/99	404 M27-2714	PD

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NO3X2QG6	7/28/99 770 971-6959	MA
NO6G2K01	10/14/99 404 M15-2653	AO
NO83B1R1	9/8/99 404 M27-6760	PD
NO85N2Y9	9/10/99 404 M27-6041	PD
NO8MDNW9	9/27/99 770 M36-5906	MA
NOB4GHY7	9/8/99 404 M27-1361	PD
NODJ7T32	11/7/98 770 M33-2392	AO
NOF8K257	10/6/99 770 M15-8252	MA
NP2X9380	9/16/99 912 245-9013	MA

Raw Data

- select so_nbr, issu_dt, tel_num, status from NODS_V_PR_HLD_ORD_TMP where so_nbr in ('CO6MGHF9', 'COC7JLV3', 'NO3X2QG6', 'NO6G2K01', 'NO8MDNW9', 'NODJ7T32', 'NOF8K257', 'NP2X9380', 'CO6923J6', 'NO1MTCP0', 'NO3WTR51', 'NO83B1R1', 'NO85N2Y9', 'NOB4GHY7') order by so_nbr, issu_dt, tel_num, status

SO_NBR	ISSU_DT	TEL_NUM	STATUS
CO6923J6	7/14/99	404S040440	MA
CO6923J6	7/14/99	404S040440	MA
CO6MGHF9	9/24/99	404N138002	PD
CO6MGHF9	9/24/99	404N138002	PD
COC7JLV3	6/22/99	404M277120	PD
COC7JLV3	6/22/99	404M277120	PD
COC7JLV3	6/22/99	404M277120	PD
NO1MTCP0	9/9/99	404M274088	PD
NO3WTR51	9/7/99	404M272714	PD
NO3X2QG6	7/28/99	7709716959	MA
NO3X2QG6	7/28/99	7709716959	MA
NO6G2K01	10/14/99	404M152653	AO
NO6G2K01	10/14/99	404M152653	AO
NO83B1R1	9/8/99	404M276760	PD
NO85N2Y9	9/10/99	404M276041	PD
NO8MDNW9	9/27/99	770M365906	MA
NO8MDNW9	9/27/99	770M365906	MA
NO8MDNW9	9/27/99	770M365906	MA
NO8MDNW9	9/27/99	770M365906	MA
NOB4GHY7	9/8/99	404M271361	PD
NODJ7T32	11/7/98	770M332392	AO
NODJ7T32	11/7/98	770M332392	AO
NOF8K257	10/6/99	770M158252	MA
NOF8K257	10/6/99	770M158252	MA
NOF8K257	10/6/99	770M158252	MA
NP2X9380	9/16/99	9122459013	MA
NP2X9380	9/16/99	9122459013	MA
NP2X9380	9/16/99	9122459013	MA

Service Orders with so_nbr's of CO6T77R5, COBL5BP2, COCJQ7B2 are the exceptions not included in the previous tables. These records can not be found in the raw data table because service orders are only considered held if they are not complete by the end of the

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 89

reporting period. These three records were completed before the end of the reporting period (10/31/1999). Therefore, the 'CMPLTN_DT' field is populated with a date before 10/31/1999 causing the records to fall out of raw data. However, when these so_nbr's are found in the PMAP database the 'status' fields match as demonstrated by the queries and data shown below.

ICAIS/BARNEY

- select order_number, issue_date, telephone_number, status from socs_1099 where order_number in ('CO6T77R5', 'COBL5BP2', 'COCJQ7B2') order by order_number, issue_date

Order_number	issue_date	telephone_number	status	Cmpltn_dt
CO6T77R5	10/4/99	404 S19-0030	CP	10/08/1999
COBL5BP2	10/18/99	404 S10-0215	CP	10/29/1999
COCJQ7B2	9/28/99	404 S25-0020	CP	10/28/1999

PMAP Database

- select so_nbr, issu_dt, tel_num, status from NODS_so where so_nbr in ('CO6T77R5', 'COBL5BP2', 'COCJQ7B2') order by so_nbr, issu_dt, tel_num, status

SO_NBR	ISSU_DT	TEL_NUM	STATUS	CMPLTN_DT
CO6T77R5	10/4/99	404S190030	CP	10/08/1999
COBL5BP2	10/18/99	404S100215	CP	10/29/1999
COCJQ7B2	9/28/99	404S250020	CP	10/28/1999

10. Billing (October 1999) – *Invoice Accuracy* for the CLEC aggregate

BellSouth Billing discovered that a tax record (with record type 16x) was being reported as part of billed revenue. This was reported to the Financial Database Group (FDB) programmers. The mechanized program that pulls the billed revenue has been fixed and beginning with the March 2000 reports, record type 16x is no longer included as part of the Total Billed Revenue for CRIS CLECs.

11. Billing (January 2000) – *Mean Time to Deliver Invoices* for CLECs (CABS)

The Billing Raw Data 'early stage value' for the referenced account reflected two bill media types for the billing account number in the 25th bill period. The TAPE media reflected a value of 3 calendar days (date of 1/28/00) and PAPER media reflected a value of 6 calendar days (date of 1/31/00). Both of these dates were reported correctly on the "CLEC CABS Bill Verification Report" and "CLEC CABS Billing Invoice Delivery Report-Paper" and the monthly raw data file provided to PMAP for including in the Billing SQM.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 90



July 6, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Performance Measurement testing associated with the validation of Service Quality Measurement (SQM) calculations.

Exception:

KPMG cannot replicate three of BellSouth's reported Service Quality Measurements (SQMs) in the March 2000 performance measurement reports.

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 reports¹.

As part of the BellSouth-Georgia OSS Evaluation, KPMG is attempting to replicate these reports (i.e., achieve exactly the same results as reported by BellSouth). To complete validation of the calculations, KPMG has relied on BellSouth's published *PMAP Raw Data User Manual*, where applicable, and the corresponding raw data,² along with technical assistance from BellSouth.

KPMG has been unable to replicate the following SQM values for the KPMG CLEC for the month of March:

1. **Ordering - Firm Order Confirmation Timeliness.** KPMG was unable to replicate the BellSouth reported values for the Residence product level for the Fully Mechanized and the Total Mechanized reports.

Category	KPMG Calculations	BellSouth's Report
Total Mechanized; OCN 9992; Residence: LSR Count 0-15	0	1
Total Mechanized; OCN 9992; Residence: 0-15 Min	0.00%	5.26%
Total Mechanized; OCN 9992; Residence: LSR Count 15-30	15	14
Total Mechanized; OCN 9992; Residence: 15-30 Min	78.95%	73.68%
Fully Mechanized; OCN 9992;	0	1

¹ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) web site.

² The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding raw data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site.

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Residence: LSR Count 0-15		
Fully Mechanized: OCN 9992; Residence: 0-15 Min	0.00%	5.26%
Fully Mechanized: OCN 9992; Residence: LSR Count 15-30	15	14
Fully Mechanized: OCN 9992; Residence: 15-30 Min	78.95%	73.68%

2. **Provisioning - Order Completion Interval.** For the UNE Dispatch report, KPMG was unable to replicate the UNE Non-Design product level, using BellSouth's instructions.

Category	KPMG Calculations	BellSouth's Report
UNE Non-Design; OCN 9994; < 10 Circuits; Dispatch; Total Orders 5-10 Days	1	2
UNE Non-Design; OCN 9994; < 10 Circuits; Dispatch; 5-10 Days	33.33%	40.00%
UNE Non-Design; OCN 9994; < 10 Circuits; Dispatch; Average Interval (Days)	12.0	11.4
UNE Non-Design; OCN 9994; ≥ 10 Circuits; Dispatch; Total Orders 5-10 Days	0	1
UNE Non-Design; OCN 9994; ≥ 10 Circuits; Dispatch; 5-10 Days	0.00%	33.33%
UNE Non-Design; OCN 9994; ≥ 10 Circuits; Dispatch; 15-20 Days	100.00%	66.67%
UNE Non-Design; OCN 9994; ≥ 10 Circuits; Dispatch; Average Interval (Days)	19.00	15.67

3. **Provisioning - Coordinated Customer Conversions.** KPMG was unable to replicate the following BellSouth reported values.

Category	KPMG Calculations	BellSouth's Report
Without Number Portability; Count ≤ 5	29	40
Without Number Portability; % ≤ 5	85.29%	88.89%
Without Number Portability; 5 > % ≤ 15	14.71%	11.11%
Without Number Portability; Total Count	34	45
Without Number Portability; Total Minutes	158	161
Without Number Portability; Average Interval (Minutes)	4.65	3.58

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 90

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. KPMG's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the three applicable SQMs may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

BellSouth Response

1. Ordering - Firm Order Confirmation Timeliness

In its review of the exception, BellSouth found that the problem in replication was in the interval "buckets". The difference between KPMG's numbers and PMAP's numbers can be attributed to the LSRs FOC'd (confirmed) in the 15th minute. KPMG was putting those LSRs in the 15-30 minute "bucket" while PMAP was including them in the 0-15 minute "bucket".

As a result of the KPMG Draft Exception 47, Change Request 5848 was opened to clarify the bucket definitions. The change will be effective for May data, published on June 15. The SQM dated May 2000 includes the clarified "bucket" definitions.

2. Provisioning - Order Completion Interval

BellSouth agrees that using the current raw data users manual KPMG is unable to replicate for the test CLEC the following data: for March 2000, the UNE Non-Design product for OCN 9994.

Currently, the instructions to create a report using the exclusion "so_cmtt_cd = 'L'" will not yield results identical to the SQM reports. The SQM report performs additional exclusions, permitting supplementary "L" orders into the final report. Specifically, "L" orders with commitment dates from prior months are not being excluded. BellSouth has issued a system change request # 5330 that addresses the issue of exclusion of "so_cmtt_cd = 'L'" and is scheduled to be effective for March data. This change, **which will cause supplementary L orders to be excluded from the report**, will enable the monthly reports to match results created using the Raw Data Users Manual.

BellSouth will provide KPMG with the rerun March OCI report and KPMG will attempt to revalidate the report.

3. Provisioning - Coordinated Customer Conversions.

The file sent to KPMG for replication was the original raw data file from WFA-C and did not contain some additional data (Cut Start Minutes) that had to be obtained from CCSS. This accounts for one record included in the BellSouth report which was not included in

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the KPMG replication. Also, there was a miscalculation in the summation of the number of items by the KPMG replication process (items for 5 orders were not counted).

A copy of the file that BellSouth used to generate the report has been provided to KPMG. KPMG was informed of the miscalculation problem and the orders that were not included in the calculation.

KPMG will attempt to generate the report again using the new file provided and ensure that all items are included in the calculation. KPMG reported on 6/12/00 that they were able to replicate the Provisioning - *Coordinated Customer Conversions* metric for the BellSouth reported values.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 92



July 6, 2000

EXCEPTION REPORT

An exception has been identified as a result of the activities associated with the Metrics Data Integrity Verification and Validation Test (PMR-4).

Exception:

BellSouth's raw data¹ used in the calculation of the BellSouth Service Quality Measurement (SQM) reports are not accurately derived from or supported by their component early-stage data².

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.³

As part of the BellSouth-Georgia OSS Evaluation, KPMG is validating the integrity of the raw data used in the calculation of SQM values reported by BellSouth. KPMG conducts this validation by reviewing: (a) the accuracy of the raw data (by comparing a sample of raw data values with their early-stage counterparts); and (b) the completeness of the raw data (by analyzing whether a consecutive block of early-stage data is entirely accounted for in the raw data).

For the SQMs below, KPMG discovered discrepancies with the completeness of the raw data.

1. Pre-Ordering (October 1999, and January 2000)⁴ – *Average OSS Response Time and Response Interval* for CLEC aggregate

The raw data file used to calculate the *Average OSS Response Time and Response Interval* does not contain the response data from the TAG system for 10/06/1999, 10/24/1999, 10/25/1999, 10/28/1999, 01/16/2000, and 01/31/2000.

¹ Raw Data refers to the data used to calculate and validate the SQMs reported on the PMAP Web site.

² Early-stage data refers to the data that is extracted from BellSouth's various source systems. Early-stage data is processed into the raw data. Depending upon the SQM, the raw data are used either to generate the SQM report directly, or to validate calculations of the SQM values performed by other systems.

³ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) Web site.

⁴ October 1999 was the initial test month for the Performance Measurements Test. However, due to issues with the daily response feeds for October 1999, KPMG used January 2000 as the test month for this SQM.

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2. Pre-Ordering (December 1999) – *OSS Interface Availability*

The raw data file used for the calculation of the SQM under consideration:

- did not list any outages for the component SL13GTWY, whereas the earlier data listed outages on 12/19/99 and 12/22/99.
- listed component SL13GTWY as part of the LEO-EDI model/version, whereas the earlier data listed it as a part of the ENCORE model/version.

3. Ordering (October 1999) – *Firm Order Confirmation Timeliness* for Trunks

None of the selected early stage data (25 records) from the EXACT system could be found in the raw data. Each of the selected ASRs (Access Service Requests) could be found in the raw data, but the associated ACNA (Access Customer Name Abbreviation), PON (Purchase Order Number), and VER (Version Number) fields in the raw data and early stage data were different⁵.

4. Ordering (October 1999) – *Percent Rejected Service Requests, Reject Interval, Firm Order Confirmation Timeliness* for Trunks

KPMG found that two records from the LCSC Order Number (LON) source system (of a sample of 25 reviewed) did not show up in the PMAP raw data⁵.

5. Provisioning (October 1999) – *Mean Held Order and Distribution Interval, Percent Missed Installation Appointments, Average Completion Interval/Order Completion Interval Distribution, Percent Provisioning Troubles within 30 Days of Service Order Activity*

Ten of the service orders in a sample of 50 service orders from the ICAIS system, issued on October 15, 1999, did not appear in the raw data⁵.

6. Maintenance & Repair (October 1999) – *Missed Repair Appointments, Customer Trouble Report Rate, Maintenance Average Duration, Percent Repeat Troubles within 30 days, Out of Service for greater than 24 hours*

Five trouble tickets in a sample of 50 trouble tickets from the LMOS and WFA systems, opened on October 15, 1999, did not appear in the raw data⁵.

7. Maintenance & Repair (December 1999) – *OSS Interface Availability*

The raw data file used for the calculation of this SQM did not list the component MRLM53BM, whereas the early stage data listed the component as a part of LMOS-

⁵ Please note that KPMG has not provided any additional details due to the proprietary nature of the record identifier information.

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FE model/version. In other words, the data related to this component are missing from the raw data file.

8. Billing (January 2000) – *Mean Time to Deliver Invoices* for CLECs (CABS)

KPMG found that of the total of 26 CABS billing accounts (associated with a sample of three ACNAs), 13 electronically transmitted bills in the CSR Verification Reports were not accounted for in the raw data used in the SQM calculations⁵.

9. Billing (October 1999) – *Mean Time to Deliver Invoices* for BellSouth retail

Compared to the early stage data, the raw data indicated that 23 more bills were mailed for BellSouth retail in October 1999. The inconsistency appeared in the 26th billing period for the category "CLUB BILLS MAILED"⁵.

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth as well as to plan future business activities. KPMG's inability to confirm the integrity of the data used to calculate the reported values implies that the accuracy of BellSouth reported values of the SQMs under consideration may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

BellSouth Response

1. Pre-Ordering (October 1999, and January 2000)⁶ – *Average OSS Response Time and Response Interval* for CLEC aggregate

Two of the dates listed above (10/24/1999 and 01/16/2000) were Sundays. On these weekend days, no activity occurred on the TAG server, and thus there is no OSS Response data to report.

On the other dates (10/06/1999, 10/25/1999, 10/28/1999, and 01/31/2000) the TAG server failed to send the server a data file. All data feeds generated by the TAG server are placed in a temporary directory. On these dates the directory filled up, and the data feeds failed since there was no room to write the data files. By the time the situation was discovered it was too late to regenerate the previous day's data.

⁵ Please note that KPMG has not provided any additional details due to the proprietary nature of the record identifier information.

⁶ October 1999 was the initial test month for the Performance Measurements Test. However, due to issues with the daily response feeds for October 1999, KPMG used January 2000 as the test month for this SQM.

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As a corrective measure, BellSouth has moved processing of the data to a new directory which contains over 4 gigabytes of free space, eliminating the issue of capacity on the TAG server.

2. Pre-Ordering (December 1999) – OSS Interface Availability

The BellSouth Billing report with data for OCT 1999 that is used to support the Mean Time to Deliver Invoices for BellSouth Aggregate report contained a total that was incorrect on one portion of the early stage data, however the **correct totals** for "CLUB Bills Mailed" were reported on the final report to PMAP and the **correct totals** were reported in the SQM reports on PMAP. Early stage reports have been reviewed and corrected. A sample of the actual raw data report follows to illustrate the data that was reported to PMAP.

Club Bills Mailed	30656		
2wd	15.0%	4598	9197
3wd	60.0%	18394	55181
4wd	25.0%	7664	30656
5wd		0	0
6wd		0	0
7wd			
	100.0%	30656	
CRIS Mean Time to Distribute Bills	4.16	17695431	73561533

			2WD	3WD	4WD	5WD	6WD	TOTAL
AL (A)	2184	189901	462	1470	252	0	0	2184
FL (Q)	1889	144713	109	1215	565	0	0	1889
FL(R)	2875	212321	0	1616	1259	0	0	2875
FL(Y)	2832	305046	0	1930	902	0	0	2832
GA (O)	3157	546817	642	1437	1078	0	0	3157
GA (P)	1838	143881	354	902	582	0	0	1838
KY (K)	1775	183943	488	842	422	0	0	1752
LA (B)	323	14260	115	156	52	0	0	323
LA (C)	2699	259313	1005	1165	529	0	0	2699
MS (M)	1775	174313	588	872	315	0	0	1775
NC (X)	3179	342237	66	2176	937	0	0	3179
SC (W)	2670	178824	269	2093	308	0	0	2670
TN-B(TB)	598	36555	151	387	60	0	0	598
TN-C(TC)	2862	251964	268	2036	558	0	0	2862
TOTAL	30656	2984088	4577	18320	7819	0	0	30633

(1) After review of totals for CLUB October 1999, 1775 total bills for Kentucky as indicated on the left side and 30656 Grand Total bills for all states is correct.

(2) The right side total should have been 865 bills for KY 3rd WD and 1775 for KY total.

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(3) Grand totals should have reflected 30656. Early stage reports have been noted and corrected.

3. Ordering (October 1999) – *Firm Order Confirmation Timeliness* for Trunks

Under investigation

4. Ordering (October 1999) – *Percent Rejected Service Requests, Reject Interval, Firm Order Confirmation Timeliness* for Trunks

Under investigation

5. Provisioning (October 1999) – *Mean Held Order and Distribution Interval, Percent Missed Installation Appointments, Average Completion Interval/Order Completion Interval Distribution, Percent Provisioning Troubles within 30 Days of Service Order Activity*

Each of these records was excluded from the raw data tables because they did not meet specific business requirements. An explanation of the specific business rule not met is included in the table below.

Record	SO_NBR	ISSU_DT	TEL_NUM	Discrepancy Detail	Reason for absence in Raw Data
1	CO5DT9J8	10/15/99	4043773826	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	HELD ORDER - This record is an administrative order, and therefore is not reported upon. OCI/PMI/TROUBLES WITHIN 30 DAYS - This record was cancelled. These measures only report upon completed orders.
2	CORND342	10/15/99	7705291218	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	HELD ORDER - This record is an administrative order, and therefore is not reported upon. OCI/PMI/TROUBLES WITHIN 30 DAYS - This record was cancelled. These measures only report upon completed orders.
Record	SO_NBR	ISSU_DT	TEL_NUM	Discrepancy Detail	Reason for absence in Raw Data
3	CP5DM4P2	10/15/99	7063352321	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	This is a listing order - no work performed, therefore, this is not reported on.
4	DOCRVXY4	10/15/99	7703909116	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	HELD ORDER - This record had a commitment date that was outside of the reporting period, and therefore is not considered in this month's report. OCI/PMI/TROUBLES WITHIN 30 DAYS - This record has a status of "pending". These measurements only report on completed orders.
5	DP7H54W4	10/15/99	9128245251	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	This is a listing order - no work performed, therefore, this is not reported on.
6	DPCRPD37	10/15/99	9128532415	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting	This is a listing order - no work performed, therefore, this is not reported on.

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				at 10:00 am., and therefore, cannot provide any more additional information on these records.	
7	NP4B72G6	10/15/99	7066363748	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	This is a listing order - no work performed, therefore, this is not reported on.
8	NP7497P3	10/15/99	7063353357	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	This is a listing order - no work performed, therefore, this is not reported on.
9	NP764WT6	10/15/99	9125296473	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	This is a listing order - no work performed, therefore, this is not reported on.
10	TO420Y26	10/15/99	7706508811	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	HELD ORDER - This record had a commitment date that was outside of the reporting period, and therefore is not considered in this month's report. OCI/PM/TROUBLES WITHIN 30 DAYS - This record has a status of "pending". These measurements only report on completed orders.

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6. Maintenance & Repair (October 1999) – *Missed Repair Appointments, Customer Trouble Report Rate, Maintenance Average Duration, Percent Repeat Troubles within 30 days, Out of Service for greater than 24 hours*

The five trouble tickets in a sample of 50 trouble tickets from the LMOS and WFA systems, opened on October 15, 1999, are explained below. They are as follows:

- (1) 7709465348,
- (2) 50/QGDA/501036 /SB,
- (3) 38/LXFU/600197 /SB,
- (4) 8002 /T1 /ATLBGACL1MD/MRTTGAEA97F,
- (5) 4117 /T3Z /ATLNGABUK12/ATLNGABUTMD

Item one 770-946-5348 this fell out of the LMOS data due to an invalid disposition code of 799. Item two 50/QGDA/501036 fell out of the WFA data due to having an invalid OCN. Item three 38/LXFU/600197 fell out of WFA data due a product miss-match, was shown as a UNE but belonging to BellSouth. Since BellSouth has no UNE'S it caused a fall out. Items four and five: The following two record identifiers (line numbers) are found in source systems but not in the raw data because these records indicate carrier trunks. Only serial and message trunks are included in the final reporting. Since carrier trunks are not included in the reports we also exclude these records from the raw data. These records can be found in the PMAP database but are excluded in the process of creating raw data (raw data selection criteria shown below). Raw Data selection criteria: (AL1.cktfmt='s' or AL1.cktfmt='m' or AL1.cktfmt is null)

7. Maintenance & Repair (December 1999) – *OSS Interface Availability*

Component MRLM53BM is a redundant LMOS system to MRLM53AM. The same data is contained in both, therefore both components will not be present at all times.

8. Billing (January 2000) – *Mean Time to Deliver Invoices for CLECs (CABS)*

Twelve (12) (accounts from the 4th bill period) of the 13 bills referenced in the above exception were electronically transmitted to be billed on a MegaBill format. The individual paper bills for each of these 12 accounts, as noted on the "CABS Bill Verification Report" were 'Suppressed' as noted in the comments column of each bill. The MegaBill account was transmitted (under a special billing arrangement with that customer), however the MegaBill account is not currently identified as a CLEC and was therefore not included in the CLEC Measurement report.

The remaining referenced account as noted in the CABS Bill Verification report for 1st Bill Period noted 'Suppressed' for the paper bill as indicated in the comments column. The electronic media transmit date for this account was omitted from the final report, however the bill was transmitted to the customer on the 5th workday.

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Bill Distribution implemented the following Quality Control initiatives to ensure accurate reporting of Billing Invoice Timeliness Data for the Mean Time to Deliver Invoices CLEC measurement:

(1) A mechanized work request has been targeted for implementation. This request will provide a list of CABS billing account numbers and media types for the Bill Distribution Center (BDC) to use in reporting the timeliness of Invoices released. The majority of this request is currently implemented. The remaining work is being reviewed and targeted for an upcoming system release.

(2) Prior to implementation of the remaining mechanization work, the BDC will continue to use the manual checklists to ensure that each site for pulling accounts is listed. They will also allow one day to follow-up on data expected for a specific bill period to ensure that the cycle has completed and that the data has had adequate time to be posted to SAR. An additional step has been implemented to compare the previous months account lists and research any billing accounts not captured from the previous month.

A notice will be placed on the PMAP web site indicating the omission of the data from the reports in January 2000.

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9. Billing (October 1999) – *Mean Time to Deliver Invoices* for BellSouth retail

The BellSouth Billing report with data for Oct. 1999 that is used to support the Mean Time to Deliver Invoices for BellSouth Aggregate report contained a total that was incorrect on one portion of the early stage data. However the **correct totals** for "CLUB Bills Mailed" were reported on the final report to PMAP and the **correct totals** were reported in the SQM reports on PMAP.

Early stage reports have been corrected and are available for review after November 1999.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 93



June 21, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Metrics Definition Documentation and Implementation Verification and Validation Review (PMR-2).

Exception:

KPMG encountered ten Service Quality Measurements ("SQMs") for which there are inconsistencies among the statements of the definition, calculation and business rules sections in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*.

SQMs are calculated to measure 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 evaluating the accuracy, completeness and consistency of SQM definitions, calculations, and business rules in the *SQM Reports*.²

1. Ordering - Speed of Answer in Ordering Center - Local Carrier Service Center (LCSC)

Definition	Measures the average time a customer is in queue.
Calculation	$(\text{Total time in seconds to reach the LCSC}) / (\text{Total Number of Calls in the Reporting Period})$.

While the numerator of the documented calculation only takes into account answered calls (i.e., calls that reach the LCSC), the denominator includes both calls answered and calls abandoned.

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 the *SQM Reports, Version 10/22/99* as a basis to perform this test. KPMG also took into consideration changes published in the *SQM Reports, Version 2/24/00*.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 93

2. Provisioning - *Mean Held Order Interval & Distribution Intervals.*

Definition	When delays occur in completing CLEC orders, the average period that CLEC orders are held for BST reasons, pending a delayed completion, should be no worse for the CLEC when compared to BST delayed orders.
Calculation	Mean Held Order Interval: $\Sigma (\text{Reporting Period Close Date} - \text{Committed Order Due Date}) / (\text{Number of Orders Pending and Past The Committed Due Date}) \text{ for all orders pending and past the committed due date.}''$ Held Order Distribution Interval: $((\# \text{ of Orders Held for } \geq 90 \text{ days}) / (\text{Total } \# \text{ of Orders Pending But Not Completed}) \times 100$ $((\# \text{ of Orders Held for } \geq 15 \text{ days}) / (\text{Total } \# \text{ of Orders Pending But Not Completed}) \times 100''$

While the title and definition of this SQM suggest that it is the average period that all CLEC orders are held, the calculation describes the average period held for CLEC orders still pending at the end of the reporting period. CLEC orders that were closed before the end of the reporting period are not accounted for in this SQM.

3. Provisioning - *Percent Missed Installation Appointments*

Calculation	$\Sigma (\text{Number of Orders Not Complete by Committed Due Date in Reporting Period}) / (\text{Number of Orders Completed in Reporting Period}) \times 100$
Business Rules	Percent Missed Installation Appointments is the percentage of total orders processed for which BST is unable to complete the service orders on the committed due dates...

While the business rules for this SQM refer to the percentage of orders processed, the denominator in the calculation description refers to the number of orders completed in the reporting period.

4. Maintenance and Repair - *Percent Repeat Troubles Within 30 Days*

Definition	Trouble reports on the same line/circuit as a previous trouble report received within 30 calendar days as a percent of total troubles reported.Closed
Calculation	$[...] (\text{Count of Customer Troubles where more than one trouble report was logged for the same service line within a continuous 30 days}) / (\text{Total Trouble Reports Closed in Reporting Period}) \times 100$

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 93

While the documented definition describes this SQM as a percentage of total troubles reported, the denominator in the calculation refers to the total trouble reports closed in the reporting period.

5. Provisioning - Average Completion Notice Interval

Calculation	$\Sigma (\text{Date and Time of Notice of Completion}) - (\text{Date and Time of Work Completion}) / (\text{Number of Orders Completed in Reporting Period})$

The denominator should be the number of orders for which completion notices were sent, rather than number completed. Since there is a time lag between completion and notification times, the number of orders completed during the reporting period may differ from the number of orders for which a notification of completion has been issued to the CLEC.

6. Billing – Invoice Accuracy

Calculation	$\text{Invoice Accuracy} = (\text{Total Billed Revenues during current month}) - (\text{Billing Related Adjustments during current month}) / \text{Total Billed Revenues during current month} \times 100$

“Total Billed Revenues during current month” pertain to the current month's bills, while “Billing Related Adjustments during current month” pertain to bills from both current and previous months. These two components of the numerator refer to different and inconsistent sets of bills.

7. Billing – Usage Data Delivery Completeness

Definition	This measurement provides percentage of complete and accurately recorded usage data (usage recorded by BellSouth and usage recorded by other companies and sent to BST for billing) that is processed and transmitted to the CLEC within thirty (30) days of the message recording date. A parity measure is also provided showing completeness of BST messages processed and transmitted via CMDS. BellSouth delivers its own retail usage from recording location to billing location via CMDS as well as delivering billing data to other companies. Timeliness, Completeness and Mean Time to Deliver Usage measures are reported on the same report.
Calculation	$\text{Usage Data Delivery Completeness} = \Sigma(\text{Total number of Recorded usage records delivered during the current month that are within thirty (30) days of the message recording date}) / \Sigma(\text{Total number of Recorded usage records delivered during the current month}) \times 100$

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 93

This calculation only measures timeliness of delivery of usage data. It does not measure completeness. Therefore, the title of the SQM and the reference to completeness in the definition are not reflected in the description of the calculation.

8. Billing – Mean Time to Deliver Usage

Definition	This measurement provides the average time it takes to deliver Usage Records to a CLEC. A parity measure is also provided showing timeliness of BST messages processed and transmitted via CMDS. Timeliness, Completeness and Mean Time to Deliver Usage measures are reported on the same report.
Calculation	Mean Time to Deliver Usage = Σ (Record volume X estimated number of days to deliver the Usage Record) / total record volume

This calculation is based on the “estimated number of days to deliver the Usage Record.” The reason for using an estimate and the exact nature of the estimate need to be explained.

9. Pre-Ordering and Maintenance & Repair – OSS Interface Availability

Pre-Ordering – OSS Interface Availability	
Calculation	(Functional Availability) / (Scheduled Availability) X 100
Business Rules	This measurement captures the availability percentages for the BST systems, which are used by CLECs during Pre-Ordering functions. Comparison to BST results allow conclusions as to whether an equal opportunity exists for the CLEC to deliver a comparable customer experience.

M&R – OSS Interface Availability	
Calculation	OSS Interface Availability = (Actual System Functional Availability) / (Actual planned System Availability) X 100
Business Rules	This measure is designed to compare the OSS availability versus scheduled availability of BST's legacy systems.

These calculation descriptions do not provide details regarding the calculation of functional availability and scheduled availability. Specifically, they do not indicate:

1. How the functional availability time period is determined or what time units are used for reporting;
2. Whether partial availability is included in functional availability;

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 93

3. What schedule is used for scheduled or planned availability.

10. Maintenance and Repair – *OSS Response Interval and Percentages*

Definition	The response intervals are determined by subtracting the time a request is received on the BST side of the interface until the response is received from the legacy system. Percentages of requests falling into each interval category are reported, along with the actual number of requests falling into those categories.
Calculation	$\text{OSS Response Interval} = (\text{Query Response Date and Time for Category "X"}) - (\text{Query Request Date and Time for Category "X"}) / (\text{Number of Queries Submitted in the Reporting Period})$ where, "X" is 0-4, ≥ 4 to 10, ≥ 10 , ≥ 30 seconds.
Business Rules	This measure is designed to monitor the time required for the CLEC and BST interface system to obtain from BST's legacy systems the information required to handle maintenance and repair functions. The clock starts on the date and time when the request is received and the clock stops when the response has been transmitted through that same point to the requester.

The documented calculation of percentage of requests falling within specific interval categories is inaccurate because:

1. It refers to "OSS Response Interval."
2. It does not describe counting the number of queries for which response time falls within a specific category.

Moreover, the SQM title "OSS Response Interval and Percentages" suggests that Response Interval is reported in addition to the percentage of requests falling within specific categories, which is not the case.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 93

Impact

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. Accurate, complete and consistent SQM definitions, calculations and business rules are essential to the CLECs' ability to properly interpret and utilize these performance measurements.

BellSouth Response

1. Ordering - *Speed of Answer in Ordering Center – Local Carrier Service Center (LCSC)*

Abandoned calls are not included in the denominator. For clarification purposes, the SQM will be updated in the July version. For Speed of Answer in Ordering Center the Calculation will be: **(Total seconds in queue) / (Total number of calls answered in the reporting period)**

2. Provisioning - *Mean Held Order Interval & Distribution Intervals.*

This calculation is scheduled to be corrected in the July 2000 SQM update as outlined in the response to Observation 26. The calculation will read:

"Mean Held Order Interval: Σ (Reporting Period Close Date – Committed Order Due Date) / (Number of Past Due Orders Held and Pending but Not Completed and past the committed due date.)"

