

BellSouth Telecommunications, Inc.
333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

Guy M. Hicks
General Counsel

615 214-6301
Fax 615 214-7406

VIA HAND DELIVERY

REC'D TN
REGULATORY AUTH.
•00 AUG 25 PM 1 58
August 25, 2000
OFFICE OF THE
EXECUTIVE SECRETARY

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:

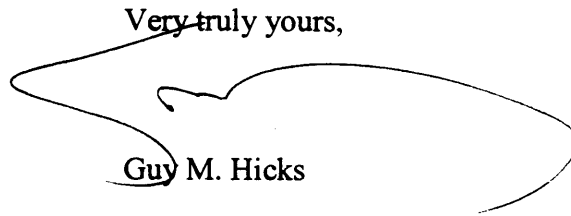
Enclosed please find fourteen copies of the following documents which have been filed with the Georgia Public Service Commission ("GPSC").

<u>Date Filed</u>	<u>Description of Document(s)</u>
7/28/00	BellSouth 2 nd Amended Response to Exception 55
7/28/00	BellSouth Responses to Exceptions 65, 83, 91 and 94; Amended Responses to Exceptions 49, 66, 70, 71, 83, 87 and 88; Second Amended Responses to Exceptions 78, 88, 89 and 92; Third Amended Responses to Exceptions 16, 84, 89, and 92; and Fourth Amended Responses to Exceptions 16 and 28
7/28/00	KPMG Second Amended Exception 76
7/28/00	KPMG Exceptions 96, 97, 98, 99 and 100, with BellSouth Responses
8/4/00	KPMG Closure Reports for Exceptions 25, 29, 34, 37, 44, 48, and 58
8/8/00	KPMG Closure Report for Exception 45
8/8/00	KPMG Amended Responses to Exceptions 91 and 100; Second Amended Responses to Exceptions 61, 74 and 87; and Fourth Amended Responses to Exceptions 84, 89 and 92

David Waddell, Executive Secretary
August 25, 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, appearing to read "Guy M. Hicks", is written over the typed name. The signature is stylized with a large, sweeping loop that extends to the left and then curves back to the right.

GMH:ch

CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2000, a copy of the foregoing document was served on counsel for the petitioner and the entities seeking intervention, via the method indicated, addressed as follows:

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

James P. Lamoureux
AT&T
1200 Peachtree St., NE, #4068
Atlanta, GA 30367

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

James Wright, Esq.
United Telephone - Southeast
14111 Capitol Blvd.
Wake Forest, NC 27587

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

H. LaDon Baltimore, Esquire
Farrar & Bates
211 Seventh Ave. N, # 320
Nashville, TN 37219-1823

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

Henry Walker, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

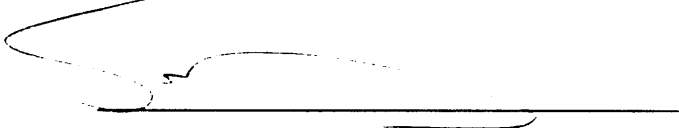
Jon E. Hastings, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

Vincent Williams, Esquire
Consumer Advocate Division
426 5th Avenue, N., 2nd Floor
Nashville, TN 37243

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

Terry Monroe
Competitive Telecom Association
1900 M St., NW, #800
Washington, DC 20036





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

Telephone 404 222 3000
Fax 404 222 3050

July 28th, 2000

RECEIVED

JUL 31 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 BellSouth's Second Amended Response to Exception 55 for filing in the above referenced matter. This amended response was mislabeled as BellSouth's Second Amended Response to Exception 80 in a previous filing.

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 SECOND AMENDED RESPONSE TO EXCEPTION 55



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 SECOND AMENDED RESPONSE TO EXCEPTION 55

	<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 SECOND AMENDED RESPONSE TO EXCEPTION 55

The *CLEC Service Order Tracking System (SOTS) User Guide* 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 SECOND AMENDED RESPONSE TO EXCEPTION 55

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 SECOND AMENDED RESPONSE TO EXCEPTION 55

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.

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:

Jim Hurt, Director
Consumers' Utility Counsel
2 Martin Luther King Jr. Drive
Plaza Level East
Atlanta, GA 30334-4600

Newton M. Galloway
Newton Galloway & Associates
Suite 400 First Union Bank Tower
100 South Hill Street
Griffin, GA 30229

Charles A. Hudak, Esq.
Gerry, Friend & Saponov, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346-2131

Kent F. Heyman, Esq.
Sr. VP and General Counsel
Mpower Communications Corp.
171 Sully's Trail, Suite 202
Pittsford, NY 14534

Suzanne W. Ockleberry
AT&T
1200 Peachtree Street, NE
Suite 8100
Atlanta, GA 30309

John M. Stuckey, Jr.
Webb, Stuckey & Lindsey
7 Lenox Pointe, N.E.
Atlanta, GA 30324

Charles V. Gerkin, Jr.
Smith, Gambrell & Russell, LLP
Promenade II, Suite 3100
1230 Peachtree Street, N.E.
Atlanta, GA 30309-3592

Frank B. Strickland
Wilson, Strickland & Benson
One Midtown Plaza, Suite 1100
1360 Peachtree Street, NE
Atlanta, GA 30309

Jeremy D. Marcus, Esq.
Blumenfeld & Cohen
Co-Counsel for Rhythm, aka ACI Corp.
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036

Scott A. Sapperstein
Sr. Policy Counsel
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619

John P. Silk
Georgia Telephone Association
1900 Century Boulevard, Suite 8
Atlanta, GA 30345

Thomas K. Bond
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, GA 30334

Eric J. Branfman
Richard M. Rindler
Swidler & Berlin
3000 K Street, NW, Suite 300
Washington, DC 20007

Harris R. Anthony
BellSouth Long Distance
28 Perimeter Center East
Atlanta, GA 30346

Robert A. Ganton
Regulatory Law Office
Dept. Army
Suite 700
901 N. Stuart Street
Arlington, VA 22203-1837

Charles F. Palmer
Troutman Sanders LLP
5200 NationsBank Plaza
600 Peachtree Street, NE
Atlanta, GA 30308-2216

Peter C. Canfield
Dow Lohnes & Albertson
One Ravinia Drive, Suite 1600
Atlanta, GA 30346

Judith A. Holiber
One Market
Spear Street Tower, 32nd Floor
San Francisco, CA 94105

James M. Tennant
Low Tech Designs, Inc.
1204 Saville Street
Georgetown, SC 29440

Nanette S. Edwards, Esq.
Regulatory Attorney
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802

Peyton S. Hawes Jr.
127 Peachtree Street, NE
Suite 1100
Atlanta, GA 30303-1810

Daniel Walsh
Assistant Attorney General
Office of the Attorney General
40 Capitol Square
Atlanta, GA 30334-1300

Mark Brown
Director of Legal and Government Affairs
MediaOne, Inc.
2925 Courtyards Drive
Norcross, GA 30071

John McLaughlin
KMC Telecom Inc.
Suite 170
3025 Breckinridge Boulevard
Duluth, GA 30096

Jeffrey Blumenfeld
Elise P. W. Kiely
Blumenfeld & Cohen
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036

James A. Schendt
Regulatory Affairs Manager
Interpath Communications, Inc.
P. O. box 13961
Durham, NC 27709-3961

James A. Schendt
Regulatory Affairs Manager
Interpath Communications, Inc.
P. O. Box 13961
Durham, NC 27709-3961

William R. Atkinson
Sprint Communications Co. L.P.
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339

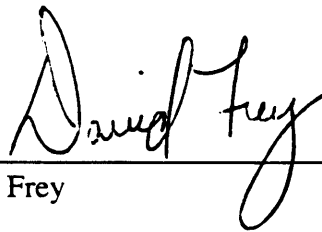
Nancy Krabill
Director of Regulatory Affairs
1300 W. Mockingbird Lane
Suite 200
Dallas, TX 75247

Dana R. Shaffer
Legal Counsel
105 Molloy Street
Suite 300
Nashville, TN 37201

Anne E. Franklin
Arnall Golden & Gregory, LLP
2800 One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309

Glenn A. Harris
Lori Anne Dolquest
NorthPointe Communications, Inc.
303 Second Street, South Tower
San Francisco, CA 94107

This 28th day of July 2000.

A handwritten signature in black ink, appearing to read "David Frey", is written over a horizontal line.

David Frey

KPMG
303 Peachtree Street, N.E.
Suite 2000
Atlanta, Georgia 30308
(404) 222-3000



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

Telephone 404 222 3000
Fax 404 222 3050

July 28th, 2000

RECEIVED

JUL 31 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**

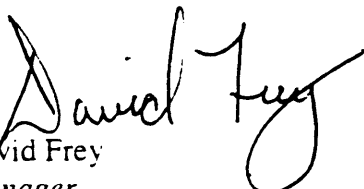
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of BellSouth's Responses to Exceptions 65, 83, 91 and 94, BellSouth's Amended Responses to Exceptions 49, 66, 70, 71, 83, 87 and 88, BellSouth's Second Amended Responses to Exceptions 78, 88, 89 and 92, BellSouth's Third Amended Responses to Exceptions 16, 84, 89 and 92, and BellSouth's Fourth Amended Responses to Exceptions 16 and 28 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'S RESPONSE TO EXCEPTION 65



July 18, 2000

EXCEPTION REPORT

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

Exception:

BellSouth's Calculate Due Date (CDD) pre-order query does not support all order requisition (REQ) and activity (ACT) types.

CDD pre-order queries allow CLECs to obtain the earliest possible due date to be requested on a Local Service Request (LSR). The BellSouth Telecommunications Access Gateway (TAG) calculates a due date based on four primary CLEC inputs:

- REQ TYPE
- ACT TYPE
- Quantity of lines requested
- UNE product type

Based on KPMG's testing experience, BellSouth is unable to process CDD queries for the following order types:

1. ***Loop with Number Portability (REQ TYPE B) - Migrate as-is (ACT TYPE W).***
In response to CDD queries with a REQ TYPE input of "B" and an ACT TYPE input of "W", KPMG received Error Message TAG1110VAL: "Invalid REQTYP – Account Activity Type Combination".
2. ***Stand-alone Number Portability (REQ TYPE C) – Migrate as-is (ACT TYPE W).***
In response to CDD queries with a REQ TYPE input of "C" and ACT TYPE input of "W", KPMG received Error Message TAG1110VAL: "Invalid REQTYP – Account Activity Type Combination".
3. ***Loop Port Combinations (REQ TYPE M) – all valid Activity Types.***
KPMG is unable to process CDD queries for REQ TYPE M. The list of applicable inputs¹ for the UNE Product Type data element does not contain any indicator for Loop-Port Combination service. This issue was referred to the Customer Support Manager (CSM) at BellSouth, who was unable to provide a valid entry for this input.

¹ KPMG obtained a listing of inputs for the UNE Product Type data element from the BellSouth TAG API Reference Guide, Version 2.2.0.5 and Version 2.2.0.7.

BELLSOUTH'S RESPONSE TO EXCEPTION 65

Impact

The absence of CDD functionality for the order types listed above can impact CLECs in the following way:

- **Increase in Operating Costs.** Absence of CDD functionality for specific REQ/ACT types prevents CLECs from identifying the due date to be input in an LSR in a mechanized fashion. For these order types, a CLEC will be required to perform a manual review of BellSouth's *Standard Interval Guide* documentation prior to submitting an electronic order. A manual review will necessarily slow the ordering process. In order to process the same number of orders manually, CLECs will have to utilize additional resources. These additional resources will increase CLEC operating costs.

BellSouth Response

Loop with Number Portability (REQ TYPE B) - Migrate as-is (ACT TYPE W)

The TAG defect has been uncovered regarding calculating due dates for REQ TYPs B and C with ACT TYP W in both pre-order and firm order. The defect will be corrected in TAG 2.2.0.10 scheduled for implementation in July.

Stand-alone Number Portability (REQ TYPE C) – Migrate as-is (ACT TYPE W)

The TAG defect has been uncovered regarding calculating due dates for REQ TYPs B and C with ACT TYP W in both pre-order and firm order. The defect will be corrected in TAG 2.2.0.10 scheduled for implementation in July.

Loop Port Combinations (REQ TYPE M) – all valid Activity Types

The following tests involving REC Type M were successfully performed using the 2.2.0.8 Tag release, 4/18/00, AFTER 3:00PM:

RECTYP:	M	M	M	M	M	M	M
ACT:	A	C	D	M	T	SS	RS
QLR:	9	9	9	9	9	9	9
DDD:	4/18	4/18	4/18	4/18	4/18	4/18	4/18
UNEPROD:	blank	blank	blank	blank	blank	blank	blank

RESULTS:

CDD	4/24	4/20	4/19	4/24	4/24	4/19	4/19

BELLSOUTH'S RESPONSE TO EXCEPTION 65

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 RESPONSE TO EXCEPTION 91



July 20, 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

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.

BELLSOUTH'S RESPONSE TO EXCEPTION 91

BellSouth algorithm to calculate the invoice accuracy metric³. This calculation demonstrates a 723% under-billing.

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 – Addtnl 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	-

³ ((Total Billed Revenue – Total Adjustments[Variance])/Total Billed Revenues) X 100 – This is invoicing accuracy metric as defined in the Georgia Master Test Plan (Appendix D2).

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.

BELLSOUTH'S RESPONSE TO EXCEPTION 91

Operator Call Handling	31	0	31	0.9680296	30.01	0.00	30.01	-
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.

BellSouth Response

BellSouth was able to determine the specific source of the discrepancies for the billing variances for two of the billing elements referenced above: Operator Call Handling and Automated Call Handling. For the remaining billing elements, we are not able to complete the investigation due to the retention period of our historical records.

Through the information that is available to BellSouth, we were able to determine that during the November time frame, there were multiple service orders issued against these line numbers. The service orders activity resulted in usage guides that were not always properly assigned, and identified, as belonging to KPMG, a facilities based provider. It is our assumption that some of the usage was processed at a time when the usage guide(s) would have directed the usage to our error process. Without being able to trace this usage back through our processed error usage, we cannot specifically determine the root cause of discrepancy. BellSouth recommends that the UNE billing rate elements be verified during any subsequent UNE re-test.

Operator Call Handling

As to what BellSouth was able to determine through its investigation, the rate file system authorizes Operator Call Handling(OPCH) with a LIDB dip to be rated in one of two ways. . A CLEC contract can contain a) two separate rates; one for the OPCH portion and one for the LIDB portion; or b) a combined rate for both the OPCH and the LIDB. The KPMG billing was set up for the combined rate. The design for the rate file maintenance process requires BellSouth to enter rates for both the rate structure that has two separate rates and the rate structure that has the combined rate. When a CLEC contract contains the two-rate structure, BellSouth enters the appropriate rate in the OPCH rate field and the appropriate rate in the LIDB rate field, and we enter a rate of zero in the combined

BELLSOUTH'S RESPONSE TO EXCEPTION 91

rate field. When a CLEC contract contains the combined rate structure, the appropriate rate is entered in the combined rate field, and a zero rate is entered in both the OPCH rate field and the LIDB rate field.

There is a design flaw in the rating process that will look for the two-rate structure as the first step in the process. If there are entries for the two-rate structure, then those rates are applied for billing purposes. If the entries for the two-rate structure are not found, then the process will look for the combined rate structure. The problem with this design is that both rate structure entries are required, and as a result, when a CLEC has a combined rate structure, the two rate structure will always be found with zero rate entries.

In discussions with programming staff regarding the design issue, they recommended the following work around: For a CLEC that has a combined rate structure, the two rate structure entries can be entered with a zero rate, and the effective dates and end dates can be entered such that both date ranges will fall prior to the effective date of the contract. This will in effect make these rate entries invalid for use, and the system will then bypass them and use the combined rate structure.

For a long term fix, there appears to be two options: a) change the rate file maintenance process such that both rate structures are not required, or b) change the rate file maintenance process such that zero rates are not required and a given rate structure can be shown as not/applicable. Either option will require an enhancement to the system which will have to be scheduled and worked into the IT work request process. BellSouth will investigate the appropriate option for correcting this process, issue a work request, and coordinate to determine an implementation date.

Automated Call Handling

The rate element is processed in the same way as stated above. It is the two-rate structure vs. the combined rate structure.

BELLSOUTH'S RESPONSE TO EXCEPTION 94



July 18, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Resale Usage Functional Evaluation (BLG8).

Exception:

BellSouth failed to deliver 20% of expected resale DUF records to KPMG.

During the period of April 4 – 7, 2000 KPMG executed 898 test call scenarios for the Resale Usage Functional Evaluation¹. BellSouth failed to deliver DUF² records for twenty percent of the test calls for which records were expected. Representative occurrences of calls with no corresponding DUF record are detailed in the following tables.

Intralata Toll

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Response
912-743-7339	912-892-2517	912-892-2517	4/5/2000	09:17:28	0001:28.0	1. Call does not bill to KPMG Resale number therefore it should not be sent to them over ODUF for the resale test.
912-744-0639	912-453-8383	912-743-9678	4/6/2000	13:53:00	0001:12.0	2. Call was sent to KPMG on 4/11/00
912-745-2140	912-453-3999	912-745-2140	4/6/2000	14:10:11	0000:18.0	3. Call was sent to KPMG on 4/11/00
770-226-0815	706-563-4440	770-226-0483	4/6/2000	10:28:00	0001:00.0	4. Verbatim-Call at 1030020 Call was dropped because call incomplete and/or unbillable the tariff.
770-226-9019	706-571-3456	770-226-9019	4/6/2000	10:37:02	0001:38.0	5. Did not find call on Verba
770-690-0761	706-596-8244	770-690-0761	4/6/2000	13:16:00	0000:50.0	6. Verbatim-Call at 131645 (was dropped because call is incomplete and/or unbillable the tariff.)

¹ 898 test call scenarios were introduced into the test with the expectation that 576 calls would generate corresponding DUF records. 312 of the test call scenarios were not expected to generate DUF records.

² 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.

BELLSOUTH'S RESPONSE TO EXCEPTION 94

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Response
706-235-5431	770-832-0539	706-802-0193	4/6/2000	09:59:50	0001:56.0	7. Verbatim-Call at 100102 Call was dropped because call is incomplete and/or unbillable at the tariff.
706-235-5762	770-832-6100	706-235-5762	4/6/2000	09:43:00	0001:27.0	8. Verbatim-Call at 094411 Call was dropped because call is incomplete and/or unbillable at the tariff.
706-235-5762	770-832-6100	706-235-5762	4/6/2000	10:18:00	0002:46.0	9. Verbatim-Call at 101756 Call was dropped because call is incomplete and/or unbillable at the tariff.
404-633-0247	706-782-6488	404-633-4121	4/6/2000	09:27:31	0000:35.0	10. Call Sent on ODUF 04/10/00 CTime 926210 Another call Ctime 92807 was dropped because call is incomplete and/or unbillable at the tariff.
404-633-0247	706-783-6488	404-633-0247	4/6/2000	09:34:11	0002:25.0	11. Not on Verbatim- Found Term # 706-782-6488 found Call was dropped because call is incomplete and/or unbillable at the tariff.
404-633-6560	706-782-6100	706-782-6100	4/6/2000	13:46:16	0001:03.0	12. Call does not billed to a KPMG Resale number therefore it should not be sent to them over ODUF

BELLSOUTH'S RESPONSE TO EXCEPTION 94

Local (Operator Assisted/Completed)

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Response
912-743-7339	912-743-6502	912-743-7339	4/5/2000	16:13:17	0000:31.0	13. (flat rate) Verbatim-Call at 161317 (Alpha passed 21 Call was dropped because call is incomplete and/or unbillable per the tariff.
912-743-9678	912-745-0679	912-743-9678	4/6/2000	12:34:20	0001:03.0	14. Verbatim-Call at 1235417 Call was dropped because call is incomplete and/or unbillable per the tariff.
912-744-0639	912-742-2085	912-744-0639	4/6/2000	12:41:50	0001:00.0	15. Verbatim-Call at 1235417 Call was dropped because call is incomplete and/or unbillable per the tariff.
770-226-0483	770-226-9019	770-226-0483	4/6/2000	15:03:21	0001:44.0	16. Verbatim Call at 150431 Call was dropped because call is incomplete and/or unbillable per the tariff.
770-226-0815	678-532-6698	770-226-0815	4/5/2000	13:57:00	0002:00.0	17. Verbatim Call at 135736 Rate Account. Call was dropped because call is incomplete and unbillable per the tariff.
770-226-9019	770-933-9532	770-226-9019	4/5/2000	14:40:20	0000:50.0	18. Verbatim Call at 144106 Rate Account. Call was dropped because call is incomplete and unbillable per the tariff.
706-235-5431	706-235-5762	706-235-5431	4/5/2000	15:36:10	0001:20.0	19. Did not find call as shown Verbatim. Call at 15:25:01 but was DDD. No Operator calls found. Call at 15:25:01 sent on ODUF
706-235-5762	706-802-0193	706-235-5431	4/5/2000	15:45:00	0001:12.0	20. Verbatim shows call at 153829 to Operator. Call was sent on ODUF
706-235-5762	706-802-0193	706-235-5762	4/5/2000	15:49:00	0001:14.0	21. Verbatim Call at 154925 Call was dropped because call is incomplete and/or unbillable per the tariff.
404-633-0247	404-633-4761	404-633-4761	4/5/2000	14:10:15	0002:28.0	22. Verbatim Call at 140832 sent on ODUF 4/7/00. No recording for collect calls to this number found on verbatim.*.
404-633-4121	404-296-5519	404-633-4121	4/5/2000	14:47:12	0000:33.0	23. Verbatim Call at 144718 Call was dropped because call is incomplete and/or unbillable per the tariff
404-633-6560	404-296-5519	404-633-6560	4/6/2000	13:18:50	0001:33.0	24. Verbatim Call at 131857 Call was dropped because call is incomplete and/or unbillable per the tariff

BELLSOUTH'S RESPONSE TO EXCEPTION 94

Busy Verify

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Response
912-743-0829	912-741-7059	912-743-0829	4/5/2000	15:40:10	0001:05.0	25. Verbatim Call at 154027 was dropped because call is incomplete and/or unbillable per the tariff.
770-226-9460	770-951-5592	770-226-9460	4/6/2000	13:25:40	0001:05.0	26. Call not found on Verbatim
404-633-0247	404-633-5981	404-633-0247	4/5/2000	14:03:36	0000:14.0	27. Call not found on Verbatim

Optional Calling Services

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Response
912-745-0679	912-953-7584 (*66)	912-745-0679	4/6/2000	09:50:45	0000:11.0	28. Call not on Verbatim.
912-745-2140	912-745-0679 (*69)	912-745-2140	4/6/2000	10:58:26	0000:47.0	29. Call recorded, but ALPH. dropped because of CT=330 v drop reason code 228-(Drop c type 330 call trace service features in states which are not terrified.)
706-235-6837	706-235-8076 (*66)	404-633-0247	4/6/2000	11:09:00	0000:06.0	30. Call not found on Verbatim
706-235-8076	706-235-6837 (*69)	706-235-8076	4/6/2000	11:08:30	0000:20.0	31. Verbatim shows two calls at 11:05:25 and one at 11:10:1 Both local calls were sent on ODUF.

BELLSOUTH'S RESPONSE TO EXCEPTION 94

Credit Requests³

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Response
404-633-6560	404-222-9412		4/5/2000	14:00:13	0001:17.0	32. Call not found on Verbatum
404-633-6560	404-296-5519		4/6/2000	10:02:58	0000:47.0	33. Call not found on Verbatum
912-744-0639	912-742-2085		4/6/2000	10:49:00	0000:10.0	34. Billing System passed 200 Mass record type created from CT189. Work Request in progress to pass CT 189 to OD
770-690-0761	706-596-8244		4/6/2000	13:05:00	0001:00.0	35. Billing System passed 200 Mass record type created from CT189. Work Request in progress to pass CT 189 to ODUF.
770-951-5592	706-576-3400		4/6/2000	13:14:26	0000:50.0	36. Billing System passed 200 Mass record type created from CT189. Work Request in progress to pass CT 189 to ODUF. progress to pass 189 to ODUF

Impact

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

- **Decrease in revenue.** If BellSouth does not deliver billable DUF records, CLECs cannot bill end users appropriately, which results in decreased revenue.
- **Inaccurate forecasting.** If all billable records are not delivered, CLECs are unable to reliably forecast usage and project revenue.

Additional BellSouth Response

BellSouth sent all billable usage to KPMG on ODUF during this test except for three credit type records. It was discovered during this test, that one of the systems that processes toll type calls was not passing credit records to ODUF. A work request was issued on June 14, 2000 to pass these credit type records to the ODUF process. This work request will be completed on 7/30/00. BellSouth will also update our ODUF documentation for CLECs to clarify what types of messages will be sent over ODUF for RESALE customers. This documentation update will be complete by 7/28/00.

³ The test caller received confirmation from the operator that a credit would be issued.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 49



July 14, 2000

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Resale Functional Evaluation (PO&P11).

Exception:

BellSouth did not provide an accurate and timely update to CLECs when implementing a Universal Service Order Code (USOC) change.

During resale functional testing, KPMG received the following error message in response to an Local Service Request (LSR): 'CO0VJ7L2 FORMAT SAE 536 I1 ESXDC¹'. KPMG was unable to determine the nature of this error message by reviewing ordering documentation available to CLECs.

To further research this error message, KPMG contacted its assigned BellSouth Customer Service Manager (CSM). The CSM referenced a letter sent to the Local Carrier Service Center (LCSC) on March 15, 2000. This letter announced the following change: 'N1ACR is a new USOC to be used in place of NXMCR² and ESXDC. NCACR is used if customer has GCJ³.'

Neither the letter sent to the LCSC nor the information contained therein was released to the CLECs. Additionally, no updates to BellSouth's ordering documentation reflecting this change were announced or implemented.

Impact

The absence of accurate and timely updates regarding USOC changes will impact CLECs in the following way:

- **Increase in operating costs.** If CLECs do not receive accurate and timely updates regarding USOC changes, order entry errors will result from the incorrect usage of affected fields. CLECs will be forced to investigate error messages which are received due to incorrect usage and re-submit these orders. The process of investigation and re-submission will increase CLEC operating costs.

¹ Call Waiting, per line, deluxe, with conferencing – See *General Services Tariff, Section A13*

² Caller ID, per line, deluxe – See *General Services Tariff, Section A13*

³ Call Forwarding Don't Answer – See *General Services Tariff, Section A13*

1 Response

CLEC Manual (Product Catalog) receives feeds from eight different sources at the end of each month. An updated CLEC USOC Manual (Product Catalog) is posted on the BellSouth web site for CLECs the end of the next month. For example, the CLECs that were forwarded up to March 1 were posted to the web on April 28th.

The process for updating the CLEC USOC Manual is a labor intensive, non-mechanized process. The USOCs NXMCR and ESXDC will not be deleted from the database until the 2000 update of the CLEC USOC Manual.

BellSouth is in the process of assessing the effort, costs and resources required to streamline this process to provide more timely updates to the USOC manual.

2 BellSouth Response

BellSouth will utilize the carrier notification process to provide monthly notice of new CLEC USOCs that may be submitted by a CLEC ordering local service.

Carrier notification will be published monthly on the BellSouth web site beginning 1/1/00. The carrier notification will include the following information:

- USOC
- USOC description/translation
- USOC reference
- Estimated tariff date
- Estimated implementation date

t (PRE-

the
ibility)

ll be
f data
nation
at

TAG
as can be

entation.

y

l.
he Pre-
tions for
ide as the
for data

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 66

TAG Preorder Responses

Deficiency Type	Data Elements
Missing	<i>Address Validation Response – Street Name</i> – HOUSE-NUM-HI – HOUSE-NUM-LOW – ODD-EVEN-IND – AHN STATUS <i>Address Validation Response - Menu of Address Response</i> -EST-SERVICE-DATE -TEXT-CODE -TEXT
Extraneous	<i>Address Validation Response – Single Address Match</i> – ADDR-STATUS – FACAVAIL – TN – QUICK-SERV-IND

Impact

Incomplete pre-order responses delivered in response to valid queries will impact CLECs in the following way:

- **Increase in operating costs.** Receipt of extraneous information may cause confusion for CLEC ordering representatives. CLECs may not obtain all required account information if responses have missing or incorrect data elements. If a CLEC does not receive all necessary account information, it will be required to contact BellSouth to obtain the information, requiring additional CLEC resources. Utilizing additional resources will result in an increase in CLEC operating costs.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 66

BellSouth Response

Deficiency Type	Data Elements	BellSouth Response
Missing	TAG Release 2.2-1 Requirements, Issue 4, 1/20/00 (BD-TAG-REQ-R2.2-1) Address Validation Response – Street Name Response (AVR-F) – (Required) - TAG-DSA-HOUSE-NUM-HI – (Required) - TAG-DSA-HOUSE-NUM-LOW – (Required) - TAG-DSA-ODD-EVEN-IND – (Required) - TAG-DSA-AHN-STATUS <i>Address Validation Response - Menu of Address Response</i> -EST-SERVICE-DATE -TEXT-CODE -TEXT	TAG API Reference Guide BD-TAG-R2.2.0.7-1 Issue 16, February 29, 2000 RELEASE 2.2.0.7 Equivalent fields FROMHOUSENUMBER TOHOUSENUMBER ODDEVENINDICATOR ASSIGNEDHOUSENUMBERSTATUS Equivalent fields ESTSERVICEDATE TEXTCODE TEXT
Extraneous	TAG Release 2.2-1 Requirements, Issue 4, 1/20/00 (BD-TAG-REQ-R2.2-1) Address Validation Response – Single Address Match Response (AVR-AB) – (Optional) – TAG-DTN-ADDR-STATUS – (Optional) – TAG-DTN-FACAVAIL – (Optional) – TAG-DTN-TN (Optional) – TAG-DTN-QUICK-SERV-IND	Equivalent fields ADDRESSSTATUS AVAILABLEFACILITIESINDICATOR TELEPHONENUMBER QUICKSERVEINDICATOR

Additional BellSouth Response

BellSouth's response to the KPMG Exception assumes that the reference to "BellSouth documentation" refers to the TAG API Reference Guide 2.2.0.7

1. The Address Validation Response – Street Name Response (AVR-F)-

These fields are represented in the API Guide with the equivalent names shown in the table above. Population of these fields for the response are REQUIRED according to the

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 66

TAG Release 2.2 System Requirements. If they are not present in this type of response, this is a fault.

After testing with the input data provided, the response received from TAG 2.2.0.7c contained the fields that were stated as missing from the Address Validation Response-Street Name. As a result of these findings there is no reproducible fault with the data provided. The code is working as designed.

2. Address Validation Response – Menu of Addresses

The TAG 2.2 system requirements do not have a response same “Address Validation Response-Menu of Addresses”. The response field referenced in the KPMG exception is found in the Single Address Match Response. The fields are represented in the API Guide with the equivalent names shown in the table above. These fields are optional and are documented in the BellSouth Pre-Order Business Rules and the TAG 2.2 System Requirements.

3. The Address Validation Response – Single Address Match (AVR-AB)-

The TAG 2.2 System Requirements consider these 3 fields as optional; therefore, their presence in a Single Address Match (AVR-AB) is not a fault. These fields are represented in the API Guide with the equivalent names shown in the table above. The data is not extraneous and the code is working as designed. The data elements of the field is also documented in the BellSouth Pre-Order Business Rules.

Additional BellSouth Response

The TAG Release 2.2-1 Requirements, Issue 4, 1/20/00 (BD-TAG-REQ-R2.2-1) shows the optional fields EstServiceDate, TextCode, and Text as part of the Service Restriction Information found in the Single Address Match Response (AVR-AB).

In the 2.x platform, which includes 2.2.0.8 and 2.2.0.9, Address validation responses are returned in the following format:

```
ga047158:2.2.0.9=>xstTestClient avq att112t 14the$ sg contract_A
[5879: New Connection (ga044077,IT_daemon,*,xst_adm,pid=2654,optimised) ]
[5879: New IIOP Connection (ga044077:28101) ]
[5879: New IIOP Connection (ga044077:28107) ]
STATUS:BLP0000ADR|COMPLETED SUCCESSFULLY
INQNUM:2c906a7f00000001
ADDRESS:|1836|||DR|MAPLE LEAF|||||WINDERMERE|FL|34786|N||||||
NPANXX:407293
CLLI:ORLDFLPH
TELEPHONE:4072920276|N|W|N
TELEPHONE:4072900960|N|W|N
TELEPHONE:4072993048|N|N|
TELEPHONE:4072992608|N|N|
```

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 66

TELEPHONE:4072969706|N|N|

TELEPHONE:4072930000|N|N|

AREATRANSFINFO:|||ORSL

SVCRESTRICTION:||

SVCINSTRUCTION:

This format does not give field names that are a part of a subsection (i.e. Service Restriction Information) if the data corresponding to the data element name is not present; therefore, "the presence of the data element name itself" will not be displayed.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 70



July 21, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Performance Metrics Review Change Management Verification and Validation Test (PMR-3).

Exception:

BellSouth does not have an adequate change management process for the generation of Service Quality Measurement (SQM) data from its legacy/source systems.

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.

The raw data BellSouth uses to calculate SQMs are extracted from various BellSouth legacy/source systems. As a result of the following observations, KPMG believes that BellSouth does not adequately monitor the impact of changes to legacy/source systems on the procedures for collection of raw data.²

1. On one occasion, a data format change caused data to be entered incorrectly into PMAP. This problem occurred because changes in the legacy/source systems were not communicated to the PMAP personnel who produce the SQM reports. The PMAP personnel identified the error during the production run and made the necessary corrections.
2. Trunk Group Performance reports were not posted from October 1999 to December 1999. This problem occurred after changes to the source system that provides raw data caused insufficient data to be produced for these SQMs. These changes were not communicated to PMAP personnel.
3. Partial data and incomplete reports were inadvertently posted for several months for the pre-ordering SQM *Average Response Time and Response Interval*. This problem occurred because BellSouth changed the source system components that provided the raw data used in this SQM's calculation. The new components lacked the ability to feed data for this SQM into PMAP. The change and its implications were not communicated to PMAP personnel.