Held Order Distribution Interval:

(# of Orders Held for ≥ 90 days) / (Total # of Past Due Orders Held and Pending But Not Completed) X 100

(# of Orders Held for ≥ 15 days) / (Total # of Past Due Orders Held and Pending But Not Completed) X 100"

Regarding the exception stated above, this measure is taken from LCUG Page 31 and the NPRM (FCC) page 31-Section E-65 where both state: Held Order Interval is designed to detect orders continuing in a non-completed state for an extended period of time. The NPRM states "measuring those orders whose due dates have passed, the Average Held Order measurement will capture those orders not covered by the Average Completion Interval measurement". Also, these orders are later measured in the Percent Missed Installation Appointment report to state the percentage of orders that were completed past their original committed due date. Therefore, the measurement is accurately stated.

3. Provisioning - *Percent Missed Installation Appointments*

The Calculation and Business rules will be updated in the next version of the SQM, currently scheduled for July 2000.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 93

The Calculation will be: Σ (Number of Orders with Completion date in Reporting Period past the Original Committed Due Date) / (Number of Orders Completed in Reporting Period) X 100

The Business Rules will include the following statement: **Percent Missed Installation Appointments is the percentage of orders with completion dates in the reporting period that are past the original committed due date.**

4. Maintenance and Repair - *Percent Repeat Troubles Within 30 Days*

As noted in the response to Draft Exception 93, BellSouth will update both the Definition and Calculation in the next version of the SQM scheduled for July 2000.

The updated definition will read: **Closed trouble reports on the same line/circuit as a previous trouble report received within 30 calendar days as a percent of total troubles closed.**

The updated calculation will read: **(Count of closed customer troubles where more than one trouble report was received for the same service line within a continuous 30 days of the reporting period) / (Total trouble reports closed in the reporting period) X 100**

5. Provisioning - *Average Completion Notice Interval*

The Calculation will be updated in the next version of the SQM, currently scheduled for July 2000.

The Calculation will be: Σ (Date and Time of Notice of Completion) – (Date and Time of Work Completion) / (Number of Orders With Notices of Completion in Reporting Period)

6. Billing – *Invoice Accuracy*

Billing Related Adjustments that are used to calculate the Invoice Accuracy Measure are derived from any adjustments that are applied to the billing account during the report month. There are billing situations where adjustments are made to a customer's bill that reflects several prior months' bills. The measure captures the adjustments for the month in which the adjustment appears on the customer's bill. The ability to report adjustments on the month that the charge appears is not feasible.

The wording in the July SQM will be changed to read: **"Total Billed Revenue reported during the current month" and "Billing Related Adjustments reported during the current month".**

7. Billing – *Usage Data Delivery Completeness*

The Usage Completeness measure as established by long standing national standards is tracked through reporting the volume of message records sent to the CLEC within thirty days after the AMA record is produced in the BellSouth central office. The number of

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 93

records sent in the thirty day interval is expressed as a percentage of the total records sent. The established completeness target is included in some Local Interconnection contract for 98% of all usage within thirty days.

8. Billing – Mean Time to Deliver Usage

The industry standard has been to compute delays in number of days for each message. Days_Delayed does not provide the exact period of time it took for that record volume to be delivered, therefore Messages that take less than 1 full day to be delivered to the CLEC are calculated with a weight_factor. Therefore, the days delayed is reported as estimated number of days to deliver the Usage Record.

9. Pre-Ordering and Maintenance & Repair – OSS Interface Availability

BellSouth will add the changes below to the July update to the SQM which will answer all of KPMG's concerns.

1. How the functional availability time period is determined or what time units are used for reporting; **The down time other than that scheduled is measured in hours and reported as a percent of the time scheduled.**
2. Whether partial availability is included in functional availability; **Any down time whether partial or not is considered not available.**
3. What schedule is used for scheduled or planned availability. **The scheduled availability is developed by the legacy system owner based on maintenance requirements for that system. CLEC system availability is posted on the web at www.interconnection.bellsouth.com/oss/oss_hour.html.**

The July SQM will be updated to reflect the following changes to the Calculation and Business Rules for *Pre-Ordering and Maintenance & Repair – OSS Interface Availability*

Pre-Ordering – OSS Interface Availability	
Calculation	$\text{OSS Interface Availability} = (\text{Actual System Functional Availability}) / (\text{Actual Planned System Scheduled Availability}) \times 100$
Business Rules	This measurement captures the availability percentages for the BST systems, which are used by CLECs during Pre-Ordering functions. Functional Availability is the amount of time in hours during the reporting period that the legacy systems are functionally available to users. The Planned System Scheduled Availability is the time in hours per day that the legacy system is scheduled to be available. Scheduled availability is posted on the ICS Operations internet site: (www.interconnection.bellsouth.com/oss/oss_hour.html).

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 93

M&R – OSS Interface Availability	
Calculation	OSS Interface Availability = (Actual System Functional Availability) / (Actual Planned System Availability) X 100
Business Rules	This measure is designed to compare the OSS availability versus scheduled availability of BST's legacy systems. Functional Availability is the amount of time in hours during the reporting period that the legacy systems are functionally available to users. The Planned System Scheduled Availability is the time in hours per day that the legacy system is scheduled to be available. Scheduled availability is posted on the ICS Operations internet site (www.interconnection.bellsouth.com/oss/oss_hour.html).

10. Maintenance and Repair – OSS Response Interval and Percentages

BellSouth will add the changes below to the July update of the SQM which will answer all of KPMG's concerns.

OSS Response Percent within Interval

Definition	The response intervals are determined by subtracting the time a request is received on the BST side of the interface until the response is received from the legacy system. Percentages of requests falling into each interval category are reported, along with the actual number of requests falling into those categories.
Calculation	OSS Response Interval = (Query Response Date and Time for Category "X") - (Query Request Date and Time for Category "X") / (Number of Queries Submitted in the Reporting Period) where, "X" is 0-4, ≥ 4 to 10, ≥ 10 , and ≥ 30 seconds.
Business Rules	This measure is designed to monitor the time required for the CLEC and BST interface system to obtain from BST's legacy systems the information required to handle maintenance and repair functions. The clock starts on the date and time when the request is received and the clock stops when the response has been transmitted through that same point to the requester. The number of requests and the percent within interval is accumulated. Percentages of requests falling into each interval category are reported, along with the actual number of requests falling into those categories.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 84



June 30, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Metrics Definition Documentation and Implementation Verification and Validation Review (PMR-2).

Exception:

The information in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)* is inconsistent with the computational instructions provided by BellSouth¹ for five Service Quality Measurements (SQMs).

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 reports².

As part of the BellSouth-Georgia OSS Evaluation, KPMG is reviewing BellSouth's implementation of the definitions of the SQMs, as documented in the *SQM Reports*.³ KPMG is comparing the information in *SQM Reports* to the computational instructions in the *PMAP Raw Data User Manual*, or the instructions provided by BellSouth for manual SQMs, in order to assess their consistency.⁴

1. Provisioning – Total Service Order Cycle Time

Instructions provided by BellSouth to compute this SQM prescribe converting null values to 0.33 days for the *tsoct_dur* field. This is inconsistent with the *SQM Reports*, which specifies that these intervals should be computed as the difference between two time stamps expressed as date and time. Therefore, no approximation should be needed if the SQMs are computed as described in the *SQM Reports*.

2. Provisioning – Order Completion Interval

¹ The "computational instructions provided by BellSouth" either appeared in the *PMAP Raw Data User Manual*, or were provided by BellSouth for manual SQMs.

² These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform ("PMAP") Web site.

³ KPMG used the *SQM Reports*, Version 10/22/99 as a basis to perform this test. KPMG also considered changes published in Version 2/24/00.

⁴ KPMG used instructions from the *PMAP Raw Data User Manual* – Version 2.0.4 – December 15, 1999 and information provided by BellSouth personnel.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 84

Instructions provided by BellSouth to compute this SQM prescribe converting null values to 0.33 days for the **cmpld_dur** field. This is inconsistent with the *SQM Reports*, which specifies that these intervals should be computed as the difference between two time stamps expressed as date and time. Therefore, no approximation should be needed if the SQMs are computed as described in the *SQM Reports*.

3. Collocation – Average Arrangement Time

The *SQM Reports, Version 10/22/99* specifies that this SQM is computed in business days. *Version 2/24/00* does not specify whether it should be computed in business days or calendar days. The computational instructions provided by BellSouth call for computing this SQM in calendar days.

4. Operator Services/Directory Assistance – Average Speed to Answer

SQM Reports states that “Calls abandoned by customers are not reflected in the average speed to answer [...]” The instructions provided by BellSouth to compute this SQM indicate that the time that abandoned calls stay in the queue is included in the numerator.

5. Billing – Mean Time to Deliver Usage

The computational instructions provided by BellSouth prescribe that usage records falling within the “30+” category of delivery duration be given a weight of 31.5. However, 31.5 does not necessarily represent an estimation of delivery duration for records that take significantly more than 30 days to deliver. Depending upon the actual delivery time of these records, this procedure could underestimate the SQM.

Impact

Inaccuracies and inconsistencies in SQM information and computation instructions may call into question the validity of the BellSouth’s reported SQM values. CLECs rely on BellSouth’s performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. If BellSouth’s reported SQM values are not correct, CLECs might not be able to conduct these functions reliably.

BellSouth Response

Provisioning – Total Service Order Cycle Time

The July update to the SQM will include an addition of the following: Business Rules: “Orders that are worked on zero due dates are calculated with a .33 day interval (8 hours) in order to report a portion of a day interval.’ The Calculation will be corrected to read: “ Σ (Completion Date of Service Order) (SOCS HIST –CD DATE) - (Date of Service Request Receipt) / (Count of Orders Completed in Reporting Period)”

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 84

Provisioning – Order Completion Interval

The July update to the SQM will include an addition of the following:

Business Rules: “Orders that are worked on zero due dates are calculated with a .33 day interval (8 hours) in order to report a portion of a day interval.”

The calculation for Average Completion Interval will be corrected to:

“ Σ (Completion Date) – (Order Issue Date) / Σ (Count of Orders Completed in Reporting Period)”

Collocation – Average Arrangement Time

At one time BellSouth's standard collocation contract specified provisioning intervals in business days. The standard contract was later changed to days (i.e., calendar days). Because there was a mixture of customer contracts (some with business days, others with calendar days), an average was not appropriate, so BellSouth defaulted SQM reporting to calendar days. The reference to business days was deleted from the 2/24/00 SQM version based on the contract change. BellSouth will revise the Definition for the Average Arrangement Time measurement to clarify that the provisioning interval is measured in calendar days with the July, 2000 SQM update.

Operator Services/Directory Assistance – Average Speed to Answer

The Average Speed to Answer does consider the amount of time a call waits in queue, so BellSouth concurs that the referenced statement should be deleted from the SQM. The SQM has been revised, effective May 2000, and now shows “None” under Exclusions for the Average Speed to Answer measurement.

The second sentence of the Business Rules for Average Speed to Answer will be revised in the July 2000 SQM update to read as follows: “The length of each call is determined by measuring, using a scanning technique, and accumulating the elapsed time from the entry of a customer call into the BellSouth call management system queue until the customer call is abandoned or transferred to BellSouth personnel assigned to handle calls for assistance.”

Billing – Mean Time to Deliver Usage

BellSouth compiled a seven-month study to determine the number of invoices in the 30+ Category. As the attached results indicate, 0.22% fell into the 30+ Category. The 0.22% does not justify the expense involved to track and measure this portion of the component.

BellSouth has added a note to the SQM Documentation indicating to the CLECs that any invoice that falls in the 30+ Category will be given a weight of 31.5 days in the results calculations.

MEAN TIME TO DELIVER USAGE RECORDS - ALL CLECs:

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 84

<u>MONTH</u>	<u>TOT.</u> <u>RECORDS</u>	<u>30+ RECORDS</u>	<u>% 30+ RECORDS</u>
Apr-00	23,393,595	25,360	0.1084%
Mar-00	25,880,349	19,165	0.0741%
Feb-00	21,554,135	22,270	0.1033%
Jan-00	19,598,574	32,478	0.1657%
Dec-99	19,221,788	72,724	0.3783%
Nov-99	18,323,210	106,678	0.5822%
Oct-99	18,357,512	46,172	0.2515%
TOTALS:	<u>146,329,163</u>	<u>324,847</u>	<u>0.2220%</u>

Additionally, as requested, BellSouth provided KPMG with a list of usage records that had days delayed (30+) and the breakout of those usage records by the actual days delayed. These 100 messages were extracted through a lengthy, manual process. A work request would be required for the ODUF/ADUF reports to show message delay for all days. The BellSouth conclusion is that the 0.22% does not justify the expense involved to track and measure this portion of the component. A note has been posted to the PMAP Web Site indicating to the CLECs that any invoice that falls in the 30+ Category will be given a weight of 31.5 days in the results calculations.

CERTIFICATE OF SERVICE

Docket No. 8354-U

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

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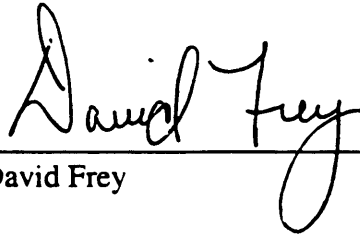
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This 12th day of July 2000.



David Frey

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July 12, 2000

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

RECEIVED

JUL 12 2000

EXECUTIVE SECRETARY
G.P.S.C.

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

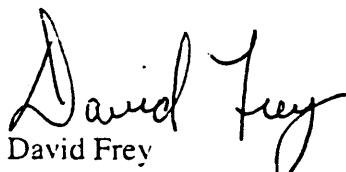
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG Consulting LLC's Exception 91. KPMG has chosen to re-file Exception 91 to correct a minor error in the "header" of the previous version.

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

Thank you for your assistance in this regard.

Very truly yours,


David Frey
Manager

Enclosures

cc: Parties of Record





EXCEPTION 91

BellSouth Georgia OSS Testing Evaluation

Date: May 24, 2000

EXCEPTION REPORT

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

Exception:

BellSouth incorrectly billed KPMG CLEC for usage charges for messages processed in the Augusta central office.

The KPMG CLEC generated local, toll, long distance and operator-assisted usage in executing the ADUF/ODUF¹ Functional Usage Test – BLG-2. The usage test was conducted from five BellSouth central offices during the three-day period from November 18 to November 20, 1999. The KPMG CLEC received EMI² records, which reflected usage that was captured by BellSouth during the test period and the corresponding invoices. The following invoices from the Augusta central office (AGSTGAMT72C):

<u>Q-Account Number</u>	<u>Invoice Date</u>
706Q858252-99339	December 5, 1999
706Q979808-99351	December 17, 1999
706Q858252-00005	January 5, 2000

KPMG checked the invoices to verify that: 1) the usage agreed with the EMI records; 2) the rates used agreed with the rates published in the rate sheet provided to KPMG by BLS in lieu of an Interconnection Agreement; and 3) the additions and extensions on the invoices were mathematically correct.

KPMG determined that invoice rates were correct but that the billed amount was incorrect because of discrepancies in usage quantities appearing on the invoice. KPMG observed variances between billed usage and usage reported by EMI in every category tested, except switching and transport-related rate elements. KPMG applied the BellSouth algorithm to calculate the invoice accuracy metric³. This calculation demonstrates a 723% under-billing.

¹ Access Daily Usage Files (ADUF) provide competitive local exchange carriers with records of intraLATA/interLATA calls originated from or terminated to CLEC end user lines. Optional Daily Usage Files (ODUF) provide competitive local exchange carriers with records of billable measured intraLATA local and toll calls, per use/per activation services, directory assistance messages and WATS & 800 service calls.

² EMI – Exchange Message Interface is a standard developed by the Message Processing Committee of the Alliance for Telecommunications Industry Solutions' (ATIS) Ordering and Billing Forum (OBF). This standard is an industry guideline for the format of information regarding ordering, billing, and provisioning of services.

³ $((\text{Total Billed Revenue} - \text{Total Adjustments}[\text{Variance}]) / \text{Total Billed Revenues}) \times 100$ – This is invoicing accuracy metric as defined in the Georgia Master Test Plan (Appendix D2).



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The single largest cause of the error was the Operator Call Handling element (700 of the 723 percentage point total). The EMI records reported 31 operator-handled minutes-of-use; BellSouth billed 0 minutes-of-use.

The following table details variances between usage billed by BellSouth and usage reported per EMI records.

KPMG DUF Analysis Comparison to BellSouth KPMG CLEC Billing

Office – AGSTGAMT72C Billing Elements	Usage Per EMI Records	Usage Per BellSouth Invoice	Usage Variance	Rate	Billed Amount Per KPMG	Billed Amount Per BellSouth	Billing Variance	Accuracy Metric ³ (Total Only)
ULS-SF – Total MOU [Unbundled Local Switching (Switching Functionality)]	1224	1228	0	0.0016333	N/A	N/A	N/A	-
ULS-SF – Initial MOU	242	242	0	0.0016333	0.43	0.43	0.00	-
ULS-SF – Addtl MOU	986	986	0	0.0016333	1.63	1.63	0.00	-
ULS-TP [Unbundled Local Switching (Trunk Port)]	64	64	0	0.0001564	0.09	0.09	0.00	-
UIT-S – mileage [Unbundled Transport (Shared Transport)]	N/A	45	N/A	0.000008	N/A	0.09	N/A ⁴	-
UIT-S – fixed [Unbundled Transport (Facilities Termination)]	41	41	0	0.0004152	0.05	0.05	0.00	-
UTS-SF [Unbundled Transport (Tandem Switching)]	41	41	0	0.0006757	0.05	0.05	0.00	-
UTS-TP [Unbundled Transport (Tandem Switching – Trunk Port)]	62	62	0	0.0002126	0.07	0.07	0.00	-
800 Access Ten Digit Screening	63	68	5	0.0004868	0.03	0.04	0.01	-
Operator Call	31	0	31	0.9680296	30.01	0.00	30.01	-

⁴ The data elements to support validation of mileage-based charges do not exist in the EMI record format and, therefore, were excluded from the overall variance calculation.



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Handling								
Automated Call Handling	9	0	9	0.0776409	0.70	0.00	0.70	-
Verification	4	1	3	0.921083	3.68	0.92	2.76	-
Interrupt	3	1	2	0.921083	2.76	0.92	1.64	-
DACC	5	0	5	0.0348712	0.17	0.00	0.17	-
Total (All Billing Elements)					39.67	4.29	35.29	-723%

Impact

Issuing bills containing erroneous usage information impacts CLECs in the following ways:

- **Hampers capacity management efforts.** Under-reporting of usage activity may impede a CLEC's ability to adequately assess network requirements.
- **Distorts financial planning and rate setting.** A CLEC's ability to accurately project revenue and expenses and to set rates for its customers is based, in part, on accurate billings from BellSouth.

CERTIFICATE OF SERVICE

Docket No. 8354-U

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

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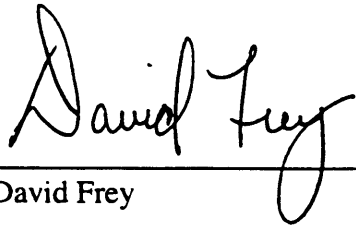
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This 12th day of July 2000.



David Frey

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JUL 12 2000

EXECUTIVE SECRETARY
G.P.S.C.

July 12, 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**

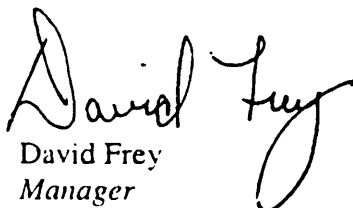
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG Consulting LLC's Exception 95 along with BellSouth's Response to Exception 95.

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

Thank you for your assistance in this regard.

Very truly yours,



David Frey
Manager

Enclosures

cc: Parties of Record





EXCEPTION 95

BellSouth Georgia OSS Testing Evaluation

Date: June 21, 2000

EXCEPTION REPORT

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

Exception:

BellSouth has delivered Firm Order Confirmations (FOCs) in response to Local Service Requests (LSRs) that should have received error messages.

After an LSR is received by the BellSouth interface gateway, it proceeds through a series of order validations to ensure that the CLEC has adhered to business rule requirements documented by BellSouth. These documented requirements are intended to reflect the BellSouth system requirements for order processing. In response to a valid LSR, BellSouth returns an FOC, notifying the CLEC that its order is confirmed and providing a committed due date for completion of service provisioning. In the event an LSR contains an error, BellSouth should return an Error (ERR) or Clarification (CLR) notification.

In response to some KPMG LSRs containing data values populated contrary to business rule documentation, BellSouth delivered FOCs. After issuing confirmation, BellSouth proceeded to provision the service request, subsequently generating a Completion Notice (CN). BellSouth should have issued error messages in response to these service requests, allowing KPMG the opportunity to make corrections to ensure that service provisioning matches the service desired.

The following table provides detail on a sample of orders that should have received errors (as defined in the "Expected Results" column). All of these service requests were confirmed and completed (as noted in the "Actual Results" column).

PON*VER Company Code (CC)	Order Type	Actual Results	Expected Results
433A124PTJ100001*01 CC = 9991	MM Loop-Port Combination Inside Move	FOC/CN	According to BellSouth documentation, requests for feature changes are disallowed for this order type. An error message should have been received.
602A214PTJ100002*00 CC = 9991	MD Loop-Port Combination Partial Disconnect	FOC/CN	According to BellSouth documentation, an activity type "D" should only be used for full (i.e., all of a customer's lines) disconnect



EXCEPTION 95
BellSouth Georgia OSS Testing Evaluation

PON*VER Company Code (CC)	Order Type	Actual Results	Expected Results
			requests. Activity type "C" should be used for partial disconnects. KPMG issued a partial disconnect using a "D" activity type. An error message should have been received.
406C213PTO100012*06 CC = 9994	MV Full Migration As Specified	FOC/CN	On migration-as-specified service requests, the CLEC should enter feature detail information on those service features the customer wants to add or maintain on their line. Requests for feature deletion are performed via change orders. On this LSR, KPMG inserted a feature activity code of "D", for delete. An error message should have been delivered.
305A112PTH100001*18 9994	AV Full Migration to UNE Loop	FOC/CN	Service request did not contain a Q Acct for billing purposes. This request should have generated an error.
305A112PEH100003*00 9994	AV Full Migration to UNE Loop	FOC/CN	Service request did not contain a Q Acct for billing purposes. This request should have generated an error.
374A225PEG100006*00 9992	CV Stand Alone INP	FOC/CN	Service request did not contain a Q Acct for billing purposes. This request should have generated an error.
403A223PEM100002*00 9994	FV Full Migration to UNE Port	FOC/CN	Service request did not contain ADL FID or a DL form. This request should have generated an error.
408A313PEM000002*00 9991	FV Resale to UNE Port Conversion	FOC/CN	Service request contained duplicate TNs on REFNUM 0016 and 0017. This request should have received an error.
443A224PEM000002*00 9991	MRS Restore	FOC/CN	Based on BellSouth's <i>Local Exchange Ordering Guide</i> ,



EXCEPTION 95
BellSouth Georgia OSS Testing Evaluation

PON*VER Company Code (CC)	Order Type	Actual Results	Expected Results
	Service on a UNE Loop- Port Combination account		<i>Volume 1 (LEO Guide)</i> , the entry ("P") in the B11 field for this order type should have produced a Clarification response from BLS, not an FOC.
606A123PTM101003*02 9991	FC TN Change for a UNE Port customer	FOC/CN	KPMG's BellSouth Customer Support Manager (CSM) informed KPMG that, on a "Change in Service for a Port" Order (Order Type "FB/C"), the LOCBAN field must be populated with the new TN in order to receive an FOC. KPMG received a FOC on this order when the LOCBAN field was populated incorrectly (i.e., it contained the customer's old TN).

Impact

The receipt of an FOC in response to an erred service request impacts CLECs in the following way:

- **Decrease in customer satisfaction.** After receiving an FOC, a CLEC assumes that all inputs on the LSR were valid, and that service will be provisioned exactly according to the LSR specifications. In cases where BellSouth inappropriately confirms and provisions service instead of issuing an error message, the service established for an end-user will differ from CLEC and end-user expectations (which were based on the incorrect LSR). The time required to diagnose the ordering problem and to re-issue the service request ultimately delays accurate provisioning of customer service. This delay will result in a decrease in customer satisfaction.

BELLSOUTH'S RESPONSE TO EXCEPTION 95



June 27, 2000

EXCEPTION REPORT

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

Exception:

BellSouth has delivered Firm Order Confirmations (FOCs) in response to Local Service Requests (LSRs) that should have received error messages.

After an LSR is received by the BellSouth interface gateway, it proceeds through a series of order validations to ensure that the CLEC has adhered to business rule requirements documented by BellSouth. These documented requirements are intended to reflect the BellSouth system requirements for order processing. In response to a valid LSR, BellSouth returns an FOC, notifying the CLEC that its order is confirmed and providing a committed due date for completion of service provisioning. In the event an LSR contains an error, BellSouth should return an Error (ERR) or Clarification (CLR) notification.

In response to some KPMG LSRs containing data values populated contrary to business rule documentation, BellSouth delivered FOCs. After issuing confirmation, BellSouth proceeded to provision the service request, subsequently generating a Completion Notice (CN). BellSouth should have issued error messages in response to these service requests, allowing KPMG the opportunity to make corrections to ensure that service provisioning matches the service desired.

The following table provides detail on a sample of orders that should have received errors (as defined in the "Expected Results" column). All of these service requests were confirmed and completed (as noted in the "Actual Results" column).

BELLSOUTH'S RESPONSE TO EXCEPTION 95

PON*VER Company Code (CC)	Order Type	Actual Results	Expected Results	BellSouth Respon
433A124PTJ100001*01 CC = 9991	MM Loop-Port Combination Inside Move	FOC/CN	According to BellSouth documentation, requests for feature changes are disallowed for this order type. An error message should have been received.	Do not agree. BellSouth LE documentation does not disa feature changes for this orde type. An error message is n applicable.
602A214PTJ100002*00 CC = 9991	MD Loop-Port Combination Partial Disconnect	FOC/CN	According to BellSouth documentation, an activity type "D" should only be used for full (i.e., all of a customer's lines) disconnect requests. Activity type "C" should be used for partial disconnects. KPMG issued a partial disconnect using a "D" activity type. An error message should have been received.	Do not agree. Documentati reflects the ACT field indic the Activity Type requested account level. Activity type is used to request disconnect of the account.
406C213PTO100012*06 CC = 9994	MV Full Migration As Specified	FOC/CN	On migration-as-specified service requests, the CLEC should enter feature detail information on those service features the customer wants to add or maintain on their line. Requests for feature deletion are performed via change orders. On this LSR, KPMG inserted a feature activity code of "D", for delete. An error message should have been delivered.	Unable to locate PON
305A112PTH100001*18 9994	AV Full Migration to UNE Loop	FOC/CN	Service request did not contain a Q Acct for billing purposes. This request should have generated an error.	Do not agree. An error mes is not returned if the correct account is not populated in BAN field. BellSouth deriv correct Q account number a returns it in the FOC.
305A112PEH100003*00 9994	AV Full Migration to UNE Loop	FOC/CN	Service request did not contain a Q Acct for billing purposes. This request should have generated an error.	Do not agree. An error me is not returned if the correc account is not populated in BAN field. BellSouth deriv correct Q account number a returns it in the FOC.
374A225PEG100006*00 9992	CV Stand Alone INP	FOC/CN	Service request did not contain a Q Acct for billing purposes. This request should have generated an error.	Do not agree. An error me is not returned if the correc account is not populated in BAN field. BellSouth deriv correct Q account number a returns it in the FOC.
403A223PEM100002*00 9994	FV Full Migration to UNE Port	FOC/CN	Service request did not contain ADL FID or a DL form. This request should have generated an error.	Do not Agree. Service req did contain a DL form. AI not required for this service request.

BELLSOUTH'S RESPONSE TO EXCEPTION 95

PON*VER Company Code (CC)	Order Type	Actual Results	Expected Results	BellSouth Response
408A313PEM000002*00 9991	FV Resale to UNE Port Conversion	FOC/CN	Service request contained duplicate TNs on REFNUM 0016 and 0017. This request should have received an error.	Agree. An error message was returned. However, the service order was processed with the correct TNs. Customers using Issue 9 to order will receive an error message. The need for a system change in Issue 7 is being evaluated due to the lack of customer orders for this order type.
443A224PEM000002*00 9991	MRS Restore Service on a UNE Loop- Port Combination account	FOC/CN	Based on BellSouth's <i>Local Exchange Ordering Guide, Volume 1 (LEO Guide)</i> , the entry ("P") in the B11 field for this order type should have produced a Clarification response from BLS, not an FOC.	Do not agree. Based on BellSouth's LEO IG documentation, B11 field is optional unless more than one BAN field is populated on LSR. Therefore, clarification is not applicable.
606A123PTM101003*02 9991	FC TN Change for a UNE Port customer	FOC/CN	KPMG's BellSouth Customer Support Manager (CSM) informed KPMG that, on a "Change in Service for a Port" Order (Order Type "FB/C"), the LOCBAN field must be populated with the new TN in order to receive an FOC. KPMG received a FOC on this order when the LOCBAN field was populated incorrectly (i.e., it contained the customer's old TN).	Agree. Service rep error. Service rep covered on 04/05/00. LEO Vol 1 also updated on 04/20/00 to provide additional guidance for customers.

Impact

The receipt of an FOC in response to an erred service request impacts CLECs in the following way:

- Decrease in customer satisfaction.** After receiving an FOC, a CLEC assumes that all inputs on the LSR were valid, and that service will be provisioned exactly according to the LSR specifications. In cases where BellSouth inappropriately confirms and provisions service instead of issuing an error message, the service established for an end-user will differ from CLEC and end-user expectations (which were based on the incorrect LSR). The time required to diagnose the ordering problem and to re-issue the service request ultimately delays accurate provisioning of customer service. This delay will result in a decrease in customer satisfaction.

BellSouth Response

BELLSOUTH'S RESPONSE TO EXCEPTION 95

BellSouth's responses to the individual occurrences have been incorporated into the above table.

CERTIFICATE OF SERVICE

Docket No. 8354-U

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

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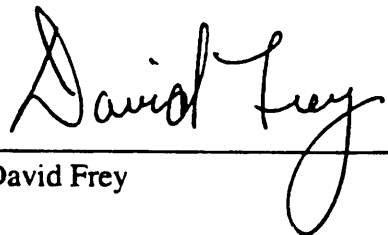
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This 12th day of July 2000.



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July 12, 2000

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JUL 12 2000

EXECUTIVE SECRETARY
G.P.S.C.

Re: BellSouth Telecommunications, Inc.'s Entry into InterLATA Services
Pursuant to Section 271 of the Telecommunications Act of 1996;
Docket No. 6863-U

Review of Cost Studies, Methodologies, and Cost-Based Rates for
Interconnection and Unbundling of BellSouth Telecommunications, Inc.;
Docket No. 7061-U

BellSouth Telecommunications, Inc.'s Statement of Generally
Available Terms and Conditions Under Section 252(f) of the
Telecommunications Act of 1996; Docket No. 7253-U

Performance Measurements for Telecommunications, Interconnection,
Unbundling and Resale; Docket no. 7892-U

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

Generic Proceeding to Establish Long-Term Pricing Policies
For Unbundled Network Elements; Docket No. 10692-U

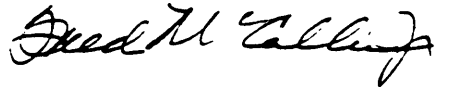
Dear Ms. O'Leary:

Enclosed are an original and twenty-nine (29) copies, as well as an electronic version, of BellSouth Telecommunications, Inc.'s Response to Petition to Establish a Comprehensive Procedure to Further Local Competition in Georgia in the above-referenced dockets. I would appreciate your filing same and returning the four (4) extra copies stamped "filed" in the enclosed self-addressed envelopes.

Ms. Helen O'Leary
July 12, 2000
Page Two

Thank you for your assistance in this regard.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Fred McCallum Jr.", written in dark ink.

Fred McCallum Jr.

FJM:nvd
Enclosures

cc: Parties of Record

220085/217640

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

In re:	)	
	)	
Consideration of BellSouth	)	Docket No. 6863-U
Telecommunications, Inc.'s Entry Into	)	
InterLATA Services Pursuant to Section	)	
271 of the Telecommunications Act of	)	
1996	)	
	)	
Review of Cost Studies, Methodologies,	)	Docket No. 7061-U
and Cost-Based Rates for Interconnection	)	
and Unbundling of BellSouth	)	
Telecommunications Services	)	
	)	
BellSouth Telecommunications, Inc.'s	)	Docket No. 7253-U
Statement of Generally Available Terms	)	
And Conditions Under Section 252(f) of	)	
the Telecommunications Act of 1996	)	
	)	
Performance Measurements for	)	Docket No. 7892-U
Telecommunications, Interconnection ,	)	
Unbundling and Resale	)	
	)	
Investigation Into Development of	)	Docket No. 8354-U
Electronic Interfaces for BellSouth's	)	
Operational Support Systems	)	
	)	
Generic Proceeding to Establish Long-	)	Docket No. 10692-U
Term Pricing and Policies for Unbundled	)	
Network Elements	)	
	)	

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE TO PETITION
TO ESTABLISH A COMPREHENSIVE PROCEDURE TO
FURTHER LOCAL COMPETITION IN GEORGIA**

BellSouth Telecommunications, Inc. ("BellSouth") hereby responds to the *Petition to Establish a Comprehensive Procedure to Further Local Competition In Georgia* ("Petition"), filed by numerous CLECs. In the Petition, the CLECs seek to make a case that this Commission needs to open numerous generic dockets to "complete

the opening of the local telecommunications market to competition.” (Petition, at 1). As is obvious from the content of the Petition, however, the CLECs’ true motive simply is to delay BellSouth’s entry into the interLATA market as evidenced by the fact that the Commission has already addressed, or is in the process of addressing, all of the issues raised in the Petition. The generic dockets sought by the CLECs would be duplicative of work this Commission has already done, or is already doing, and would unnecessarily expend Commission time and resources for no justifiable reason. For these reasons, the Commission should deny the Petition.

DISCUSSION

A. The Commission’s Additional Proceedings In Docket No. 7892-U Will Address All Outstanding Performance Measures Issues.

In the Petition, the CLECs ask for a generic docket to address the issues of performance measurements and enforcement mechanisms. In its recent Order in Docket No. 7892-U opening an expedited proceeding, the Commission set forth the following issues to be resolved:

The purpose of this proceeding is to establish performance measurements, and to establish appropriate enforcement mechanisms for those performance measurements, for telecommunications interconnection, unbundling and resale.

Order, at 2.

This comprehensive update to the Commission’s last performance measurement order should address all of the CLECs’ purported concerns. All parties have filed extensive direct testimony, and have the opportunity to file rebuttal testimony prior to the

hearing. Because the issues raised in the Petition are the same issues that are raised in the 7892-U Docket, BellSouth will not duplicate its response here, but rather would direct the Commission to its testimony in Docket No. 7892-U.

B. The Commission Should Not Open Further Proceedings Regarding BellSouth's Operational Support Systems ("OSS").

On October 30, 1997, the Commission issued an order in Docket No. 7253-U directing the Staff to conduct a technical workshop on OSS, and the enhancements any party would like to see to the OSS, and subsequently to submit a report to the Commission. As a result, Docket 8354-U was opened to fully address BellSouth's OSS. Informal workshops were held on December 9 and 10 of 1997. CLECs were encouraged to submit written comments giving their views as to enhancements they believed were necessary to BellSouth's OSS. After considering these comments and attending the workshops, the Commission Staff submitted its Report on December 23, 1997, identifying approximately 100 items that BellSouth needed to accomplish. Parties to this docket, including seven intervenors, had the opportunity to comment on the report.

After receiving these comments, the Commission held a three day hearing for the purpose of "discuss[ing] and propos[ing] any necessary enhancements to BellSouth's operations support systems which will aid entry by competitive local exchange companies...into the local market, and to ensure that the systems meet the spirit and the intent of the Telecommunications Act of 1996." (Order, at 2). Rather than focus on the strict dictates of the Act, the Commission "focused upon the practical aspects of meeting the spirit and intent of the Act in general, and in particular the identification of any necessary enhancements to BellSouth's OSS which will aid entry by CLECs into the local market." (Order, at 4). At the conclusion of the hearing, the Commission approved

the Staff's Report as "reasonable and appropriate." (Order, at 19). The Commission also ordered BellSouth to file joint progress reports with the CLECs to apprise the Commission on the status of each of the issues. Through the end of 1999, BellSouth held monthly conference calls with the CLECs to discuss progress on each of the issues. After the conference calls, detailed monthly reports have been submitted to the Commission.

In short, the Commission has fully considered BellSouth's OSS, and has remained involved in the evolution of BellSouth's provision of access to its OSS. The Commission has continued its involvement in OSS development through the independent Third Party Test currently being conducted in Georgia by KPMG. Although the CLECs criticize the substance of the test plan as being inadequate, the plan was developed by KPMG and approved by the Commission. Thus, irrespective of the CLECs' view of the Plan, this Commission has already deemed it to be appropriate. The CLECs also complain that the testing process has not afforded them adequate input. The key point that the CLECs fail to acknowledge, however, is that KPMG is an *independent* third party tester. Thus, while KPMG may solicit comments from interested parties, the use it makes of those comments is in its discretion. KPMG is under no obligation, other than to the Commission, to conduct its test in any particular manner or to conform to the dictates of any particular interested party. If the process were otherwise, it would defeat the purpose of an independent third party test.

Finally, notwithstanding the above, the CLECs *have* been afforded the opportunity to participate in the testing process. Interested CLECs receive all exceptions and interim reports filed by KPMG and are free to provide their comments on them. CLECs are free to participate in weekly conference calls relating to the status of the

testing. Finally, KPMG has invited CLECs to actively participate in several aspects of the testing.

The first issue the CLECs want considered in a generic proceeding is the change control process. As is evidenced below, a generic proceeding is not necessary or appropriate. One of the purposes of the CCP is to address changes in the CCP itself. In fact, the process has recently undergone significant changes to make it more responsive to the needs of the participants. BellSouth established its original change management process, known as the Electronic Interface Change Control Process ("EICCP"), to secure input from the CLECs regarding future enhancements to existing electronic CLEC interfaces, and to have an organized means of securing, understanding and prioritizing CLECs' requirements regarding these interfaces. On May 15, 1998, the EICCP became effective throughout BellSouth's region.

Subsequent to the implementation of the EICCP, BellSouth and the CLECs determined that the original EICCP needed to be enhanced. Thus, BellSouth held a workshop on this subject on February 16-17, 2000, to which all CLECs were invited. Following the workshop, a draft revised Change Control Process document ("CCP document") was distributed to the CLECs. BellSouth conducted conference calls on February 29, 2000, and March 23, 2000, again with all participating CLECs invited, to review the recommended CLEC changes raised during the workshop and to follow-up on any outstanding issues.

As a result of these workshops, the change process was amended to include items such as defect change requests, both documentation and software that are BellSouth and CLEC-initiated and CLEC-affecting; BellSouth -initiated enhancement requests that are

CLEC-affecting; BellSouth's escalation and defect notification processes; formalization of escalation and defect notification processes; definition of how the new processes will be incorporated into the existing change control structure; monthly status update meetings that are open to all CLECs; and new email process for system outages and defect notices. While BellSouth has not reached agreement with the CLECs on the new change control process, BellSouth and the CLEC participants did agree to a three-month trial period for the interim CCP.

Thus, BellSouth is working collaboratively with the CLECs to modify the change control process to the extent necessary to meet the needs of the members. This Commission does not need to use its time and resources to conduct a generic investigation into the change control process.

In the Petition, the CLECs highlight several specific areas they deem necessary in the change control process.¹ (See Petition, at 15). As reflected below, these issues are already covered in change control, or are unnecessary or inappropriate for a change control process, and thus need not be considered in a generic proceeding.

a. *Changes to manual as well as electronic processes, whether sought by BellSouth or by CLECs:*

The revised CCP covers change requests for the LENS, TAG, EDI, TAFI, ECTA and CSOTS electronic interfaces and *the associated manual processes* that have the potential to impact the interfaces connected to BellSouth. Thus, this subject is adequately addressed in the current CCP process.

¹ It is interesting to note that the large majority of the text of the Petition comes straight from AT&T's Petition for Arbitration, Docket No. 11853-U, and AT&T's testimony submitted in its arbitration in North Carolina. For this reason, it seems especially incongruous for AT&T to be asking this Commission to expend the resources to conduct a generic docket on issues it plans to arbitrate anyway.

b. Introduction of new interfaces:

The interim CCP contains the process for the introduction of new interfaces. The process is described on page 30 of the Interim CCP document on BellSouth's website.

For the introduction of new interfaces, the document states:

BellSouth will introduce new interfaces to the CLEC community as part of the Change Control Process. A description of the proposed interface will be submitted to the CBBM [BellSouth Change Control Manager]. The BCCM will add an agenda item to discuss the new interface at the monthly status meeting. BellSouth will be given 30-44 minutes to present information on the proposed interface. If additional time is needed for the presentation, a separate meeting will be scheduled...the objective will be to identify interest in the new interface and socialize ideas. BellSouth will provide specifications on the interface being developed to the CLEC Community.

Thus, the CCP provides BellSouth and the CLECs with a meaningful opportunity to discuss and socialize ideas for the proposed new interfaces.

It is important to note, however, that the development of new interfaces is not subject to the CCP. BellSouth must have the flexibility to develop interfaces to meet industry standards and regulatory requirements. The process allows for and encourages CLEC input, but development is too critical to risk being stymied in the process by CLEC disagreement. To ensure efficient and up-to-date deployment of new interfaces, BellSouth must retain ultimate control of their deployment.

c. Retirement of existing interfaces

The retirement of existing interfaces is properly not included in CCP. As specified in the Change Control document:

Retirement of interfaces will not be part of the Change Control Process. As active interfaces are retired, BellSouth will post a CLEC Notification Letter to the web site six (6) months prior to the retirement of the interface. BellSouth will have the discretion to ... provide shorter

notifications (30-60 days) on interfaces that are not actively used and/or have low volumes.

This policy is reasonable because BellSouth must retain operational control over interfaces to manage such issues as discontinued hardware, software that cannot be upgraded, or lack of interface use. If retirement were included in CCP, CLECs could vote to maintain obsolete or unused interfaces simply to game the system. That being said, it is not BellSouth's intent to take an interface out of service that would have a detrimental impact on the CLEC community. Upon giving notification that an interface is going to be taken out of service, BellSouth will remain open to input from CLECs concerning the decision. When it is determined appropriate to retire an interface, BellSouth will ensure that the functionality provided by that interface is available via another means and provide a mechanism to assist CLECs in the transition.

d. Exceptions to the Change Control Process

It is unclear what process the CLECs are advocating with this issue. The CCP already contains a process for urgent change requests that need to be expedited. The change request form contains a space for designating priority. For urgent change requests, which are designated as ones that "should be implemented as soon as possible," resources may be pulled from scheduled release efforts to expedite the item. Thus, the CCP already provides CLECs a mechanism to expedite items from the normal process when appropriate.

e. Defect correction

The CCP already addresses defect correction. A defect to an electronic interface is a defect found in a production environment when the system is not operating as specified in a baseline business requirement's document. A defect to documentation is a

condition where the documentation does not agree or accurately reflect the business environment. In the change control process, a workaround will be provided, in most cases, no more than (5) business days after validation of the existence of a defect. Defect fixes, depending upon the system/customer impacts, are generally implemented in point releases, which means a quicker turnaround for the CLEC.

f. Stratification of changes

It is unclear what the CLECs are seeking here, and thus BellSouth is unable to respond. The CLECs, however, have the opportunity to raise this issue in the CCP and have it discussed.

g. Escalation of change requests

The change control process already contains a process for the escalation of change requests. The guidelines for the escalation process are on page 31 of the Interim CCP document and provide as follows:

- The ability to escalate is left to the discretion of the CLEC based on the severity of the missed or unaccepted response/resolution.
- Escalations can involve issues related to the Change Control process itself.
- For change requests, the expectation is that the escalation should occur only after normal Change Control procedures (e.g. communication timelines) have occurred per the Change Control agreement.

The contacts and the processes for each type of change request are located on pages 32-34 of the change control document. To summarize:

Type 1 change requests (System Outages) would be escalated through three levels of the Electronic Communications Support Group – Interconnection Operations by the CLEC.

Type 2-6 change requests would be escalated through the Change Control Team who would direct Business Rules, Operation Issues and System Issues to the appropriate Director within BellSouth.

Thus, escalations are already adequately addressed.

h. Dispute Resolution

The interim CCP has a dispute resolution process. The full description of the process is on page 35 of the interim CCP document. In brief summary, the process is as follows: in the event that an issue is not resolved through the CCP's escalation process, BellSouth and the affected CLECs will form a Joint Investigative Team of Subject Matter Experts within one week. The team will conduct a root cause analysis to determine the source of the problem, and then develop a plan to remedy it. Each party to the dispute must escalate the issue within each company to the person with the authority to resolve the issue. If the dispute cannot be resolved after these steps, either party may proceed to the appropriate state commission for resolution of the complaint, first through mediation and next through a formal complaint proceeding.

i. Meeting schedule

The interim CCP documents provides for schedules for meetings of the CCP depending on the type of change that is being considered. If the CLECs feel more frequent meetings are appropriate, the CLECs can submit such an issue to be considered by the CCP. This issue does not warrant a generic docket by the Commission.

j. Firm notification schedule of changes by BellSouth

The interim CCP provides a firm schedule for notifications associated with BellSouth-initiated changes. The schedule is outline on page 18 of the Interim CCP

document with a detailed description of the process flow for BellSouth-initiated changes following on pages 18-22. In summary form, notifications for software releases will be provided at least 30 days in advance of the implementation date; notification of documentation changes will be provided at least 30 days in advance of the implementation date; notification of documentation updates (not related to system changes) will be posted 5 business days in advance of the posting of the updated documentation.

k. Process should be legally binding

BellSouth has offered to make the interim CCP document a part of its interconnection agreements with various CLECs. Once accepted by a CLEC and incorporated into an agreement, the terms of the CCP will be legally binding. BellSouth is unclear as to what additional legally binding obligations the CLECs want.

l. Regularly scheduled releases

Like meeting frequency, this issue hardly warrants the opening of a generic docket. If the CLECs have a proposed schedule for releases, the schedule should be proposed to the CCP for consideration.

As is obvious from this brief discussion of the CLECs' issues, there is no need for a generic docket on the change control process. The majority of these issues are already handled in the CCP, and those that aren't are excluded for good reasons. Simply, there is nothing here for the Commission to resolve.

The Petition also raises two substantive issues, neither of which warrants a generic docket before this Commission. First, the Petition raises the issue of whether

BellSouth should be required to provide the ability to submit and process orders electronically for all services and elements.² (See Petition at 16). Contrary to the CLECs' apparent expectation, non-discriminatory access does not require that all LSRs be submitted electronically and involve no manual processes. BellSouth's own retail processes, primarily complex services, often involve manual processes, and therefore there is no requirement that every LSR has to be submitted electronically in order to provide non-discriminatory access. BellSouth processes for complex orders, with their substantial reliance on manual handling and paper forms, are common to both retail and CLEC orders. Thus, BellSouth provides to CLECs the ability to order complex services in substantially the same time and manner as it provides to its retail customers.

With respect to those orders that "fall out by design," referenced on page 16 of the Petition, BellSouth's position is the same – namely that non-discriminatory access does not require that all LSRs be submitted electronically and flow through BellSouth's systems without manual intervention. Flow through for a CLEC LSR occurs when the complete and correct electronically-submitted LSR is sent via one of the CLEC ordering interfaces (EDI, TAG, or LENS), flows through the mechanical edit checking and LESOG system, is mechanically transformed into a service order by LESOG, and is accepted by the Service Order Control System ("SOCS") without any human intervention. As discussed above, it is not feasible for LSRs for all complex services to be submitted electronically and flow through the BellSouth systems. For certain orders, BellSouth has, *for the ease of the CLEC*, allowed the orders to be submitted electronically even though such orders are then manually processed by BellSouth. Complex, variable processes are difficult to mechanize, and BellSouth has concluded that mechanizing

² Again, this issue comes directly from AT&T's Petition for Arbitration, Docket No. 11853-U.

many lower-volume complex retail services would be imprudent for its own retail operations. In that the benefits of mechanization would not justify the cost. Because the same manual processes are in place for both CLEC and BellSouth retail orders, the processes are competitively neutral, which is exactly what the Act and the FCC require.

In short, there is no need to open a generic docket to address this issue. BellSouth is in full compliance with its obligations under the Act and the FCC rules and no further investigation needs to be done.

The second substantive issue raised in the Petition is whether BellSouth should be required to provide a full function, machine-to-machine integratable maintenance and repair interface. This issue was fully considered by the Commission in Docket No. 8354-U, the generic OSS proceeding. Thus, there is no reason to reconsider it now. Moreover, BellSouth currently provides CLECs with non-discriminatory access to its maintenance and repair OSS functions through the TAFI and the ECTA gateway, and therefore meets its obligations under the Act and the FCC rules. Furthermore, despite the Petition's allegations to the contrary, BellSouth has complied with this Commission's Order regarding access to TAFI. The Commission did not order BellSouth to "enhance" TAFI; rather, the Commission ordered that BellSouth complete enhancements to allow CLECs "access" to TAFI. Therefore, BellSouth has complied with the Commission order.

The Petition also asserts that BellSouth should provide "additional OSS enhancements" such as electronic pre-order xDSL loop qualification, service inquiry and ordering ability. All of these issues are being addressed in the context of Docket No. 11900-U; thus, another generic docket would be duplicative. Lastly, the Petition alleges that BellSouth should provide CLECs with "parsed customer service records for

preordering.” This issue, however, currently is being considered in the CCP and need not be addressed by the Commission in a generic proceeding. AT&T submitted a Change Request, Log # TAG0812990003, on August 12, 1999, requesting that BellSouth deliver a parsed CSR as part of the pre-ordering functionality. Even without consideration by CCP, BellSouth currently provides CLECs a stream of data via the machine-to-machine TAG pre-ordering interface based on the Common Object Request Broker Architecture (“CORBA”) industry standard. The stream of data is identified by section with each line uniquely identified and delimited. This data is provided to CLECs in the same manner as it is provided to BellSouth’s retail units. Thus, BellSouth is providing non-discriminatory access to this data right now.

In conclusion, there are no grounds for this Commission to open a generic docket on OSS issues. The issues raised in the Petition are red herrings – they are either non-issues, or already being appropriately handled or addressed. A generic docket of the type sought by the CLECs would be duplicative and would constitute an unnecessary expenditure of Commission resources.

C. The Commission Does Not Need Another Generic Cost Docket.

In essence, the CLECs complain that BellSouth has attempted to move ahead and provide cost-based rates for all of the UNEs addressed in the FCC’s 319 Remand Order rather than submitting such rates on a piecemeal, and therefore delayed, basis. This section of the Petition represents the proverbial catch-22. Had BellSouth not filed cost studies for these elements, the Commission can rest assured that the CLECs would have accused BellSouth of attempting to delay the development of competition in Georgia. More importantly, these rates and supporting cost studies were filed pursuant to the

Commission's Order of February 1, 2000 in Docket 10692-U, which explicitly required BellSouth to file an SGAT implementing the rates and policies established in the Commission's Order as well as the unbundling requirements of the FCC's Third Report and Order (see page 22). Because there are adequate dockets currently open to address the issues raised in the Joint Petition, the Commission should dismiss the Petition as the empty rhetoric it is.

The cost studies filed by BellSouth in Docket Nos. 6863-U/7253-U and 11900-U, among others, are compliant with the methodology established by this Commission in Docket 7061-U. As BellSouth understood the purpose of establishing a standard cost methodology, it was to avoid exactly the scenario the CLECs are advocating in the Petition – namely the obligation to conduct an entire Commission proceeding every time BellSouth implements a new element at cost-based rates. The cost methodology established by the Commission enables BellSouth to file a compliant study, the Commission to evaluate the study (which is in a format with which the Commission is already familiar) and accept or deny the proposed costs and rates. There is no need for the Commission to expend the time and the resources to conduct a generic proceeding for every new study BellSouth submits to this Commission. For CLECs who profess such a need for expediency, their position is ironic at best.

D. The Commission Should Not Adopt A Generic Collocation Docket.

As with the other issues raised in the Petition, there is no need for the Commission to conduct a generic collocation docket. BellSouth's Collocation Handbook, which is incorporated into its SGAT and has gone into effect, sets forth the nondiscriminatory terms and conditions pursuant to which BellSouth will provide

collocation. CLECs with individual issues may file complaints with the Commission; those who have been denied space can challenge BellSouth's waiver petitions in proceedings established to accommodate such protests. In short, there is no need for the Commission to conduct a generic proceeding on collocation issues.

The CLECs set forth a virtual laundry list of alleged issues and concerns that they contend support the need for a generic docket. Even with the brief response provided to each of those issues as set forth herein, it will be obvious that a generic proceeding is unnecessary. First, the CLECs allege that "BellSouth routinely fails to adequately demonstrate the basis for its denial of collocation due to space limitations...." (Petition, at 22). Not surprisingly, the CLECs cite no support for this bald assertion. Should a CLEC wish to support this broad, unsubstantiated allegation, however, there is already a procedure to do so established by the Commission in Docket No. 10429-U. Specifically, the Commission established methods and procedures for a CLEC to challenge BellSouth's request for a waiver. Of the CLECs participating in this filing, Sprint is the only company that has availed itself of the established procedures.

The CLECs next allege, again without support, that "BellSouth has not complied with [the] requirement" to remove obsolete unused equipment. To BellSouth's knowledge, this statement simply is untrue. BellSouth commits to removing obsolete unused equipment, at the request of the CLEC, to make room for physical collocation. Any allegation that BellSouth has refused to comply with this obligation (although BellSouth doubts it could be supported) should be the subject of a complaint proceeding, not a generic docket.

Next, the CLECs complain that BellSouth does not provide forecasts to support its space reservation in its central offices. As most of the parties to this Petition should remember, this issue was discussed in the workshop in Docket No. 10429-U. At the conclusion of the workshop, the parties developed consensus procedures, all of which were subsequently adopted by the Commission. Part of the procedures specified the information that BellSouth is required to provide to support a waiver petition. Notably, *there is no specific requirement* that BellSouth provide forecasts.³ Because this issue has already been considered by both the industry and the Commission, it hardly warrants the opening of a generic docket.

The CLECs next complain about BellSouth's collocation intervals. Interestingly, the CLECs cite "mounting authority" that ILECs must provision cageless and shared collocation at intervals reflective of the "time needed to complete the work necessary to establish such arrangements...." (Petition, at 24). This is precisely the basis upon which BellSouth established its collocation intervals, whether for caged, cageless or shared. The real root of the CLECs' issue seems to be their contention that intervals for cageless collocation should be different from those for caged. The basis for this assertion is that the caged interval "assumes space identification, build-outs of enclosures, power and HVAC, all of which are not necessary in a cageless environment." (Petition, at 24-25). The CLECs' position, however, is unsustainable. BellSouth's provisioning interval is not controlled by the time required to construct an arrangement enclosure. Where BellSouth performs the construction of an arrangement enclosure, the activities required to design

³ The procedures in Docket No. 10429-U provide that BellSouth will file a waiver petition that includes the following: detailed engineering drawings with project codes/available project numbers for all reserved space; completed Physical Collocation Floor Space Worksheet; reclamation timelines; timelines for space

and construct the enclosure are not the controlling factor in the provisioning interval for collocation. Regardless of whether a collocation arrangement is caged or cageless, certain other critical activities must be performed such as providing upgrades to power capacity and supply, heating, ventilation, and air-conditioning, as well as the cable racking and cross-connect capacity required to serve the collocation space.

The CLECs next misquote the FCC's *Advanced Wireline Services Order* in an attempt to bolster their position that ILECs have an affirmative duty to precondition space. (Petition, at 25). According to the CLECs, the FCC ordered that "BellSouth must make *collocation space available* 'without waiting until a competing carrier requests a particular arrangement so that competitors will have a variety of collocation options from which to choose.'" (Petition, at 25)(Emphasis added). In actuality, the FCC ordered that ILECs must offer *all methods* of collocation without waiting for a CLEC to request a given type of collocation. In relevant part, the Order provides as follows:

We now adopt new rules requiring incumbent LECs to make certain *collocation arrangements* available to requesting carriers... We require incumbent LECs to make each of these arrangements outlined below available to competitors as soon as possible, without waiting until a competing carrier requests a particular arrangement, so that competitors will have a variety of *collocation options* from which to choose.

Advanced Services Order, ¶ 40 (emphasis added). As is clear from the correct quote, the Order contains no affirmative obligation on the part of the ILEC to precondition space, and no generic proceeding is necessary to make such a determination. The reality of the FCC's order is much different than the CLECs' representation of said order.

The Petition next alleges that the Commission must revisit BellSouth's collocation intervals because "cageless collocation is akin to virtual collocation."

availability; description of construction plans; staffing levels and schedules. and description of all

(Petition, at 25). As BellSouth has demonstrated to this Commission on various occasions, this premise is false. The Commission has addressed issues of this nature several times over the past few months. Most recently, the Commission addressed collocation intervals in the DeltaCom and Intermedia arbitrations.

The Petition references several state commission decisions the CLECs contend support their position on collocation intervals. These decisions, however, are not comparable to BellSouth's collocation offerings. In the Texas decision, for example, the Texas Commission established the cited intervals for "*active* collocation space" which translates to pre-conditioned collocation space. BellSouth's intervals, on the other hand, are based on the necessity of doing all of the work to provision physical collocation within the specified time period. Thus, the Texas intervals and the BellSouth intervals are not comparable.

Similarly, the Virginia Commission Staff based its recommended quoted interval on conditioned space, so it is not comparable to BellSouth's intervals. The Virginia Staff's conclusion that cageless collocation was similar to virtual collocation was also based on a premise that cageless collocation is always preconditioned, (*see* Staff Recommendation, at 26), a premise BellSouth vigorously disputes. While it does appear that the Utah Commission did implement an interval of 45 days for virtual and physical collocation, BellSouth has demonstrated to this Commission on numerous occasions that such an interval is not reasonable. Finally, with respect to the Louisiana Commission Staff recommendation, the Commission has not yet issued an order in the DeltaCom arbitration so it is unclear what the Commission will do with respect to the interval for cageless collocation.

administrative space and equipment; and description of grounds and surrounding area.

Finally, the CLECs allege that BellSouth's rates for collocation are not cost based and thus improper. Again, the CLECs' analysis is based on faulty premises. The application charge for collocation space is based on the various activities required to process an application. The development of the application response is complex, but efficient. First, the CLEC submits an application for collocation to its Account Team Collocation Coordinator ("ATCC"). When the application is received by the ATCC, in addition to verifying that it is complete and accurate, the ATCC must distribute the application to six different departments within BellSouth and to one BellSouth certified vendor. BellSouth's Property and Services Management ("PS&M") group evaluates the impact of the applicant's equipment placement on existing central office building support systems such as, heating, ventilation, and air conditioning, and building space. BellSouth's Common Systems Capacity Management ("CSCM") and Circuit Capacity Management ("CCM") group assess the central office infrastructure related to the application, such as cable rack requirements, cable lengths and routes, fiber entrance arrangements and routes, and point of demarcation terminations.

In the event the CLEC wishes to place its own entrance facility, BellSouth's Outside Plant Engineering ("OSPE") group surveys the location and determines the availability of spare ducts from the manhole into the central office and whether the construction or rearrangements will be required. BellSouth's Power Capacity Management ("PCM") group and BellSouth's certified power vendor analyze the impact of the application on existing power capacity within the central office to determine whether additional power capacity will be required to support the collocater's equipment. The BellSouth Interconnection Network Access Coordinator ("INAC") then reviews the

application responses from each of the network organizations, verifies that the response is complete and accurate, and coordinates the response back to the applicant through the ATCC. Given this scope of work, and the time and cost involved, BellSouth's Application Fee is reasonable.

The CLECs next complain that "BellSouth has never submitted a cost study to the Commission" for rates for cageless or shared collocation. As BellSouth has explained to the Commission, the appropriate rates for cageless and shared collocation *are the same as* the rates for physical collocation established by this Commission – namely \$100 per square foot recurring rate. There is no difference in cost between caged physical and shared or cageless.

In particular, virtual collocation is *not* the same as cageless – there are numerous costs incurred by BellSouth in a cageless arrangement that are not present in a virtual arrangement including power/HVAC, cable racking etc. The theory of using a surrogate virtual rate for cageless collocation espoused by the CLECs, developed in large part by Don Wood on behalf of ITC^DeltaCom, is not based on sound cost methodology principles. First, the underlying assumption is wrong – BellSouth does not own the equipment in a virtual collocation arrangement, nor does it incur the expense of maintaining such equipment. In virtual collocation, BellSouth leases the equipment from the collocator and pays a nominal fee of \$1.00 as outlined in BellSouth's FCC Tariff No. 1, Section 20. BellSouth maintains the equipment at the collocator's expense, pursuant to the rates and charges in Section 13 of the FCC Tariff No. 1. Second, the CLECs' methodology fails because the collocator purchases the equipment; therefore, there is no

investment by BellSouth against which annual cost factors could reasonably be applied to develop a cost for BellSouth.

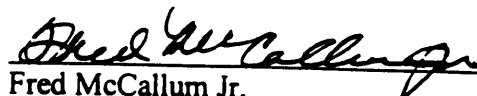
The appropriate cost studies to use for cageless collocation are the studies for physical collocation. The FCC specifically stated in its Advanced Services order that cageless collocation is a form of physical collocation. The rates for physical collocation developed for this Commission and approved by this Commission are equally applicable to cageless collocation and thus no new cost studies are necessary.

CONCLUSION

For the reasons set forth herein, BellSouth respectfully requests that the Commission deny all relief sought in the Petition. As demonstrated herein, there is no need for the Commission to open additional generic dockets and needlessly expend Commission time and resources addressing the so-called "issues" the CLECs have attempted to raise.

This 12th day of July, 2000.

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CERTIFICATE OF SERVICE
6863-U/7061-U/7253-U/7892-U/8354-U/10692-U

This is to certify that I have this day served a copy of the within and foregoing,
**BellSouth Telecommunications, Inc.'s Response to Petition to Establish a Comprehensive
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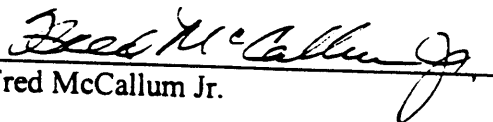
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July 21st, 2000

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Executive Secretary
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RECEIVED
JUL 24 2000
EXECUTIVE SECRETARY
G.P.S.C.

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

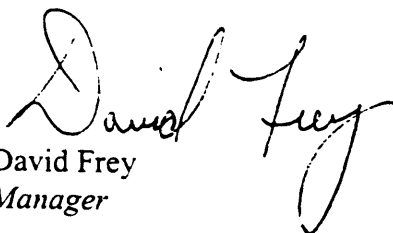
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG Consulting LLC's Closure Reports for Exceptions 2 (with attachment), 13, 17, 21, 36, 40, 51, 69, and 81 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





CLOSURE REPORT FOR EXCEPTION 2

BellSouth Georgia OSS Testing Evaluation

Date: July 21, 2000

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

This exception consisted of two dimensions:

1. BellSouth's current procedures and systems for change management do not include fully defined and published notification intervals for announcements of change events.
2. BellSouth's change management process should define notification intervals for both BellSouth- and CLEC-initiated changes that stem from both system enhancements and defects.

Summary of BellSouth Responses:

BellSouth's second amended response to Exception 2 addressed each of the elements noted in the exception, stating:

A workshop was held on February 16-17, 2000, during which BellSouth and the CLECs expanded the process scope (creating the *Interim Change Control Process*, dated April 26, 2000, which replaced the former *Electronic Interface Change Control Process [EICCPC]*) to include the following:

- "BellSouth- and CLEC-initiated Defect Change Requests, both documentation and software, that are CLEC impacting.
- BellSouth-initiated enhancement requests that are CLEC impacting.
- Oversight of BellSouth's Escalation and Defect Notification processes.
- Formalized Escalation and Defect Notification processes.
- Implementation of a Dispute Resolution Process.
- Incorporation of System Outages as part of the new process.
- Inclusion of changes to the manual process for CLECs.

Notification intervals for each request type were included in the revised CCP document as follows:



CLOSURE REPORT FOR EXCEPTION 2

BellSouth Georgia OSS Testing Evaluation

- Software release notification will be provided a minimum of 30 (calendar) days in advance of the implementation time frame.
- Documentation changes will be provided a minimum of 30 (calendar) days in advance of the implementation date.
- Documentation only updates (non-system changes) will be posted 1 week in advance of documentation posting date.

The *Interim Change Control Process (I-CCP)*, which is posted on BellSouth's Web site, became effective 4/17/00."

Summary of KPMG Re-test Activities:

KPMG's re-test activities consisted of: 1) an evaluation of BellSouth's responses to determine if they adequately addressed the concerns raised in Exception 2; 2) an interview with BellSouth's Change Control Manager and team; 3) a review of updated policies and procedures noted in BellSouth's responses to Exception 2; and 4) a review of BellSouth's revised *Interim Change Control Process* document.

KPMG Re-test Results:

BellSouth's resolutions to the exception's two dimensions are described below:

1. **BellSouth's current procedures and systems for change management do not include fully defined and published notification intervals for change events.**

KPMG verified that BellSouth, with CLEC involvement, has made adequate improvements to its change control process. Processes and procedures have been constructed to provide defined notification intervals for both software and documentation change events, as described above.