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's observations are drawn from interviews with BellSouth personnel regarding the SQM report generation process.

AMENDED RESPONSE TO EXCEPTION 70

tion process that compares record counts processed by the PMAP and reviews the reports produced. While this remedy, some legacy/source system changes, it does not constitute a management process, as evidenced by the problems cited above.

Public Commission requires BellSouth to provide the CLECs with reports regarding BellSouth's business functions. BellSouth's lack of management process regarding the generation of raw data from the system could result in inaccurate or incomplete SQM reports. Without SQM reports, CLECs are unable to assess the quality of service and conduct their business functions reliably.

Format change caused data to be entered incorrectly into PMAP

process in place where legacy system support groups notify the Network Analysis group of pending upgrades or system changes. However, where the notification failed and a data format change resulted in PMAP Subject Matter Expert found the error during the data validation and made necessary corrections. This validation process is a critical step to publish the SQMs. This process was followed and the data is accurate.

Some reports were not posted from October 1999 to December

system providing trunk group data for the Network Information System was taken out of service due to Y2K issues. Just prior to the system outage, the group responsible for the system that produces the Trunk Group reports experienced a vendor relationship issue. The vendor was delayed in a delayed implementation of the new Trunk Group data source. The vendor issue was resolved, and the reports were published in January, 2000.

They were aware as the issue was communicated to all parties involved and once the data became available, the reports were published.

Some reports were inadvertently posted for several months for the wrong Response Time and Response Interval

due to the loss of the data from the RNS servers in late 1999, which occurred because the servers were not Y2K compliant. The system was then programmed to capture the required data. Once the

EXCEPTION 70

the Legacy system was used for the PMAP and was not proactive in keeping 'data feeds' for RNS reports worked to pull this

reports were not inadvertently posted. The Measurements group was responsible for the 'data feeds' for these reports in the May report

reports are handled by the RNS data is used by Management and the team retrained on legacy system owners are responsible for support. -

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 71



July 20, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Pre-order Functional Test (PRE-1), the EDI and TAG UNE and Resale Functional Tests (O&P-1, O&P-2, and O&P-11) and the EDI and TAG UNE and Resale Documentation Evaluations (O&P-8, O&P-9, and O&P-14).

Exception:

The service establishment intervals returned on Calculate Due Date (CDD) pre-order responses are not consistent with intervals defined in the *BellSouth Product and Services Interval Guide*.

When issuing a Local Service Request (LSR), CLECs are required to populate a Desired Due Date (DDD) for service completion. The interval between the DDD and the LSR submission date should be no shorter than the "standard" interval defined by BellSouth for the particular service type.¹

BellSouth offers two methods for determining a service request type standard interval:

1. *Documentation*

The *BellSouth Product and Services Interval Guide* provides targeted business-day service intervals based on product type, quantity of lines, and order activity type.

2. *Pre-Order Inquiry*

The CDD pre-order provides CLECs with a tool for mechanized interval calculation via the Telecommunications Access Gateway (TAG). Based on inputs (requisition type, activity type, quantity of lines, product type of the planned LSR, and the pre-order transaction date), TAG returns a calculated due date.

BellSouth does not provide a CLEC with an authoritative source of interval guidelines. The two methods available yield inconsistent results. The following table details a sample of discrepancies between CDD pre-order responses and standard intervals defined in the *BellSouth Product and Services Interval Guide*. In some cases, the interval returned in response to CDD queries was shorter than the interval specified in the documentation. In other cases, it was longer.

¹ A CLEC desiring a DDD earlier than the standard interval allows can request an "Expedited LSR." BellSouth fulfills expedited requests based on resource and staffing availability.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 71

REQ TYPE	ACT TYPE	UNE Product Type ⁽¹⁾	ORDER TYPE	Nbr. Lines	CDD Interval ⁽²⁾			Documentation
					Submit Dt	Due Date	Days ⁽³⁾	Interval Days ⁽³⁾
E	A	NOT UNE To Calculate	POTS	3	4/5/2000	4/10/2000	3	7
E	A	NOT UNE To Calculate	POTS	3	4/6/2000	4/11/2000	3	7
E	A	NOT UNE To Calculate	POTS	3	4/7/2000	4/12/2000	3	7
E	A	NOT UNE To Calculate	POTS	1	4/7/2000	4/10/2000	1	4
E	A	NOT UNE To Calculate	POTS	1	4/7/2000	4/10/2000	1	4
E	A	NOT UNE To Calculate	POTS	2	4/7/2000	4/11/2000	2	4
E	A	NOT UNE To Calculate	POTS	2	4/7/2000	4/11/2000	2	4
E	T	NOT UNE To Calculate	POTS	1	4/7/2000	4/10/2000	1	4
E	W	NOT UNE To Calculate	ISDN	1	4/7/2000	4/7/2000	0	3
E	V	NOT UNE To Calculate	ISDN	1	4/10/2000	4/11/2000	1	16
E	W	NOT UNE To Calculate	ISDN	1	4/7/2000	4/7/2000	0	3
E	A	NOT UNE To Calculate	ISDN	1	4/7/2000	4/10/2000	1	16
E	C	NOT UNE To Calculate	ISDN	1	4/7/2000	4/8/2000	1	16
E	C	NOT UNE To Calculate	ISDN	1	4/7/2000	4/8/2000	1	16
E	C	NOT UNE To Calculate	POTS	2	4/10/2000	4/12/2000	2	4
E	C	NOT UNE To Calculate	POTS	2	4/10/2000	4/11/2000	1	4
E	C	NOT UNE To Calculate	POTS	2	4/10/2000	4/12/2000	2	4
E	C	NOT UNE To Calculate	POTS	2	4/10/2000	4/12/2000	2	4
B	V	LocalNumberPortability_NotComplexServices	POTS	2	2/18/2000	2/28/2000	6	5
C	D	LocalNumberPortability_NotComplexServices	POTS	1	2/18/2000	2/29/2000	7	5
C	V	LocalNumberPortability_NotComplexServices	POTS	5	2/22/2000	3/15/2000	16	5
C	V	LocalNumberPortability_NotComplexServices	POTS	1	2/22/2000	3/15/2000	16	5
F	A	UnbundledLocalSwitching_2WireAnalogPort	POTS	8	2/22/2000	3/15/2000	16	3
F	C	UnbundledLocalSwitching_2WireAnalogPort	POTS	5	2/18/2000	2/28/2000	6	3
F	SS	UnbundledLocalSwitching_2WireAnalogPort	POTS	3	2/18/2000	2/28/2000	6	3
F	D	UnbundledLocalSwitching_2WireAnalogPort	POTS	1	2/22/2000	2/28/2000	4	3
F	V	UnbundledLocalSwitching_2WireAnalogPort	POTS	1	2/18/2000	2/28/2000	6	3
A	A	UnbundledLoops	POTS	1	2/28/2000	3/8/2000	7	7

Notes

(1) UNE Product TYPE is a data element on the CDD inquiry. The valid entries are provided by BellSouth.
 NOT UNE To Calculate is used for Resale service requests.

(2) CDD Interval obtained by subtracting the CDD query submission date from the due date returned by the CDD.

(3) Business Days

Impact

Discrepancies between service establishment intervals returned on pre-orders and intervals contained in the BellSouth *Product and Services Interval Guide* will impact CLECs in the following ways:

- A CLEC obtaining interval information from the 'incorrect' source may be requesting service provisioning at a longer interval than is necessary, ultimately depriving its end-user from the most timely service available. Using the incorrect source, a CLEC may also request a shorter interval than BellSouth allows, resulting in service request errors and provisioning delays.

BellSouth Response

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 71

The due dates provided in the Calculate Due Date transaction are an estimated due date. The intervals provided in the BellSouth Product and Services Interval Guide are targeted intervals. The actual interval provided on the specific date and time the transaction was submitted can be longer than the targeted interval. The confirmed due date is sent via the Firm Order Confirmation sent to the CLEC.

The actual Due Date assigned is based on the following:

- BellSouth Product and Services Interval Guide
- Time of day an error-free LSR is submitted.

The interim due date solution for preorder queries in Release 2.2 uses various internal tables, depending on the RECTYP/ACT Type combination, to determine the method for calculating the interim due date. The process does not access the BellSouth Products and Services Interval Guide.

ISDN – TAG is calculating a shorter interval than what is in the products and service guide. TAG 2.2x API uses tables that were extracted from the BellSouth Products and Services Interval Guides. The tables are hard coded in the API and have never been updated. The Interim Due Date Calculation solution was implemented to meet a BellSouth mandate and was never intended to be used long term. A change request has been issued to update the tables to reflect the current information will be implemented 7/21/00. This change will follow the current interim change control process to be prioritized and implemented in a future release.

ISDN Calculated Due Date Intervals

This exception listed six test cases for Order Type ISDN. The calculated due date was determined in the manner outlined below:

- General validations were applied to the input data and the data passed the validations.
- Table 4, RECTYP/ACT Combinations That Require Due Date Combinations, was searched to determine the status of the test case. Table 4 is reproduced below.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 71

Table 4 – REQTYPE/ACT Combinations That Require Due Date Calculation

ACT → REQTYPE ↓	A New Install	C Change	D Discon nect	M : Inside move	T Outside move	R Record	V Conversion as specified	SS Suspend	RS Restore	W Conversi on as-is
A : Loop	Y	Y	Y	Y	Y		Y			
B : Loop w/INP		Y	Y	Y	Y		Y			
C : INP		Y	Y				Y			
D : Retail / Bundled			Y							
E : Resale	Y	Y	Y	Y	Y		Y	Y	Y	Y
F : Port	Y	Y	Y				Y	Y	Y	Y
J : Directory										
M : Loop w/Port	Y	Y	Y	Y	Y			Y	Y	

Per the draft exception document, the combinations of interest are E/A, E/C, E/V and E/W, all of which require a due date calculation based on Table 4.

The next step in the process requires extracting information from Table 5, which provides either the interval to assign or the interval table to use. Table 5 is reproduced below:

Table 5 – REQTYPE/ACT Intervals

REQTYPE	ACT	Logic	Saturday Availability
J	ALL	Interval = 0	N/A
ALL	R	Interval = 0	N/A
A	A,C,D,M,T,V	Use UNE Product Interval Table (Table 3)	No
B	C,D,M,T,V	Use UNE Product Interval Table (Table 3)	No
C	C,D,V	Use UNE Product Interval Table (Table 3)	No
D	D	If request received by 3 PM Mon-Sat interval = 0, otherwise interval = 1.	Yes
F	A,C,D,V,SS, RS,W	Use UNE Product Interval Table (Table 3)	No
E & M	A	Use Standard Interval Table (Table 6)	No
E & M	C	If request received by 3 PM Mon-Sat interval = 0, otherwise interval = 1.	Yes
E & M	D	If request received by 3 PM Mon-Sat interval = 0, otherwise interval = 1.	Yes
E & M	M	Use Standard Interval Table (Table 6)	No
E	T	Use Standard Interval Table (Table 6)	No
E	V	Use Standard Interval Table (Table 6)	No
E	W	If request received by 3 PM Mon-Sat interval = 0, otherwise interval = 1.	Yes
E & M	RS	If request received by 3 PM Mon-Sat interval = 0, otherwise interval = 1.	Yes
E & M	SS	If request received by 3 PM Mon-Sat interval = 0, otherwise interval = 1.	Yes

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 71

For Act types C and W, the assignment of the interval is dependent on the time of day the request is received. If the time is 3:00 PM or earlier, the interval is set to 0, otherwise it is set to 1. For ACT types V and C, the algorithm is directed to Table 6 in which intervals are assigned depending on the order quantity. Table 6 is reproduced below.

Table 6- Standard Interval Table

Number of Lines	Interval (in work days)
1-2 lines	If request received by 3 PM Mon-Fri interval = 0, otherwise interval = 1.
3-5 lines	1
6-14 lines	2

For the Resale products represented by the test data included in the draft exception, the Due Date calculation is consistent with the system requirements. The test data was recreated and processed and the results confirm this assertion.

LNP (REQTYP C, ACTTYP of D & V) – TAG test team ran scenarios using RECTYP C with an activity of D and V using TAG Release 2.2.0.8, and received a calculated due date of 5 days, which is the same as the number of days listed in the Products and Services Interval Guide.

Local Number Portability – Not Complex Services

This exception questioned the intervals received from test cases submitted for RECTYP C, ACT of D and V respectively. The steps for calculating the due date is the method documented above. However, for these combinations, Table 5 indicates the use of the UNE Product Interval Table, reproduced below.

The test results documented in the exception were not in line with expected results based on the system requirements. Identical test data was created and submitted to the CDD pre-order process in an attempt to replicate the results set forth in the exception. The results obtained in the retest were not the same as those indicated in the exception. For each combination, the Calculated due date interval was 5 days, the results expected based on the system requirements and the documented interval.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 71

Table 3 – UNE Product Intervals

UNE PROD Identifier	UNE Product Identifier Description	Max Qty (QLR)	Qty (QLR)	Interval (work days)
0	NOT A UNE TO CALCULATE	0	0	0
1	UNBUNDLED LOOPS	14	1-5 6-14	7 10
2	LOOP CONCENTRATION – LOOP CHANNELIZATION SYSTEM	1	1	90
3	LOOP CONCENTRATION – CENTRAL OFFICE CHANNEL INTERFACES	1	1	30
4	SUB LOOPS – LOOP FEEDER	1	1	30
5	SUB LOOPS – LOOP CONCENTRATION	1	1	90
6	NETWORK INTERFACE LOOP	14	1-14	7
7	OPEN AIN	1	1	45
8	CCS7	1	1	60
9	UNBUNDLED INTEROFFICE TRANSPORT (EXCLUDING DARK FIBER)	1	1	30
10	O/S AND DA UNES	1	1	30
11	CUSTOMIZED CALL ROUTING	25	1-5 6-25	30 60
12	UNBUNDLED LOCAL SWITCHING – 2 WIRE ANALOG LINE PORT	25	1-10 11-25	3 4
13	UNBUNDLED LOCAL SWITCHING - HUNTING	1	1	5
14	UNBUNDLED LOCAL SWITCHING – 2 WIRE ANALOG DID TRUNK PORT	25	1-10 11-25	5 6
15	UNBUNDLED LOCAL SWITCHING – 2 WIRE DIGITAL LINE SIDE PORT	25	1-10 11-25	5 6
16	UNBUNDLED LOCAL SWITCHING – 4 WIRE ISN DSI DIGITAL TRUNK PORT	25	1-10 11-25	5 6
17	UNBUNDLED LOCAL SWITCHING – SWITCHING FUNCTIONALITY	1	1	5
18	UNBUNDLED LOCAL SWITCHING – UNBUNDLED LOCAL USAGE (ENTIRE LOCAL CALLING AREA	1	1	5
19	UNBUNDLED ACCESS TO OSS	1	1	30
20	ACCESS TO DATABASES – 800 DATABASE	1	1	10
21	ACCESS TO DATABASES – LINE INFORMATION DATABASE (LIDB)	1	1	30
22	INTERIM NUMBER PORTABILITY – RCF, NOT COMPLEX SERVICES	50	1-25 26-50	5 7
23	INTERIM NUMBER PORTABILITY – RCF, COMPLEX SERVICES	50	1-25 26-50	7 7
24	INTERIM NUMBER PORTABILITY – DID INITIAL REQUEST (TRUNK GROUP TO BE ESTABLISHED)	9994	1-9994	30
25	INTERIM NUMBER PORTABILITY – DID SUBSEQUENT REQUEST (TRUNK GROUP IN PLACE)	100	1-100	5
26	LOCAL NUMBER PORTABILITY – NOT COMPLEX SERVICES	50	1-50	5
27	LOCAL NUMBER PORTABILITY – COMPLEX SERVICES	50	1-50	7
28	PHYSICAL COLLOCATION – ORDINARY	5	1-5	120
29	PHYSICAL COLLOCATION – EXTRAORDINARY	5	1-5	180
30	VIRTUAL COLLOCATION – ORDINARY	5	1-5	90
31	VIRTUAL COLLOCATION – EXTRAORDINARY	5	1-5	120

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 71

Additional BellSouth Response:

An earlier response erroneously contained a table copied from the February 19, 1999 version of the Interim Due Date documentation, rather than the latest known version at that time, which was dated March 29, 1999. As a result, the initial response contained a version of Table 6 which was entirely replaced in the latest version of the document. The current version of Table 6, contained in the 'TAG User Requirements for Calculating Due Date For Preorder (Interim Solution)', dated March 29, 1999 is reproduced below:

Table 6- Standard Interval Table

Number of Lines	Interval (in work days)
1	1
2	2
3-5	3
6-14	4

This version of the table will be used to respond to the latest inquiries from KPMG.

KPMG test results were not supported by the look-up tables and the outlined procedure in the original response to this exception.

Issue 1

1. **KPMG: Non-ISDN Resale (REQTYP E)** queries received intervals greater than 1 in 8 instances.

BellSouth: Since **Table 6** is used for **REQTYP E** and **M**, the use of the obsolete Table 6 had a direct impact on expected results. Using the table above, three of the test cases (**ACTTYP A**), with quantities of 3, correctly received the expected interval of three days. Two other test cases, also **ACTTYP A**, with quantities of 2, correctly received intervals of two days. For the **ACTTYP C** resale test cases, the timing of the order is the determining factor as indicated in Table 5. **These test cases did not require Table 6.** If the order is received before 3:00 PM the interval is set to 1, otherwise it is set to 2.

2. **KPMG: Loop with Number Portability (REQTYP B)** KPMG expected to receive an interval of 5 based on Table 6, but received an interval of 6.

BellSouth: **TABLE 6** applies only to **REQTYPs E** and **M**. The interval in this situation was dictated by information contained in Table 3, as directed by the table lookup procedure using Table 5. This test case and all listed **RECTYP C** test cases were processed using Release 2.2.0.8 and received a 5-day interval, per the system requirements.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 71

3. **KPMG: UNE Port (REQTYP F)** KPMG did not receive the expected three day interval for these test cases.

BellSouth: These test cases were processed using Release 2.2.0.8 and the expected 3-day interval was the result, per the system requirements.

Issue 2

KPMG: The expected response indicated in the look-up tables contradicts the expected response based on the BellSouth documentation.

BellSouth: All look-up tables have been verified to reflect the most recent version of the tables in the March 29, 1999 version of the interim due date procedures. Steps have also been taken to facilitate the synchronization of the interval information in the internal tables with the information in the BellSouth Product and Services Interval Guide.

Issue 3

KPMG: KPMG questions the use of DSAP information since it is generally understood that the ISSUE 7 CDD query does not utilize back-end workload considerations.

TAG: The information relating to the work week, as it appears in several tables in the documentation, is information provided to TAG by the customer. This information may have been obtained or derived by the customer using DSAP information. There is no direct use of DSAP in the TCIF 7 implementation of the due date process.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 83



July 14, 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 AMENDED 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. Because 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.

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 87



July 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:

Computation instructions provided by BellSouth for thirteen PMAP Service Quality Measurements (SQMs) are inconsistent with the information provided in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*¹.

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 comparing the instructions provided by BellSouth³ for computing SQMs to their definitions as documented in the *SQM Reports*⁴ in order to assess their consistency.

1. Ordering – *Firm Order Confirmation Timeliness*

For the *Firm Order Confirmation Timeliness* SQM, the second exclusion listed in the *SQM Reports*, "Partially Mechanized or Non-Mechanized LSRs received and/or FOC'd outside of normal business hours," is not addressed either in the computation instructions or in the raw data creation process.

When Local Service Requests (LSRs) are either confirmed or received outside of normal business hours, the date confirmed/received as recorded in the BellSouth systems is converted to a date falling within business hours. Therefore, such service requests are included when computing the *Firm Order Confirmation Timeliness* SQM, and the second

¹ Relevant PMAP SQM information is documented in the Definitions, Exclusions, Calculation and Business Rules sections of the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*.

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

⁴ KPMG used the 10/22/99 version of the *SQM Reports* as a basis to perform this test. KPMG also took into consideration changes published in the 2/24/00 version of the *SQM Reports*.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 87

exclusion listed in the *SQM Reports* is inconsistent with the computation instructions provided by BellSouth.

2. Ordering – Percent Rejected Service Requests

For the *Percent Rejected Service Requests* SQM, the exclusion listed in the *SQM Reports*, “Service Requests cancelled by the CLEC prior to being rejected/clarified,” is not addressed either in the computation instructions or in the raw data creation process.

Service requests cancelled by the CLEC prior to being rejected or clarified manually are automatically excluded from the numerator when calculating this SQM, since such service requests would not generate rejection records. However, KPMG could not find instructions to exclude cancelled service requests from the denominator of the SQM (“service requests received during the reporting period”). Therefore, the exclusion listed in the *SQM Reports* is inconsistent with the computation instructions provided by BellSouth.

3. Ordering – Reject Interval

For the *Reject Interval* SQM, the computation instructions do not include fatal rejects when computing this SQM for the fully mechanized category. The *SQM Reports* specify that fatal rejects are included in the fully mechanized category⁵. Since fatal rejects are effectively instantaneous, the numerator (time interval) would be unchanged. However, the denominator (volume) would differ from its current calculation by the number of fatal rejects.

4. Provisioning – Percent Provisioning Troubles within 30 days of Service Order Activity

KPMG identified two inconsistencies between the computation instructions and the *SQM Reports*:

- The instructions provided by BellSouth prescribe excluding trouble records for which `cause_id < 0`.⁶ Some of the records excluded through this operation are consistent with exclusions stated in the *SQM Reports* (“cancelled and non-customer generated troubles”). However, this also excludes troubles due to Customer Provided Equipment (“CPE”), which is not listed as an exclusion in the *SQM Reports*.
- The *SQM Reports* describe the denominator of this SQM as “all service orders completed in the report calendar month,” and does not list an exclusion for provisioning appointments on which the customer requested a later due date. The instructions for denominator computation provided by BellSouth prescribe excluding records for which `so_cmtt_cd = “L”` from the “Provisioning: Order Completion

⁵ *SQM Reports*, Business Rules section.

⁶ Step 2 of the *PMAP Raw Data User Manual – Troubles Within 30 Days of Provisioning (Non Trunks)*.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 87

Interval” raw data file.⁷ Such records are associated with service orders that were not provisioned on the committed due date because the customer requested that the provisioning appointment be postponed (so_cmmt_desc_dd = “Customer request later due date”). Subsequently the instructions prescribe including records for which so_cmmt_type_cd = 1.⁸ This results in keeping only records with an original due date, thereby excluding all records with subsequent due dates. The effect of these stipulations is to exclude (among other records) all service order records relating to original provisioning appointments for which the customer requested a later due date.

5. Provisioning – Total Service Order Cycle Time

For the *Total Service Order Cycle Time* SQM, the fourth exclusion listed in the *SQM Reports* – “L Appointment coded orders” – is not addressed either in the computation instructions or in the raw data creation process.

6. Provisioning – Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices

For the *Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices* SQM, none of the exclusions listed in the *SQM Reports* are addressed in either the computation instructions or the raw data creation process.

7. Provisioning – Average Completion Notice Interval

For the *Average Completion Notice Interval* SQM, KPMG identified two inconsistencies between the computation instructions and the *SQM Reports*:

- The instructions provided by BellSouth prescribe including records for which “tsocs_mthd_acqstn = 0, 1 or 2.”⁹ This equates to excluding non-mechanized orders (tsocs_mthd_acqstn = 3, 4 or 5), which is consistent with exclusions listed in the *SQM Reports*; excluding mechanized orders acquired through TAG (tsocs_mthd_acqstn = 6); and excluding all partially mechanized orders (tsocs_mthd_acqstn = 7, 8 or 9) acquired through any interface. The *SQM Reports* does not list mechanized orders acquired through TAG and partially mechanized orders as exclusions for this SQM.
- This SQM is computed from the “Provisioning: Average Completion Notice Interval raw data file.” BellSouth has described this file as providing “all service orders within a given reporting period.” Both the computation instructions and the raw data creation process call for orders to be limited to those completed before the end of the reporting period. However, there are no instructions to exclude orders completed before the beginning of the reporting period. The *SQM Reports* specifically state that

⁷ Step 7 of the *PMAP Raw Data User Manual – Troubles Within 30 Days of Provisioning (Non Trunks)*.

⁸ Step 8 of the *PMAP Raw Data User Manual – Troubles Within 30 Days of Provisioning (Non Trunks)*.

⁹ Step 3 of the *PMAP Raw Data User Manual – Average Completion Notice Interval*.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 87

the denominator of this SQM should be the number of orders completed during the reporting period.

8. Provisioning – *Mean Held Order Interval*

For the *Mean Held Order Interval* SQM, KPMG identified three inconsistencies between the computation instructions and the *SQM Reports*:

- In computing this SQM, the instructions provided by BellSouth prescribe including records for which “so_cmmt_cd = ‘W, X, F, L, or is null’”¹⁰. This computation excludes records for the appointment code “so_cmmt_cd is ‘C, Y and Z,’” which are listed as exclusions in the *SQM Reports* (BellSouth internal/administrative orders). However, the computation also excludes records for which the appointment code is ‘A’ (Special construction in rural area), and M (Work stoppage), which are not listed as exclusions in the *SQM Reports*.
- The instructions provided by BellSouth prescribe including only records for which “so_missed_cmmt_cd begins with a ‘C’.”¹¹ These records represent appointments missed due to BellSouth reasons. However, records for which “so_missed_cmmt_cd begins with an ‘E’” represent appointments missed due to BellSouth reasons as well. Therefore, not all of the appointments missed due to BellSouth reasons are included in this SQM. This is inconsistent with the *SQM Reports* which specify that “all held orders for BST reasons” should be included in this SQM.
- The instructions provided by BellSouth prescribe computing the “held duration” as the difference between the report end date and the earliest commitment date for each service order.¹² This is inconsistent with the *SQM Reports* which specify that “held order interval” is computed on service orders that are not complete and passed the currently committed due date.¹³ Service orders might be associated with various commitment dates as provisioning appointments are missed or postponed. The currently committed due date logically implies the latest or most up-to-date committed due date rather than the earliest committed due date.

9. Provisioning - *Mean Held Order Interval and Distribution Interval, and Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices*

For the *Mean Held Order Interval and Distribution Interval, and Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices* SQMs, the computation instructions provided by BellSouth prescribe excluding orders for disconnection of service (so_type_cd = “D”), which is not listed as an exclusion in the *SQM Reports* for either SQM.

¹⁰ Step 5 of the *PMAP Raw Data User Manual – Held Order Interval*.

¹¹ Step 6 of the *PMAP Raw Data User Manual – Held Order Interval*.

¹² Step 8 and 7 of the *PMAP Raw Data User Manual – Held Order Interval*.

¹³ See Business Rules section for *Provisioning – Mean Held Order Interval and Distribution Interval* in the *SQM Reports*.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 87

10. Provisioning – *Service Order Accuracy*

Computation instructions for the *Service Order Accuracy* SQM provided by BellSouth indicate that for large sample sizes of service orders¹⁴, when a service request cannot be matched with a specific service order, it is not identified as inaccurate (by default, it becomes classified as an order completed without error) in the numerator, but it is still counted in the denominator. This is inconsistent with the *SQM Reports*.

11. Maintenance and Repair – *Percent Repeat Trouble Within 30 Days*

According to the *SQM Reports*, the *Percent Repeat Trouble Within 30 Days* SQM includes "Customer trouble reports received within 30 days of an original customer trouble report".¹⁵ The instructions provided by BellSouth prescribe counting the number of closed trouble tickets reported during the reporting month that were identified as a repeat trouble. Repeat trouble is defined as any trouble that has previously been reported.

KPMG identified two inconsistencies between the computation instructions and the *SQM Reports*:

- Computation instructions include only closed trouble reports in the numerator of the SQM, while the *SQM Reports* describe this SQM as including all troubles reported during the reporting month (i.e. including pending trouble reports).
- Computation instructions prescribe including repeat troubles that occur during the reporting month (without further qualification), while the *SQM Reports* describe the SQM as including only repeat troubles within 30 days of an original customer trouble report.

12. Maintenance and Repair – *Customer Trouble Report Rate*

Computation instructions for the *Customer Trouble Report Rate* SQM include only closed trouble reports in the numerator, while the *SQM Reports* describe the calculation as including all initial and repeated troubles reported during the reporting period (i.e., including pending trouble reports).

13. Maintenance and Repair – *Maintenance Average Duration*

Computation instructions for the *Maintenance Average Duration* SQM prescribe counting all closed trouble tickets received within the reporting period in the denominator, while the *SQM Reports* describe it as the count of trouble tickets closed during the reporting period (some of which might have been received prior to the reporting period).

¹⁴ A "large" sample size is described in the *SQM Reports* as consisting of 200 or more service orders.

¹⁵ *SQM Reports*, *Business Rules* section.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 87

Impact

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. If SQM computation instructions differ from the steps taken by BellSouth to produce the SQMs, CLECs' will not correctly interpret the SQMs, as calculated.

BellSouth Response

Ordering – Firm Order Confirmation Timeliness

KPMG is correct, the LSRs were included in the reports but weekend hours were excluded. Based on Carrier Notification SN91081623, the hours of operation in the LCSC changed on February 1, 2000. The SQM was updated in the May 2000 SQM to correct the Exclusion and will reflect the new LCSC hours of operation. The Raw Data User Manual will also be updated for May 2000 to correct the Exclusion.

The SQM update dated May 2000 includes the following Exclusions:

- Rejected LSRs
- Designated Holidays
- The following hours for Non-mechanized LSRs*:
 - Residence Resale Group – from 10:00 PM EST Saturday until 7:00 AM EST Monday
 - Business Resale, Complex, UNE Groups – from 8:00 PM EST Friday until 8:00 AM EST Monday
 - IPC – 4:30 PM CST Friday until 8:00 AM CST Monday

* The hours excluded will be altered to reflect changes in the Center operating hours.

The SQM update scheduled for July 2000 will contain the following Exclusion:

- The following hours for Non-mechanized LSRs are excluded from the interval computation:
 - Residence Resale Group – from 10:00 PM EST Saturday until 7:00 AM EST Monday
 - Business Resale, Complex, UNE Groups – from 8:00 PM EST Friday until 8:00 AM EST Monday
 - IPC – 4:30 PM CST Friday until 8:00 AM CST Monday
 - Designated Holidays

PMAP is not currently excluding weekend hours from the Interconnection Trunk Ordering (Reject Interval and FOC Timeliness) Reports. The following "bullet" will be deleted from the July 2000 SQM update:

- IPC – 4:30 PM CST Friday until 8:00 AM CST Monday

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 87

Change Request 5986 was submitted on July 17, 2000 to exclude weekend hours from the Interconnection Trunk reports for Reject Interval and FOC Timeliness. BellSouth has scheduled this Change Request to be worked no later than September 15, 2000.

Ordering – Percent Rejected Service Requests

Changes made to the code in November 1999 created the problem delineated in the Exception. On March 15, 2000, the discrepancy was identified and a Change Request opened. That Request, #5705, was worked with the May upload of April data. Therefore, LSRs that are canceled by the CLEC prior to being rejected/clarified, are now excluded from the data.

The exclusion of Service Requests canceled by the CLEC prior to being clarified / rejected is done from Staging to NODS and therefore, not included in PMAP raw data.

The following is included in the Resolution of Change Request 5705:

The job that was affected by this change was ORSNSRqLon. This change was made and ran in May/April data. Exclusions done from Staging to NODS, does not affect the Raw Data Users Manual.

A copy of CLOSED Change Request #5705 with information from Issue Tracker was provided to KPMG on July 20, 2000.

Ordering – Reject Interval

In the May 2000 SQM, the Business Rules were amended to delete the reference to Fatal Rejects. The Reject Interval Definition reads "Reject Interval is the average reject time from receipt of an LSR to the distribution of a Reject. An LSR is considered valid when it is submitted by the CLEC and passes edit checks to insure the data received is correctly formatted and complete." When a "Fatal Reject" occurs, a valid LSR is not created, therefore, Fatal Rejects should not be included in the calculation.

Provisioning – Percent Provisioning Troubles within 30 days of Service Order Activity

The following exclusion will be added to the next SQM update scheduled for July 2000:
"*Exclude all troubles caused by CPE (Customer Provided Equipment)."

This report measures all completed service orders, so the "L" exclusion does not apply. The original raw data guide did refer to excluding "L" and that entry was removed in the May 15, 2000 version of the Raw Data User Manual.

Provisioning – Total Service Order Cycle Time

This exclusion was added to the May 15th version of the Raw Data User Manual in Step 2 as: **"Exclude any records where so_cmtt_cd = 'L'.**

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 87

Provisioning – Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices

BellSouth does not issue Jeopardy Notices for reasons other than facility delays. All records in the raw data for Average Jeopardy Notice Interval capture only orders that have been in jeopardy for facility delay (PF) and therefore, performing the actual exclusion of end user reasons is not needed. BellSouth does feel the note of excluding these orders is necessary to remove any question of customer caused delays being included in the report.

Regarding the non-mechanized order exclusion, BellSouth will remove this entry in the July 2000 version of the SQM. All orders are accessible through CSOTS for all CLECs to review status of their order. This measure reports the time the notice has been released to all systems including electronic systems for the CLECs and CSOTS and therefore the exclusion is no longer valid.