2. **BellSouth's change management process should define notification intervals for both BellSouth- and CLEC-initiated changes that stem from both system enhancements and defects.**

BellSouth's revised *Interim Change Control Process* provides for six types of change requests, including Type 6 for Defects, Type 4 for BellSouth-initiated enhancement changes, and Type 5 for CLEC-initiated enhancement changes.



CLOSURE REPORT FOR EXCEPTION 2

BellSouth Georgia OSS Testing Evaluation

Based on its experience, KPMG has determined that BellSouth has adequately addressed the issues raised in Exception 2. The implemented processes have allowed a greater degree of management of proposed changes by CLECs, as they are now provided with advance notification from BellSouth of upcoming change events. This allows the CLECs to plan for and implement their own internal processes and systems to align with those introduced by BellSouth through the *Interim Change Control Process*.

KPMG will continue to monitor BellSouth's management of all change events through the conclusion of testing to ensure that all such items are properly processed through the formal *Interim Change Control Process*, and that stated advance notification intervals are met. The GA-PSC may also desire to monitor BellSouth's management of all change events on a continuing basis to ensure that all such items are processed through this same process.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, closes Exception 2.

Attachments: BellSouth's *Interim Change Control Process*, Version 1.5, dated April 26, 2000.



CHANGE CONTROL PROCESS

CCP.DOC

VERSION 1.5

APRIL 26, 2000

The following document consolidates input from CLECs and BellSouth. It is a working document for discussion purposes only.

Issued: 04/26/00

Jointly Developed by the Change Control Sub-team comprised
of BellSouth and CLEC Representatives.

BellSouth Telecommunications reserves the right to revise this document for any reason, with concurrence of the CLEC/BellSouth Review Board, including but not limited to, conformity with standards promulgated by various government or regulatory agencies, utilization of advance in the state of the technical arts, or the reflection of changes in the design of any equipment, techniques, or procedures described or referred to herein. LIABILITY TO ANYONE ARISING OUT OF USE OR RELIANCE UPON ANY INFORMATION SET FORTH HEREIN IS EXPRESSLY DISCLAIMED, AND NO REPRESENTATIONS OR WARRANTIES, EXPRESSED OR IMPLIED, ARE MADE WITH RESPECT TO THE ACCURACY OR UTILITY OF ANY INFORMATION SET FORTH HEREIN.

This document is not to be construed as a suggestion to any manufacturer to modify or change any of its products, nor does this document represent any commitment by BellSouth Telecommunications to purchase any product whether or not it provides the described characteristics.

This document is not to be construed as a contract. It does not create an obligation on the part of BellSouth Telecommunications or the Competitive Local Exchange Carriers to perform any modification, change or enhancement of any product or service.

Nothing contained herein shall be construed as conferring by implication, estoppel or otherwise, any license or right under any patent, whether or not the use of any information herein necessarily employs an invention of any existing or later issued patent.

Issued: 04/26/00

Jointly Developed by the Change Control Sub-team comprised
of BellSouth and CLEC Representatives.

VERSION CHANGE HISTORY

This section list changes made to the baseline Electronic Interface Change Control Process document since the last issue. New versions of this document may be obtained via BellSouth's Web site.

Version	Issue Date	Section Revised	Reason for Revision
1.0	04/14/98		Initial issue.
1.2	2/28/00	All	The EICCP Documentation has been modified to incorporate: - Multiple Change Request Types (CLEC Initiated, BST Initiated, Industry Standards, Regulatory and System Outages) - Incorporated manual process - Defined cycle times for process intervals and notifications - Defect Notification process - Escalation Process - Modified Change Control forms to support process changes - Changed EICCP to CCP
1.3	3/14/00	All	The CCP Documentation has been modified to incorporate: - Type 6 Change Request, CLEC Impacting Defect - Increased number of participants at Change Review meetings - Changed cycle time for Types 2-5 Step 3 from 20 days to 15 days - Defined Step 4 of the Defect Notification process to include communicating the workaround to the CLEC community - Web Site address for Change Control Process - Notification regarding the Retirement and

			Introduction of new interfaces - New status codes for Defect Change Requests - New status codes: 'S' for Scheduled Change Requests and 'I' for Implemented Change Requests (types 2-5 Change Requests) - Removed reference to EDI Helpdesk. Electronic Communications Support (ECS) will be the first point of contact for Type 1 System Outages. - Word changes to provide clarification throughout the document.
1.4	4/12/00	All	The CCP Documentation has been modified to incorporate: - Type 1 and 6 Notifications will be communicated to CLECs via e-mail and web posting - Step 3 Cycle Time (Types 2-5) changed from 15 business days to 20 business days - Verbiage to Step 10 (Types 2-5) regarding BellSouth presenting baseline requirements - Introduction and Retirement of New Interfaces Section - Dispute Resolution Process - Testing Environment Section - Word changes to provide clarification throughout the document - Monthly Status Meeting Agenda Template - RF1870 Change Request Form changes
1.5	4/26/00	Section 1	- Updated CCP web site address
		Section 8	- Updated Escalation Contacts for Types 2-6
		Section 11	- Added definitions for Account Team and Electronic Communications Support (ECS)

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1.0 INTRODUCTION

This document establishes the process by which BellSouth Telecommunications (BST) and Competitive Local Exchange Carriers (CLECs) will manage requested changes to the BellSouth Local interfaces, the introduction of new interfaces, and provide for the identification and resolution of issues related to Change Requests. This process will cover Change Requests that affect external users of BellSouth's Electronic Interface Applications, associated manual process improvements, performance or ability to provide service including defect notification. This process shall be referred to as the Change Control Process.

All parties should recognize that deviations from this process might be warranted where unanticipated circumstances arise such that strict application of these guidelines may not result in their intended purpose. Furthermore, deviations may be required due to specific regulatory and business requirements. Parties shall provide appropriate web notification to the CLEC/BST Change Control Team participants prior to deviating from the processes established within this document. All parties will comply with all legal and regulatory requirements.

The Change Control Process will cover change requests for the following interfaces and associated manual processes that have the potential to impact the interfaces connected to BellSouth:

- Local Exchange Navigation System (LENS)
- Electronic Data Interchange (EDI)
- Telecommunications Access Gateway (TAG)
- Trouble Administration Facilitation Interface (TAFI)
- Electronic Communications Trouble Administration (EC-TA) Local
- CLEC Service Order Tracking System (CSOTS)

The types of changes that will be handled by this process are as follows:

- Software
- Hardware
- Industry Standards
- Product and Services (i.e., new services available via the in-scope interfaces)
- New or Revised Edits
- Process (i.e., electronic interfaces and manual processes relative to order, pre-order, maintenance)
- Regulatory
- Documentation (i.e., business rules for electronic and manual processes relative to order, pre-order, maintenance)
- Defects

The scope of the Change Control Process **does not** include the following:

- BonaFide Requests (BFR)
- Production Support (i.e. adding new users to existing interfaces, existing users requesting first time use of existing BST functionality)
- Contractual Agreements
- Collocation
- Testing Support (i.e. negotiating/coordinating test agreements and dates)
- Issue Resolution/Questions (i.e. questions associated with interface functionality, interpreting documentation)

Change Requests of this nature will be handled through existing BellSouth processes.

OBJECTIVES OF THE CHANGE CONTROL PROCESS:

- Support the Industry guidelines that impact Electronic Interfaces and manual processes relative to order, pre-order, maintenance, and billing as appropriate
- Ensure continuity of business processes and systems operations
- Establish process for communicating and managing changes
- Allow for mutual impact assessment and resource planning to manage and schedule changes
- Capability to prioritize requested changes

The minimum requirements for participation in the Change Control Process electronically are:

- Word 6.0 or greater
- Excel 5.0 or greater
- Internet E-mail address
- Web access

The web site address for the Change Control Process is as follows:

<http://www.interconnection.bellsouth.com/>

Select "Local Exchange Carriers"

Select "Change Control Process"

2.0 CHANGE CONTROL ORGANIZATION

The Change Control organizational structure supports the Change Control Process. Each position within the organization has defined roles and responsibilities as outlined in the Change Control Process Flow - Section 4 of this document. Identified positions, along with associated roles and responsibilities are as follows:

Change Review Participants. Representatives from Competitive Local Exchange Carriers (CLECs) and BellSouth. This team meets to review, prioritize, and make recommendations for Candidate Change Requests. The Candidate Change Requests are used as input to the Internal Change Management Processes (refer to process step 7).

CLECs and BellSouth will define points of contact in each of their companies for communicating and coordinating change notification. All change requests are made in writing. Notifications will be posted to the BellSouth web site.

Each company may bring the number of participants necessary to represent their position. If the number of participants grows to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.

BellSouth Change Control Manager (BCCM). The BCCM is responsible for managing the Change Control Process and is the main point of contact for Types 2 – 6 changes. This individual maintains the integrity of the Change Requests, prepares for and facilitates the Change Review Meetings, presents the Pending Change Requests to the BST Internal Change Management Process, and ensures that all Notifications are communicated to the appropriate parties.

CLEC Change Control Manager (CCCM). The CCCM is the CLEC point of contact for Change Requests. This individual is responsible for presenting and prioritizing Change Requests at the Change Review Meetings.

Release Management Project Team. A team of CLEC and BellSouth Project Managers who manage the implementation of scheduled changes and releases.

3.0 CHANGE CONTROL DECISION PROCESS

Change requests will be classified by Type. There are six Types:

Type 1 – System Outage

A Type 1 change is a BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface. If the System Outage is not resolved within 20 minutes, a notification will be provided via e-mail and posted to the web within one hour. Either BellSouth or a CLEC may initiate the change request. Type 1 system outages will be processed on an expedited basis. All Type 1 System Outages will be reported to the Electronic Communications Support (ECS) Help Desk. A Type 1 System Outage is a condition where the CLEC Pre-Orders/Orders/Queries/Maintenance Requests cannot be submitted or will not be accepted by BellSouth.

Type 2 – Regulatory Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts are Type 2 changes. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. While timely compliance is required, the systems requirements and methodology to achieve compliance are usually discretionary and within the scope of change management. Either BellSouth or a CLEC may initiate the change request.

Type 3 – Industry Standard Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines are Type 3 changes. Either BellSouth or a CLEC may initiate the change request.

Type 4 – BellSouth Initiated Change.

Any non-Type 1 change affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes).

Type 5 – CLEC Initiated Change.

Any non-Type 1 change affecting interfaces between the CLEC's and BellSouth's operational support systems which the CLEC requests BellSouth to implement is a Type 5 change. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes).

Type 6- CLEC Impacting Defects.

Any non-Type 1 change where a CLEC Impacting defect is found in a production environment when the system is not operating as specified in the baselined business requirements. The CLEC and/or BellSouth may initiate these types of changes affecting interfaces between the CLEC's and BellSouth's operational support systems. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require workarounds or clarification.

Figure 3-1 shows the top-level process that will be used to evaluate Change Requests. The BellSouth Account Team(s) will handle BFR requests and production support issues. Enhancements and defects will be handled through the Change Control Process.

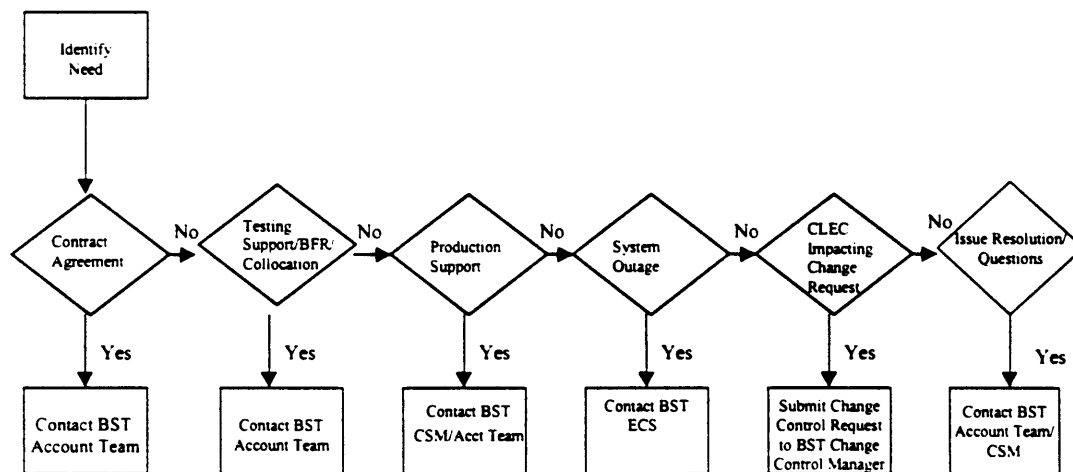


Figure 3-1. Change Control Decision Process

4.0 CHANGE CONTROL PROCESS FLOW

The following two sub-sections describe the process flows for typical Type 1 through Type 5 changes. Each sub-section will describe the cycle times for an activity and document accountability, sub-process activities, inputs and outputs for each step in the process. Section 5 of this document describes the process flow for Type 6 changes. Based on the categorization of the request, the following diagram will help guide a CLEC or BellSouth representative to the appropriate process flow based on Change Control Request Type:

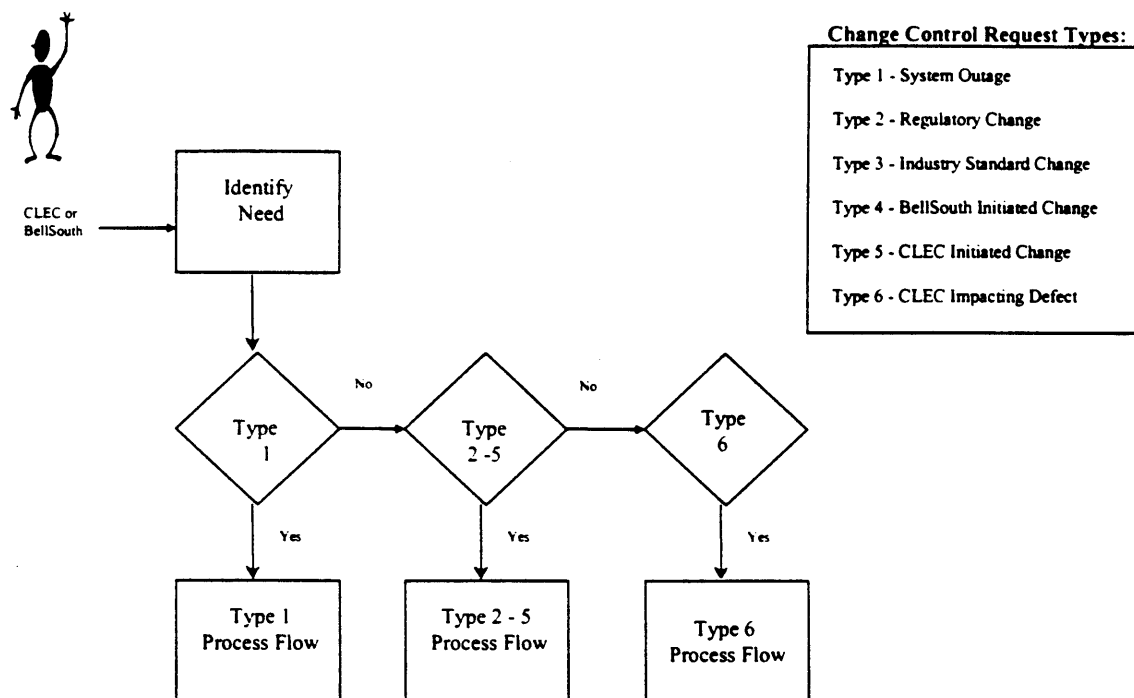


Figure 4-1. Change Control Process Flow

Part 1 - Type 1 Process Flow

Figure 4-2 provides the process flow for resolving a typical Type 1 - System Outage. The Electronic Communications Support (ECS) Group will work with the CLEC community to resolve and communicate information about system outages in a timely manner - actual cycle times are documented in table 4-1 and the sub-process steps. The ECS Helpdesk number is 888-462-8030.

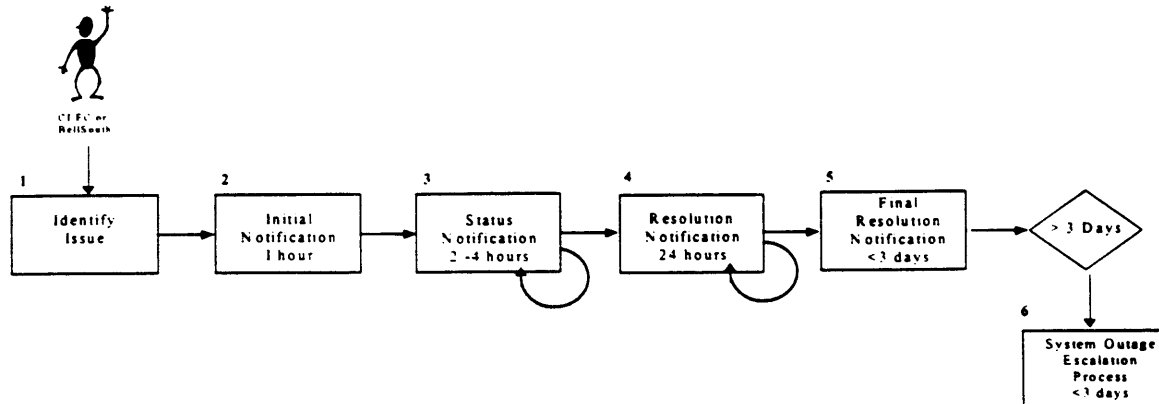


Figure: 4-2. Type 1 Process Flow

Table 4-1 describes the cycle times for each process step that is outlined in the Type 1 - System Outage Process Flow. These cycle times represent typical timeframes for completing the documented step and producing the desired output for the step. In sub-process step 2 "Initial Notification" timeframe for completing this step does not begin until after the outage has been reported. The sub-process steps 3 "Status Notification" and 4 "Resolution Notification" are iterative steps. Iterative steps will be performed one or more times until the exit criteria for that process are met. If resolution is not reached within 20 minutes, BellSouth will provide the initial notification to the CLEC community via e-mail and post outage information on the web.

Table 4-1. Type 1 Cycle Times

Process Description	1 Identify Issue	2 Initial Notification	3 Status Notification	4 Resolution Notification	5 Final Resolution Notification	6 Escalation
Cycle Time	N/A	1 hour E-mail & BST Website will be posted if outage exceeds 20 minutes	2 - 4 hours (Iterative)	24 hours (Iterative)	< 3 days	> 3 days System Outage Escalation Process

Note: The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.

The table below details the steps, accountable individuals, tasks, the inputs/outputs and the cycle time of each sub-process in the Type 1 Process Flow. This process will be used to capture and communicate system outage information, status notification(s), resolution and notification(s), and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 4-2. Type 1 Detail Process Flow

Step	Accountability	<u>Sub-processes</u> Activities	Inputs and Outputs	Cycle Time
1	CCCM ECS	<u>IDENTIFY ISSUE:</u> - Internally determine if outage exists with BellSouth Electronic Interface. (The CLEC should perform internal outage resolution activities to determine if the potential problem involves the BellSouth Electronic Interface). - Call the BST Electronic Communications Support (ECS) help desk at 888-462-8030. - ECS and individual CLEC will determine if the problem is likely to have no impact on the industry. If there is no impact, the outage will be worked on a bilateral basis. - ECS will record and track the outage.	<u>INPUTS:</u> - Issue Characteristics - Call to ECS Helpdesk <u>OUTPUTS:</u> - Recorded Outage	N/A
2	ECS	<u>INITIAL NOTIFICATION:</u> - ECS will post to the Web an Initial Industry Notification that a BellSouth Electronic Interface outage has been identified. An e-mail to the CLECs participating in Change Control will also be distributed. - The CLEC initiating the Type 1 System Outage will need to be available for communications on an as needed basis. - ECS will continue to work towards the resolution of the problem - If outage is resolved, this notice is the first and final notification. The process for the item has ended.	<u>INPUTS:</u> - Recorded Outage <u>OUTPUTS:</u> - Industry Notification posted on Web - E-mail to CLECs participating in Change Control	1 Hour If System Outage is not resolved within 20 minutes, a notification will be sent to CLECs via e-mail and posted to the web.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Outage Information will be reported in the monthly status meeting by the BCCM.		
3	ECS	<u>STATUS NOTIFICATION: (ITERATIVE)</u> 1. If the outage is not resolved, ECS will continue to work towards the resolution on the problem. 2. ECS may communicate with the industry / affected parties. The following information may be discussed: • Clarification of outage • Current status of resolution • Agreement of resolution 3. If a resolution has not been identified continue giving status notifications to the industry and continue repeating Step 3 "Status Notification" via the web. 4. Proceed to Step 4 "Resolution Notification" when a resolution has been identified.	<u>INPUTS:</u> • Industry Notification posted on Web <u>OUTPUTS:</u> • Status Notification posted on Web • Resolution information	2-4 hour intervals
4	ECS CCCM	<u>RESOLUTION NOTIFICATION: (ITERATIVE)</u> 1. The resolution notification is posted to the Web. 2. If the item is determined to be a defect, the CLEC that initiated the call will submit a "Change Request Form" checking the defect box. 3. If the resolution is not the final resolution the process will loop back to Step 3 "Status Notification". BellSouth will continue to work towards the final resolution. 4. When the final resolution has been created, proceed to Step 5 "Final Resolution Notification".	<u>INPUTS:</u> • Status Notification posted on Web • Resolution information <u>OUTPUTS:</u> • Resolution Information posted on Web • Final Resolution Information	24 hours after reporting outage
5	ECS	<u>FINAL RESOLUTION NOTIFICATION:</u> 1. The final resolution notification is posted on the Web.	<u>INPUTS:</u> • Final Resolution Information	< 3 days

Step	Accountability	<u>Sub-processes</u> Activities	Inputs and Outputs	Cycle Time
			<u>OUTPUTS:</u> • Final Resolution Notification	
6	CCCM ECS	<u>ESCALATION</u> 1. Escalation is appropriate anytime the interval exceeds the recommended guidelines for notification. 2. Refer to the Type 1 - Escalation Process documented in Section 7.	<u>INPUTS:</u> • Information or concern relating to a Type 1 - Systems Outage <u>OUTPUTS:</u> • Documented Escalation • Escalation Response	> 3 days (The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.)

Part 2 – Types 2-5 Process Flow

Figure 4-3 provides the process flow for reviewing, scheduling and implementing a typical Type 2-5 Change Request. The process diagram applies to Change Requests submitted via the Change Control Process. Change Requests should be submitted to the BellSouth Change Control Manager using the standard Change Request form template. This template can be acquired on the Change Control web page.

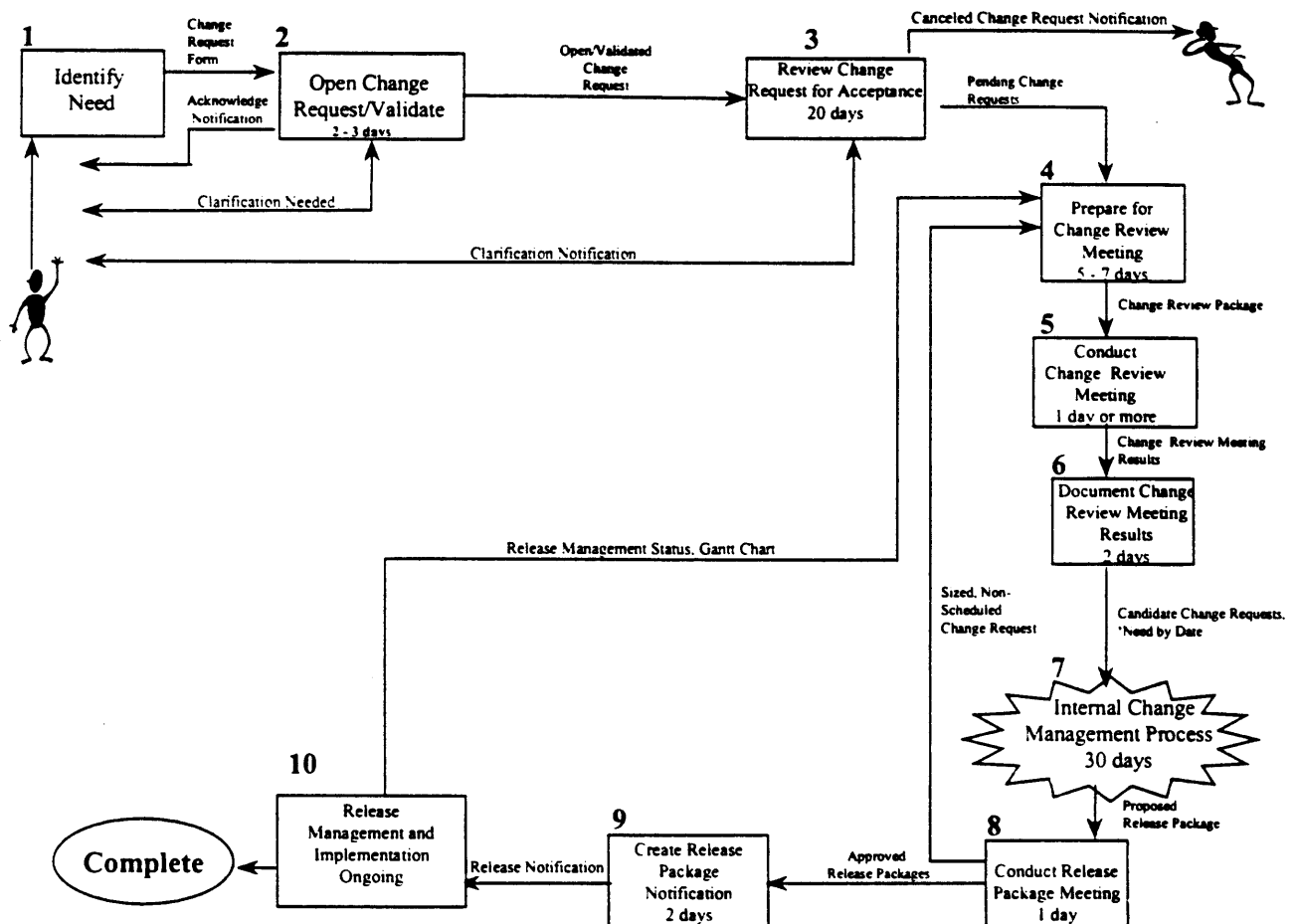


Figure 4-3. Change Control Process Flow

Based on the process flow outlined above:

- Software Release Notifications will be provided 30 days or more in advance of the implementation date.
- Documentation changes will be provided 30 days or more in advance of implementation date.
- CLEC notification of documentation updates (non-system changes) will be posted 5 (five) business days in advance of documentation posting date.

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Change Control process. This process will be used to develop Candidate Change Requests that will be used as input to the Internal Change Management Process. Steps shown in the table are sequential unless otherwise indicated.

Table 4-3. Types 2-5 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	<u>IDENTIFY NEED</u> 1. Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. 3. Attach related requirements and specification documents. (See Attachment A-1A, Item 22) 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth.	<u>INPUTS:</u> • Change Request Form (Attachment A-1) • Change Request Form Checklist (Attachment A-1A) <u>OUTPUTS:</u> • Completed Change Request Form with related documentation	N/A
2	BCCM	<u>OPEN CHANGE REQUEST/VALIDATE CHANGE REQUEST FOR COMPLETENESS</u> 1. Log Request in Change Request Log. 2. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. 3. Establish request status ('N' for New	<u>INPUTS:</u> • Completed Change Request Form with related documentation • Change Request Form Checklist • Change Request Clarification Response	2-3 Bus Days Clarification times would be in addition to cycle time.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Request) - Review change request for mandatory fields using the Change Request Form Checklist. - Verify Change Request specifications and related information exists. - Send Clarification Notification via email to the originator (Attachment A-4) if needed. - Update Change Request Status to "PC" for Pending Clarification if clarification is needed. <u>CLEC or BellSouth Originator</u> If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).	<u>OUTPUTS:</u> - New Change Request - Acknowledgment Notification - Validated Change Request - Clarification Notification - Industry Notification posted on web	
3	BCCM	<u>REVIEW CHANGE REQUEST FOR ACCEPTANCE</u> - Review Change Request and related information for content. - Determine status of request: - If change already exists or training issue forward Cancellation Notification (Attachment A-3) to CCM or BCCM and update status to 'C' for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. - If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. - If request is accepted, update Change Request status to "P" for Pending in Change Request Log. - If a request is not accepted, update change request status to 'CB' for "Cancelled BellSouth" and provide notification and explanation to originator. NOTE: See Section 9.0 Terms and Definitions – Change Request Status for valid status codes and descriptions.	<u>INPUTS:</u> - New Change Request - Validated Change Request - Clarification Notification (if required) <u>OUTPUTS:</u> - Pending Change Request - Clarification Notification (if required) - Cancellation Notification (if required) - CR status updated on web	20 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		3. Change Request reviewed for impacted areas (i.e., system, manual process, documentation) and adverse impacts. 4. BST may reject the change request based on the following reasons: cost/benefit, resource commitments, industry direction or BellSouth direction and will provide notification to the originating party.		
4	BCCM CCCM	<u>PREPARE FOR CHANGE REVIEW MEETING</u> NOTE: These activities take place to prepare for Change review meetings when prioritizations take place. <u>BCCM</u> 1. Prepare an agenda. 2. Make meeting preparations. 3. Update Change Request Log with current status for new and existing Change Requests. 4. Prepare and post Change Request Log to web. <u>CCCM</u> 1. Analyze Pending Change Requests. 2. Determine priorities for change requests and establish "Desired/Want" dates. 3. Create draft Priority List to prepare for Change Review meeting.	<u>INPUTS:</u> • Pending Change Request Notifications • Project Release Status (Step 10) • Change Request Log <u>OUTPUTS:</u> • Change Request Log • CLEC Draft Priority List	5-7 Bus Days
5	BCCM CCCM	<u>CONDUCT CHANGE REVIEW MEETING</u> <u>Monthly Status Meetings</u> 1. Communicate regulatory mandates. 2. Review status of pending/approved Change Requests (including defects) at monthly status meeting. 3. Review current Release Management statuses.	<u>INPUTS:</u> • Change Request Log • CLEC Draft Priority List • Desired/Want Dates • Impact analysis <u>OUTPUTS:</u> • Meeting minutes • Updated Change Request Log • Candidate Change Request List • Issues and Actions Items	1 Bus Day (or as needed based on volume) Meeting Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		<u>Prioritization Meetings (held as needed based on published release schedule)</u> 1. Follow Steps 1-3 from Monthly Status Meetings. 2. Initiators present Change Requests. 3. Discuss Impacts. 4. Prioritize Change Requests. 5. Develop final Candidate Requests list of Pending Change Requests by interface, 'Need by Dates' and prioritized Change Requests. 6. Update Change Request Log to 'CRC' for Change Review Complete, 'RC' for Candidate Request List, as appropriate. 7. Review issues and action items and assign owners.	(if required)	
6	BCCM	<u>DOCUMENT CHANGE REVIEW MEETING RESULTS</u> 1. Prepare and distribute outputs from Step 5.	<u>INPUTS:</u> - Change Request Log - Final Candidate Request List <u>OUTPUTS:</u> - Updated Change Request Log - Web posting of meeting output	2 Bus Days
7	BCCM CCCM	<u>INTERNAL CHANGE MANAGEMENT PROCESS</u> 1. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities only to the Candidate Change Requests that meet the criteria established by the Internal Change Management Process. This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities.	<u>INPUTS:</u> - Candidate Change Request List with agreed upon 'Need by Dates' - Change Request Log <u>OUTPUTS:</u> - BellSouth's Proposed Release Package	30 Bus Days
8	BCCM CCCM	<u>CONDUCT RELEASE PACKAGE MEETING</u> 1. Prepare agenda. 2. Make meeting preparations. 3. Evaluate proposed release schedule. 4. Non-scheduled Change Requests	<u>INPUTS:</u> - BellSouth's Proposed Release Package - BellSouth's Release Schedule - Change Request Log	1 Bus Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		returned to Step 4 as Input for the "Prepare for Change Review Meeting" process. - Based on BST/CLEC consensus create Approved Release Package. - Identify Release Management Project Manager, if possible. - Establish date for initial Release Management Project Meeting. - All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled".	OUTPUTS: - Approved Release Package - Updated Change Request Log - Meeting Minutes - Scheduled Change Requests - Non-Scheduled Change Requests (Return to Step 4) - Date for initial Release Management Project Meeting	
9	BCCM	<u>CREATE RELEASE PACKAGE NOTIFICATION</u> Develop and distribute Release Notification Package via web.	INPUTS: - Approved Release Package OUTPUTS: - Release Package Notification	2 Bus Days after Release Package Mtg.
10	BCCM (Project Managers from each participating company)	<u>RELEASE MANAGEMENT AND IMPLEMENTATION</u> - Provide Project Management and Implementation of Release (See Release Management @ Appendix B). - Lead Project Manager communicates Release Management Project status to BCCM for inclusion in Monthly Status Meetings. - BellSouth Business Requirements will be presented to CLECs. If needed, changes will be incorporated and requirements re-baselined. - Once a Change Request is implemented in a release, the status will be changed to "I" for Change Implemented.	INPUTS: - Approved Release Package Notification OUTPUTS: - Project Release Status - Implementation Date - Project Plan, Work Breakdown Schedule, Risk Assessment, Executive Summary, etc - Implemented Change Request	Ongoing

5.0 DEFECT NOTIFICATION PROCESS

A CLEC identified defect will enter this process through the Change Management Team. If the defect is validated internally, it will route through this process, and notification provided to the CLEC community via e-mail and web posting. CLEC Notification of documentation updates (non-system changes) will be posted 5 (five) business days in advance of documentation posting date.

Figure 5-1 provides the process flow for the validation and resolution of a Type 6 Change – CLEC Impacting Defect.

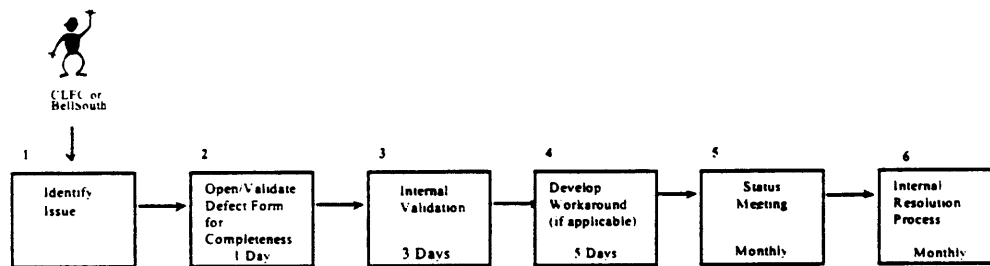


Figure 5-1. Type 6 Process Flow

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Type 6 Process Flow. This process will be used to validate defects, provide defect and status notification(s), workarounds and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 5-1. Type 6 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	<u>IDENTIFY NEED</u> - Identify Defect. - Originator and CCCM or BCCM should complete the standardized Change Request Form indicating that it is a defect. - Attach related requirements and specification documents. These attachments should include the following: - PON - OCN - Specific Scenario - Interface(s) affected - Error message (if applicable) - Release or API version (if applicable) - Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth Change Management Team.	<u>INPUTS:</u> - Change Request with defect indicated <u>OUTPUTS:</u> - Completed Change Request Form (with related documentation if necessary)	N/A
2	BCCM	<u>OPEN & VALIDATE DEFECT FORM FOR COMPLETENESS</u> - Log Defect in Change Request Log. - Send Acknowledgment Notification via email to initiating CLEC. - Establish Defect status ('N' for New Defect). - BCCM reviews change request for mandatory fields using the Change Request Form Checklist. - Verify Defect specifications and related information exists. - Send Clarification Notification via email to the originator if needed. - Update Defect Status to 'PC' for Pending Clarification if clarification is needed.	<u>INPUTS:</u> - Completed Change Request Form (with related documentation if necessary) <u>OUTPUTS:</u> - New Defect - Acknowledgment Notification - Clarification Notification (if required)	1 Bus Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		If clarification is needed, CLEC or BST originator makes necessary corrections per Clarification Notification and submits via email Defect Clarification Response.		
3	BCCM	INTERNAL VALIDATION 1. Validate that it is a defect. 2. Perform internal defect analysis. 3. Determine status of request: • If change already exists or training issue forward Cancellation Notification to CCCM or BCCM and update status to 'C' for Request Cancelled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • Send Clarification Notification via email if needed and update status to 'PC' for Pending Clarification. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is valid, update Change Request status to 'V' for Validated Defect. • If the process is operating as specified in the baselined requirement, the "Defect Request" will be cancelled and supporting information provided via email to the originator. Update Change Request status to 'DC' for Defect Cancelled and send Cancellation Notification via email to originator. • If issue is re-classified as a feature change, update Change Request status to "P" for Pending and provide supporting information via email to the originator. NOTE: See Section 9.0 Terms and Definitions – Defect Status for valid status codes and descriptions. Defect notification will be provided to CLEC community via e-mail and web posting.	INPUTS: • New Defect OUTPUTS: • Validated Defect • Defect notification to CLEC community via e-mail and web posting • Clarification Notification (if required) • Cancellation Notification (if required)	3 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
4	BCCM	<u>DEVELOP WORKAROUND (IF APPLICABLE)</u> 1. Defect workaround identified. 2. Change Request status changed to "W" for workaround identified. 3. Workaround is communicated via e-mail to originating CLEC. 4. If appropriate, communication to the CLEC community regarding workaround will be discussed via conference call. Defect workaround notification will be provided to CLEC community via e-mail and web posting. If it is determined that additional time is needed to develop workaround due to the complexity of the defect, notification will be provided to CLEC community via e-mail and web posting.	<u>INPUTS:</u> • Validated Defect • Clarification Notification (if required) <u>OUTPUTS:</u> • Workaround (if applicable) • Clarification Notification (if required) • Cancellation Notification (if required) • E-mail and web posting of workaround	5 Bus Days
5	BCCM	<u>MONTHLY STATUS MEETING</u> 1. Provide status of Defect. 2. Solicit CLEC/ BST input. 3. Update Defect information as needed.	<u>INPUTS:</u> • Defects Received • Change Request Log • Defect Analysis • Workaround (if applicable) <u>OUTPUTS:</u> • Updated status • Updated Change Request Log • Meeting minutes	Monthly
6	BCCM	<u>INTERNAL RESOLUTION PROCESS</u> 1. Schedule and evaluate Defects based on capacity and business impacts. 2. Update status of scheduled Defects to 'S' for Scheduled. 3. Provide status and Defect Release Schedule at next Monthly Status Meeting. 4. Update status of Implemented Defects to 'I' for Implemented.	<u>INPUTS:</u> • CLEC/ BST input <u>OUTPUTS:</u> • Defect Release Schedule • Scheduled Defects • Implemented Defects	Monthly

6.0 CHANGE REVIEW

Part 1 – Change Review Meeting

The Change Review meeting provides the forum for reviewing and prioritizing Pending Change Requests, generating Candidate Change Requests, submitting Candidate Change Requests for sizing, and reviewing the status of all release projects underway. Status update meetings will be held monthly and are open to all CLEC's. Meetings will be structured according to category (pre-order, order, and maintenance, etc.). Prioritization meetings will be scheduled to coincide with the published release schedules. For non-system impacting changes, there will be a 5 (five)-business day notice for documentation updates. The prioritization meeting dates will be communicated when the release schedule is published.

During the Change Review Meeting each originator of a Change Request will be allowed 5 (five) minutes to present their Change Request. A question and answer session not to exceed 15 minutes will follow this presentation. After all presentations for a particular interface are complete, the prioritization process will begin.

The Change Request Log will be distributed 5 - 7 (five to seven) business days prior to the Change Review meeting. A valid and complete Change Request must be received 33 business days prior to the Change Review Meeting to be placed on the agenda for the next scheduled meeting.

Note: Status Meetings will occur monthly. Prioritization meetings will be scheduled to coincide with the published release schedules and will include the monthly status meeting agenda items.

Part 2 – Change Review Package

The Change Review Package will be distributed to all participants 5 – 7 (five to seven) business days prior to the Change Review meeting. The package will include the following:

- Meeting Notice
- Agenda
- Change Request Log (List of Change Requests to be reviewed)
- Reference to Change Control Process on the BST website (for CLECs not familiar with the process, new CLECs or CLECs that choose to participate after the initial rollout)
- Status Reports from each of the active Release Management Project Teams

Part 3 – Prioritizing Change Requests

Prior to the Change Review Meeting, each participating CLEC should determine priorities for change requests and establish “desired/want” dates. The CLEC should use the Preliminary Priority List form as provided via the web.

Final prioritization will be determined at the Change Review meeting after presentation of the Change Requests for each category.

Prioritization Voting Rules

- Voting on an interface not used by the CLEC is prohibited
- One vote per CLEC, per interface
- No proxy voting
- Each company may bring the number of participants necessary to represent their position. If the number of participants grow to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.
- Forced Ranking (1 to N, with N being the highest) will be used
- Votes will be tallied to determine order of ranking
- Changes will be ranked by category, by interface
- Manual processes and documentation will be prioritized separately; however they will need to be synchronized with the electronic interface changes
- Sizing and sequencing of prioritized change requests will begin with the top priority items and continue down through the list until the capacity constraints have been reached
- In case of a tie, the affected Changes will be re-ranked and prioritized based on the re-ranking

Example: The top 2 Changes from high to low are E5 and E2, with E1 and E4 tied for 3rd. E1 and E4 would be re-ranked and prioritized according to the re-ranking.

Pre-Order LENS	CLEC 1	CLEC 2	CLEC 3	Total
E1	3	6	1	10
E2	4	2	6	12
E3	6	1	2	9
E4	2	4	4	10
E5	5	5	3	13
E6	1	3	5	9

7.0 INTRODUCTION AND RETIREMENT OF INTERFACES

Introduction of New Interfaces

BellSouth will introduce new interfaces to the CLEC Community as part of the Change Control Process. A description of the proposed interface will be submitted to the BCCM. The BCCM will add an agenda item to discuss the new interface at the monthly status meeting. BellSouth will be given 30 – 45 minutes to present information on the proposed interface. If BellSouth requests additional time for the presentation, a separate meeting will be scheduled to review the proposed interface, so that, the information can be presented in its entirety. The objective will be to identify interest in the new interface and socialize ideas. BellSouth will provide specifications on the interface being developed to the CLEC Community. As new interfaces are deployed, they will be added to the scope of this document as appropriate, based on the use by the CLEC community and requested changes will be managed by this process.

Retirement of Interfaces

The retirement of interfaces will not be part of the Change Control Process. As active interfaces are retired, BellSouth will post a CLEC Notification Letter to the web six (6) months prior to the retirement of the interface. BellSouth will have the discretion to give provide shorter notifications (30-60 days) on interfaces that are not actively used and/or have low volumes.

8.0 ESCALATION PROCESS

Guidelines

- The ability to escalate is left to the discretion of the CLEC based on the severity of the missed or unaccepted response/resolution.
- Escalations can involve issues related to the Change Control process itself.
- For change requests, the expectation is that escalation should occur only after normal Change Control procedures (e.g. communication timelines) have occurred per the Change Control agreement.
- Three levels of escalation will be used.
- For Type 1 issues, the escalation process is agreed to allow BellSouth a one day turnaround for each cycle of escalation.
- For Types 2-5 issues, the escalation process is agreed to allow BellSouth a five day turnaround for each cycle of escalation.
- Each level will go through the same Cycle, which is described below.
- All escalation communications may be optionally distributed by the CLEC to the industry and BellSouth Change Control e-mail unless there is a proprietary issue.

Cycle for Type 1 System Outages

Contact List for Escalation - ECS Group - Type I Changes

If the originator does not receive a call back from the EC Support Group according to the times specified in this document, they may escalate according to the following list:

Escalation Level	Name and Title	Office Number	Pager Number	Email Address
1st Level	Susan Hart Manager - EC Support Group Interconnection Operations	205-733-5393	1-800-946-4646 PIN 1436470	Susan.K.Hart@bridge.bellsouth.com
2nd Level	Bruce Smith Operations Director - EC Support Group Interconnection Operations	205-988-7211	1-800-542-3260	Bruce.Smith@bridge.bellsouth.com
3rd Level	Bill Reid Operations Assistant Vice President Interconnection Operations	205-988-1447	1-800-946-4646 PIN 1179523	Bill.C.Reid@bridge.bellsouth.com

NOTE: If a call is escalated without first attempting to contact the ECS Helpdesk, the caller will be referred back to the ECS Helpdesk.

Escalation Cycle for Types 2-6 Change Requests

- Item must be formally escalated as an e-mail sent to the appropriate escalation level within BellSouth with a copy to the industry and BellSouth Change Control e-mail.
- Subject of e-mail must be CLEC (CLEC Name) ESCALATION-CR#, if applicable, Level of Escalation, unless it is proprietary.
- Content of e-mail must include:
 - Definition and escalation of item.
 - History of item.
 - Reason for escalation.
 - Desired outcome of CLEC.
- Impact to CLEC of not meeting the desired outcome or item remaining on current course of action as previously discussed at the Change Control Meeting for enhancements.
- Contact information for appropriate Level including Name, Title, Phone Number, and E-mail ID.
- For escalation Level 2, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Level 1.
- For escalation Level 3, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Levels 1 and 2.
- BellSouth will reply to escalation request with acknowledgement of receipt within 4 hrs and begin the escalation process through Level of escalation.
- The escalating CLEC should respond to BellSouth within 5 days as to whether escalation will continue or the BellSouth response has been accepted as closure to the item.
- If the BellSouth position suggests a change in the current disposition of the item (i.e., what has already been communicated to the industry), a conference call will be held within 1 business day of the BellSouth decision in order to provide industry notification with the appropriate executives.
- BellSouth will publish the outcome of the conference call to the industry via web.
- If unsatisfied with an outcome, either party can seek appropriate relief.

Contact List for Escalation - Type 2 - 6 Changes

Within 5 business days of receipt (4 from acknowledgement), BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position. Escalations should be made according to the following list.

Escalation Level	Name and Title	Office Number	Email Address
1st Level	Valerie Cottingham Sales Director Change Control Process	205-321-2168	Valerie.cottingham@bridge.bellsouth.com
2nd Level	Linda Tate Director (for Systems Issues) Joy Lofton Director (for Business Rules/Operations Issues)	404-927-7878 404-927-7828	Linda.Tate3@bridge.bellsouth.com Joy.A.Lofton@bridge.bellsouth.com
3rd Level	Peggy Caldwell Senior Director (for Systems Issues) Doug McDougal Senior Director (for Business Rules/Operations Issues)	404-335-0872 404-927-7505	Peggy.S.Caldwell@bridge.bellsouth.com Doug.Mcdougal@bridge.bellsouth.com

Dispute Resolution Process

In the event that an issue is not resolved through the Escalation Process as described herein, BellSouth and the impacted CLEC(s) agree to follow this Dispute Resolution Process. BellSouth and the CLEC shall assemble a Joint Investigative Team, within one week, comprised of subject matter experts. The party prompting the dispute should initiate the formation of the team. The team should be co-chaired by representatives of BellSouth and the CLEC respectively. The investigative team will conduct a root-cause analysis to determine the source of the problem, if one exists, and then develop a plan for remedying it. The parties to the dispute must escalate the issue within each company to the person who has ultimate authority for State operations in an effort to achieve a resolution.

If the dispute cannot be resolved between the companies after these steps are taken, then either party to the dispute may file a formal complaint with the State PSC through the Director of the Telecommunications section for binding mediation. The Director of the Telecommunications section, or his appointee, shall rule upon the complaint within 30 days of its filing. If either party is then aggrieved, it may file a formal complaint with the State PSC.

9.0 CHANGES TO THIS PROCESS

The current, approved version of this process document will be stored under the component name "Ccp.doc". The BellSouth Change Control Manager BCCM (and alternate) will be the only persons authorized to update the document version.

Requests for changes to the Change Control Process may be submitted to the BellSouth Change Control Manager (BCCM) using the Change Request form located in the Appendix A. Cosmetic changes may be made and published by the BCCM (or alternate) without further review. Other changes will be reviewed at the monthly Change Review status meetings. All changes will be submitted as a change request and reviewed.

10.0 TESTING ENVIRONMENT

BellSouth offers Carrier Testing to CLECs in an open proven test environment for Telecommunications Access Gateway (TAG) and Electronic Data Interchange (EDI) interfaces. The testing opportunities offered are BETA and New Carrier Testing.

BETA testing is offered to those CLECs that express an interest in assisting BellSouth validate a Telecommunications Industry Forum (TCIF) change for the affected interfaces. The opportunity for testing is submitted via the BellSouth Account Team and is negotiated with the Carrier Testing group. BellSouth opens the test environment for BETA testing only after "major releases". CLECs are selected on a "first come, first served basis".

New Carrier Testing is offered to those CLECs who are transitioning from a manual to an electronic environment or from one TCIF issue to another. New Carrier Testing is available to all CLECs and is scheduled with the BellSouth Account Team and Carrier Testing group.

For additional details on the testing environment, regulations and guidelines, you will be able to refer to the BellSouth public internet site by the end of May 2000. The internet web site is as follows:

www.interconnection.bellsouth.com/markets/lec.html

BellSouth is currently investigating and pricing the feasibility of a wholly separate, non-production testing environment for all pre-ordering and ordering interfaces per a CLEC request. This testing environment will mirror the production environment.

11.0 TERMS AND DEFINITIONS

A

Account Team. The Account Teams represent the CLECs and all CLEC interests within BellSouth, that is, the Account Team is the CLECs' advocate within BellSouth. Some of the Account Team functions are listed below:

- Contract Negotiations
- Enhanced Billing Options Negotiations
- Customer Education
- Technical Assistance
- General Problem Resolution
- Tariff Interpretation
- BonaFide Requests (BFR)
- Production Support
- Collocation
- Testing Support
- Project/Order Coordination
- Rate Quotations

Accountability. Individual(s) having responsibility for completing and producing the outputs of each sub-process as defined in the Detailed Process Flow.

Acknowledgement Notification. Notification returned to originator by BCCM indicating receipt of Change Request.

Approved Release Package. Calendar of Candidate Change Requests with consensus target implementation dates as determined at the Release Package Meeting.

B

BellSouth Change Control Manager (BCCM). BellSouth Point of Contact for processing Change Requests and defects.

BFR (Bonafide Request). Process used for providing custom products and/or services. Bonafide Requests are outside the scope of the Change Control Process and should be referred to the appropriate BellSouth Account Team.

Business Day. A business day is considered any Monday-Friday workday that does not fall on an official BellSouth holiday.

Business Rules. The logical business requirements associated with the Interfaces referenced in this document. Business rules determine the when and the how to populate data for an Interface. Examples of data defined by Business Rules are:

- The five primary transactions sets: 850, 855, 860, 865, and 997
- Data Element Abbreviation and Definition
- Activity Types at the appropriate level (account, line, feature) and the associated Usage Type (optional, conditional, required, not applicable, prohibited)
- Conditions/rules associated with each Activity and Usage Type
 - ◊ Dependencies relative to other data elements
 - ◊ Conditions which will be edited within BellSouth's OSSs
- Valid Value Set
- Data Characteristics

C

Cancellation Notification. Notification returned to originator by the BCCM indicating a Change Request has been canceled for one of the following reasons: BST cancellation, duplicate request, training issue, or failure to respond to clarification.

Candidate Request List. List of prioritized Change Requests with associated "Need by Dates" as determined at an Change Review Meeting. These requests will be submitted for sizing and sequencing.

Candidate Change Request. Change Requests that have been prioritized at an Change Review Meeting and are eligible for independent sizing and sequencing by BellSouth and each CLEC.

Change Request. A formal request submitted on a Change Request Form, to add new functions, defects or Enhancements to existing Interfaces (as identified in the scope) in a production environment.

- Type 1 – BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.
- Type 2 – Regulatory Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority or state and federal courts.

- **Type 3 – Industry Standard Change.** Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines.
- **Type 4 – BellSouth Initiated Change.** Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord.
- **Type 5 – CLEC Initiated Change.** Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems, which the CLEC requests BellSouth to implement.
- **Type 6 – CLEC Impacting Defect.** Any non-Type 1 change where a CLEC Impacting Defect is found in a production environment when the system is not operating as specified in baseline business requirements.

Change Request Status. The status of a Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Request Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
 - **CB = Cancellation by BellSouth.** BST may reject the change request based on the following reasons: cost/benefit, resource commitments, industry direction or BellSouth direction.
 - **CC = Clarification.** Requested clarification not received in allotted time (7 days).
 - **CD = Duplicate Request.** A request for this change already exists.
 - **CT = Training.** Requested change already exists, additional training may be required.
- **CRC = Change Review Complete.** Indicates a Change Request has been reviewed at an Change Review Meeting, but did not reach the Candidate Request List (Step 10).
- **D = Request Purge.** Indicates the cancellation of a Change Request that has been pending for 12 months and has failed to reach the Candidate Request List (Step 3).
- **I = Change Implemented.** Indicates a Change Request has been implemented in a release (Step 10).
- **N = New Change Request.** Indicates a Change Request has been received by the BCCM, but has not been validated (Step 2).
- **P = Pending.** Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review (Step 3 moving to Step 4).

- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **PN = Pending N times.** Indicates a Change Request reached the Candidate Request List, was sized but not scheduled for a release and has cycled through the process N number of times. Example: P1 = 2nd time through process, P2 = 3rd time through process, etc (Step 8).
- **RC = Candidate Request.** Indicates a Change Request has completed the Change Review process and been assigned to the Candidate Request List for sizing and sequencing (Step 5).
- **S – Request Scheduled.** Indicates a Change Request has been scheduled for a release (Step 8).

Change Review Meeting. Meeting held by the Change Review participants to review and prioritize pending Change Request, generate Candidate Change Request, and submit Candidate Change Request for sizing and sequencing.

Change Review Package. Package distributed by the BCCM 5 – 7 business days prior to the Change Review Meeting. The package includes the Meeting Notice, Agenda, Approved Release Package, Change Request Log, etc.

Clarification Notification. Notification returned to the originator by the BCCM indicating required information has been omitted from the Change Request and must be provided prior to acceptance of the Change Request. The Change Request will be cancelled if clarification is not received by the date indicated on the Clarification Notification.

CLEC Affecting Change. Any change that requires the CLEC to modify the way they operate or to rewrite system code.

CLEC Change Control Manager (CCCM). CLEC Point of Contact for processing Change Requests.

CSM. Customer Support Manager which supports resale and facility based CLECs.

Cycle Time. The time allotted to complete each step in the Change Control Process prior to moving to the next step in the process.

D

Defect (Documentation). A condition where the documentation does not agree or accurately reflect the business environment.

Defect (Electronic Interfaces). A defect found in a production environment when the system is not operating as specified in a baseline business requirement's document.

Defect Status. The status of a CLEC Impacting Defect Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
 - **CC = Clarification.** Requested clarification not received in allotted time (7 days).
 - **CD = Duplicate Request.** A request for this change already exists.
 - **CT = Training.** Requested change already exists, additional training may be required.
 - **DC = Defect Cancelled.** Process is operating as specified in the baseline requirements.
- **I = Implemented.** Indicates a Defect Change Request has been implemented in a release (Step 6).
- **N = New Defect Change Request.** Indicates a Defect Change Request has been received by the BCCM and the change request form validated for completeness (Step 2).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **S = Scheduled for Release.** Indicates a Defect Change Request has been scheduled for a release (Step 6).
- **V = Validated Defect.** Indicates internal analysis has been conducted and it is determined that it is a validated defect (Step 3).
- **W = Workaround Identified.** Indicates a workaround has been developed and communicated to impacted CLEC community (Step 4).

E

Electronic Communications Systems (ECS). ECS is the help desk for reporting system outages or degradation in an existing feature/functionality within an interface. The ECS group works with the CLEC community to resolve system outages/degradation in a timely manner. The telephone number for the ECS group is 1-888-462-8030.

Enhancement. Functions which have never been introduced into the system; improving or expanding existing functions; required functional changes to system interfaces (user and other systems), data, or business rules (processing algorithms – how a process must be performed); any change in the User Requirements in a production system.

I

Internal Change Management Process. Internal process unique to BellSouth and each participating CLEC for managing and controlling Change Requests.

N

Need-by-Date. Date used to determine implementation of a Change Request. This date is derived at the Change Review Meeting through team consensus. Example: 1Q99 or Release XX.

P

Points of Contact (POC). An individual that functions as the unique entry point for change requests on this process.

Priority. The level of urgency assigned for resource allocation to implement a change. Priority may be initially entered by the originator of the Change Request, but may be changed by the BCCM with concurrence from the originator or the Review Meeting participants. In addition, level of priority is not an indication of the timeframe in which the Change Request will be worked. It is the originator's label to determine the priority of the request submitted.

One of four priorities may be assigned:

1-Urgent. Should be implemented as soon as possible. Resources may be pulled from scheduled release efforts to expedite this item. A need-by date will be established during the Change Review Meeting. A special release may be required if the next scheduled release does not meet the agreed upon need-by date.

2-High. Implement in the next possible scheduled major release, as determined during the Release Package Meeting.

3-Medium. Implement in a future scheduled major release. A scheduled release will be established during the Release Package Meeting.

4-Low. Implement in a future scheduled major release only after all other priorities. A scheduled release will be established during the Release Package Meeting.

Project Plan. Document which defines the strategy for Release Management and Implementation, including Scope Statement, Communication Plan, Work Breakdown Structure, etc. See Release Management Project Plan template, Attachment B-1.

Proposed Release Package: Proposed set of change requests slated for a release that the BCCM presents to the CLEC community during the Release Package Meeting

R

Release – Major. Implementation of scheduled Change(s) which may or may not impact all CLECs; may or may not require CLECs to make changes to their interface and may or may not prohibit the use of an interface upon implementation of the Change(s). Application-to-Application and Machine-to-Human.

Release – Minor. Implementation of scheduled Change(s) which do not require coordination with the entire CLEC industry, do not require CLECs to make changes to their interface or do not prohibit the use of an interface upon implementation of the Change(s). Machine-to-Human.

Release Package. Package distributed by the BCCM listing the Candidate Change Requests that have been targeted for a scheduled release.

Release Package Notification. Package distributed by the BCCM and used to conduct an initial Release Management and Implementation meeting. The package includes the list of participants, meeting date, time, Approved Release Package, Maintenance/Defect Notification, etc.

Release Schedule: Schedule that contains the intended dates for implementation of software enhancements. This release schedule is created annually.

S

Specifications. Detailed, exact document(s) describing enhancement and/or defects, business processes and documentation changes requested and included with the Change Request as additional information.

System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.

V

Version (Document). Indicates variation of an earlier Change Control process document. Users can identify the latest version by the version control number.

APPENDIX A – CHANGE CONTROL FORMS

See Attached Forms

This section identifies the forms to be used during the initial phases of the Change Control process accompanied by a brief explanation of their use. Attachments A1 – A-4A contains sample Change Control forms and line by line Checklists.

Change Request Form. Used when submitting a request for a change (Attachment A-1).

Change Request Form Checklist. Provides line-by-line instructions for completing the Change Request form (Attachment A-1A).

Change Request Clarification Response. Used when responding to request for clarification or Clarification Notification (Attachment A-2).

Change Request Clarification Checklist. Provides line-by-line instructions for completing the Change Request Clarification Response (Attachment A-2A).

Acknowledgement Notification. Advises originator of receipt of Change Request by BCCM (Attachment A-3).

Acknowledgement Notification Checklist. Provides line-by-lines instructions for completing the Acknowledgement Notification. (Attachment A-3A).

Cancellation Notification. Advises the originator of cancellation of a Change Request (Attachment A-3).

Cancellation Notification Checklist. Provides line-by-line instructions for completing the Cancellation Notification. (Attachment A-3B).

Clarification Notification. Advises originator that a Change Request is being held pending receipt of additional information (Attachment A-4).

Clarification Notification Checklist. Provides line-by-line instructions for completing the Clarification Notification. (Attachment A-4A).

APPENDIX B – RELEASE MANAGEMENT

See Attached Forms

Release Management and Project Implementation is described in Step 10 of the Change Control Process. Project Managers are responsible for confirming the release date, developing project plans and requirements, providing the WBS, Gantt chart and Executive Summary to the BCCM for input to the Change Review Package and ensuring the successful implementation of the release.

The BST Change Control Manager (BCCM) will distribute the Release Notification Information via web. The Notification should contain the following information:

- List of participants (Project Managers from each stakeholder)
- Date(s) for the next Project Manage Release meeting(s)
- Times
- Logistics
- Meeting facilitator and minutes originator (rotated between stakeholders)
- Current Approved Release Package (email attachment)
- Current Maintenance/Defect Notification Information (web posting)
- Draft Release Project Plan - WBS (email attachment created by the Lead Project Manager (s) assigned in step 8 of the Change Control Process)
- Lead Project Manager (s) assigned to the Release with reach numbers (s)

Attachments B1 – B12 contain templates designed to assist the Project Manager(s) in conducting project management responsibilities as needed for Release Management and Implementation.

APPENDIX C –ADDITIONAL DOCUMENTS

See Attached Documents



CLOSURE REPORT FOR EXCEPTION 13

BellSouth Georgia OSS Testing Evaluation

Date: July 21, 2000

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

KPMG encountered spurious, BellSouth specific messages generated by the TAFI Application. Specific messages highlighted included:

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

Summary of BellSouth's Responses:

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

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

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

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

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



CLOSURE REPORT FOR EXCEPTION 13

BellSouth Georgia OSS Testing Evaluation

initial TAFI window – *'System may contain fragmented CPNI data, to be used only consistent with your CPNI training. Not to be used for sales and marketing purposes'* – appears for all users (BST and CLEC). In release 2000.1, the CPNI error message has been modified to just state *'CPNI data is not available'* as opposed to what was observed by the tester.

The message *'Take trouble in GA WFA/C'* was appropriate since the tester entered a trouble report for a UNE Port. UNE Ports are designed services supported in WFA. TAFI allowed the user to continue processing a trouble report for the UNE Port in error. TAFI will be modified to provide this error message (should a user enter a UNE Port telephone number) and then automatically return the user to the initial trouble entry window.

References to obtaining the customer's E-mail address and directing the user to the BST website will be removed for CLEC transactions. This is an internal requirement for the BRCs.

The *'Pending BackTalk'* message should never be displayed since CLEC reports are not routed to the BackTalk system. The BackTalk reference was found in a TAFI recommendation line. This is the incorrect message for the CLECs TRANSQ routed trouble and will be corrected.

The BackTalk message will be corrected in the next CLEC TAFI release tentatively scheduled for April 15, 2000. The prevention of taking a trouble report for a UNE Port (which is avoided with training) and removing the E-mail reference require significant code modification and will be implemented in release 2000.3 which is tentatively scheduled for implementation September 1, 2000."

After publication of this amended response, BellSouth changed the scheduled release of 2000.3 to June 1, 2000. Additionally, a second amended response was provided to KPMG on May 12, 2000.

Second Amended Response: BellSouth re-submitted the original language from its amended response with the following supplement:

"Additional Information

The *'Pending BackTalk'* message was observed in error, rather this specific message is not valid for CLEC (or BellSouth Business) customers. The internal CLEC TAFI table that provides the appropriate recommendation narrative was copied from the Residence version of TAFI (see segment below). Once this error was identified, the administrator corrected the CLEC TAFI table and removed the *'- pending BACKTALK'* verbiage.



CLOSURE REPORT FOR EXCEPTION 13

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TAFI		LMOS
Internal		
Code	Recommendation Narrative	Handle Code
Coding		
MR14	Need Tree(s) Trimmed	TREETRIM GRMMR
MR15	Limb On Line	TREETRIM GRMMR
MR16	Need Tree(s) Trimmed	TREETRIM GRMMR
H70	NEEDS FURTHER ANALYSIS-pending BACKTALK	TRANQ1 GRMXXX
H69	NEEDS FURTHER ANALYSIS-pending BACKTALK	TRANQ GRMXXX
H76	RFC WMC-terminal open	TERMOPN GRMXXX
H77	(OVR) Terminal Open	TERMOPN GRMXXX
MR7	Terminal Open	TERMOPN GRMMR
MR8	Terminal Open	TERMOPN GRMMR
H74	(OVR) Terminal Damaged	TERMDAM GRMXXX
H75	RFC WMC-terminal damaged	TERMDAM GRMXXX

Summary of KPMG Re-test Activities:

KPMG's re-test activities consisted of: 1) an evaluation of BellSouth's responses to determine if they successfully addressed the concerns raised by KPMG in Exception 13; 2) the execution of additional trouble report creations in TAFI, releases 2000.1, 2000.2 and 2000.3 as well as a review of the *CLEC TAFI User Guide (Issues 1, 2 and 3)*.

KPMG Re-test Results:

KPMG's evaluation of BellSouth's initial and amended responses determined that the proposed solutions adequately address the issues identified in Exception 13.

1. A CPNI warning message stating, "CPNI data unavailable do not use this customer as a sales opportunity." By re-creating the conditions that resulted in this warning message, KPMG determined that this CPNI warning message has been modified in TAFI, Release 2000.1 as described in BellSouth's responses.
2. A message stating, "System may contain fragmented CPNI data, to be used only consistent with your CPNI training. Not to be used for sales and marketing purposes." This message has not been modified as described by BLS. However, the



CLOSURE REPORT FOR EXCEPTION 13

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CPNI messages associated with both issue 1 and 2 are now documented in the latest release of the *CLEC TAFI User Guide* (EP- Issue 3 May 2000) on page 32.

Additionally, while this message appears on the initial screen, it does not occur during the trouble report creation process. Thus, while cumbersome to view, its presence does not impede the functionality of TAFI for CLEC users.