Regarding the order cancelled by the CLEC exclusion, BellSouth removed this entry in the May 2000 version of the SQM.

Provisioning – Average Completion Notice Interval

The following exclusion will be added in the July 2000 update of the SQM:

***Partially mechanized orders.**

In addition, orders received fully mechanized through TAG will be included in this measurement. The May 2000 update to the Raw Data User Manual now reflects the following instructions in Step 3: **'Include records that have a 0,1,2, or 6 in the tsocs_mthd_acqstn field.'** '6' represents fully mechanized orders received through TAG. Partially mech orders received through TAG are included in '9'.

The May 15th version of the Raw Data user manual was updated to change the entry in Step 4 to read: **'Include records with a cmplt_n_dt between the first and last day of the reporting month for which the raw data is valid'.**

Provisioning – Mean Held Order Interval

An exclusion will be added to exclude orders held for Special Construction in rural areas in the July 2000 update of the SQM manual. Service order commit codes of 'M' were added to computation in the May 15th Raw Data Users Manual as orders due to work stoppage would be considered held orders in the event of a strike.

"E" missed appointment codes have been added to all areas of the May 15th Raw Data User Manual that apply to so_missed_cmtt_cd of "C".

BellSouth attempts to complete the work on all held service orders as soon as possible. This sometimes necessitates trying different methods to provide service and may involve

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 87

more than one due date change depending upon facility work, situations regarding load or weather conditions, or equipment delays. This report measures if the order is held for company reasons on or after its current due date. An order may have had previous due dates that were held for company reasons and changed to the new due date to attempt to provide service. BellSouth reports the total held time from the first BellSouth caused missed appointment, using the current held reason for the current due date. BellSouth will update the SQM Business Rules and Calculation in the July 2000 SQM as follows:

Business Rules: Mean Held Order Interval: This metric is computed at the close of each report period. The held order interval is established by first identifying all orders, at the close of the reporting interval, that both have not been reported as completed in SOC's and have passed the currently committed due date for the order. For each such order, the number of calendar days **between the earliest committed due date on which BellSouth had a company missed appointment** and the close of the reporting period is established and represents the held order interval for that particular order. The held order interval is accumulated by the standard groupings, unless otherwise noted, and the reason for the order being held. The total number of days accumulated in a category is then divided by the number of held orders within the same category to produce the mean held order interval. The interval is by calendar days with no exclusions for Holidays or Sundays. CLEC Specific reporting is by type of held order (facilities, equipment, other), total number of orders held, and the total and average days.

Calculation: **Mean Held Order Interval:** $\Sigma(\text{Reporting Period Close Date} - \text{Earliest Committed Order Due Date with a BellSouth missed appointment}) / (\text{Number of Past Due Orders Held and Pending but not completed and Past The Committed Due Date}).$

Held Order Distribution Interval:

$(\# \text{ Of Orders Held for } \geq 90 \text{ days}) / (\text{Total } \# \text{ of Past Due Orders Held and Pending But Not Completed and past the committed due date}) \times 100$

$(\# \text{ Of Orders Held for } \geq 15 \text{ days}) / (\text{Total } \# \text{ of Past Due Orders Held and Pending But Not Completed and past the committed due date}) \times 100$

Provisioning - Mean Held Order Interval and Distribution Interval, and Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices

The exclusion of D and F (total disconnect and from disconnects on transfer orders) will be added to the July 2000 version of the SQM for Jeopardy Notice Interval. These orders were not mentioned in the previous SQM's as they apply to disconnects which are worked on the due date requested by the subscriber and would not be placed in jeopardy for company reasons.

However, it is not necessary to exclude D & F orders from Held Order Interval, as they would not be counted in this measure or in the base of orders.

Orders are held for company reasons and this does not affect D&F orders. As these are disconnect orders placed at the customer request, they are worked on the requested due date. Held Order is a Mean Interval report that only calculates orders that are held and

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 87

does not use the base of total orders which would include D&F orders. Therefore, since D&F orders are not considered in the calculation of the interval, as they are not held, it is not deemed necessary to specify they are excluded. BellSouth has clarified this policy for KPMG and will update the SQM, in the July 2000 version, to say that D&F orders are excluded.

Provisioning – Service Order Accuracy

The following statement will be added to the July 2000 version of the SQM: "For both small and large sample sizes, when a Service Request cannot be matched with a corresponding Service Order, it will not be counted. For small sample sizes an effort will be made to replace the service request."

Maintenance and Repair – Percent Repeat Trouble Within 30 Days

The definition will be updated in the July 2000 SQM version. 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 Calculation and Business Rules will be updated in the July 2000 SQM version. 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**

The updated Business Rules will read: **Closed customer troubles received within 30 days of an original closed customer trouble report.**

LMOS uses a flag to score troubles that have met the requirements of a repeat. When a original trouble report has been received and closed and a second trouble is received, LMOS waits for the completion of the second trouble and then looks at the issue date of the repeat and if this trouble report is within 30 days, strokes the flag with a one.

Maintenance and Repair – Customer Trouble Report Rate

The Definition, Business Rules, and Calculation for the *Customer Trouble Report Rate* SQM will be updated in the July 2000 SQM version. They will read as follows:

Definition: **Initial and repeated customer direct or referred troubles closed within a calendar month per 100 lines/circuits in service.**

Business Rule: **Customer trouble report rate is computed by accumulating the number of maintenance initial and repeated trouble reports closed in the reporting period.**

Calculation: **Customer Trouble report rate = (Count of initial and repeated trouble reports closed in the current period) / (Number of service access lines in service at the end of the report period) X 100**

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 87

For Maintenance measurements, all trouble reports must be closed to be counted in both the WFA and LMOS systems. This process ensures that only valid trouble reports are included in the measurement. For example, trouble reports that are cancelled by the customer or excluded by BellSouth (due to a non-telephone problem) would not be valid trouble reports.

Maintenance and Repair – Maintenance Average Duration

The actual computation for the Maintenance Average duration SQM prescribes counting all closed troubles tickets within the reporting period in the denominator.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 88



July 12, 2000

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the Metrics Change Management Verification and Validation Review (PMR-3).

Exception:

BellSouth does not have a clearly defined change management process for the *PMAP Raw Data User Manual*.

Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of Service Quality Measurement values (SQMs) 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.

The instructions for calculating certain SQM values are contained in the *PMAP Raw Data User Manual*. BellSouth publishes the manual and the corresponding raw data to provide CLECs with the ability to calculate their SQM values independently and thus verify the reports. BellSouth has indicated that updates to the manual are typically made after the close of a PMAP production cycle. Updates are posted on the PMAP Web site.

KPMG observed that BellSouth lacks a clearly defined change process for managing synchronization between the SQM report production process and updates to the *PMAP Raw Data User Manual*. By definition, the instructions contained in the *PMAP Raw Data User Manual* should be synchronized with the PMAP validation scripts to ensure that SQM calculation procedures are accurate and complete.

BellSouth personnel informed KPMG that the change management process for the *PMAP Raw Data User Manual* is separate from the change management process for PMAP itself. Changes to the *PMAP Raw Data User Manual* are driven by changes to the raw data validation scripts, which are used during the PMAP production cycle to ensure that the SQM reports can be replicated using the raw data. BellSouth personnel informed KPMG that BellSouth ensures that the *PMAP Raw Data User Manual* is synchronized with the validation scripts². However, BellSouth did not provide documentation of the procedures followed to ensure that this synchronization is accomplished.

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

² If an SQM definition is changed in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*, a corresponding change must be made to the PMAP validation scripts. Failure to change the validation scripts will cause an error in the validation process.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 88

Impact

BellSouth's lack of documented management process for the *PMAP Raw Data User Manual* may hinder its ability to deliver a useable document to the CLECs. Without a properly updated manual, CLECs may encounter difficulty in replicating their own reports, and may be unable to assess the quality of service received or plan for future business activities reliably.

BellSouth Response:

The Performance Measurement Group's Issue Management and Change Control Process Guide is being updated to incorporate the applicable Change Control Process. The update will broaden the scope of the guide to document the way issues and changes are tracked from instigation through completion. It will apply to all issues and changes that require formal tracking within the group and will include changes to the Raw Data User Guide. It is available to all members of the Performance Measurement Group on their PMAP Shared Drive.

Version 2.2 of the Issues Management and Change Control Process was released on 7/7/00. An electronic copy was provided to KPMG as a part of the response to this Exception.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 78



July 21, 2000

Exception:

BellSouth does not deliver timely Firm Order Confirmation (FOC) responses to flow through Local Service Requests (LSRs).

In response to Exception 78, BellSouth investigated a sampling of the PONs provided by KPMG as instances of late FOCs. Based on the timestamps derived from the BLS Local Exchange Ordering (LEO) system, BellSouth disputes the majority of timeliness results presented by KPMG.

KPMG reviewed the PONs for which BLS provided LEO timestamps to validate that the responses were not received following periods of KPMG/HP downtime. The following observations were noted:

Flow Through FOCs received via TAG

1. Two apparent instances of HP TAG Listener downtime were noted. Based on timestamps provided by BLS for the first delivery of the FOC, it is reasonable to assume the response was "on time".
2. BellSouth claims that 5 instances of late FT FOCs reported by KPMG are actually Non Flow Through transactions. KPMG obtained data on the flow through nature of PONs from BLS systems. Although BellSouth modified its Flow Through report definitions for the February report¹, transactions sent prior to the definitional change should be reviewed based on BellSouth's initial categorization. KPMG will report on the flow through nature of a transaction based on the rules in place when the order was sent. However, KPMG does note that if the 5 FT instances were reviewed from a NFT standpoint, only 1 would fall into the "on time" (received in under 36 hours) category. The remaining 4 transactions, if categorized as NFT, would be considered "late".
3. BellSouth identified one instance as a transaction used by KPMG during Interface Testing. This transaction was submitted following the completion of interface testing. Furthermore, the account used is a KPMG production account, not one provided by BLS on any test scripts.

Flow Through FOCs received via EDI

1. BellSouth claims that 5 transactions categorized as FT should be considered NFT. KPMG has verified that these transactions were considered FT at the time they were

¹ Under the Flow Through report changes, certain transactions previously categorized as flow through may now be considered non flow through.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 78

processed. As referenced above, KPMG will report on the flow through nature of a transaction based on the definitions in place when the order was sent.

2. Upon further review of one transaction (428A124PEJ100010 Ver 00 CC 9994), KPMG discovered that the same PON VER had been inappropriately submitted twice. Based on the timestamps associated with the latest transmission, the FOC response should be categorized as "on time". However, KPMG does note that if the 5 FT instances were reviewed from a NFT standpoint, 3 would fall into the "on time" (received in under 36 hours) category. The remaining 2 transactions, if categorized as NFT, would be considered "late".

BellSouth Response

Flow Through FOCs Received via TAG

1. Agree.
2. At the time of the test the BellSouth standard for delivery of FOC responses NFT LSRs was 85% within 48 hours. BellSouth reviewed the 5 FOCs reported by KPMG as FT. These LSRs were actually NFT. Of the 5 FOCs, 3 fell out due to system defects which have since been corrected, 1 fell out due to an incorrect account number provided by KPMG, and 1 appears to be due to a KPMG not activating the TAG Listener.
3. BellSouth records indicate this PON was NFT.

Flow Through FOCs Received via EDI

1. At the time of the test the BellSouth standard for delivery of FOC responses NFT LSRs was 85% within 48 hours. BellSouth reviewed the 5 FOCs reported by KPMG as FT. These LSRs were actually NFT. Of the 5 FOCs, 4 fell out due to system defects which have since been corrected.
2. At the time of the test the BellSouth standard for delivery of FOC responses NFT LSRs was 85% within 48 hours. Therefore the NFT LSRs studied were within the on time range.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 88



July 20, 2000

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the Metrics Change Management Verification and Validation Review (PMR-3).

Exception:

BellSouth does not have a clearly defined change management process for the *PMAP Raw Data User Manual*.

Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of Service Quality Measurement values (SQMs) 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.

The instructions for calculating certain SQM values are contained in the *PMAP Raw Data User Manual*. BellSouth publishes the manual and the corresponding raw data to provide CLECs with the ability to calculate their SQM values independently and thus verify the reports. BellSouth has indicated that updates to the manual are typically made after the close of a PMAP production cycle. Updates are posted on the PMAP Web site.

KPMG observed that BellSouth lacks a clearly defined change process for managing synchronization between the SQM report production process and updates to the *PMAP Raw Data User Manual*. By definition, the instructions contained in the *PMAP Raw Data User Manual* should be synchronized with the PMAP validation scripts to ensure that SQM calculation procedures are accurate and complete.

BellSouth personnel informed KPMG that the change management process for the *PMAP Raw Data User Manual* is separate from the change management process for PMAP itself. Changes to the *PMAP Raw Data User Manual* are driven by changes to the raw data validation scripts, which are used during the PMAP production cycle to ensure that the SQM reports can be replicated using the raw data. BellSouth personnel informed KPMG that BellSouth ensures that the *PMAP Raw Data User Manual* is synchronized with the validation scripts². However, BellSouth did not provide documentation of the procedures followed to ensure that this synchronization is accomplished.

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

² If an SQM definition is changed in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*, a corresponding change must be made to the PMAP validation scripts. Failure to change the validation scripts will cause an error in the validation process.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 88

Impact

BellSouth's lack of documented management process for the *PMAP Raw Data User Manual* may hinder its ability to deliver a useable document to the CLECs. Without a properly updated manual, CLECs may encounter difficulty in replicating their own reports, and may be unable to assess the quality of service received or plan for future business activities reliably.

BellSouth Response:

The Performance Measurement Group's Issue Management and Change Control Process Guide is being updated to correct this oversight. The update will broaden the scope of the guide to document the way issues and changes are tracked from instigation through completion. It will apply to all issues and changes that require formal tracking within the group. This will include changes to the Raw Data User Guide. It is available to all members of the Performance Measurement Group on their PMAP Shared Drive.

Version 2.2 of the Issues Management and Change Control Process was released on 7/7/00. An electronic copy was provided to KPMG representatives as a part of the response to this Exception.

This document fixed responsibility for updating the Raw Data Users Guide and maintaining contact with the data owners. In the future, the Raw Data Users Guide will be updated each time the SQMP is updated. SMEs and the programmers have been notified of these changes. The change requests must be properly annotated before they are closed. Examples of correctly annotated Change Requests were sent to KPMG as part of the response to this exception.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 89



July 14, 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.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 89

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.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 89

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.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 89

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

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 89

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.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 89

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.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 89

tracked on Excel spreadsheets with no built-in edit process. BellSouth is testing a web-based order interface that is designed to eliminate typographical errors as well as mitigate the errors caused by the manual preparation of these documents.

The resulting database will also serve as a collection point for tracking dates, further reducing the opportunity for human error. Tentative implementation is scheduled for late 2000.

As an additional interim step, BellSouth is using Collocation Program Managers in each state to facilitate the collocation process, by tracking dates, and removing roadblocks to completing collocation orders.

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

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 89

			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 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*

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.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 89

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 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.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 89

Trunk information is currently captured from two tables in EXACT (EXACT_seg1 and EXACT_seg2). The first table identifies the request for Trunks, the second table indicates Local Trunks opposed to Access Trunks, which are also ordered on ASRs. The log screens reviewed by KPMG didn't match because the site code is not currently captured from EXACT.

Change Request 5928 has been submitted to assure BST captures the correct data for each ASR in the future. It will be worked with June data to be posted to the Web in July.

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 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.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 89

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_cmmt_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_cmmt_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_cmmt_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

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 89

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', 'NO1MTCPO', '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
NO1MTCPO	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 SECOND 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 SECOND AMENDED RESPONSE TO
EXCEPTION 89**

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 92



July 14, 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.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 92

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*

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

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 92

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-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.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 92

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.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 92

(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	This is a listing order - no work performed, therefore, this is not reported

ELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 92

			block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records	on.
2G6	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.
7P3	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.
WT6	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.
Y26	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/PMI TROUBLES WITHIN 30 DAYS - This record has a status of "pending". These measurements only report on completed orders.

omer
within 30

/FA
'S:

ition code
invalid
atch, was
caused a
s) are
carrier
e carrier
w data.
ess of
m criteria:

same data

);

above
he
ll
ach bill.
th that
and was

ort for 1st
column.
report,

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 92

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 implementation date of the final mechanization for CABS Billing Account Numbers is scheduled for September 2000, however the manual process for review is currently in place to be tested.

(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.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 92

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.