3. **A message instructing the TAFI user to, "Take trouble in GA WFA/C³".** KPMG attempted to create trouble tickets for eight UNE port lines in TAFI, Version 2000.3 in order to test BellSouth's solution to this issue. In each case, TAFI provided the following message, "Take trouble in GA WFA-C or call the UNE Center" along with an "OK" tab in order to give the user time to digest the notice prior to the next step. In each case, after selecting "Enter" to accept the message, TAFI returned the user to the initial trouble entry window as described in BellSouth's responses.
4. **A message instructing the TAFI user to get their customer's email address and provide BellSouth's small business web site address.** Re-test activities using resale lines were conducted in TAFI, Version 2000.2. Re-testing activities confirm that all references to obtaining the customer's email address or instructions directing customers to the BellSouth Web site have been removed as described in BellSouth's responses.
5. **A message stating, "Pending Backtalk."⁴** Finally, using TAFI version 2000.2, KPMG recreated the scenario in which the "pending backtalk" message originally appeared. While the pending backtalk message no longer appeared, the exact scenario could not be accurately replicated. Thus, as detailed in BellSouth's second amended response, BellSouth provided KPMG with documentation, including a screen shot of the table that creates this message and a description of the specific steps taken to prevent this message from occurring in the future. The source of the incorrect message had been a typographical error within the table.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, closes Exception 13.

Attachments: None.

³ GA WFA/C refers to the Georgia WFA Center, which controls a BellSouth backend system intended to handle designed circuits. This message was received for a trouble ticket relating to POTS lines.

⁴ Backtalk refers to a BellSouth service which calls customers with a recorded message to update the status of a trouble ticket. During playback, the recorded message makes explicit reference to BellSouth.



CLOSURE REPORT FOR EXCEPTION 17

BellSouth Georgia OSS Testing Evaluation

Date: July 21, 2000

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

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

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

1. 12/10/99 - Selecting *TAG Programmer's Job Aid – Version 5, September 1999* link actually produced the document *TAG Programmer's Job Aid – Version 5.1, September 1999*.
2. 12/15/99 - The *TAG Programmer's Job Aid – Version 5, July 1999* (an older version) appeared with no Carrier Notification.
3. 12/15/99 - Both the *TAG API Reference Guide 2.2.0.5* and *TAG Programmer's Job Aid – Version 5, September 1999* were removed with no Carrier Notification.
4. 1/17/00 - The *TAG API Reference Guide 3.0.1.x* and *TAG Programmer's Job Aid – Version 6.0, January 15, 2000* appeared with no Carrier Notification.
5. 1/17/00 - The *TAG Programmer's Job Aid – Version 5, July 1999* was removed with no Carrier Notification.
6. 1/18/00 - Carrier Notification SN91081631 was posted describing the release of TAG Release 2.2.0.6. Neither this nor another Carrier Notification announced the posting of the associated technical specification documentation that was provided to coincide with the update of this interface.
7. 1/21/00 – The *TAG API Reference Guide 2.2.0.5* reappeared (ref. Item #3 above) with no Carrier Notification.

KPMG Consulting LLC

07/20/00

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CLOSURE REPORT FOR EXCEPTION 17

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Summary of BellSouth Responses:

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

Some documents were inadvertently deleted when the Interconnection Web site was redesigned. BellSouth recovered the deleted TAG Programmer's Job Aid, V5.1 and reposted 2/8/00.

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

Second Amended Response: "BellSouth has developed a documentation checklist that will minimize the types of concerns raised in the exception. The process will be implemented by 5/31/00 and BellSouth will provide a copy of the document when it has been finalized by the document owners."

Summary of KPMG Re-test Activities:

KPMG's retest activities consisted of: 1) an evaluation of BellSouth's response to determine if it adequately addressed the concerns raised by KPMG in Exception 17; 2) an interview with the appropriate BellSouth project manager; 3) a review of BellSouth's revised documentation process; and 4) a review of BellSouth's *Documentation Quality Control Checklist*.

KPMG Re-test Results:

BellSouth has made adequate improvements to its internal processes and procedures for ensuring that documentation intended for CLEC consumption is properly posted to its Interconnection Web site.

BellSouth's revised procedures, which KPMG confirmed were implemented on May 31, 2000, include a formalized, documented process for developing documentation that includes inputs, internal processing, and outputs. The outputs of the process include



CLOSURE REPORT FOR EXCEPTION 17

BellSouth Georgia OSS Testing Evaluation

drafting and delivering CLEC notification, and submitting documents for Web posting.

BellSouth's revised procedures also include a comprehensive quality control checklist that is used for each discrete step of the new documentation development and posting process. Those that map specifically to the resolution of Exception 17 include discrete steps related to the following:

- Preparing CLEC Notification
- Forwarding Document to Webmaster
- Webmaster Responsibilities
- Document Owner's Responsibilities

These new processes and procedures, properly applied on a continuing basis, should eliminate errors in posting documents and notifications to BellSouth's Interconnection Services Web site.

Since the May 31, 2000 implementation, KPMG has observed 24 postings related to CLEC customer guides and 54 postings of carrier notifications. No errors have been observed by KPMG among these post-implementation postings.

The Georgia Public Service Commission may wish to continue to monitor this situation to ensure BellSouth's continued adherence to revised process that was implemented on May 31, 2000 .

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, closes Exception 17.

Attachments: None.



CLOSURE REPORT FOR EXCEPTION 21

BellSouth Georgia OSS Testing Evaluation

Date: July 21, 2000

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of exception:

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

SOCS Fall-Out: Approximately 1.39% of LSRs for the period reviewed are classified as successful flow-through, yet also have error codes associated with them¹. KPMG determined that, during an attempt to format a service order, these orders completed LEO edits successfully, but failed additional edits in SOCS. Depending on the failure type, the service order may be cancelled. In each of these cases, the LSR is routed to the LCSC for review. The LCSC review results in either a request for clarification to the CLEC or correction of the error by a BellSouth service representative and re-queuing into SOCS. Since manual intervention (or a return of the LSR to the CLEC) was required to complete these orders, these LSRs should not be reported as flow-through.

"Z" Processing Status: Approximately 0.57% of LSRs for the period reviewed were counted as "CLEC-caused fallout," yet did not receive error codes or messages and were not routed to the LCSC for review². In these cases, each LSR received a "Z" processing status. A "Z" processing status is assigned to an LSR when a supplemental order (i.e., a second LSR with a new version of the same PON) is received during processing of the original LSR. LSRs assigned a "Z" processing status are not routed to the LCSC, nor is the CLEC notified as in other cases of "CLEC-caused fallout." Through the normal ordering process, the supplemental order replaces the original LSR as the CLEC's service request. However, the original LSR remains in "Z" processing status and is recorded as "CLEC-caused fallout," even though the CLEC has received the requested service (via the supplemental order) and no review by a BellSouth representative or notification of the CLEC took place.

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

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



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Summary of BellSouth Response:

"SOCS Fall-Out"

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

'Z' Processing Status

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

Summary of KPMG Re-test Activities:

KPMG's re-testing activities consisted of: 1) a review of BellSouth's response; 2) complete replication of the Flow Through calculation for the month of February; 3) a review of the impact of both SOCS fall-out and "Z" processing status LSRs on the Flow Through calculations; and 4) replication of Flow Through calculations for December 1999 and January 2000 (to determine the impact the change to the calculations would have had on those months).

KPMG Re-test Results:

SOCS Fall-Out: KPMG's Flow Through calculations matched BellSouth's published calculations for February. A detailed analysis of the Flow Through calculation demonstrated that the LSRs that reached SOCS, but failed the additional edits were not included as "flow through LSRs" in the Flow Through calculation. The same analysis showed that no manually-handled orders were counted as "flow through LSRs."

"Z" Processing Status: Replication of the February Flow Through calculation showed that LSRs with a "Z" processing status were no longer treated as CLEC-caused fall-out, except where additional errors resulting from CLEC causes existed on the LSRs.



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As part of the re-test, KPMG calculated the estimated impact of the SOCS fall-out and "Z" processing changes on the December 1999 and January 2000 Flow Through Reports.

In December 1999, approximately 2.64%³ of LSRs contained SOCS errors, but were reported as flow through. An additional 1.08%⁴ of LSRs received a "Z" processing status, and were reported as CLEC caused fall-out.

In January 2000, approximately 1.27%⁵ of LSRs contained SOCS errors, but were reported as flow through. No "Z" processing status LSRs were reported as CLEC-caused fall-out. This occurred as the result of changes BellSouth made to their Flow Through Report, which were included in KPMG's February re-test.

Based on the re-testing results, KPMG believes that BellSouth has adequately addressed the issues raised in Exception 21.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, closes Exception 21.

Attachments: None.

³ 2,008 out of 124,883 valid LSRs submitted. Of these 723 LSRs fell-out due to CLEC causes.

⁴ 1,359 out of 124,883 valid LSRs submitted.

⁵ 1,903 out of 150,136 valid LSRs submitted. Of these 1358 LSRs fell-out due to CLEC causes.



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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.

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



CLOSURE REPORT FOR EXCEPTION 36

BellSouth Georgia OSS Testing Evaluation

Date: July 21, 2000

EXCEPTION CLOSURE REPORT

Exception:

During TAFI interface testing, KPMG encountered multiple inconsistencies while accessing information in BellSouth's Service Order Communications System (SOCS).

Summary of Exception:

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 SOCS¹, KPMG received a variety of unexpected results.

In analyzing these test results, KPMG attempted to determine through BellSouth's Carrier Service Order Tracking System² (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.
2. **KPMG was able to access an account, but SOCS service order data was unavailable.** This result occurred three times.
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.

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.



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4. **KPMG successfully accessed an account and viewed the information, however other anomalies occurred.** This result occurred once.
5. **KPMG successfully accessed an account and was able to view the information as expected.** This result occurred five times.

Summary of BellSouth's Responses:

Initial 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



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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.

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."

Amended Response: "Upon further investigation with KPMG, BellSouth determined the following:

- When checking a pending service order to validate ownership (OCN value on the order matches the user's profile value), CLEC TAFI also looks at the current status of the service order. If the service order is in jeopardy of completing (i.e., errors, facility problems, etc.) then the CLEC user will be denied access independent of the due date on the order. Remember that CLEC TAFI looks at the pending service order so that an accurate assessment of ownership can be made prior to the CRIS record being updated. If the order is in jeopardy, then ownership is not transferred until the problem with the order is resolved (which is provisioning issue, not a CLEC TAFI repair issue).
- One of KPMG's test service orders did have a jeopardy status.
- The due date for several KPMG test orders changed without the tester's knowledge. This caused the tester to be denied access to the account.
- One KPMG test number showed a pending service order OK, but the account actually belonged to a BellSouth customer, not the KPMG CLEC. The next day this pending service order was correct (showing the KPMG CLEC as the owner). This error was a SOCS error and CLEC TAFI performed as designed.



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Each time the KPMG tester identified a problem, the Project Manager was able to demonstrate why the anomaly occurred. The CLEC TAFI User Guide (Issue 3) was updated to reflect that the status of the pending service order is used to determine ownership."

Summary of KPMG Re-test Activities:

KPMG's re-test activities consisted of: 1) an evaluation of BellSouth's responses to determine if they successfully addressed the concerns raised by KPMG in Exception 36; 2) a series of clarifying conversations with BellSouth; 3) a real-time evaluation of the SOCS Pending Service Order viewing feature during resale functional testing.

Because the legacy system data is not maintained beyond one month as indicated in the BellSouth initial response as well as the nature of the SOCS Pending Service Order viewing feature, KPMG was unable to reproduce the scenarios described in the original exception for re-testing purposes. More specifically, a pending service order cannot be viewed once the order has been completed after a certain period of time, as is the case for the original data in the exception. Because of this, KPMG's re-test activities were focused on outcomes obtained during the testing of resale lines as they were being provisioned.

KPMG Re-test Results:

After Exception 36 was issued and prior to the real-time testing of the resale lines, KPMG's conversations with BellSouth clarified the specific circumstances a SOCS pending service order can be viewed through TAFI. First, a SOCS pending service order can typically only be viewed on the day the order is due. In some circumstances, such as a change on a line (ie adding a feature) that already belongs to the CLEC, a pending service order may be able to be viewed prior to the due date. Similarly, a pending order can sometimes be seen through TAFI after the due date if all downstream systems have not yet been updated. For example, an order may be closed, but if CRIS has not yet been updated, or if there was human error entering a comment in another system, the information will remain in SOCS until all systems are correctly updated. While the information remains in SOCS, a user will continue to be able to view the SOCS information using TAFI after the order due date.

In terms of KPMG's inability to view orders on accounts which had been recorded as provisioned under the KPMG OCN, the following explanation, now described on page 26 of the *CLEC TAFI User Manual* (Issue 3), was provided: "If there is a pending service order due today or past due, TAFI looks for an OCN value in the S & E section (i.e., part



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of the MAN or RESH number). If the SO is future dated, TAFI looks for an OCN value in the CRIS record. If CRIS is not available...TAFI uses the OCN value found on the

LMOS DLR report. If all sources for the OCN value are not available, the validation cannot be made and the CLEC user can either: (a) report the customer's trouble manually to the BRMC or (b) wait until access to the legacy systems becomes available.

If the OCN value is found, TAFI compares this value against the list OCN values stored in TAFI that the particular user is allowed to view. If a match is found, the CLEC user has full access to process the report. If a match is not found, TAFI will generate an error message for five seconds (informing the user that the account belongs to another company) and will then return the user to the Initial Trouble Entry Screen."

It is primarily because of this validation process and KPMG's efforts to view orders prior to their due date that KPMG was unable to view some of the accounts detailed in the exception.

Finally, if an order is in jeopardy of meeting its due date, it is possible that the SOCS pending service order may not be able to be viewed through TAFI. As described in the BellSouth response, TAFI looks at both the OCN and at the status value of the order. In circumstances where a line is being migrated and the order is delayed, when TAFI goes through its validation process, it will find that the account does not yet belong to the CLEC user, and thus a SOCS pending service order will not be able to be viewed.

KPMG began transaction-based re-testing activities on April 24, 2000 using the above pieces of information to determine which TNs fit within the appropriate guidelines to enable KPMG to successfully view SOCS pending service orders through the TAFI application.

Of 22 transactions, KPMG was able to view 18 pending service orders successfully without any associated problems. Of the four "failed" attempts, the following issues were identified.

- The due dates for two of the orders had been changed from 4/28/00 to 05/01/00. KPMG attempted to view the orders on 04/28/00.
- One of the TNs provided to KPMG's provisioning group had been assigned to a BellSouth business customer. This error was a BellSouth provisioning issue and thus is not reflective of any issues associated with TAFI or the SOCS Pending Service Order viewing feature.
- KPMG attempted to view an order at 6:40 p.m. on the due date (04/24/00) and was given a message indicating that the account belonged to another customer. At



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9:47 a.m. on 04/25/00, KPMG successfully viewed the pending service order. BellSouth provided no reason for the delay.

Finally, during the transaction based re-testing activities, KPMG experienced one anomaly where KPMG received a message stating that an account belonged to another company, yet were able to view the pending service order information. BellSouth indicated in their amended response that this was due to a SOC's error.

Based on KPMG's evaluation of BellSouth's amended response and the results of re-testing activities, KPMG has determined that BellSouth has adequately taken measures to address Exception 36.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, closes Exception 36.

Attachments: None.



CLOSURE REPORT FOR EXCEPTION 40

BellSouth Georgia OSS Testing Evaluation

Date: July 21, 2000

EXCEPTION CLOSURE REPORT

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)*¹.

Summary of Exception:

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 DFDT².

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 At the time this Exception was issued, Version 7N was the latest release of the LEO Guide available. The current release, Version 7Q, contains similar business rules with respect to coordinated hot cuts for SL1 loops.

² BellSouth's *Local Exchange Ordering (LEO) Implementation Guide, Volume 1, Issue 7N, Sections 4.3.1.14 and 4.3.1.16*.



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Summary of BellSouth's Response:

"The TAG interface did not support coordinated hot cuts on on-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"

Summary of KPMG Re-test Activities:

KPMG's re-test activities for this exception consisted of re-submitting the service requests that initiated this exception. Via TAG, Version 2.2.0.8, KPMG submitted two LSRs requesting a coordinated hot cut for an SL1 loop without specifying a specific cut-over time.

KPMG Re-test Results:

Both of KPMG's service requests for coordinated SL1 loops submitted during the re-test, which were developed in accordance with BellSouth's documentation, received Firm Order Confirmations (FOCs) via TAG, Version 2.2.0.8.

Based on the successful confirmation of orders submitted during the re-test, KPMG's experience indicates that TAG, Version 2.2.0.8 presently provides the functionality for CLECs to request coordinated hot cuts for SL1 loops without specified frame due times.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, closes Exception 40.

Attachments: None.



CLOSURE REPORT FOR EXCEPTION 51

BellSouth Georgia OSS Testing Evaluation

Date: July 21, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth's electronic ordering systems (EDI and TAG) do not support the partial migration¹ of a customer's Billing Telephone Number (BTN) on UNE Loop-Port Combination service requests.

Summary of Exception:

A CLEC issues a partial migration service request for a multi-line customer wishing to convert a portion of its lines to a new Local Service Provider (LSP) while maintaining at least one line with BellSouth.

During testing, KPMG was unable to perform partial migrations from BellSouth retail to UNE Loop-Port Combination service when one of the migrating lines was the customer's original BTN.² Following receipt of error messages for these transactions, KPMG contacted the BellSouth Customer Support Manager (CSM). BellSouth's CSM informed KPMG that a system defect involving partial migrations of this type had been identified and was resolved on January 17, 2000.

However, KPMG discovered that LSRs requesting partial migration of a customer's BTN submitted after the system fix received error messages.

BellSouth has informed KPMG that they expect to implement a system fix for this BTN defect on April 29, 2000.

Summary of BellSouth Response:

"KPMG has found an error occurring in BellSouth's Local Exchange Service Order Generator (LESOG). BellSouth is implementing a system enhancement on April 29, 2000 to support the partial migration of a customer's Billing Telephone Number (BTN) on UNE Loop-Port Combination service requests. This fix will allow a CLEC to issue a partial migration local service request for a multi-line customer. CLECs will be able to convert a portion of their UNE Loop-Port Combination lines to a new Local Service Provider (LSP) while maintaining at least one line with BellSouth."

¹ A CLEC issues a partial migration service request for a multi-line customer wishing to convert a portion of its lines to a new Local Service Provider (LSP) while maintaining at least one line with BellSouth.

² KPMG previously addressed BellSouth's inability to support submission of partial migration service requests for loop-port combinations in Exception 4. However, this exception focussed on error messages received in connection with the population of certain fields on partial migration Local Service Requests (LSRs). At that point, KPMG had not tested any scenarios involving the partial migration of an end-user's BTN.



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Summary of KPMG Re-test Activities:

KPMG's re-test activities for this exception consisted of re-submitting the service requests that initiated this exception. KPMG submitted two service requests via TAG and two service requests via EDI to request the partial migration of a customer's BTN.

KPMG Re-test Results:

All of KPMG's service requests for BTN partial migrations submitted during re-testing received Firm Order Confirmations (FOCs) via TAG and EDI. Based on the successful confirmation of orders submitted during the retest, KPMG's experience indicates that TAG and EDI presently provide the functionality for CLECs to request partial migration of a customer's BTN on UNE Loop-Port Combination service requests.

BellSouth provided notification to CLECs of its 4/29/00 system fix via a Carrier Notification letter posted on 5/25/00.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, closes Exception 51.

Attachments: None.



CLOSURE REPORT FOR EXCEPTION 69

BellSouth Georgia OSS Testing Evaluation

Date: July 21, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth does not deliver timely Jeopardy Notifications via the EDI and TAG interfaces.

Summary of Exception:

In response to a CLEC's valid Local Service Request (LSR), BellSouth delivers a Firm Order Confirmation (FOC). The FOC provides: 1) confirmation that the service request has been validated; 2) notification of BellSouth internal Service Order(s) generated to work the request; and 3) verification of the order's confirmed due date (DD).

According to BellSouth's *Service Quality Measurements Georgia Performance Reports*, BellSouth delivers a Jeopardy Notification when it can be determined in advance that an FOC DD is in jeopardy of being missed. In the standards filed on March 22, 2000 with the Georgia Public Service Commission, BellSouth proposed, for purposes of this evaluation, a benchmark of 95% of Jeopardy Notifications delivered at least 24 hours prior to the DD¹.

KPMG has received 31 Jeopardy Notifications through April 21, 2000. BellSouth delivered only 10% of those notices at least 24 hours prior to the FOC DD.

Summary of BellSouth Response:

"BellSouth's Service Quality Measurements (SQM) Georgia Performance Report provides "Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices" when BellSouth can determine in advance that a committed due date is in jeopardy for facility delay. This jeopardy report is based on a Pending Facility (PF) status of the pending service order in SOCS. The SQM report document has been enhanced to clarify "jeopardy for facility delay". Other delays such as subscriber/end user or company (BellSouth) reasons are not included in this report.

BellSouth's Pending Order Status transactions delivered via the EDI and TAG interfaces contain a TRANSETPURPOSECD field entry of "21" in EDI and "JEOPARDY" in TAG

¹ At the time this exception was drafted, the proposed standard for Jeopardy Timeliness was 95% returned within 24 hours prior to the FOC DD. On June 6, 2000, the Georgia Public Service Commission (GPSC) approved a set of Service Quality Measurements (SQMs) and associated standards for use during this evaluation. The approved standard for Jeopardy Timeliness is 95% returned within 48 hours prior to the FOC DD. KPMG subsequently analyzed Jeopardy response timeliness relative to this new standard.



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for order delays due to subscriber/end user reasons. This transaction is delivered when the due date is missed and a subsequent due date is not simultaneously requested. If the customer negotiates a new due date prior to the service order being placed in a missed appointment status in SOCS this transaction is not sent. BellSouth delivers Pending Order Status for due date delays due to subscriber/end user reasons within 24 hours of the status condition.

The Pending Order Status job aid will be enhanced by 6/30/00 to provide additional clarification."

Summary of KPMG Re-test Activities:

KPMG's initial data set for Jeopardy Notifications included all responses containing a TRANSETPURPOSECD field value of "21" for EDI orders² and "Jeopardy" for TAG orders. Based on BellSouth's clarified definition of Jeopardy Notifications³, these responses are not considered "Jeopardies."

KPMG performed a re-test to review only those responses containing a status of "Pending Facilities"⁴. KPMG received nine Jeopardy Notifications via EDI and five via TAG.

KPMG Re-test Results:

Of the 14 Jeopardy Notifications KPMG received, 100% arrived at least 48 hours before the FOC Due Date.

Based on the Pending Facilities responses received during the course of this evaluation, KPMG's experience indicates that TAG and EDI presently deliver timely Jeopardy Notifications.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, closes Exception 69.

Attachments: None.

² BellSouth's *Local Exchange Ordering Guide*, Volume 4 contains technical specifications for EDI transactions and responses. According to this documentation, a value of "21" in the TRANSETPURPOSECD field equates to a "Jeopardy" response type.

³ KPMG has issued an Exception to address the absence of a clearly defined process for delivering Jeopardy and Missed Appointment Notifications. KPMG is reviewing BellSouth documentation with respect to Jeopardy Notification definitions under Exception 72.

⁴ BellSouth has indicated that only Pending Facilities notifications are counted as "Jeopardies" for purposes of the Jeopardy Timeliness metric calculation.



CLOSURE REPORT FOR EXCEPTION 81

BellSouth Georgia OSS Testing Evaluation

Date: July 21, 2000

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

Examples of inaccurate notification are described as follows:

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

The repeatReport object of a trouble report submitted via the ECTA Gateway allows a CLEC to indicate whether the circuit has had other recent troubles, or is a recent installation. The repeatReport object is used to indicate to BellSouth maintenance personnel that this ticket should receive priority handling. During the course of functional testing, KPMG intentionally submitted an incorrect non-numeric value for the repeatReport object¹ while performing a "Modify" operation. The ECTA Gateway returned a normal successful Modify operation response. The ECTA Gateway did not indicate that any erroneous information had been included in this instance.

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

The commitmentTimeRequest object of a trouble report submitted via the ECTA Gateway allows a CLEC to request a time by which BellSouth will commit to clearing a trouble situation. During the course of functional testing, KPMG intentionally submitted an invalid value for the repeatReport object² while performing a "Create" operation. The ECTA Gateway returned a normal successful Create operation response. The ECTA Gateway did not indicate that any erroneous information had been included in this instance.

3. **The ECTA Gateway did not inform KPMG of an improper value transmitted for the perceivedTroubleSeverity object.**

¹ Valid entries for repeatReport are 0 (Unspecified), 1 (Recent Installation), 2 (Repeat), 3 (both Recent Installation and Repeat), 4 (Chronic) and 5 (both Recent Installation and Repeat).

² The valid format for the commitmentTimeRequest is YYYYMMDDHHMMSSZ (for example, May 5, 2000 at 4:30 P.M. would be 20000505163000Z). The value of "April 30, 2000 12:31:00" was submitted on this transaction.



CLOSURE REPORT FOR EXCEPTION 81

BellSouth Georgia OSS Testing Evaluation

The perceivedTroubleSeverity object of a trouble report submitted via the ECTA Gateway allows a CLEC to indicate whether or not the reported trouble affects the customer's service. The perceivedTroubleSeverity object is used to indicate to BellSouth maintenance personnel that a ticket should receive priority handling (based upon the degree to which the customer's service is affected). During the course of functional testing, KPMG intentionally submitted an incorrect value for the perceivedTroubleSeverity object³ while performing a "Modify" operation. The ECTA Gateway returned a normal successful Modify operation response. The ECTA Gateway did not indicate that any erroneous information had been included in this instance.

Summary of BellSouth's Responses:

Initial Response: "This exception is similar to Exception 12 and the following information applies to both.

The issue is who should provide attribute validation. BellSouth's position is that the Manager (CLEC) is responsible for insuring that their users enter correct information into their 'front end' system and that their system correctly translate the user's input to the ANSI standard values defined in the JIA which are transmitted to ECTA.

The ECTA interface has been operational in the Interexchange Carrier (IXC) environment for over five years⁴ and there are a total of 5 production clients using this system (3 IXC and 2 CLEC). Each of these production clients has been successfully reporting their customer's troubles without incident (due to the lack of error checking).

The OSS interfaces developed by BellSouth for CLEC's usage are governed by different national organizations. The complexities and resultant standards of the pre-order/order process (guided by OBF) are significantly more rigorous than the maintenance and repair process defined by ECIC. Each ECTA client is an active member of ECIC and together work to develop and approve the standards. If these clients want the Agent (BellSouth) to provide attribute error checking, they would should pursue this requirement in the ANSI standards.

The BellSouth ECTA developers have reviewed the ANSI standards and determined that error checking by the Agent (BellSouth) is not required.

If BellSouth were required to error check each attribute:

³ Valid entries for perceivedTroubleSeverity are 0 (Out of Service), 1 (Back in Service), 2 (Service Impairment), 3 (Non-Service Affecting Problem). For this transaction, KPMG submitted a value of 9.

⁴ The AT&T(IXC)-BellSouth ECTA JIA was approved on November 30, 1994.



CLOSURE REPORT FOR EXCEPTION 81

BellSouth Georgia OSS Testing Evaluation

- This requirement would cause a major rewrite of the ECTA system at a significant investment of time and money. This additional cost would be passed on to the CLEC communities who may not want or need this capability.
- The programming overhead caused by the constant error checking will slow the system response time thereby delaying the information sent back to the CLEC. This overhead could require BellSouth to purchase additional ECTA processors should the volume of reports approach forecasted levels.
- Delivering attribute validation error messages will require the existing clients to reprogram their systems to react to these error messages. This will require acceptance of this change by these clients which included commitment of time and money on their part to implement. The existing ECTA users seem to be satisfied with the existing agreed upon process and may be reluctant to make such changes.

BellSouth does not plan to add attribute value error checking over what was committed in the response to Exception 12.”

Amended Response: In its amended response, BellSouth re-printed the original language from its initial response along with the following supplement:

“However, BellSouth will submit a request for via the Interim Change Control to be reviewed and prioritized for potential implementation in a future release.”

Summary of KPMG Re-Test Activities:

As BellSouth has indicated that they will not be making modifications to the ECTA Gateway, KPMG was unable to perform any re-testing activities.

KPMG Re-Test Results:

Based on KPMG’s professional experience, standard programming practices dictate that both parties in a Manager/Agent electronic communications system relationship should validate data to the degree reasonably possible. Data elements should be validated for proper syntax as well as vetted against data that reside in accessible databases. BellSouth’s ECTA Gateway does not validate the data elements in either way.

The ANSI T1M1 standards, to which the ECTA Gateway is designed to conform, do not address the issue of data validation for either the Manager (CLEC) or the Agent (BellSouth) system. In the absence of any specifically delineated standard set of responsibilities, KPMG would expect that both parties would default to standard programming practices.



CLOSURE REPORT FOR EXCEPTION 81

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Both the TAG and EDI interfaces offered to CLECs by BellSouth are expected to perform data validation in a manner consistent with the standard to which ECTA is being held by KPMG. Although usage of these systems can be more complex, whether an error delays a CLEC customer getting a new service (as in the case of TAG and EDI) or delays the repair of a CLEC's previously provisioned line (as in the case of ECTA) the effect is the same: an out-of-service condition for the CLEC's customer ultimately leading to decreased satisfaction.

KPMG will assign a "Not Satisfied" to the relevant evaluation criteria in its final report. In the absence of any other activity, KPMG closes this exception for testing purposes.

Based on BellSouth's response, KPMG, with the concurrence of the Georgia Public Service Commission, closes Exception 81.

Attachments: None.

CERTIFICATE OF SERVICE

Docket No. 8354-U

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

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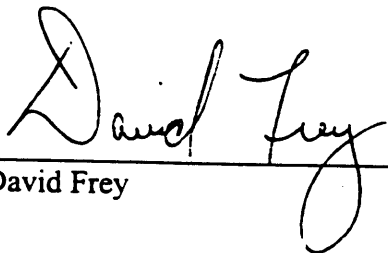
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This 21st day of July 2000.



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RECEIVED

JUL 24 2000

EXECUTIVE SECRETARY
G.P.S.C.

July 21st, 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**

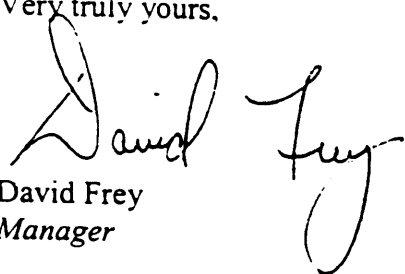
Dear Ms. O'Leary:

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 July 21, 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





**BellSouth-GA OSS Testing Evaluation
Interim Status Report
July 21, 2000**

1.0 Document Objective

In this document, KPMG provides an interim summary status report on developments related to the BellSouth-GA OSS Test. A brief overview of key developments is provided in section 2.0. Key upcoming activities are summarized in section 3.0. A detailed report on specific Master Test Plan (MTP) 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. A detailed report on specific Supplemental Test Plan (STP) items is provided in the table in section 5.0. Each item presented in the table in section 5.0 includes a reference number that identifies the item from a previous status report, where applicable. A detailed report on Exceptions is provided in the table in section 6.0.

2.0 Key Developments

- Pre-order and order testing:
 - MTP: KPMG completed a pre-order timeliness re-test. Results indicate that the majority of responses were returned within proposed timeframes.
- Pre-order and order volume testing:
 - KPMG/HP conducted the following volume tests:
 - June 2, 2000 - Normal Volume, Day One
 - June 14, 2000 – Normal Volume, Day One Re-test
 - June 20, 2000 – Normal Volume, Day One Second Re-test
 - July 10, 2000 - Peak Volume, Day One
 - July 13, 2000 - Peak Volume, Day One Re-test
 - July 17, 2000 - Peak Volume, Day Two
- Performance measurement reporting (Metrics):
 - KPMG has substantially completed the process of replicating the calculations of Service Quality Measurement (SQMs) for the KPMG test CLEC, as applicable, for the month of May 2000. KPMG had previously completed the process of replicating the calculations for November 1999 through April 2000. Additionally, KPMG has substantially completed the process of replicating

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the calculations of SQMs for the CLEC aggregate where BellSouth does not report on a CLEC-specific basis.

- KPMG has substantially completed the process of comparing KPMG test CLEC data collected by KPMG to that provided by BellSouth (PMAP raw data), through the month of April.
 - KPMG continues to discuss replication and data comparison issues with BellSouth and the Georgia Public Service Commission (GPSC) via the exceptions process.
 - KPMG has completed the process of replicating the calculations of SQMs for the CLEC aggregate and BellSouth retail data for October 1999 and other selected months. KPMG has issued exceptions related to these reports, and is discussing them with BellSouth.
 - KPMG has finished comparing BellSouth data in the early stages of processing to BellSouth raw data for PMAP SQMs and manual SQMs. KPMG has issued exceptions related to these data, and is discussing them with BellSouth. Based upon these discussions, KPMG has requested raw and early-stage data for more recent months, to make comparisons as part of re-testing activities.
 - KPMG has reviewed BellSouth's data collection and storage processes, and metrics-related change management processes. KPMG has issued its exceptions related to these processes, and is discussing them with BellSouth.
 - KPMG has completed its review of BellSouth's definitions of performance measures and its comparison of BellSouth calculation instructions with actual BellSouth calculation procedures. KPMG has issued exceptions related to these definitions and instructions, and is discussing them with BellSouth. BellSouth is updating the definitions and calculation descriptions that appear in the SQM manual.
- Maintenance and Repair:
 - KPMG has completed approximately 95% of *M&R12: TAFI Functional Test of Resale Lines*. Testing continues on BellSouth responses to exceptions identified during the original test. Analysis and report writing are currently underway.
 - KPMG has completed approximately 95% of *M&R13: ECTA Functional Test of Resale Lines*. Testing continues on BellSouth responses to exceptions identified during the original test. Analysis and report writing are currently underway.



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- KPMG has completed testing of *M&R11: Maintenance and Repair End-To-End Process Evaluation of xDSL Capable UNE Loops*. Analysis and report writing are complete.
- Change Management:
 - KPMG has recommended closure of all exceptions related to *CM-1: Change Management Practices Review* to the Georgia Public Service Commission.
 - KPMG has completed testing for *CM2: OSS'99 Release Evaluation*. Analysis and report writing activities are in the final stages.
- Capacity Management:
 - KPMG continues to evaluate Capacity Management issues identified via the exception process. Additional information and documentation has been requested from BellSouth regarding Exception 25.
 - KPMG has completed *PO&P15: Work Center Capacity Management Evaluation – xDSL* and *PO&P16: xDSL Process Parity Evaluation* work center visits and associated interviews. Analysis and final report writing activities are in progress.
- Billing:
 - KPMG placed UNE DUF calls during the week of April 24, 2000 as part of re-test activities associated with Exceptions 27, 28 and 29. KPMG completed its analysis of the results of the retest and amended these exceptions to reflect the new findings.
 - KPMG has concluded the *BLG7: CRIS Resale Invoicing Functional Evaluation* and the *BLG8: Resale Usage Functional Evaluation*. Results of both tests have been analyzed and findings have been documented in Exception 94 and three exceptions currently in “Draft” status, pending BellSouth responses.

3.0 Key Upcoming Activities

- KPMG expects to conduct a second UNE DUF retest¹ during the month of August. This re-test is intended to assess software fixes that BellSouth believes will address the failures responsible for missing usage.

¹ “Retest” refers to test activities designed to evaluate areas that were initially identified as deficient through the exceptions process.



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- KPMG is planning an ordering functional re-test² to re-evaluate BellSouth's performance with respect to the following issues identified in previous status reports: 1) Completion Notification (CN) timeliness; 2) Functional Acknowledgement (FA) timeliness; 3) FOC Due Date accuracy compared to LSR Desired Due Date requests; 4) Loop Service with Directory Listing ordering process; 5) Order validation process for invalid LPIC entries on UNE-Port service requests; and 6) Inaccurate FOC responses (confirmations received on invalid service requests).

² "Retest" refers to test activities designed to evaluate areas that were initially identified as deficient through the exceptions process.



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4.0 Master Test Plan Specific Item Status

Ref	Item	Status	Issues	Next Step/Resolution
I-6	EDI functional testing	- KPMG issued the following exceptions, related to EDI functional testing, that remain open: Exceptions 9, 18, 22, 26, 31, 32, 38, 39, 44, 47, 54, 60, 67, 68, 72, 77, 78, 95. Additionally, KPMG has submitted 2 draft exceptions to BLS that will be publicly issued if the information is substantiated by the BLS response. KPMG is drafting a closure report for Exceptions 39, 54, 67 & 72. KPMG is currently clarifying a closure report for Exception 44 based on the GPSC's comments. - KPMG is proceeding with EDI functional testing for all UNE product types. Approximately 88% of planned orders have been submitted.	- The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>. - None	- All exceptions must be closed for purposes of the test before reports can be finalized. - N/A.
			The following issue presented in the 4/06/00 interim status report remains open: A timeliness deficiency in BLS's delivery of fully-mechanized Clarifications (C1.Rs) and Flow-Through Firm Order Confirmations (FOCs);	BLS is in the process of drafting an amended response with detail on the late C1.Rs and FOCs identified by KPMG.



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Ref	Item	Status	Issues	Next Step Resolution
		KPMG is in the process of planning a functional re-test to reevaluate BLS performance with respect to the following issues identified in previous status reports: 1) Completion Notification (CN) timeliness; 2) Functional Acknowledgement (FA) timeliness; 3) FOC Due Date accuracy compared to LSR Desired Due Date requests; 4) Loop Service with Directory Listing ordering process; 5) Order validation process for invalid L.PIC entries on UNE-Port service requests; and 6) Inaccurate FOC responses (confirmations received on invalid service requests).	None.	BellSouth is in the process of creating the re-test test bed accounts based on specifications provided by KPMG.
1		In response to an issue identified regarding inadequate process definition for delivering electronic Jeopardy and Missed Appointment (MA) Notifications, BLS has modified its existing documentation. The 6/14/00 release of the <i>Pending Service Order Job Aid</i> included a definition of Jeopardy and MA responses, a description of status-related data elements returned in the responses, and a listing of possible status message codes and definitions.	None.	N/A.



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Ref	Item	Status	Issues	Next Step Resolution
		BLS has proposed additions to existing electronic ordering functionality via the CLEC Change Control Process in response to several issues raised by KPMG: 1) The absence of system functionality to process UNE-to-UNE service requests; and 2) The absence of system functionality to process UNE Loop partial migration. CLECs voted on prioritization of these issues during the June 28th Change Control Meeting.	BLS plans to add UNE Loop partial migration and UNE-to-UNE migration functionality to its OSS '99 ordering systems.	N/A
		In response to an issue regarding missing or extraneous data elements and data values on service order responses (FOCs and C'Ns), BLS will update its existing documentation to more accurately reflect the expected components of order responses. BLS plans to issue an amended version of the LEO Guide (Volume I) on 8/28/00.	None.	KPMG will review the revised LEO Implementation Guide, Volume I upon publication.
		In response to an issue identified regarding the absence of adequate documentation on the BLS process for returning Status messages on confirmed service requests, BLS has updated its <i>Pending Order Status Job Aid</i> (published on 6/14/00) to more clearly define the process for returning status messages.	None.	N/A.
		KPMG has identified a response timeliness deficiency on Non Flow-Through Firm Order Confirmations (NFT FOCs) and Partially Mechanized Clarifications (PM CLR's).	None.	KPMG has issued Draft Exceptions to address these issues. BLS is investigating.



BellSouth-GA OSS '00 Migration Evaluation
Interim Status Report
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Ref	Item	Status	Issues	Next Step/Resolution
		BLS informed KPMG that ISDN-to-UNE and CENTREX-to-UNE migrations are not supported for any service delivery method.	KPMG has received multiple conflicting responses to inquiries on these conversion types. BLS documentation does not adequately specify the types of electronically orderable service requests that are supported.	KPMG submitted a draft exception regarding BLS's documentation.
1-7	TAG functional testing	KPMG issued the following exceptions, related to TAG functional testing, that remain open: Exceptions 9, 18, 22, 26, 31, 32, 38, 39, 44, 47, 54, 67, 68, 72, 77, 78 & 95. Additionally, KPMG has submitted two draft exceptions to BLS that will be publicly issued if the information is substantiated by the BLS response. KPMG is drafting a closure report for Exceptions 39, 54, 67 & 72. KPMG is currently clarifying a closure report for Exception 44 based on the GPSC's comments.	The status of exceptions and draft exceptions is detailed in Section 6.0 Exceptions Status.	All exceptions must be closed for purposes of the test before reports can be finalized.
1		KPMG is proceeding with TAG functional testing for all UNE product types. Approximately 88% of planned orders have been submitted.	None	N/A.
2			The following issue presented in the 4/06/00 interim status report remains open: A timeliness deficiency in BLS's delivery of fully-mechanized Clarifications (CLRs) and Flow-Through Firm Order Confirmations (FOCs);	BLS is in the process of drafting an amended response with detail on the late CLRs and FOCs identified by KPMG.



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Ref	Item	Status	Issues	Next Step Resolution
		• KPMG is in the process of planning a functional re-test to reevaluate BLS performance with respect to the following issues identified in previous status reports: 1) Completion Notification (CN) timeliness; 2) FOC Due Date accuracy compared to LSR Desired Due Date requests; 3) Loop Service with Directory Listing ordering process; 4) Order validation process for invalid LPI entries on UNE-Port service requests; and 5) Inaccurate FOC responses (confirmations received on invalid service requests).	• None.	• BellSouth is in the process of creating the re-test test bed accounts based on specifications provided by KPMG.
:		• In response to an issue identified regarding inadequate process definition for delivering electronic Jeopardy and Missed Appointment (MA) Notifications, BLS has modified its existing documentation. The 6/14/00 release of the <i>Pending Service Order Job Aid</i> included a definition of Jeopardy and MA responses, a description of status-related data elements returned in the responses, and a listing of possible status message codes and definitions.	• None.	• N/A.



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Ref	Item	Status	Issues	Next Step/Resolution
		BLS has proposed additions to existing electronic ordering functionality via the CLEC Change Control Process in response to several issues raised by KPMG: 1) The absence of system functionality to process UNE-to-UNE service requests; and 2) The absence of system functionality to process UNE Loop partial migrations. CLEC's voted on prioritization of these issues during the June 28th Change Control Meeting.	BLS plans to add UNE Loop partial migration and UNE-to-UNE migration functionality to its OSS '99 ordering systems.	N/A
		In response to an issue regarding missing or extraneous data elements and data values on service order responses (FOCs and CNs), BLS will update its existing documentation to more accurately reflect the expected components of order responses. BLS plans to issue an amended version of the LEO Guide (Volume 1) on 8/28/00.	None.	KPMG will review the revised LEO Implementation Guide, Volume 1 upon publication.
		In response to an issue identified regarding the absence of adequate documentation on the BLS process for returning Status messages on confirmed service requests, BLS has updated its <i>Pending Order Status Job Aid</i> (published on 6/14/00) to more clearly define the process for returning status messages.	None.	N/A.
		KPMG has identified a response timeliness deficiency on Non Flow-Through Firm Order Confirmations (NFT FOCs) and Partially Mechanized Clarifications (PM CLR's).	None.	KPMG has issued Draft Exceptions to address these issues. BLS is investigating



**BellSouth-GA OSS
ing Evaluation
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Ref	Item	Status	Issues	Next Step/Resolution
	Pre-Order Functional Testing	KPMG issued the following exceptions, related to Pre-Order functional testing, that remain open: Exceptions 1, 24, 65, 66 & 71. KPMG is drafting a closure statement for Exception 1.	The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.	All exceptions must be closed for purposes of the test before reports can be finalized.
		Approximately 95% of planned TAG pre-orders have been submitted.	The following issue presented in the 6/9/00 interim status report remains open: 1) KPMG has uncovered discrepancies between the service establishment intervals obtained from BLS documentation (<i>Product and Services Interval Guide</i>) versus those obtained from the Calculate Due Date (CDD) pre-order query.	BLS is in the process of investigating and resolving these issues. KPMG will re-test, as appropriate.
			The following issues presented in the 4/06/00 interim status report remain open: 1) 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 response to an issue regarding the absence of Calculate Due Date (CDD) business rules, BLS has published Version 7.0 of the Pre-Order Business Rules. This document contains information on field inputs and outputs for CDD queries performed in Issue 7 of TAG.	None.	N/A.



BellSouth-GA OSS ing Evaluation
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July 21, 2000

Ref	Item	Status	Issues	Next Step/Resolution
I-8	CRIS/CABS Invoicing Functional Test	KPMG issued the following exceptions, related to CRIS/CABS invoicing functional testing, that remain open: Exception 16 & 35.	The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.	All exceptions must be closed for purposes of the test before reports can be finalized.
II-1	Metrics	KPMG issued the following exceptions, related to Metrics (MTP - Performance Measures Evaluations) that remain open: Exceptions 23, 42, 43, 45, 46, 52, 56, 62, 74 & 90. Additionally, KPMG has submitted three draft exceptions to BLS that will be publicly issued if the information is substantiated by the BLS response. KPMG is clarifying a closure statement for Exception 45 based on the GPSC's comments.	The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.	All exceptions must be closed for purposes of the test before reports can be finalized.
I		KPMG is updating the calculation validation programs to apply to June SQM values for the KPMG Test CLEC.	KPMG anticipates identifying issues, if any, within the next two weeks.	If KPMG finds any discrepancies, KPMG will bring them to the attention of BLS via draft exceptions.
		KPMG continues to compare BLS raw data to KPMG Test CLEC data	KPMG has found some potential discrepancies between the BLS raw data and the KPMG Test CLEC data.	KPMG has brought these to the attention of BLS via draft exceptions and exceptions. Updates on exceptions and draft exceptions is available in section 6.0.
II-4	Volume Test	- KPMG/HP prepared all pre-order and order transactions for the production volume test. KPMG/HP ran a Production SRT on 7/18/00. - KPMG/HP conducted Normal Volume, Day One on 6/2/00, Normal Volume, Day One Re-test on 6/14/00 and Normal Volume, Day One Second Re-test on 6/20/00.	None.	N/A.
			BLS failed to meet six criteria on Normal Test, Day One, four criteria on Normal Test, Day One Retest and eight criteria on Normal Test, Day One Second Retest.	KPMG/HP expect to re-execute the first normal volume test in the RSIMMS environment shortly.



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Ref	Item	Status		Issues		Next Step/Resolution	
II-5	Change Management	• KPMG/HP successfully submitted Peak Volume Day One 7/10/00, Peak Day One Retest 7/13/00 and Peak Day Two 7/17/00.		• BLS failed to meet four criteria on Peak Test Day One, and one criteria on Peak Test Day One Retest. KPMG is currently processing the data from Peak Test Day Two.		• KPMG will review the data from Peak Test Day Two and re-execute, if necessary.	
		• KPMG is performing an evaluation of the RSIMMS and production environments to verify that there are no significant differences in hardware, applications, and data loads.		• None.		• KPMG is currently drafting final report to be submitted to the GA-PSC.	
		• KPMG has no open exceptions related to Change Management.		• None.		• N/A.	
		• KPMG attended the BLS-CLEC Change Review Meeting, as described in the <i>Interim Change Control Process (I-CCP)</i> , on 6/28/00.		• KPMG identified a deficiency around the lack of participation or attendance by BLS subject matter experts (SMEs) to explain BLS-originated change requests and to answer questions regarding BLS systems or business processes. This deficiency lessened the effectiveness of the meeting. KPMG identified this issue to BLS.		• BLS has committed to involve SMEs in future Change Review Meetings to maximize their effectiveness.	
III-1	Flow-Through Evaluation	• BLS and CLECs are currently in discussions regarding a BLS-proposed addition to the I-CCP that would establish an Expedited Feature Process. This proposed process would offer the parties a method to accelerate the handling of time critical non-defect change requests.		• None.		• KPMG will continue to monitor the BLS-CLEC discussions and implementation around this proposed process.	
		• KPMG issued the following exceptions, related to Flow Through that remain open: Exceptions 41 & 48. KPMG is clarifying a closure statement for Exception 48 based on the GPSC's comments.		• The status of exceptions and draft exceptions is detailed in Section 6.0 Exceptions Status.		• All exceptions must be closed for purposes of the test before reports can be finalized.	



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Ref	Item	Status		Issues		Next Step Resolution	
		KPMG completed its review of CLEC questions raised regarding Exception 41 and made comments to BLS. BLS responded with changes to the information included in Flow-Through raw data CLECs.	KPMG is reviewing BLS's changes for Exception 41.	None.		KPMG will document and report its findings, as appropriate.	
III-2	CLEC Participation - Ordering	KPMG continues to investigate a potential system limitation with performing CLEC-to-CLEC migration orders using CLEC-provided facilities.	None.				
III-3	Capacity Management	KPMG has issued the following exception related to Capacity Management that remains open: Exception 25. The GPSC is currently reviewing a closure report for this exception.	The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.	None.		All exceptions must be closed for purposes of the test before reports can be finalized.	
IV-1	TAFI functional testing	- KPMG requested additional information and documentation for re-testing related to Exception 25. KPMG is evaluating previously received documentation. - KPMG issued the following exception related to TAFI functional testing which remains open: Exceptions 37.	- KPMG is awaiting receipt of additional documentation for pre-order transaction tracking. - The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.	None.		- KPMG will continue to analyze documentation and process information collected during re-testing activities. - All exceptions must be closed for purposes of the test before reports can be finalized.	
IV-2	ECTA functional testing	KPMG issued the following exceptions related to ECTA functional testing which remain open: Exceptions 12 & 85. 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 <i>Section 6.0 Exceptions Status</i>.	None.		All exceptions must be closed for purposes of the test before reports can be finalized.	
IV-3	ODUF/ADUF usage functional test	KPMG issued the following exceptions related to ODUF/ADUF usage functional testing that remain open: Exception 27, 28 & 29. KPMG is currently reviewing a closure report for Exception 29 internally.	The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.	None.		All exceptions must be closed for purposes of the test before reports can be finalized.	



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Ref		Item	Status	Issues	Next Step Resolution
IV-4		CRIS/CABS invoicing documentation evaluation	KPMG completed its analysis of the results of the UNE DUF re-test. Exception 28 was amended to reflect the new findings.	None.	KPMG will conduct a UNE DUF re-test in August. Results of the re-test will be analyzed upon completion of the test.
			KPMG issued the following exception related to the CRIS/CABS documentation evaluation which remains open: Exception 73.	The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.	All exceptions must be closed for purposes of the test before reports can be finalized.
			BLS has published a CLEC Billing Guide which, addresses most of the deficiencies identified in Exception 73. One remaining issue is outstanding which BLS expects to address in July with the next update to the document.	None.	Upon notification from BLS that implementation of solutions to all process deficiencies has been completed, KPMG will schedule a re-test.
V-2		Provisioning Verification	KPMG issued the following exceptions related to Provisioning Verification that remain open: 58, 76, & 82. Additionally, KPMG has submitted one draft exception to BLS that will be publicly issued if the information is substantiated by the BLS response. KPMG is reviewing a closure statement for Exception 58 internally. KPMG is drafting a closure statement for Exception 82.	The status of exceptions and draft exception is detailed in <i>Section 6.0 Exceptions Status</i>.	All exceptions must be closed for purposes of the test before reports can be finalized.
			KPMG finalized provisioning verification of "hot cuts" of actual CLEC customer accounts through the week of June 30th, 2000.	KPMG noted deficiencies in the following areas of "Hot Cuts": 1) Timeliness of Coordinated Customer Conversions 2) Methods and Procedures	Pending BLS decision on re-testing activity of Provisioning Verification.
			KPMG finalized analysis of switch translations and CSRs for accounts which completed during transaction testing of TAG and EDI functional evaluation.	KPMG deficiencies in the following areas: 1) Validation of switch translations 2) Directory Assistance 3) CSR validation	KPMG finalized its analysis based on verified PONs (pending completion of PONs through pre-order and order evaluation).



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Ref	Item	Status	Issues	Next Step Resolution
V-3	Pre-ordering, Ordering and Provisioning Documentation Review	KPMG issued the following exceptions related to Pre-Ordering, Ordering and Provisioning Documentation Reviews that remain open: Exception 33, 53, 55, 59, 63 71, 75 & 80. KPMG is drafting a closure statement for Exception 59 internally.	The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.	All exceptions must be closed for purposes of the test before reports can be finalized.
		As of July 17, 2000, BLS indicated that all issues on KPMG's <i>Documentation Issues Report</i> were forecasted for closure in the next releases of the <i>Local Exchange Ordering (LEO) Guide, Volume 2</i>.	None.	KPMG will work with BLS to identify and resolve outstanding documentation deficiencies.
		Data Element Definition: <i>Billing Account Number 1</i> <i>Billing Account Number 2</i> <i>Billing Indicator 1</i> <i>Billing Indicator 2</i>	The documentation does not state: 1) when more than one BAN is required for an account type 2) the BAN sequence when more than one BAN is to be used.	BLS has committed to further research this issue.
		- Revision Issue: <i>D/SENTx</i> - Data Definition: <i>Dispatch</i>	- Revision Table identifies Section 4.3.1.8 as D/SENT however D/SENT is not in Section 4.3.1.8 but is in Section 4.3.1.9. - BLS documentation does not contain definitions for order types requiring dispatch. Several ordering intervals (as defined in the <i>Product and Service Interval Guide</i>) 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.	- KPMG is working with BLS to resolve the issue. - Though BellSouth has added a note explaining "No Dispatch", the note does not identify specific requirements for "No Dispatch"
V-4	ODUF/ADUF Documentation Evaluation	KPMG issued the following exception related to ODUF/ADU documentation that remains open: Exception 34. KPMG is reviewing a closure statement for Exception 34 internally.	The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.	All exceptions must be closed for purposes of the test before reports can be finalized.
		KPMG reviewed BLS's revisions to ODUF/ADUF documentation.	KPMG is awaiting further revisions to the documentation.	KPMG will review the amended documentation upon receipt from BLS.



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Ref	Item	Status	Issues	Next Step Resolution
		BLS amended the ODUF/ADUF documentation on June 1.	None.	KPMG is reviewing the amended documentation for accuracy and completeness.

5.0 Supplemental Test Plan Specific Item Status

Ref	Item	Status	Issues	Next Step Resolution
VII-2	Test Bed Development	Provisioning and validation of the xDSL test bed is approximately 60% complete.	KPMG submitted two draft exceptions to BLS regarding the absence of comprehensive guidelines for submitting xDSL Service Inquiries (SIs). KPMG must submit SIs in order for BLS to correctly provision the test bed.	BLS will address the documentation issue and provision the remaining xDSL accounts.
VII-4	Metrics	- KPMG issued the following exceptions, related to Metrics (STP - Performance Measures Evaluations) that remain open: Exceptions 61, 64, 70, 79, 83, 84, 86, 87, 88, 89, 92 & 93. - KPMG has completed calculations of SQM values of PMAP-generated and manually-generated SQMs for the CLEC aggregate and BellSouth retail. - KPMG has reviewed the definitions of PMAP-generated and manually-generated SQMs.	- The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>. - KPMG has found some potential discrepancies between the values KPMG calculated and values reported by BLS. - KPMG has found some problems with these definitions and their corresponding calculation descriptions and computation instructions.	- All exceptions must be closed for purposes of the test before reports can be finalized. - KPMG has brought these to the attention of BLS via exceptions. - KPMG has brought these issues to the attention of BLS via four exceptions. These exceptions compare definitions to corresponding calculation descriptions, and calculation descriptions to corresponding computation instructions. They also review exclusions applied to the data.
		KPMG has compared data in the early stages of processing to data in the latter stages of processing (BLS raw data used for replication purposes).	KPMG has identified a number of potential issues.	KPMG has brought these to the attention of BLS via Exceptions regarding completeness and accuracy of the raw data.



BellSouth-GA OSS '14 Evaluation
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Ref	Item	Status	Issues	Next Step/Resolution
IX-2	PO&P11 – EDI & TAG Resale Functional Evaluation	KPMG has reviewed the data flow process through legacy/source, PMAP, and other related BLS systems, as well as metrics change management issues.	KPMG has identified a number of potential issues.	KPMG has brought these to the attention of BLS via Draft Exceptions and Exceptions.
		KPMG issued the following exception, related to EDI & TAG resale functional testing, that remains open: Exception 49. KPMG has submitted 1 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 <i>Section 6.0 Exceptions Status</i>.	All exceptions must be closed for purposes of the test before reports can be finalized.
		BLS provided additional business rules to KPMG and advised that the <i>Complex Products Service Ordering</i> training class contains more instruction on ordering Hunting.	None.	KPMG has requested the training material for evaluation.
IX-3	PO&P12 – xDSL Functional Evaluation	KPMG issued the following exception, related to xDSL functional testing, that remain open: Exception 57.	The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.	All exceptions must be closed for purposes of the test before reports can be finalized.
		KPMG submitted pre-order LMU Service Inquires via fax and e-mail to BLS.	KPMG has found a potential lack of documentation in areas of business rules for both pre-order and ordering xDSL capable loops. KPMG found lack of documentation for submission of pre-order LMUs via e-mail. KPMG has found inconsistent responses from LMU Service Inquiries.	KPMG will review additional documentation upon receipt and conduct interviews.
		KPMG reviewed BLS's xDSL pre-ordering and ordering documentation.	KPMG noted: 1) pre-ordering documentation for the Service Inquiry process is not complete; 2) the link between the xDSL pre-ordering and ordering process is not clearly defined in the documentation.	KPMG submitted a draft exception to BLS.
IX-4	PO&P-14 - Resale and xDSL Documentation Evaluation	KPMG reviewed BLS's xDSL documentation for structure and format.	xDSL documentation contains some minor structural and formatting inconsistencies.	KPMG will review the new release of documentation scheduled for July 24, 2000.
		KPMG conducted a second interview with CLEC personnel during the week of 5/15/00 regarding BLS's resale documentation.	KPMG is evaluating the clarity, accuracy and availability of BLS's resale documentation from the CLEC perspective.	KPMG has documented the second CLEC interview.



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Ref	Item	STATUS		ISSUES		Next Step Resolution	
		STATUS		ISSUES		Next Step Resolution	
1	PO&P15 - Work Center Capacity Management - xDSL	• KPMG has requested CLEC and BLS xDSL document interviews.		• KPMG is awaiting release of new sDSL documents due on July 24, 2000.		• KPMG will review the new release of documentation scheduled for July 24, 2000.	
		• KPMG is performing a documentation review of the new ordering guidelines to determine whether they adequately define ordering requirements.		• None.		• KPMG's further activities will be based on its documentation review.	
		• KPMG has submitted 1 draft exception, related to xDSL work center capacity management, 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 <i>Section 6.0 Exceptions Status</i> .		• All exceptions must be closed for purposes of the test before reports can be finalized.	
		• KPMG reviewed documentation received to date.		• KPMG has not received all documentation requested from BLS.		• KPMG will review additional documentation, upon receipt.	
		• KPMG completed work center visits and associated interviews. KPMG is analyzing results of interviews and documentation reviews.		• None.		• KPMG will complete and document its analysis.	
:	PO&P16 - xDSL Process Parity	• KPMG has submitted 2 draft exceptions, related to xDSL process parity, 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 <i>Section 6.0 Exceptions Status</i> .		• All exceptions must be closed for purposes of the test before reports can be finalized.	
		• KPMG reviewed documentation received to date.		• KPMG has not received all documentation requested from BLS.		• KPMG will review additional documentation, upon receipt.	
		• KPMG completed work center visits and associated interviews. KPMG is analyzing results of interviews and documentation reviews.		• None.		• KPMG will complete and document its analysis.	
XI-1	M&R11 - Maintenance and Repair Process Evaluation of xDSL-Capable Loops	• KPMG has completed 95% of TAFI Functional Resale Line testing. Analysis and final report writing are currently underway.		• None.		• N/A.	
IX-7	M&R12 - TAFI Functional Test of Resale Lines	• KPMG is currently conducting testing of Resale Lines through the ECTA interface and is approximately 95% complete.		• None.		• N/A.	



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Ref	Item	Status	Issues	Next Step/Resolution
IX-8	M&R13 - ECTA Functional Test of Resale Lines	KPMG has completed its test of End-to-end xDSL capable UNE loop lines.	None.	N/A.
IX-9	BLG7 - CRIS Resale Invoicing Functional Evaluation	- KPMG has submitted 3 draft exceptions, related to CRIS resale functional testing, to BLS that will be publicly issued if the information is substantiated by the BLS response. - KPMG completed initial testing activities related to BLG-7.	- The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>. - None.	- All exceptions must be closed for purposes of the test before reports can be finalized. - N/A.
IX-10	BLG8 - Resale Usage Functional Evaluation	- KPMG issued the following exception, related to EDI functional testing, that remains open: Exception 94. - KPMG completed initial testing activities related to BLG-8.	- The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>. - None.	- All exceptions must be closed for purposes of the test before reports can be finalized. - N/A.
IX-11	CM2 - OSS '99 Release Evaluation	KPMG's evaluation of the OSS '99 release process includes criteria related to BLS's systems test environment that was in effect during the release process.	KPMG has requested additional and specific information around BLS's test environment.	KPMG is awaiting BLS' submission of additional materials that describe and depict BLS's systems test environment(s).

6.Q Exceptions² Status

Ref	Item	Status	Issues	Next Step/Resolution
IV-5	Exceptions	During re-testing activities for Exception 1, regarding Pre-ordering, KPMG reviewed the pre-order business rules and observed that the CDD query type response rules, which were previously omitted, are now present.	KPMG indicated that BLS does not currently provide comprehensive and usable business rule documentation for submitting electronic pre-order transactions via the TAG interface.	KPMG expects to submit a closure report to the GPSC for review in the near future.



BellSouth-GA OSS '00 Tag Evaluation
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Ref ¹	Item	Status	Issues	Next Step/Resolution
		KPMG filed a closure statement for Exception 2, regarding Change Management, with the GPSC on 6/21/00. BLS implemented processes that allow a greater degree of management of proposed changes by CLECs, as they are now provided with advance notification from BellSouth of upcoming change events. This allows the CLECs to plan for and implement their own internal processes and systems to align with those introduced by BellSouth through the <i>Interim Change Control Process</i>.	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.	N/A.
1	KPMG filed a second closure statement for Exception 3, regarding Metrics, with the GPSC on 6/16/00. The events which precipitated the re-opening of this exception occurred as a result of BLS mistakenly filing the wrong report with the GPSC. BLS has taken steps to prevent this error from re-occurring. KPMG has not observed any other errors of this type.		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.	N/A.
2	KPMG filed a closure statement for Exception 4, regarding Ordering and Provisioning, with the GPSC on 6/16/00. All of KPMG's service requests for loop-port combination partial migrations submitted during re-testing received Firm Order Confirmations (FOCs) from both TAG and EDI.		KPMG indicated that TAG and EDI do not provide the functionality required for submitting partial migration service requests for loop-port combinations.	N/A.
	As part of re-testing activities for Exception 9, regarding Ordering and Provisioning, KPMG continues to monitor the remaining UNE and Resale orders to track missing electronic responses.		KPMG indicated that BellSouth failed to deliver Firm Order Confirmations (FOCs) and Completion Notices (CNs) in response to electronic service order requests.	KPMG's further actions will be based on the results of these re-testing activities.



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Ref #	Item	Status	Issues	Next Step/Resolution
		• KPMG expects to perform further re-testing activities for Exception 12, regarding Maintenance and Repair, in the near future.	• KPMG indicated that the ECTA Gateway does not accurately notify CLECs when invalid information is entered into a trouble ticket.	• KPMG's further actions will be based on the results of these re-testing activities.
		• KPMG filed a closure report for Exception 13, regarding Maintenance and Repair, with the GPSC on 7/21/00. The undocumented, BellSouth-specific messages were adequately corrected.	• KPMG indicated that numerous undocumented messages intended for BellSouth are generated by TAFI during trouble report creation and processing.	• N/A.
		• KPMG filed a closure report closure statement for Exception 14, regarding Maintenance & Repair, with the GPSC on 6/29/00. The TAFI interface does not support electronic trouble reporting for designed circuits (including ISDN lines) or non-designed circuits that are not TN-based. BLS documentation has been updated accordingly. KPMG confirmed that parity of service regarding the TAFI interface exists between BLS and the CLECs.	• KPMG indicated that BLS TAFI applications do not allow CLECs to process trouble reports for ISDN lines as described in the <i>CLEC TAFI End-User Training and User Guide</i>.	• N/A.
		• KPMG filed a closure statement for Exception 15, regarding Maintenance & Repair, with the GPSC on 6/16/00. BLS reduced the likelihood of a trouble ticket creation error of this type occurring to 1/15th of previous levels. In addition, testing validated that the purge parameter had been adjusted as stated in BLS's response.	• KPMG indicated that under certain circumstances, BellSouth's ECTA gateway cannot adequately create trouble tickets.	• N/A.
		• KPMG received BLS's third amended response to Exception 16, regarding Billing, on 7/13/00.	• KPMG indicated that BellSouth issued multiple bills containing erroneous information to KPMG.	• KPMG's expects to file BLS's third amended response with the GPSC in the near future.



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Ref	Item	Status	Issues	Next Step/Resolution
	• KPMG filed a closure statement regarding Exception 17, regarding Change Management, with the GPSC on 7/21/00. BLS has made adequate improvements to its internal processes and procedures for ensuring that documentation intended for CLEC consumption is properly posted to its Interconnection Services Web site.		• 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.	• N/A.
	• KPMG continues to monitor the CLEC Change Control prioritization and implementation process to observe the progress of a BLS-proposed feature enhancement related to Exception 18, regarding Ordering and Provisioning.		• 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 does not expect BLS to implement a fix before the end of the test. KPMG expects to write a closure statement in the near future.
	• KPMG filed a closure statement for Exception 19, regarding Metrics, with the GPSC on 6/16/00. BLS's new process for documenting changes in versions of the <i>SQM Manual</i> includes: 1 - Posting the new unmarked <i>SQM Manual</i>; 2 - Providing a change log to detail every change made to the <i>SQM Manual</i>.		• KPMG indicated that BLS does not adequately document changes in versions of the BLS Service Quality Measurements Performance Reports.	• N/A.
	• KPMG filed a closure statement for Exception 21, regarding Flow-Through, with the GPSC on 7/21/00. SOCS Fall-Out: KPMG's Flow Through calculations matched BellSouth's published calculations for February. "Z" Processing Status: Replication of the February Flow Through calculation showed that LSRs with a "Z" processing status were no longer treated as CLEC-caused fall-out, except where additional errors resulting from CLEC causes existed on the LSRs.		• KPMG indicated that Local Service Requests (LSRs) were improperly categorized for <i>Percent Flow Through Service Request Reports</i>.	• N/A.