The Spreadsheets produced by Bill Distribution for the BellSouth Aggregate billing raw data are checked for reasonableness. The errors identified in the October 1999 data were the result of human error. The spreadsheet providing the incorrect state percentages has been corrected and manually reviewed. Bill Distribution will continue to do random reasonableness checks in the future to ensure accurate reporting.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 16



July 12, 2000

EXCEPTION REPORT

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

Exception:

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

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

Undocumented Charges

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

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

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

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 16

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

Representative occurrences of errors are detailed on the following invoices:

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

USOC UEAC2¹: BellSouth billed the KPMG CLEC for the monthly recurring charge and non-recurring charge for the USOC UEAC2 (2-Wire Cross-Connect for Provisioning) at a rate of \$0.00. The non-recurring and monthly recurring rate assessed by BellSouth for the USOC UEAC2 for SL1 loops is not listed in the rate spreadsheets created for the KPMG CLEC in lieu of an Interconnection Agreement. In addition, this USOC is not defined in applicable BellSouth tariffs.

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

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

Incorrect Rates

USOC UEAL2²: BellSouth billed the KPMG CLEC a \$0.00 monthly recurring charge for the USOC UEAL2. The USOC UEAL2 is listed in the rate spreadsheet as a monthly recurring charge of \$19.57 for SL2 Loops and \$16.51 for SL1 Loops. This USOC is not defined in applicable BellSouth tariffs.

Representative occurrences of this error are detailed below.

<u>Q-Account</u>	<u>Circuit ID</u>	<u>Invoice Date</u>
706 Q85-4226 226	50.TYNU.500910	10/17/99
706 Q85-4226 226	50.TYNU.500911	10/17/99
706 Q85-4226 226	50.TYNU.501081	01/17/00
706 Q85-4226 226	50.TYNU.500896	01/17/00

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

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 16

Mislabeled Information

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

Impact

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

- **Altering expected operating costs.** All applicable charges should appear in Interconnection Agreements or in BellSouth Intra-State or Inter-State tariff documentation. By not adhering to rate documentation, BellSouth alters a CLEC's expected operating costs, and could affect CLEC budgetary planning and related activities.
- **Increased resource usage.** Regardless of the net monetary effect of incorrect charges upon a CLEC's bills, a CLEC will be forced to regularly reconcile these bills – identifying and correcting the incorrect charges and discovering and disaggregating mislabeled charges. The necessity of an extensive validation of each bill will increase CLEC resource utilization, thereby increasing operating costs.

BellSouth Response

Undocumented Charges – USOC VE1R2

The standard interconnection agreements refer to the parties to the applicable tariffs in cases where specific rates are not provided in the agreement. For Virtual Collocation, the tariff is the F.C.C. Tariff No. 1. However, no service comparable to a DS0 cross-connect is described in the F.C.C. Tariff No. 1. To resolve this gap, rates for this specific USOC were developed by the Virtual Interconnection Product Team. A recurring rate of \$0.30 per month was established for use when this service was ordered by and provisioned for a customer. The USOC, VE1R2, was added into the applicable rating tables in advance of an approved tariff and was incorrectly set to apply the resale discount. This setting was removed on 2/23/00 and all occurrences of the discounted rate on CLEC accounts will be revised to reflect this change.

BellSouth is in the process of developing a different USOC for DS0 cross-connects. All occurrences of the VE1R2 USOC will be converted once internal end-to-end testing has been completed. Since the new USOC is still under development, a tentative implementation date is not known at this time.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 16

Undocumented Charges – USOC SOME

An Interconnection Agreement was not signed with the initial Test Manager. Rates for USOCs for individual services were updated to the appropriate billing tables only for those services expected to be ordered during the test. A mistake was made which caused a mismatch between CRIS and CABS for the USOC SOME. If a standard interconnection agreement had been used as the authorization for the services ordered by the test manager, the contract implementation processes would have caused the appropriate rate to be loaded for this USOC in both CRIS and CABS.

A new edit will be implemented in October, 2000 which will error any UNE service order processed in CRIS for which a customer specific rate entry has not been added to the billing rate tables. This additional control will insure that all appropriate USOCs have been added for each CLEC prior to a service order being completed. This edit currently exists in CABS and, therefore, no corrective action is required for service orders processed through that system.

An interim process was developed to insure accurate USOC rating will occur until the permanent edit solution is implemented. A new report was created and will be implemented on 7/17/00 which is to be reviewed each day for CRIS service orders processed using USOC rates not specifically loaded for the CLEC. The report will be analyzed to determine if the CLEC is ordering services either not covered in the agreement (which then will be discussed with the CLEC) or services for which rate table entries were inadvertently omitted.

Undocumented Charges – USOC UEAC2

An Interconnection Agreement was not signed with the initial Test Manager. Rates for USOCs for individual services were updated to the appropriate billing tables only for those expected to be ordered during the test. For USOC UEAC2 a mistake was made in that USOCs for cross connects were not included in the rate tables. If a standard interconnection agreement had been used as the authorization for the services ordered by the test manager, the contract implementation processes would have caused the appropriate rate to be loaded for this USOC.

A new edit will be implemented in October, 2000 which will error any UNE service order processed in CRIS for which a customer specific rate entry has not been added to the billing rate table. This additional control will insure that all appropriate USOCs have been added for each CLEC prior to a service order being completed. This edit currently exists in CABS and, therefore, no corrective action is required for service orders processed through that system.

Incorrect Rates – USOC UEAL2

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 16

Due to an error in loading the rate tables the USOC, UEAL2, was updated to the CRIS rate tables only for residence classes of service. The accounts which contain these USOCs are defined as business accounts. As such, the rate defaulted to zero. The USOC was added to the CRIS rate file for business classes of service on 3/1/00. This will correct the rates on a going forward basis. BellSouth plans to have all occurrences of the USOC on CLEC accounts revised to reflect this charge by 3/17/00.

Mislabeled Information

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

The aggregation of adjustments seen on the "J" bills is identical to the manner in which these types of transactions are aggregated in the billing systems for retail customers. As such, BellSouth is providing parity of service to its retail and resale customers.

The three adjustments requested by KPMG were entered as a combined adjustment; i.e. the LCSC representative added the three amounts together and entered one adjustment "voucher" due to a misunderstanding by the Billing Manager. However, individual adjustments are normally processed unless the CLEC requests an aggregated adjustment.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 84



July 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 THIRD 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. These orders are issued and worked/completed on same day. They can be either flow through orders (no field work-non-dispatched) or field orders (dispatched)."

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 84

The Calculation will be corrected to read: " Σ (Completion Date of Service Order) - (Date of Service Request Receipt) / (Count of Orders Completed in Reporting Period)"

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. These orders are issued and worked/completed on same day. They can be either flow through orders (no field work-non-dispatched) or field orders (dispatched)."

The Calculation 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 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'S THIRD AMENDED RESPONSE TO EXCEPTION 84

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:

<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.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 89



July 20, 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.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 89

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.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 89

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.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 89

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 89

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.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 89

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-BW1-01	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.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 89

tracked on Excel spreadsheets with no built-in edit process. BellSouth is testing a web-based order interface that is designed to eliminate typographical errors as well as mitigate the errors caused by the manual preparation of these documents.

The resulting database will also serve as a collection point for tracking dates, further reducing the opportunity for human error. Tentative implementation is scheduled for late 2000.

As an additional interim step, BellSouth is using Collocation Program Managers in each state to facilitate the collocation process, by tracking dates, and removing roadblocks to completing collocation orders.

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. 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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 89

			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 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:

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.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 89

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 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.

Trunk information is currently captured from two tables in EXACT (EXACT_seg1 and EXACT_seg2). The first table identifies the request for Trunks, the second table

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 89

indicates Local Trunks opposed to Access Trunks, which are also ordered on ASRs. The log screens reviewed by KPMG didn't match because the site code is not currently captured from EXACT.

Change Request 5928 has been submitted to assure BST captures the correct data for each ASR in the future. It will be worked with June data to be posted to the Web in July.

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 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.

As indicated in Table 1 below, the earliest system for the "Cut Start" and "Cut Complete" times is CCSS. WFA-C is the earliest system for the "Completion Date" and "# Items". A program is run which extracts the respective data from CCSS and WFA-C and creates a data file for use in preparing the CCC report.

**Table 1: Data Fields from "CCCMAY00.xls"
Under Examination**

	Raw Data Field	Corresponding Field in Earliest System
1	Completion Date	WFA-C OSSOID screen "EVT" field = "DD" + "CMP DATE" field, see example below.
2	# Items	WFA-C OSSOID screen "ITEM"
3	Cut start	CCSS system "Cut Started" field
4	Cut comp	CCSS system "Cut Completed" field
5	Cut comp	Is this a duplicate of item 4?

As requested to clarify the explanation of the Exception, screen prints from CCSS for obtaining the "Cut Start" and "Cut Complete" data were sent to KPMG in a separate file on 7/20/00. Following each CCSS screen print is the WFA-C screen print(s) for determining the "# Items" and "Completion Date".

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 89

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 necessary to start with the December 1999 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.

**BELLSOUTH'S THIRD AMENDED RESPONSE TO
EXCEPTION 89**

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 89

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_cmmt_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_cmmt_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_cmmt_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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 89

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 THIRD 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 THIRD AMENDED RESPONSE TO
EXCEPTION 89**

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 92



July 21, 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.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 92

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.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 92

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

During normal operations activities, BellSouth discovered an omission of problem records related to SL13GTWY (LEO-EDI). Corrections were made to the database in March 2000. As a result there is a discrepancy in outage reporting for the LEO-EDI application components between September 1999 and February 2000. Additionally, there are two BSIS (MARCH) records included in this report that were not included in the January OSS Interface Availability 302 Report.

KPMG found that the Raw Data from December was incomplete. KPMG issued another raw data request for the same Pre-Ordering OSS Interface Availability to review March 2000. KPMG reviewed March 2000 raw data request for the same Pre-Ordering OSS Interface Availability and did not find any discrepancies.

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

Only one of the 25 ASRs provided to KPMG is a valid Local Access Message Trunk.

Local Trunks are identified by:

Reqtyp[1,1] = 'M' and

ECCKT[12,1] = 'J' (ECCKT[12,1] = TRKMOD[1,1])

Item 16, ASR = 9928800124 PON = A473 is the only one that meets the Local Trunk criteria. This ASR is not loaded into the PMAP system because it fails to meet criteria - Date Confirmed (D_CNF) is greater than Date Received (D_REC). Date variables "D_REC" & "D_CNF" do not include time, only month, day and year. Because it is not loaded into PMAP, it's not included in the Raw Data provided by PMAP.

Item 20, ASR = 9928800124 PON = 04269123-D9998 is not a valid Local Trunk. It is included in the Early Stage Data (PMAP Raw Data) due to an error in the logic. As ASR is unique within an EXACT Site. EXACT% Source Data is extracted as two tables, STAG_EXACT_SEG1 and STAG_EXACT_SEG2. These two tables are currently joined using ASR. Both tables contain ASRs from all 5 EXACT Sites

Change Request 5928 was submitted on 6/21/00 to assure BST captures and reports correct data for each ASR in the future. It is scheduled to be worked with June data to be posted to the Web in July.

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 92

BellSouth's response is broken into two individual responses for each record in question. Record identifier information that was provided to BellSouth by KPMG is also included for each record.

Record #1

Record	LON	OCN	PON	VER
1	2816098	7050	20-00039790A	0

This record is not in the PMAP database because certain selection criteria are not met. As certain selection criteria were not met, this record will not be stored in PMAP and will be diverted to a temporary error table. This record is not included in raw data because it is not stored in PMAP.

The text shown below in *italics* lists the selection criteria that caused this particular record to fall out to an error table. The table immediately following the italicized text shows partial detail about this particular record and includes the reasons that caused each field in the record to error out.

*IF (SUP = 1 and IsNull(FIRST_CLAR_DT)) Then 0 Else 1
and (
((FIRST_RCVDT > '01-Jan-1997') AND (isnull(FOC_DATE)))
or
(not(isnull(FOC_DATE)) and (LAST_RCVDT < FOC_DATE) and isnull(FIRST_CLAR_DT))
or
(not(isnull(FIRST_CLAR_DT)) and (FIRST_RCVDT < FIRST_CLAR_DT)))*

Field Name	Field Value	Error Description
first_rcvd	1999-10-15 10:49	Only include LSR's that have not been Clarified or that were Clarified after the LSR was First Received
last_rcvd	1999-10-21 15:50	Only include LSR's that are not Firm Order Confirmed or that were Firm Order Confirmed after the LSR was Last Received
Foc_date	1999-10-21 15:50	Only include LSR's that are not Firm Order Confirmed or that were Firm Order Confirmed after the LSR was Last Received
first_clar_dt		Only include LSR's that have not been Clarified or that were Clarified after the LSR was First Received

Record #2

Record LON OCN PON VER
2 2816295 7268 W1929

9

The OCN of '7268' is not a valid OCN number in PMAP and therefore this record fell out to an error table. Because this record is not included in the PMAP database it will not be included in raw data.

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.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 92

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	DPCRDP37	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 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.
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/PMI/TROUBLES WITHIN 30 DAYS - This record has a status of "pending". These measurements only report on completed orders.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 92

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*

The component MRLM53BM is a redundant LMOS system to MRLM53AM. These components share the same hard drive therefore have the same data. Due to this arrangement both components are not on line at the same time. There are a total of 26 LMOS processors. These two components are for the Southeast Florida LMOS processor only. There are 24 other LMOS processors that cover the remaining 8 States and all of these processors also have redundant components.

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.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 92

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.

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 implementation date of the final mechanization for CABS Billing Account Numbers is scheduled for September 2000, however the manual process for review is currently in place to be tested.

(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.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 92

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.

The Spreadsheets produced by Bill Distribution for the BellSouth Aggregate billing raw data are checked for reasonableness. Th errors identified in the October 1999 data were the result of human error. The spreadsheet providing the incorrect state percentages has been corrected and manually reviewed. Bill Distribution will continue to do random reasonableness checks in the future to ensure accurate reporting.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 16



July 12, 2000

EXCEPTION REPORT

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

Exception:

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

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

Undocumented Charges

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

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

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

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 16

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

Representative occurrences of errors are detailed on the following invoices:

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

USOC UEAC2¹: BellSouth billed the KPMG CLEC for the monthly recurring charge and non-recurring charge for the USOC UEAC2 (2-Wire Cross-Connect for Provisioning) at a rate of \$0.00. The non-recurring and monthly recurring rate assessed by BellSouth for the USOC UEAC2 for SL1 loops is not listed in the rate spreadsheets created for the KPMG CLEC in lieu of an Interconnection Agreement. In addition, this USOC is not defined in applicable BellSouth tariffs.

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

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

Incorrect Rates

USOC UEAL2²: BellSouth billed the KPMG CLEC a \$0.00 monthly recurring charge for the USOC UEAL2. The USOC UEAL2 is listed in the rate spreadsheet as a monthly recurring charge of \$19.57 for SL2 Loops and \$16.51 for SL1 Loops. This USOC is not defined in applicable BellSouth tariffs.

Representative occurrences of this error are detailed below.

<u>Q-Account</u>	<u>Circuit ID</u>	<u>Invoice Date</u>
706 Q85-4226 226	50.TYNU.500910	10/17/99
706 Q85-4226 226	50.TYNU.500911	10/17/99
706 Q85-4226 226	50.TYNU.501081	01/17/00
706 Q85-4226 226	50.TYNU.500896	01/17/00

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

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 16

Mislabeled Information

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

Impact

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

- **Altering expected operating costs.** All applicable charges should appear in Interconnection Agreements or in BellSouth Intra-State or Inter-State tariff documentation. By not adhering to rate documentation, BellSouth alters a CLEC's expected operating costs, and could affect CLEC budgetary planning and related activities.
- **Increased resource usage.** Regardless of the net monetary effect of incorrect charges upon a CLEC's bills, a CLEC will be forced to regularly reconcile these bills – identifying and correcting the incorrect charges and discovering and disaggregating mislabeled charges. The necessity of an extensive validation of each bill will increase CLEC resource utilization, thereby increasing operating costs.

BellSouth Response

Undocumented Charges – USOC VE1R2

The standard interconnection agreements refer to the parties to the applicable tariffs in cases where specific rates are not provided in the agreement. For Virtual Collocation, the tariff is the F.C.C. Tariff No. 1. However, no service comparable to a DS0 cross-connect is described in the F.C.C. Tariff No 1. To resolve this gap, rates for this specific USOC were developed by the Virtual Interconnection Product Team. A recurring rate of \$0.30 per month was established for use when this service was ordered by and provisioned for a customer. The USOC, VE1R2, was added into the applicable rating tables in advance of an approved tariff and was incorrectly set to apply the resale discount. This setting was removed on 2/23/00 and all occurrences of the discounted rate on CLEC accounts will be revised to reflect this change.

BellSouth is in the process of developing a different USOC for DS0 cross-connects. All occurrences of the VE1R2 USOC will be converted once internal end-to-end testing has been completed. Since the new USOC is still under development, a tentative implementation date is not known at this time.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 16

Undocumented Charges – USOC SOMECH

An Interconnection Agreement was not signed with the initial Test Manager. Rates for USOCs for individual services were updated to the appropriate billing tables only for those services expected to be ordered during the test. A mistake was made which caused a mismatch between CRIS and CABS for the USOC SOMECH. If a standard interconnection agreement had been used as the authorization for the services ordered by the test manager, the contract implementation processes would have caused the appropriate rate to be loaded for this USOC in both CRIS and CABS.