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Ref	Item	Status	Issues	Next Step/Resolution
		- KPMG continues to monitor performance of the remaining UNE and Resale orders for Exception 22, regarding Ordering & Provisioning. - KPMG received BLS's second amended response to Exception 23, regarding Metrics, on 6/09/00. KPMG filed BLS's second amended response with the GPSC. - KPMG expects to submit an amended version of Exception 24, regarding Pre-Ordering, to BLS in the near future. - KPMG forwarded a closure statement for Exception 25, regarding Capacity Management, to the GPSC for review and comment. - KPMG continues to plan a re-test for Exception 26, regarding Ordering and Provisioning. - KPMG forwarded an amended version of Exception 27, regarding Billing, to BLS on 6/21/00. Subsequently, KPMG filed this amended exception with GPSC. - KPMG forwarded an amended version of Exception 28, regarding Billing, to BLS on 7/10/00. Subsequently, KPMG filed this amended exception with the GPSC. - KPMG is reviewing a closure statement for Exception 29, regarding Billing, internally.	- KPMG indicated that BLS disconnected retail accounts on loop migration orders without re-connecting the UNE loop component. - KPMG indicated that it cannot replicate five of BellSouth's reported Service Quality Measurements. - KPMG indicated that BellSouth's TAG API does not deliver timely responses to pre-order transactions. - KPMG indicated that BLS's systems capacity management process does not include established ongoing procedures for forecasting business volumes and transactions. - KPMG indicated that BLS does not deliver timely Completion Notices (CNs). - KPMG indicated that BLS provided incorrect DUF records to KPMG. <u>Amended Exception:</u> BellSouth failed to deliver DUF records for twenty-seven percent (27%) of the re-test calls for which records were expected. <u>Initial Exception:</u> KPMG indicated that BLS failed to deliver 46% of expected DUF records to KPMG. - KPMG indicated that BLS did not deliver timely DUF records to KPMG.	- KPMG's further actions will be based on the results of its continuing observations. - KPMG continues re-testing activities based on BLS's second amended response. - After submission to BLS, KPMG will file the amended version of Exception 24 with the GPSC. - KPMG's further actions will be based on the results of the GPSC's initial review. - KPMG's further actions will be based on the results received during the re-test. - KPMG is awaiting BLS's response to the amended exception. - KPMG is awaiting BLS's response to the amended exception. - Upon completion of this internal review, KPMG expects to submit this closure statement to the GPSC for review and comment.



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Ref	Item	Status	Issues	Next Step Resolution
		KPMG filed a closure statement for Exception 30, regarding Change Management, with the GPSC on 6/29/00. BLS has made significant improvements to its Change Request Log, which tracks the progress of each specific change. BLS tracks and reports changes systematically using change request (CR) numbers. The revised Change Request Log is designed to track and manage the various steps and milestones (and corresponding dates) through which change requests progress, from receipt through release and/or implementation. BLS posts the revised Change Request Log on its Interconnection Services Web site and also provides the revised Log to CLECs in advance of monthly change control status meetings.	KPMG indicated that BLS's change management process does not include a comprehensive mechanism for tracking change information.	N/A.
1		KPMG is planning re-testing activities for Exception 31, regarding Ordering and Provisioning.	KPMG indicated that BLS's electronic ordering systems do not adequately support CLEC requests for Directory Listings associated with UNE loop customers.	KPMG's further actions are contingent upon the outcome of these re-testing activities.
2		KPMG is monitoring the change control process to observe the progress of a BLS-proposed feature enhancement related to Exception 32, regarding Ordering and Provisioning.	KPMG indicated that BLS delivered FOCs on transactions after issuing Clarifications (CLRs).	KPMG does not expect BLS to implement a fix before the end of the test. KPMG expects to write a closure statement in the near future.
		KPMG expects BLS to publish an updated <i>LEO Guide</i> during in the next few weeks to address Exception 33.	KPMG indicated that BLS's <i>LEO Guide, Volume 1, Version N</i> does not define data element requirements and valid entries for loop service requests.	Subsequent to publication, KPMG will complete its evaluation of the updated version of BLS's <i>LEO Guide</i>.
		KPMG is reviewing a closure statement for Exception 34, regarding Billing, internally.	KPMG indicated that BLS's ODUF/ADUF documentation is deficient.	Upon completion of this internal review, KPMG expects to submit this closure statement to the GPSC for review and comment.
		KPMG expects to receive an amended response to Exception 35, regarding Billing, from BLS in the near future.	KPMG indicated that BLS issued multiple bills containing erroneous information to the KPMG CLEC.	KPMG's further actions are contingent upon receipt of BLS's amended response.



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Ref	Item	Status	Issues	Next Step/Resolution
1	KPMG filed a closure statement for Exception 36, regarding Maintenance and Repair, with the GPSC on 7/21/00. BLS clarified the specific circumstances a SOCS pending service order can be viewed through TAFI. Additionally, BLS adequately addressed the inconsistencies encountered during testing.	KPMG continues to perform re-testing activities for Exception 37, regarding Maintenance and Repair.	KPMG indicated that, during TAFI testing, it encountered multiple inconsistencies while accessing information in BLS's Service Order Communications System (SOCS).	N/A.
2	KPMG is planning re-testing activities for Exception 38, regarding Ordering and Provisioning.	KPMG is currently writing a closure statement for Exception 39, regarding Ordering and Provisioning.	KPMG indicated that during testing of the "supervisor" functions, KPMG was presented with an unfiltered list of all in-session TAFI users.	KPMG's further actions are contingent upon the outcome of these re-testing activities.
	KPMG filed a closure statement for Exception 40, regarding Ordering and Provisioning, with the GPSC on 7/21/00. KPMG's service requests for coordinated SLI loops submitted during the re-test, which were developed in accordance with BellSouth's documentation, received Firm Order Confirmations (FOCs) via TAG, Version 2.2.0.8.	KPMG is reviewing BLS raw data documentation provided as a part of re-testing activities for Exception 41, regarding Flow-Through.	KPMG indicated that BLS does not consistently provide CLECs with a service Due Date matching their Desired Due Date.	KPMG's further actions are contingent upon the outcome of these re-testing activities.
	KPMG is planning re-testing activities for Exception 42, regarding Metrics.	KPMG is planning re-testing activities for Exception 42, regarding Metrics.	KPMG indicated that BLS's electronic ordering systems do not provide the functionality required for submitting partial migrations to UNE loops.	Upon completion of an internal review, KPMG expects to submit this closure statement to the GPSC for review and comment.
			KPMG indicated that BLS's TAG interface does not process service requests for coordinated hot-cuts on non-designed loops as described in the <i>Local Exchange Ordering Implementation Guide, Volume 1, Version 7N (LEO Guide)</i> .	N/A.
			KPMG indicated that BLS does not provide Competitive Local Exchange Carriers (CLECs) with comprehensive flow-through documentation.	KPMG's further activities will be based on the results of this documentation review.
			KPMG indicated that BLS 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.	KPMG will attempt to replicate the SQMs provided in the updated reports.



BellSouth-GA OSS 1 - Closing Evaluation
Interim Status Report
July 21, 2000

Ref	Item	Status	Issues	Next Step/Resolution
	As part of re-testing activities, KPMG is attempting to replicate the SQMs identified in Exception 43, regarding Metrics.	KPMG indicated that BLS has not provided KPMG with the raw data necessary to calculate values for the Service Quality Measurements ("SQM"), Mean Time to Deliver Invoices (Billing), for the KPMG Test CLEC.	KPMG expects to file this closure statement with the GPSC in the near future.	
	KPMG is clarifying its closure statement for Exception 44, regarding Ordering and Provisioning, based on comments received from the GPSC.	KPMG indicated that KPMG was unable to change the telephone number (TN) of a resale auxiliary line in certain instances.	KPMG expects to file this closure statement with the GPSC in the near future.	
	KPMG is clarifying its closure statement for Exception 45, regarding Metrics, based on comments received from the GPSC.	KPMG indicated that it cannot replicate four of BLS's reported Service Quality Measurements.	KPMG expects to file this closure statement with the GPSC in the near future.	
	KPMG is examining updated SQM reports for March as a part of re-testing activities for Exception 46, regarding Metrics.	KPMG indicated that it cannot replicate seven of BLS's reported Service Quality Measurements.	KPMG's further actions will be based on the outcome of these re-testing activities.	
	KPMG is drafting a closure report for Exception 47, regarding Ordering and Provisioning.	KPMG indicated that BLS delivered inconsistent and inaccurate responses to Local Service Requests.	Upon completion of an internal review, KPMG expects to forward this closure statement to the GPSC for review and comment.	
	KPMG is clarifying its closure statement for Exception 48, regarding Flow-Through, based on comments received from the GPSC.	KPMG indicated that minor errors in categorizing LSRs for BLS's Flow Through Reports indicate the potential for future, material reporting errors.	KPMG expects to file this closure statement with the GPSC in the near future.	
	KPMG is evaluating potential re-testing activities for Exception 49, regarding Ordering and Provisioning.	KPMG indicated that BLS did not provide an accurate and timely update to CLECs when implementing a Universal Service Order Code (USOC) change.	KPMG's further activities will be based on the results of its evaluation of these potential re-test activities.	
	KPMG filed a closure statement for Exception 51, regarding Ordering and Provisioning, with the GPSC on 7/21/00. All of KPMG's service requests for BTN partial migrations submitted during re-testing received Firm Order Confirmations (FOCs) via TAG and EDI.	KPMG indicated that BLS's electronic ordering systems (EDI and TAG) do not support the partial migration of a customer's Billing Telephone Number (BTN) on UNE Loop-Port Combination service requests.	N/A.	



BellSouth-GA OSS g Evaluation
Interim Status Report
July 21, 2000

Ref ¹	Item	Status	Issues	Next Step Resolution
	As part of re-testing activities, KPMG is attempting to replicate the SQMs identified in Exception 52, regarding Metrics.	KPMG continues to perform re-testing for Exception 53, regarding Ordering and Provisioning.	KPMG indicated that it cannot replicate twelve of BLS's reported Service Quality Measurements (SQMs).	KPMG's further actions will be based on the outcome of these re-testing activities.
	KPMG is drafting a closure statement for Exception 54, regarding Ordering and Provisioning.	KPMG is reviewing a closure statement for Exception 58, regarding Ordering and Provisioning, internally.	KPMG indicated that BLS's <i>LEO Guide, Volume 1, Versions J-N</i> contains numerous revision-related errors.	KPMG's further actions will be based on the outcome of these re-testing activities.
	KPMG forwarded an amended version of Exception 55, regarding Ordering and Provisioning, to BLS on 6/15/00. KPMG subsequently filed this amended exception with the GPSC. BLS forwarded a response to KPMG's amended exception during mid-July.	KPMG is planning re-testing activities for Exception 60, regarding Ordering and Provisioning.	KPMG indicated that BLS's electronic ordering systems do not support UNE-to-UNE migration service requests.	Upon completion of an internal review, KPMG expects to forward this closure statement to the GPSC for review and comment.
	KPMG filed BLS's amended response to Exception 56, regarding Metrics, with the GPSC on 6/16/00.		KPMG indicated that BLS's pre-ordering and ordering documentation contain numerous errors and omissions in structure and format.	KPMG will file this amended response with the GPSC in the near future.
	KPMG expects to perform further re-testing activities for Exception 57, regarding Ordering and Provisioning, in the near future.		KPMG indicated that BLS published incomplete PMAP Raw Data for December 1999 for the Service Quality Measurement (SQM) Maintenance Average Duration.	KPMG is evaluating further activities regarding this exception in light of BLS's amended response.
	KPMG is reviewing a closure statement for Exception 59, regarding Ordering and Provisioning, internally.		KPMG indicated that BLS guidelines for submitting xDSL pre-order Service Inquiry (SIs) for Loop Make-Up (LMU) information do not exist.	KPMG's further actions will be based on the outcome of these re-testing activities.
	KPMG is reviewing a closure statement for Exception 58, regarding Ordering and Provisioning, internally.		KPMG indicated that BLS's UNE Center does not consistently adhere to the methods and procedures for provisioning Unbundled Network Elements (UNEs).	Upon completion of this internal review, KPMG expects to forward this closure statement to the GPSC for review and comment.
	KPMG is reviewing a closure statement for Exception 59, regarding Ordering and Provisioning, internally.		KPMG indicated that BLS's documentation does not define rules for submission of batched orders.	Upon completion of this internal review, KPMG will forward this closure statement to the GPSC for review and comment.
	KPMG is planning re-testing activities for Exception 60, regarding Ordering and Provisioning.		KPMG indicated that BLS does not deliver timely Functional Acknowledgements (FAs) via Electronic Data Interchange (EDI).	KPMG's further actions will be based on the outcome of these re-testing activities.



BellSouth-GA OSS : g Evaluation
Interim Status Report
July 21, 2000

Ref	Item	Status	Issues	Next Step Resolution
1	KPMG filed BLS's amended response to Exception 61, regarding Metrics, with the GPSC on 5/26/00.	KPMG indicated that for certain Service Quality Measurements ("SQMs"), BLS does not report values at all levels of disaggregation specified in the Service Quality Measurements Georgia Performance Report 10/22/99 (SQM Reports).	KPMG is evaluating potential re-testing activities based on BLS's response.	
1	KPMG received BLS's response and amended response to Exception 62, regarding Metrics, during June. KPMG filed these responses with the GPSC.	KPMG indicated that it cannot replicate four of BLS's Service Quality Measurements (SQMs) in the February 2000 report.	KPMG continues to evaluate re-testing activities in light of BLS's responses.	
	KPMG forwarded an amended version of Exception 63, regarding Ordering and Provisioning, to BLS on 7/19/00.	KPMG indicated that it discovered numerous inconsistencies between BLS's <i>TAG API Guide, Version 2.0.0.5</i> and <i>Pre-Order Business Rules</i> documentation.	KPMG will file the amended version of this exception with the GPSC in the near future.	
	KPMG is evaluating potential re-testing activities for Exception 64, regarding Metrics.	KPMG indicated that it cannot replicate BLS's reported values for the "Provisioning - Service Order Accuracy" Service Quality Measurement.	KPMG's expects to perform re-testing activities, as appropriate.	
	KPMG expects BLS to implement a system fix for Exception 65, regarding Ordering and Provisioning, in the near future.	KPMG indicated that BLS's Calculate Due Date (CDD) pre-order query does not support all order requisition (REQ) and activity (ACT) types.	KPMG expects to perform re-testing, as appropriate, after implementation of this system fix.	
	KPMG is planning re-testing activities for Exception 66, regarding Pre-Ordering.	KPMG indicated that BellSouth does not provide complete pre-order responses via the TAG interface.	KPMG's expects to perform re-testing activities, as appropriate.	
	KPMG is drafting a closure statement for Exception 67, regarding Ordering and Provisioning.	KPMG indicated that BLS does not deliver timely Missed Appointment (MA) notices via the EDI and TAG interfaces.	Upon completion of an internal review, KPMG expects to forward this closure statement to the GPSC for review and comment.	
	As a part of re-testing activities for Exception 68, regarding Ordering and Provisioning, KPMG expects to review updated BLS documentation during August.	KPMG indicated that BLS does not provide complete Firm Order Confirmation (FOC) and Completion Notice (CN) responses.	KPMG's further actions will be based on the outcome of these re-testing activities.	



BellSouth-GA OSS '00 - Tag Evaluation
Interim Status Report
July 21, 2000

Ref	Item	Status	Issues	Next Step/Resolution
		KPMG filed a closure report for Exception 69, regarding Ordering and Provisioning, with the GPSC on 7/21/00. Of the 14 Jeopardy Notifications KPMG received, 100% arrived at least 48 hours before the FOC Due Date. Based on the Pending Facilities responses received during the course of this evaluation, KPMG's experience indicates that TAG and EDI presently deliver timely Jeopardy Notifications.	KPMG indicated that BLS does not deliver timely Jeopardy Notifications via the EDI and TAG interfaces.	N/A.
1		KPMG is drafting a closure statement for Exception 70, regarding Metrics.	KPMG indicated that BLS does not have an adequate change management process for the generation of Service Quality Measurement (SQM) data from its legacy/source systems.	Upon completion of an internal review, KPMG expects to forward this closure statement to the GPSC for review and comment.
2		KPMG is awaiting an amended response to Exception 71, regarding Ordering and Provisioning, from BLS.	KPMG indicated that the service establishment intervals returned on Calculate Due Date (CDD) pre-order responses are not consistent with intervals defined in the BLS <i>Product and Services Internal Guide</i>.	KPMG's further actions are contingent upon receipt of BLS's amended response.
		KPMG is drafting a closure statement for Exception 72, regarding Ordering and Provisioning.	KPMG indicated that BLS does not have a clear process for delivering Jeopardy and Missed Appointment notifications.	Upon completion of an internal review, KPMG expects to forward this closure statement to the GPSC for review and comment.
		KPMG expects to perform re-testing activities for Exception 73, regarding Billing, upon the release of updated documentation scheduled for later this month.	KPMG indicated that BLS's CRIS/CABS billing documentation is deficient in the breadth and depth of topical coverage.	KPMG's further actions will be based on the outcome of these re-testing activities.
		KPMG is evaluating potential re-testing activities for Exception 74, regarding Metrics.	KPMG indicated that BLS does not report certain Georgia Service Quality Measurements at the levels of disaggregation specified in the Service Quality Measurements Georgia Performance Reports.	KPMG's expects to perform re-testing activities, as appropriate.



BellSouth-GA OSS g Evaluation
Interim Status Report
July 21, 2000

Ref	Item	Status	Issues	Next Step Resolution
		KPMG expects to perform re-testing activities for Exception 75, regarding Ordering and Provisioning, upon the release of updated documentation scheduled for later this month.	KPMG indicated that BLS's Local Exchange Ordering Guide, Volume 1, Version 7N (LEO Guide) omits definitions for certain BLS ordering responses.	KPMG's further actions will be based on the outcome of these re-testing activities.
		KPMG expects to forward an amended version of Exception 76, regarding Ordering and Provisioning, to BLS in the near future. Subsequently, KPMG will file this amended exception with the GPSC.	KPMG indicated that it encountered numerous BLS provisioning errors for UNE orders.	KPMG's further actions will be based on BLS's response to this amended exception.
		KPMG is evaluating further potential re-testing activities for Exception 77, regarding Ordering and Provisioning.	KPMG indicated that BLS does not deliver timely fully mechanized Clarification (CLR) responses.	KPMG's expects to perform re-testing activities, as appropriate.
		KPMG is evaluating further potential re-testing activities for Exception 78, regarding Ordering and Provisioning.	KPMG indicated that BLS does not deliver timely Firm Order Confirmation (FOC) responses to flow through local service requests (LSRs).	KPMG's expects to perform re-testing activities, as appropriate.
		KPMG expects to perform re-testing activities for Exception 79, regarding Metrics, after implementation of a BLS fix.	KPMG indicated that BLS does not adequately retain certain source data used in the calculation of several Service Quality Measurement (SQM) reports that are not generated wholly or primarily by the Performance Measurement and Analysis Platform (PMAP).	KPMG's further actions will be based on the outcome of these re-testing activities.
		KPMG expects to perform re-testing activities for Exception 80, regarding Ordering and Provisioning, after BLS publishes new guidelines scheduled for later this month.	KPMG indicated that BLS guidelines for submitting an order Service Inquiry (SI) and Loop Service Requests (LSR) do not provide complete, consistent information.	KPMG's further actions will be based on the outcome of these re-testing activities.



BellSouth-GA OSS '00 Audit Evaluation
Interim Status Report
July 21, 2000

Ref	Item	Status	Issues	Next Step/Resolution
		- KPMG filed a closure report for Exception 81, regarding Maintenance & Repair, with the GPSC on 7/21/00. Standard programming practices dictate that both parties in a Manager/Agent electronic communications system relationship should validate data to the degree reasonably possible. BLS's ECTA Gateway does not validate the data elements. BLS intends to introduce a change request to Change Control, but will not implement a system fix during the test period. KPMG will assign a "Not Satisfied" to the relevant evaluation criteria in its final report. - KPMG is drafting a closure statement for Exception 82, regarding Ordering and Provisioning.	KPMG indicated that the ECTA Gateway did not accurately notify KPMG when invalid information was entered into a trouble ticket.	N/A.
1		KPMG received an amended response to Exception 83, regarding Metrics, from BLS on 7/17/00. KPMG expects to file this amended response with the GPSC in the near future.	KPMG indicated that BLS Central Office (CO) technicians and Unbundled Network Element Center (UNEC) coordinators do not adhere to BLS's methods and procedures for provisioning coordinated hot-cuts.	Upon completion of an internal review, KPMG expects to forward this closure statement to the GPSC for review and comment.
2		KPMG expects to perform further re-testing activities for Exception 84, regarding Metrics, subsequent to BLS's publication of the July version of the SQM Georgia Performance Reports.	"Exclusions" section of the SQM Georgia Performance Reports are not correctly applied when creating raw data or calculating SQMs.	KPMG's further actions will be based on its evaluation of BLS's amended response.
		KPMG expects to perform re-testing activities for Exception 85, regarding Maintenance & Repair, after BLS implements a system fix.	KPMG indicated that the information in the SQM Georgia Performance Reports is inconsistent with the computational instructions provided by BellSouth for five SQMs.	KPMG's further actions will be based on the outcome of these re-testing activities.
		KPMG expects to perform re-testing activities for Exception 85, regarding Maintenance & Repair, after BLS implements a system fix.	KPMG indicated the BellSouth ECTA Gateway did not automatically request a "Front-End Closeout" on a POIS line that produced negative MI.T results.	KPMG's further actions will be based on the outcome of these re-testing activities.



BellSouth-GA OSS '00 - 01 Audit Evaluation
Interim Status Report
July 21, 2000

Ref	Item	Status	Issues	Next Step/Resolution
	- KPMG expects to perform further re-testing activities for Exception 86, regarding Metrics, subsequent to BLS's publication of the July version of the SQM Georgia Performance Reports. - KPMG expects to receive BLS's amended response to Exception 87, regarding Billing, in the near future. After receipt, KPMG will file this amended response with the GPSC. - KPMG received an amended response to Exception 88, regarding Metrics, from BLS on 7/13/00. KPMG expects to file this amended response with the GPSC in the near future. - KPMG received a second amended response to Exception 89, regarding Metrics, from BLS on 7/17/00. KPMG expects to file this second amended response with the GPSC in the near future. - KPMG received an amended response to Exception 90, regarding Metrics, from BLS on 7/17/00. KPMG filed this amended response with the GPSC. - KPMG is awaiting a response to Exception 91, regarding Metrics, from BLS. - KPMG filed Exception 92, regarding Metrics, with the GPSC during June. KPMG received and filed BLS's response and amended response to this exception. KPMG received BLS's second amended response on 7/17/00. KPMG expects to file this second amended response shortly.	- KPMG expects to perform further re-testing activities for Exception 86, regarding Metrics, subsequent to BLS's publication of the July version of the SQM Georgia Performance Reports. - KPMG expects to receive BLS's amended response to Exception 87, regarding Billing, in the near future. After receipt, KPMG will file this amended response with the GPSC. - KPMG received an amended response to Exception 88, regarding Metrics, from BLS on 7/13/00. KPMG expects to file this amended response with the GPSC in the near future. - KPMG received a second amended response to Exception 89, regarding Metrics, from BLS on 7/17/00. KPMG expects to file this second amended response with the GPSC in the near future. - KPMG received an amended response to Exception 90, regarding Metrics, from BLS on 7/17/00. KPMG filed this amended response with the GPSC. - KPMG is awaiting a response to Exception 91, regarding Metrics, from BLS. - KPMG filed Exception 92, regarding Metrics, with the GPSC during June. KPMG received and filed BLS's response and amended response to this exception. KPMG received BLS's second amended response on 7/17/00. KPMG expects to file this second amended response shortly.	- KPMG indicated that it cannot replicate six of BLS's reported Service Quality Measurements (SQMs). - KPMG indicated that BLS incorrectly billed KPMG for usage charges for messages processed in the Augusta central office. - KPMG indicated that computational instructions provided by BLS for 13 PMAP SQMs are inconsistent with the information provided in the SQM Georgia Performance Reports. - KPMG indicated that BLS's raw data used in the calculation of the BLS SQM reports are not accurately derived from or supported by their early-stage data. - KPMG indicated that it cannot replicate three of BLS's reported SQMs in the March 2000 performance measurement reports. - KPMG indicated that raw data used in the calculation of BLS SQM reports are not accurately derived from or supported by their early-stage data (Instance 2). - KPMG indicated that BLS's raw data, used in the calculation of BLS SQM reports, are not accurately derived from or supported by their component early-stage data.	- KPMG's further actions will be based on the outcome of these re-testing activities. - KPMG's further actions will be based on BLS's amended response. - KPMG's further actions will be based on BLS's amended response. - KPMG's further actions will be based on BLS's second amended response. - KPMG's further actions will be based on BLS's amended response. - KPMG's further actions are contingent upon receipt of BLS's response. - KPMG is evaluating potential re-testing activities based on BLS's responses.



BellSouth-GA OSS - Reg Evaluation
Interim Status Report
July 21, 2000

Ref	Item	Status	Issues	Next Step/Resolution
	KPMG filed Exception 93, regarding Metrics, and BLS's response with the GPSC during June. KPMG received BLS's amended response during June. KPMG filed BLS's amended response with the GPSC.		KPMG indicated that it encountered ten Service Quality Measurements ("SQMs") for which there are inconsistencies among the statements of the definition, calculation and business rules sections in the <i>Service Quality Measurements Georgia Performance Reports (SQM Reports)</i>.	KPMG is evaluating potential re-testing activities based on BLS's responses.
	KPMG filed Exception 94, regarding Billing, and BLS's statement of investigation with the GPSC during June.		KPMG indicated that BLS failed to deliver 20% of expected resale DUF records to KPMG.	KPMG will await BLS's response before taking further action.
	KPMG filed Exception 95, regarding Ordering & Provisioning, and BLS's response with the GPSC during July.		KPMG indicated that BLS has delivered Firm Order Confirmations (FOCs) in response to Local Service Requests (LSRs) that should have received error messages.	KPMG is evaluating potential re-testing activities based on BLS's response.
	KPMG forwarded a Draft Exception, regarding Metrics, to BLS for its response.		KPMG indicated that BLS-reported raw data values for the KPMG Test CLEC do not match the KPMG-collected values for certain billing accounts involved in the calculation of <i>Mean Time to Deliver Invoices</i> for CRIS and CABS.	KPMG will await BLS's response before taking further action.
	KPMG forwarded a Draft Exception, regarding Maintenance and Repair, to BLS. KPMG received BLS's response to this draft exception on 7/17/00.		KPMG indicated that the BLS ECTA Gateway does not allow CLEC's to process trouble reports for PBX circuits in the state of Georgia.	KPMG is evaluating BLS's response and expects to file or withdraw this draft exception shortly.
	KPMG forwarded a Draft Exception, regarding Ordering and Provisioning, to BLS. KPMG received BLS's response to this draft exception on 7/17/00.		KPMG indicated that BLS does not deliver timely Firm Order Confirmation (FOC) responses to non-flow through local service requests.	KPMG is evaluating BLS's response and expects to file or withdraw this draft exception shortly.
	KPMG forwarded a Draft Exception, regarding Ordering and Provisioning, to BLS. KPMG received BLS's response to this draft exception on 7/17/00.		KPMG indicated that BLS does not deliver timely partially mechanized Clarification (CLR) responses.	KPMG is evaluating BLS's response and expects to file or withdraw this draft exception shortly.
	KPMG forwarded a Draft Exception, regarding Billing, to BLS. KPMG received BLS's response to this draft exception on 7/17/00.		KPMG indicated that BLS issued multiple bills to the KPMG Test CLEC incorrectly identifying recurring charges as non-recurring charges.	KPMG is evaluating BLS's response and expects to file or withdraw this draft exception shortly.



BellSouth-GA OSS g Evaluation
Interim Status Report
July 21, 2000

Ref	Item	Status	Issues	Next Step/Resolution
		- KPMG forwarded a Draft Exception, regarding Ordering and Provisioning, to BLS for its response. - KPMG forwarded a Draft Exception, regarding Metrics, to BLS. KPMG received BLS's response to this draft exception on 7/18/00. - KPMG forwarded a Draft Exception, regarding Ordering and Provisioning, to BLS for its response. - KPMG forwarded a Draft Exception, regarding Metrics, to BLS. KPMG received BLS's response to this draft exception on 7/18/00. - KPMG forwarded a Draft Exception, regarding xDSL, to BLS for its response. - KPMG forwarded a Draft Exception, regarding xDSL, to BLS for its response. - KPMG forwarded a Draft Exception, regarding xDSL, to BLS for its response.	- KPMG indicated that BLS failed to meet the agreed upon Frame Due Time (FDT) for nine loop migrations. - KPMG indicated that it was unable to replicate two of BLS's Service Quality Measurements (SQMs) in the May 2000 report. - KPMG indicated that BLS does not allow telephone number changes for lines with measured classes of service. - KPMG indicated that BLS-reported raw data values in usage data delivered to the KPMG Test CLEC, used in the calculation of three SQMs, do not match the KPMG-collected values for April 2000. - KPMG indicated that potential parity issues may exist between BLS's CLEC xDSL pre-ordering loop qualification process and its retail xDSL pre-ordering loop qualification process (BLS Internet Services). - KPMG indicated that potential parity issues may exist between BLS's CLEC xDSL ordering process and its retail xDSL ordering process (BLS Internet Services). - KPMG indicated that formal procedures for managing the capacity of the BLS work centers, which perform wholesale xDSL pre-ordering and ordering activities, are not defined and documented.	- KPMG will await BLS's response before taking further action. - KPMG is evaluating BLS's response and expects to file or withdraw this draft exception shortly. - KPMG will await BLS's response before taking further action. - KPMG is evaluating BLS's response and expects to file or withdraw this draft exception shortly. - KPMG will await BLS's response. Based on preliminary information provided by BLS, KPMG understands that additional interviews are necessary to comprehensively document the retail and wholesale pre-ordering processes. - KPMG will await BLS's response. Based on preliminary information provided by BLS, KPMG understands that additional interviews are necessary to comprehensively document the retail and wholesale ordering processes. - KPMG will await BLS's response before taking further action.



BellSouth-GA OSS ing Evaluation
Interim Status Report
July 21, 2000

¹ Referencing Methodology: An item referenced as I-n indicates that the item was first discussed in the July 22, 1999 status report. An item referenced as II-n indicates that the item was first referenced in the September 10, 1999 status report. An item referenced as III-n indicates that the item was first referenced in the November 19, 1999 report. An item referenced as IV-n indicates that the item was first referenced in the December 17, 1999 report. An item referenced as V-n indicates that the item was first referenced in the January 28, 2000 report. An item referenced as VI-n indicates that this item was first referenced in the March 3, 2000 report. An item referenced as VII-n indicates that this item was first referenced in the April 6, 2000 report. An item referenced as VIII-n indicates that this item was first referenced in the May 12, 2000 report. An item referenced as IX-n indicates that this item was first referenced in the June 9, 2000 report. An item referenced as X-n indicates that this item was first referenced in the July 21, 2000 report. An item referenced as XI-n indicates that this item is new for this report.

² According to the exception process agreed to by KPMG, BellSouth and the Georgia Public Service Commission, when KPMG discovers a potential component defect (e.g., a deficiency in a procedure, system or document) written substantiation is submitted to BellSouth detailing KPMG's findings. BellSouth provides a written response to this finding. KPMG's written substantiation is considered a "Draft Exception" until the potential defect has been confirmed. If KPMG's assessment of the potential error is determined to be inaccurate, KPMG will withdraw the Draft Exception. If the issue is substantiated, the Draft Exception and BellSouth response will be submitted to and published by the Commission, and the parties will agree on resolution steps. A complete exception listing, including all exceptions, responses, amended responses and closure reports, may be found on the Georgia Public Service Commission's Web site at www.psc.state.ga.us.

CERTIFICATE OF SERVICE

Docket No. 8354-U

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

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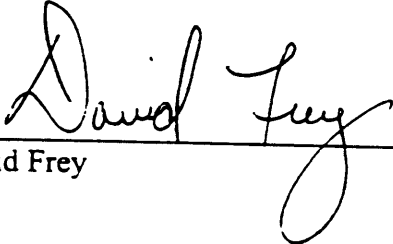
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