A new edit will be implemented in October, 2000 which will error any UNE service order processed in CRIS for which a customer specific rate entry has not been added to the billing rate tables. This additional control will insure that all appropriate USOCs have been added for each CLEC prior to a service order being completed. This edit currently exists in CABS and, therefore, no corrective action is required for service orders processed through that system.

An interim process was developed to insure accurate USOC rating will occur until the permanent edit solution is implemented. A new report was created and will be implemented on 7/17/00 which is to be reviewed each day for CRIS service orders processed using USOC rates not specifically loaded for the CLEC. The report will be analyzed to determine if the CLEC is ordering services either not covered in the agreement (which then will be discussed with the CLEC) or services for which rate table entries were inadvertently omitted.

Undocumented Charges – USOC UEACH

An Interconnection Agreement was not signed with the initial Test Manager. Rates for USOCs for individual services were updated to the appropriate billing tables only for those expected to be ordered during the test. For USOC UEACH a mistake was made in that USOCs for cross connects were not included in the rate tables. If a standard interconnection agreement had been used as the authorization for the services ordered by the test manager, the contract implementation processes would have caused the appropriate rate to be loaded for this USOC.

A new edit will be implemented in October, 2000 which will error any UNE service order processed in CRIS for which a customer specific rate entry has not been added to the billing rate table. This additional control will insure that all appropriate USOCs have been added for each CLEC prior to a service order being completed. This edit currently exists in CABS and, therefore, no corrective action is required for service orders processed through that system.

Incorrect Rates – USOC UEAL2

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 16

Due to an error in loading the rate tables the USOC, UEAL2, was updated to the CRIS rate tables only for residence classes of service. The accounts which contain these USOCs are defined as business accounts. As such, the rate defaulted to zero. The USOC was added to the CRIS rate file for business classes of service on 3/1/00. This will correct the rates on a going forward basis. BellSouth plans to have all occurrences of the USOC on CLEC accounts revised to reflect this charge by 3/17/00.

Mislabeled Information

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

The aggregation of adjustments seen on the "J" bills is identical to the manner in which these types of transactions are aggregated in the billing systems for retail customers. As such, BellSouth is providing parity of service to its retail and resale customers.

The three adjustments requested by KPMG were entered as a combined adjustment; i.e. the LCSC representative added the three amounts together and entered one adjustment "voucher" due to a misunderstanding by the Billing Manager. However, individual adjustments are normally processed unless the CLEC requests an aggregated adjustment.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28



July 20, 2000

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.

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.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

Missing Completed Calling Card DUF Records (Representative List)

Date	Connect Time	To Number	Duration (minutes)	From Number
Nov 20	13:53	603 382-9705	1	770 933-8170
Nov 20	10:35	734 214-0024	1	706 236-9492
Nov 20	10:26	941 454-0643	15	912 741-6728
Nov 18	18:16	770 719-3611	3	912 741-7059
Nov 18	16:31	770 419-4300	2	706 722-2879
Nov 18	16:29	914 763-3670	1	706 236-9677
Nov 18	16:28	912 927-1626	1	706 236-9492
Nov 18	16:27	423 755-4880	18	706 722-6207
Nov 18	16:25	914 763-3670	1	706 236-9677
Nov 18	14:26	703 525-3367	1	770 933-8526
Nov 18	13:23	770 413-9398	1	912 746-7876
Nov 18	13:08	770 719-3611	1	912 746-7876

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

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

Missing Local Call DUF Records (Representative List)

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

Directory Assistance

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

Missing Directory Assistance DUF Records (Representative List)

Date	Connect Time	From Number	Local / Long Distance	Call Completion
Nov 18	15:00	706 236-9492	Local	Yes
Nov 18	15:10	706 236-9492	Local	Yes
Nov 18	15:25	706 236-9492	LD	Yes
Nov 18	14:53	706 236-9677	Local	Yes
Nov 18	15:01	706 236-9677	LD	Yes
Nov 18	13:55	912 741-5953	LD	Yes
Nov 18	14:13	912 741-5953	Local	Yes

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

Date	Connect Time	From Number	Local / Long Distance	Call Completion
Nov 18	17:13	912 741-7059	Local	No
Nov 18	17:27	912 741-7059	LD	Yes
Nov 19	08:54	706 236-9677	Local	Yes

WATS Calls

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

Missing WATS DUF Records (Representative List)

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

Long Distance Calls

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

Missing Long Distance DUF Records (Representative List)

Date	Connect	To	Duration	From

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

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:

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

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.**

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
40463330247	7067820745	40463330247	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

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.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

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	0:55:14	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

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

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

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
7067224955	7064110000	7067224955	4/26/2000	15:29:00	0:00:56

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration
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	7037235369	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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration
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
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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration
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.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

BellSouth Response

BellSouth's response regarding the "missing" DUF record makes use of assumptions concerning the presence or absence of call data in the files that were retained.

Investigation notes and a root cause code is listed by each call for the UNE-Retest Missing DUF. The Root Cause Code definitions, plus a summary of messages by Root Cause are shown below. In summary, 53% of the calls completed by KPMG were calls placed after fixes identified during the first DUF test were put into production on 5/30/00. BellSouth further determined, from switch recording records (verbatims), that KPMG logged a number of the calls supplied in this exception incorrectly (up to 47%) with an incorrect telephone number, day, or different times. Of these calls, BellSouth found all expected calls were delivered to KPMG. Code definitions are:

Root Cause Codes:

DUPL

Message is duplicate ONL, TNL, date, and time of another.

ERR-DL

Message errored – message deleted.

ERR-DL-DTN

Found with different TN. Errored and message was deleted.

ERR-SOT

Service Order Timing. UF049 error - local measured call trying to bill to flat rate (i.e., reseller) account. UNE guide not set up at time local usage was processed.

NFAS

Call not found as shown – found another CT at same time or close match that could be the call.

NFV

Ran verbatim – could not find call – checked ONL & TNL.

OUT

Found message sent out as shown (very close to time shown.)

OUT-DTN

Sent out - Different TN (ONL or TNL) than shown.

OUT-DDT

Sent out – Different date than shown.

OUT-DTM

Sent out – Different time than shown.

SOT-CABS

Service Order Timing – no UNE guide, message sent to CABS.

SOT-DROP

Service Order Timing. Drop in Rating Interface – Reseller Guide, incomplete call.

SOT-L-DROP

Service Order Timing. Drop in Local Stream Reseller Guide

ULC-DROP

Unanswered local call – dropped. No DUF record should be sent.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

Root Cause Codes with number of messages per code:

1	DUPL	Message is duplicate ONL, TNL, date, and time of another.
4	ERR-DL	Message errored – message deleted.
1	ERR-DL-DTN	Found with different TN. Errored and message was deleted.
1	ERR-SOT-LMC	Service Order Timing. UF049 error - local measured call trying to bill to flat rate (i.e., reseller) account. UNE guide not set up at time local usage was processed.
3	NFAS	Call not found as shown – found another CT at same time or close match that could be the call.
6	NFV	Ran verbatim – could not find call – checked ONL & TNL.
12	OUT	Found message sent out as shown (very close to time shown.)
23	OUT-DTN	Sent out - Different TN (ONL or TNL) than shown.
5	OUT-DDT	Sent out – Different date than shown.
4	OUT-DTM	Sent out – Different time than shown.
48	SOT-CABS	Service Order Timing – no UNE guide, message sent to CABS.
1	SOT-DROP	Service Order Timing. Drop in Rating Interface – Reseller Guide, incomplete call.
5	SOT-L-DROP	Service Order Timing. Drop in Local Stream Reseller Guide
1	ULC-DROP	Unanswered local call – dropped. No DUF record should be sent.

Color key:

GREEN =KPMG Logging error (54 calls)

Yellow = BellSouth problems where fix was installed after retest calls were made(61 Calls)

Code	Occurrences	Percentage of Analysis Universe	Percentage of Total Universe (% of Analysis *0.27)
Received by KPMG	N/A	N/A	73.0
DUPL	1	1	0.2
ERR-DL	4	3	1.0
ERR-DL-DTN	1	1	0.2
ERR-SOT-LMC	1	1	0.2
NFAS	3	3	0.7
NFV	6	5	1.4

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

OUT	12	10	2.8
OUT-DTN	23	20	5.4
OUT-DDT	5	4	1.1
OUT-DTM	4	3	1.0
SOT-CABS	48	42	11.3
SOT-DROP	1	1	0.2
SOT-L-DROP	5	4	1.1
ULC-DROP	1	1	0.2
Total	115	99	99.8

BellSouth believes the retest reflects that the DUF process, as tested in April, 2000, provided 85.8% of the expected DUF records. The system changes implemented in May, 2000 dealing with the timing of service order activity and DUF record production will remove the final issues pertaining to the remaining 14.2% of the records.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Investigation Notes	BellSouth Root Cause Code
4046333616	7067821076	4046333616	4/27/2000	9:05:22	0:01:02	1. Ran verbatim – did not find call as shown. Do have CT 006 originating from 4046333674 to 7067821076 on 4/27, CTM 9:06:03. Message was sent out ODUF	OUT-DTN
7702269019	7066879983	7702269019	4/26/2000	11:32:32	0:01:12	2. Change from reseller to UNE. D cp 4/26 and post 4/27. N due 4/25, then SD 4/26, then SD 4/25. Appears misc input changed eff date to 4/25. Call is intraLATA, LPIC is 0288. Ran verbatim – found CT 110 CTM : 1132349, CTME: 1132282). Message was sent to CABS.	SOT-CABS
4046330247	7067820745	4046330247	4/26/2000	13:32:40	0:01:26	3. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Call is intraLATA. Verbatim shows CT 110 recorded – LPIC 0288. (CTM : 1332218, CTME: 1332042) Message was sent to CABS	SOT-CABS
7067224955	9122378723	7067224955	4/26/2000	15:32:00	0:00:16	4. Ran verbatim – did not find call as shown. Have a local call from 7067224181 to 9122378723 on 4/26/00 at 15:32:30. Verbatim shows CT 001 recorded with line # 4181. Did not find a recording for 4955. Call sent out as local to KPMG on ODUF	OUT-DTN
9127450679	9124533122	9127450679	4/26/2000	09:52:30	00:00:30	5. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Verbatim shows CT 110 (CTM 095158, CTME: 0951436), LPIC 0288. Message sent to CABS.	SOT-CABS
9127550766	9124526219	9127550766	4/26/2000	10:00:18	00:00:33	6. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Call was sent to Local Processing. Call was dropped in Local since the guide showed the account was Flat Rate on the day the usage was processed.	SOT-L-DROP
9127389836	9124538174	9127389836	4/25/2000	14:36:30	00:00:25	7. N cp 4/25/00 and post 4/26/00. Verbatim shows CT 110 – LPIC 0288, CTM : 1436057, CTME: 1435534. Message sent to CABS.	SOT-CABS

Local (Operator Assisted/Completed)

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Investigation Notes	BellSouth Root Cause Code

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Investigation Notes	BellSouth Root Cause Code
40463341211	4042920897	4046334121	4/26/2000	9:55:20	0:00:37	8. Change from reseller to UNE 4/26/00. D & N cp 4/26 & post 4/27. Verbatim shows CT 192 @ 09:52:39 to 2920897. Found RT 210 with FFFFFFFF connect time dropped call - incomplete, not billed to reseller.	SOT-DROP
7062955097	7063689160	7062955097	4/26/2000	10:07:38	0:00:28	9. Change from reseller to UNE 4/26/00. D & N cp 4/26 & post 4/28. MAC # records in ATL TOPS. Ran verbatim - found CT 192 @ 10:07:51. Call was sent to Local Processing. Call was dropped in Local since the guide showed the account was Flat Rate on the day the usage was processed.	SOT-L-DROP
7062955097	7063689160	7062955097	4/26/2000	10:10:45	0:00:58	10. Change from reseller to UNE 4/26/00. D & N cp 4/26 & post 4/28. MAC # records in ATL TOPS. Ran verbatim - found CT 192 @ 10:11:17. Call was sent to Local Processing. Call was dropped in Local since the guide showed the account was Flat Rate on the day the usage was processed.	SOT-L-DROP
7067224181	7067224141	7067224181	4/26/2000	10:25:00	0:00:52	11. Ran verbatim on ONL and TNL. Did not find CT 192 from 4181 at 10:25. Found CT 192 to TNL from 7067224953 at 10:26:33. Found 4953 call going out ODUF.	OUT-DTN
7067224181	7067740284	7067224181	4/26/2000	10:28:00	0:01:47	12. Ran verbatim on ONL and TNL. Did not find CT 192 from 4181 at 10:28. Found CT 192 to TNL from 7067224953 at 10:30:20. Found call going out ODUF.	OUT-DTN
4046333616	4042925919	4046333616	4/26/2000	12:55:15	0:00:30	13. Ran verbatims on ONL & TNL in both TOPS office 350109 and EO 300176 for 080000-160000. No calls from ONL to TNL, found. No calls found at or near connect time from either ONL or TNL.	NFV
7708599604	7705416524	7708599604	4/25/2000	13:25:40	0:00:51	14. N cp 4/25 & post 4/26. Verbatim shows a CT 192 @ 13:27:25. Found call going out ODUF.	OUT
4046335809	4045775215	4046335809	4/25/2000	14:14:45	0:00:20	15. Don't find call in error or sent out. Ran verbatim - did not find call from ONL to TNL. Did not find similar call to other TNL at connect time. Ran verbatim on TNL - nothing found.	NFV
7705416524	7067299740	7067224955	4/26/2000	15:25:00	0:01:03	16. 770541 to 706729 is interlata. Ran verbatim - did not find call as shown. Found CT 192 orig from 7067224181 to 7067299740 @ 15:26:22. Found 4181 call going out ODUF.	OUT-DTN

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Investigation Notes	BellSouth Root Cause Code
9127550766	9129537584	9127550766	4/26/2000	09:29:40	00:01:10	17. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Ran verbatim - found CT 192 as shown. Call was sent to Local Processing. Call was dropped in Local since the guide showed the account was Flat Rate on the day the usage was processed.	SOT-L-DROP
9127550766	9129294077	9127550766	4/26/2000	10:07:16	00:03:01	18. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Ran verbatim - found CT 192 as shown. Call was sent to Local Processing. Call was dropped in Local since the guide showed the account was Flat Rate on the day the usage was processed.	SOT-L-DROP

Busy Verify

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Investigation Notes	BellSouth Root Cause Code
7068239986	7067224181	7067224181	4/26/2000	14:05:00	0:00:41	19. CT 198, RT 600 at 14:05:30. Errored as WN and was deleted in error processing. Changed logic 5/23/00 to send to CLUE to be worked.	ERR-DL
7067224955	7067226642	7067226642	4/26/2000	15:07:00	0:00:45	20. Ran verbatim on ONL 4181- MB05A22P J57084. Found CT 192 from 4181 @ 15:07:48. Message errored as WU and was dropped. Changed logic 5/23/00 to stop dropping.	DTN-ERR-DL

Optional Calling Services

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Investigation Notes	BellSouth Root Cause Code
4046333674	*69	4046333674	4/27/2000	10:55:14	0:00:14	21. Ran verbatim on ONL - did not find CT 330 at 10:55. Have CT 330 @ 11:23 & 11:24. Found CT 330 from 4046333616 on 4/27/00 at 10:55:48. Message was sent out in ODUJ	OUT-DTN

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Investigation Notes	BellSouth Root Cause Code
7067224955	*69	7067224955	4/25/2000	15:36:25	0:00:29	22. Ran verbatim. Found CT 330 at 15:56:47. No CT 330 found at 15:36. Message was sent out in ODUF	OUT-DTM
7067226642	*66	7067226642	4/26/2000	8:55:25	0:00:42	23. Ran verbatim – did not find CT 330 at 8:55. Found CT 330 @ 8:56. Message was sent out ODUF	OUT
4046335809	*66	4046335809	4/25/2000	13:33:42	0:00:22	24. Ran verbatim on ONL – did not find CT 330 or any other call at 13:33. Found a CT 330 4046333674 on 4/25/00 at 13:33:46. Message was sent ODUF	OUT-DTM

Credit Requests⁵

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Investigation Notes	BellSouth Root Cause Code
4046333616	0	4046333616	4/27/2000	9:06:20	0:03:03	25. Ran verbatim – did not find CT 189 with ONL 4046333616. Found CT 189 with ONL 4046333674 @ 090738. Found call going out ODUF.	OUT-DTM
7067224953	0	7067224953	4/25/2000	14:26:00	0:00:21	26. Ran verbatim on ONL – did not find credit record for ONL. Ran verbatim for CT 189 – did not find 189 at time shown.	NFV
7068239986	0	7068239986	4/26/2000	14:47:00	0:00:15	27. N cp 4/25 & post 4/26. Ran verbatim. Found CT 189 @ 14:47:24. Found call going out ODUF.	OUT

Toll Free

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Investigation Notes	BellSouth Root Cause Code
7063689160	8003460152	8003460152	4/26/2000	8:52:11	0:00:10	28. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
4046330247	8002844889	8002844889	4/26/2000	9:17:40	0:01:28	29. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS

⁵ The test caller received confirmation from the operator that a credit would be issued.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Investigation Notes	BellSouth Root Cause Code
4046333616	8007890371	8007890371	4/27/2000	10:40:28	0:02:08	30. Ran verbatim. Found message with connect time 10:41:29. Message errored as WG and was deleted – space guide issue. Work request submitted to recognize space guide as valid.	ERR-DL
7067226207	8775669425	8775669425	4/26/2000	11:17:55	0:11:20	31. Ran verbatim – did not find searching ONL or TNL.	NFV
7067224955	8006315660	8006315660	4/27/2000	11:35:00	0:00:17	32. Found 71D @ 11:35:28 was sent out in ADUF	OUT
7062369443	8008888000	8008888000	4/27/2000	11:37:34	0:00:25	33. Ran verbatim – found CT 141 at 11:37:30. Call errored with WG and was deleted.	ERR-DL
4046330247	8007890371	8007890371	4/26/2000	13:10:47	0:02:19	34. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Did not find 71D to 8007890371 sent to CABS. (Found other 71D's from 4046330247). Found CT 192 at 13:08 and 13:11. 13:08 RT 192 – not completed and was dropped. Call at 13:11 – 192 was answered.	NFAS
7062959584	8003615660	8003615660	4/26/2000	14:19:32	0:00:08	35. ONL shown not UNE. Ran verbatim on ONL – call not found. Ran verbatim on TNL – found CT 141 from 7062369584 on 4/26/00 @ CTM : CTME: 141902. was sent out in ADUF	OUT-DTN
7708599604	8002844886	8002844886	4/25/2000	16:00:37	0:00:13	36. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
7063689160	8004245824	8004245824	4/26/2000	16:59:47	17:00:18	37. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Did not find 71D to 8004245824 sent to CABS. (Found other 71D's from 7063689160). Ran verbatim – found local call that began at 16:16 and lasted 52 min, until 17:08. Next call was at 17:10 to 2158256112 for 6 min. Found CT 110 to 8004258259 at 14:59:37, for 28 sec. It was sent to CABS.	NFAS
9127436502	8003460152	8003460152	4/26/2000	08:27:04	00:00:56	38. Change from Reseller to UNE on 4/26/00. D cp 4/26/00 and post 4/27/00. N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
9127450679	8003460152	8003460152	4/26/2000	08:27:50	00:00:08	39. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
9127450679	8003460152	8003460152	4/26/2000	08:28:51	00:00:09	40. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
9127450679	8003460152	8003460152	4/26/2000	08:35:35	00:00:09	41. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Investigation Notes	BellSouth Root Cause Code
9127415953	8003460152	8003460152	4/25/2000	08:37:35	00:00:05	42. Ran verbatim - found CT 110 @ CTM : 083710, CTME: 083659. Message sent out ADUF	OUT
9127414774	8007301008	8007301008	4/27/2000	10:58:25	00:00:15	43. Ran verbatim- Did not find call to 8007301008 from ONL 9127414774. Found call to TNL from ONL 9127389836 @ CTME 10:57:55 (CTM 10:58:02). Found 71D record sent out ADUF	OUT-DTN
9127550766	8003460152	8003460152	4/25/2000	11:00:15	00:00:10	44. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
9127450679	8003460152	8003460152	4/25/2000	11:01:15	00:00:18	45. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
9127389836	8003460152	8003460152	4/25/2000	11:09:48	00:00:07	46. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
9127450679	8003460152	8003460152	4/26/2000	11:46:00	00:00:20	47. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
9127450679	8004576490	8004576490	4/26/2000	12:15:42	00:02:37	48. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
9127550766	8003460152	8003460152	4/26/2000	12:57:02	00:00:08	49. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
9127550766	8007721213	8007721213	4/26/2000	14:46:59	00:10:32	50. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
9127389836	8888783256	8888783256	4/25/2000	15:52:49	00:01:17	51. N cp 4/25 & post 4/26. Message sent o CABS.	SOT-CABS

Directory Assistance

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Investigation Notes	BellSouth Root Cause Code
7067224181	7064110000	7067224181	4/26/2000	10:34:00	0:01:17	52. Ran verbatim on CT 194 for 4/26/00. Did not find ONL 7067224181. Found CT 194 from ONL 7067224953 at 10:34:12. (Module 307 shows 7064224188) Message was sent out ODUF	OUT-DTN

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Investigation Notes	BellSouth Root Cause Code
7067224181	7064110000	7067224181	4/26/2000	10:40:00	0:03:55	53. Ran verbatim on CT 194 for 4/26/00. Did not find ONL 7067224181. Found CT 194 from ONL 7067224953 at 10:39:27. (Module 307 shows 7067224141) Message was sent out ODUF	OUT-DTN
7062369443	7064110000	7062369443	4/26/2000	11:27:55	0:00:13	54. Ran verbatim - did not find call to 411 from 7062369443. Did find CT 110, 00- dialed, @ CTME 11:23:59, CTM 11:27:25. CETM was 3 min 25 sec. (MB05A27PFZ J11237	NFAS
4046333616	4044110000	4046333616	4/26/2000	13:10:14	0:00:32	55. Ran verbatim - found CT 141 at CTM 13:05:38 (CETM 13:05:29) for ETM 4 min, 42 sec. Also found CT 194 - dialed the operator and asked for DA at 13:34:33. Not finding match to call as shown. Message was sent out ODUF	NFAS
7067224955	7064110000	7067224955	4/26/2000	15:27:00	0:00:52	56. Ran verbatim - did not find CT 194 in TOPS 350115 or 350113. ran verbatims on orig # in all offices - NF.	NFV
7067224955	7064110000	7067224955	4/26/2000	15:29:00	0:00:56	57. Ran verbatim - did not find CT 194 in TOPS 350115 or 350113. Carla ran verbatims on orig # in all offices - NF.	NFV
9127440749	9124110000	9127440749	4/27/2000	11:09:33	00:00:10	58. Ran verbatim. Found CT 194 @ 110653 and 110815. Both sent out ODUF	OUT

Information Provider

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Investigation Notes	BellSouth Root Cause Code
7063689160	9004204200	7063689160	4/26/2000	10:29:14	0:16:15	59. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
7702269019	9004071600	7702269019	4/26/2000	11:29:07	0:02:08	60. Change from reseller to UNE. D cp 4/26 and post 4/27. N due 4/25, then SD 4/26, then SD 4/26. Appears misc input changed eff date to 4/25. Message sent to CABS.	SOT-CABS
40463330247	9007866600	40463330247	4/26/2000	13:30:32	0:01:28	61. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
7068239986	9006565000	7068239986	4/26/2000	14:23:00	0:11:47	62. N cp 4/25 & post 4/26. Ran verbatim - Found CT 110 at 14:33:48, not at 14:23. record sent out ADUF	OUT-DTM

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Investigation Notes	BellSouth Root Cause Code
7708599604	9006565000	7708599604	4/25/2000	14:32:19	0:17:51	63. N cp 4/25 & post 4/26. Message sent to CABS.	SOT-CABS
9127450679	9004847000	9127450679	4/26/2000	09:48:30	00:01:30	64. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
9127550766	9004847000	9127550766	4/26/2000	09:53:58	00:00:02	65. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
9127550766	9004847000	9127550766	4/26/2000	09:54:52	00:00:27	66. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
9127550766	9009328437	9127550766	4/26/2000	09:58:00	00:01:35	67. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
9127389836	9009328437	9127389836	4/25/2000	13:57:47	00:02:37	68. N cp 4/25 & post 4/26. Message sent to CABS.	SOT-CABS

Long Distance

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Investigation Notes	BellSouth Root Cause Code
7067224955	9416861317	7067224955	4/26/2000	9:05:00	0:01:35	69. Ran verbatim on ONL - did not find call as shown. Ran verbatim on TNL. Found CT 110 from ONL 7067224181 to 9416861317 on 4/26/00 at CTM : 090636, CTME: 090610. Record sent out ADUF	OUT-DTN
7702269019	7037230846	7702269019	4/25/2000	9:26:33	0:00:20	70. Change from reseller to UNE. D cp 4/26 and post 4/27. N due 4/25, then SD 4/26, then SD 4/26. Appears misc input changed eff date to 4/25. Message sent to CABS.	SOT-CABS
7702269019	7037253569	7702269019	4/25/2000	9:45:30	0:00:39	71. Change from reseller to UNE. D cp 4/26 and post 4/27. N due 4/25, then SD 4/26, then SD 4/26. Appears misc input changed eff date to 4/25. Message sent to CABS.	SOT-CABS

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Investigation Notes	BellSouth Root Cause Code
4046333616	7037230846	4046333616	4/26/2000	9:51:45	0:00:15	72. Ran verbatim – did not find match on ONL or TNL at time shown. Found 71D going out ADUF from ONL to TNL at time shown dated 4/25/00 at 9:51:51. Ran verbatim – found 110 record on 4/25/00. Record sent out ADUF	OUT-DDT
4046335809	7039673944	4046335809	4/25/2000	9:59:57	0:00:03	73. Ran verbatim on ONL – did not find call to TNL. Ran verbatim on TNL. Found CT 110 originating from 4046333674 @ CTM : 095916, CTME: 095916. Record sent out ADUF	OUT-DTN
4046330247	3106527760	4046330247	4/26/2000	10:16:16	0:01:44	74. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
7067224181	7065549600)	7067224181	4/27/2000	10:18:00	0:00:18	75. Ran verbatim – found CT 001 from ONL to TNL, 7065544435 @ 101830. Call was unanswered. (ANS=1, ETM = 0's). Unanswered local calls are dropped.	ULC-DROP
7067224983	7065544455	7067224983	4/25/2000	10:38:00	0:06:00	76. ONL is not UNE. Ran verbatim on ONL – did not find call as shown. Searched on TNL – did not find call from ONL. Found call to TNL at 10:32 and 10:49, but ONL was not a KPMG UNE #. Appears ONL is 7067224953. Ran verbatim – found CT 001 to 7065544435 at 10:34. Call sent out ODUF	OUT-DTN
770541652	9127414774	7705416524	4/25/2000	10:42:40	0:00:58	77. Ran verbatim – did not find call from ONL to TNL as shown. Found CT 110 to TNL from 7709339074 @ CTM 10:42:57, CTME 10:42:50 and CT 119 to TNL from 7709339074 @ CTM 10:42:46. Record sent out ADUF	OUT-DTN
4046334121	4046994943	4046334121	4/26/2000	11:00:21	0:05:46	78. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Local per BAMS. Ran verbatim – found CT 001 matching ONL & TNL @10:59:29. Message errored as UF049 (measured local call trying to bill to flat rate account.) UNE guide was not set at time call was processed. Message was deleted.	ERR-SOT-LMC
7062369443	2197639364	7062369443	4/27/2000	11:05:25	0:05:21	79. Ran verbatim – did not find call as shown. Found call from 7062369492 @ CTM 11:05:22 (CEM 11:05:12). Record sent out ADUF	OUT-DTN
7067224181	9735652426	7067224181	4/27/2000	11:21:10	0:00:34	80. Ran verbatim – found CT 110 from ONL to TNL, 9735652300. ETM was 35 minutes. This is a duplicate record of 81 below shown with 34 sec rather than 34 min.	DUPL

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Investigation Notes	BellSouth Cause Code
7067224181	9735652426	7067224181	4/27/2000	11:21:10	0:34:00	81. Ran verbatim - found CT 110 from ONL to TNL 9735652300. CTM 11:20:13 and ETM was 35 minutes. Record was sent out ADUF	OUT-DTN
7067226207	7067389173	7067226207	4/26/2000	11:35:20	0:03:28	82. Local call sent out ODUF	OUT
7063689160	304525211	7063689160	4/26/2000	11:47:45	0:01:20	83. Change from reseller to UNE. D cp 4/26 and post 4/27. N due 4/25, then SD 4/26, then SD 4/26. Appears misc input changed eff date to 4/25. Message sent to CABS.	SOT-CABS
7067224953	7037230846	7067224953	4/26/2000	13:24:00	0:00:25	84. Ran verbatim - did not find match on ONL or TNL at date & time shown. Found 71D going out ADUF from ONL to TNL dated 4/25/00 at @ 13:21:20. Ran verbatim - found 110 record on 4/25/00. Record sent out ADUF	OUT-DDT
7067224953	7709339530	7067224953	4/26/2000	14:40:30	0:01:01	85. Ran verbatims - unable to find searching ONL or TNL. Found 71D from ONL to TNL on 4/25/00 @ 15:39 Record sent out ADUF	OUT-DDT
7067224953	9545876362	7067224953	4/26/2000	14:43:00	0:02:53	86. Ran verbatims - unable to find searching ONL or TNL. Found 71D from ONL to TNL on 4/25/00 @ 13:41 Record sent out ADUF	OUT-DDT
7062950681	3105538900	7062950681	4/25/2000	14:48:02	0:00:25	87. N cp 4/25 & post 4/26. Message sent to CABS.	SOT-CABS
4046335809	5136624811	4046335809	4/26/2000	15:09:53	0:00:50	88. Ran verbatim. Found CT 110 that matched ONL & TNL at 14:09. No call found at 15:09. Record sent out ADUF	OUT-DTM
7708599604	5136845133	7708599604	4/25/2000	15:14:59	0:12:51	89. N cp 4/25 & post 4/26. Message sent to CABS.	SOT-CABS
7067226207	7067369889	7067226207	4/26/2000	15:17:55	0:00:01	90. Local per BAMS. Ran verbatim - found CT 001 at 15:17:34. Local message was sent out ODUF.	OUT
7067226207	7067903860	7067226207	4/26/2000	15:18:00	0:04:49	91. Local per BAMS. Ran verbatim - found CT 001 at 15:19:05. RT 120 was sent out ODUF	OUT
4043206215	4049673944	4043206215	4/27/2000	15:33:14	0:01:33	92. Ran verbatim - did not find call as shown. Found CT 110 to 7039673944 @ 133237. Record sent out ADUF	OUT-DTN
7067224953	7062369443	7067224953	4/26/2000	15:43:15	0:00:31	93. Ran verbatim - did not find call on 4/26/00. Found CT 110 from ONL to TNL on 4/25/00, CTM : 154315, CTME : 154234. Record sent out ADUF	OUT-DDT

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Investigation Notes	BellSouth Root Cause Code
7063689160	2158256112	7063689160	4/26/2000	17:11:08	0:06:26	94. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
9127415953	4046333616	9127415953	4/25/2000	09:24:45	00:02:00	95. Ran verbatim – found CT 110 as shown, CTM : 092416, CTME: 092406. Record sent out ADUF	OUT
9127415953	7709339074	9127415953	4/25/2000	10:44:54	00:00:21	96. Ran verbatim. Did not find call from ONL as shown. Ran verbatim on TNL – found CT 110 from 9127414774, CTM : 104427, CTME: 104424. Record sent out ADUF	OUT-DTN
9127450679	7039053549	9127450679	4/25/2000	11:02:33	00:02:33	97. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
9127550766	4043258391	9127550766	4/25/2000	11:03:00	00:00:30	98. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
9127415953	9124642426	9127415953	4/27/2000	11:15:45	00:00:08	99. Local per BAMS. Ran verbatim – found CT 001 @ CTM 11:15:01. RT 120 sent out in ODUF	OUT
9127550766	8502659336	9127550766	4/26/2000	12:58:30	00:09:27	100. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS	SOT-CABS
9127450679	7706565691	9127450679	4/26/2000	13:29:00	00:01:10	101. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
9127450679	7063689160	9127450679	4/26/2000	15:11:00	00:00:20	102. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
4046330247	5135551212	4046330247	4/26/2000	9:30:58	0:00:47	103. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
4046330247	5135551212	4046330247	4/26/2000	9:37:18	0:00:16	104. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
7067226207	9735551212	7067226207	4/26/2000	11:03:25	0:00:34	105. Ran verbatim on ONL – did not find call to TNL. Ran verbatim on TNL – found call originating from 7067226642 @ 110450. Record sent out ADUF	OUT-DTN
4046335981	7065551212	4046335981	4/25/2000	13:42:03	0:02:00	106. Ran verbatim on ONL – found CT 110 to 5135551212 @ 13:37 with ETM 2 min 57 sec. Also found CT 006 to TNL. 7067823490 @ 13:42. 71D for 5135551212	OUT-DTN&DTM

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 28

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Investigation Notes	BellSouth Root Cause Code
7062950681	3045551212	7062950681	4/25/2000	15:22:45	0:00:12	107. N cp 4/25 & post 4/26. Message sent to CABS.	SOT-CABS
7063689160	5185551212	7063689160	4/26/2000	15:42:07	0:00:15	108. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Did not find 71D to 5185551212 sent to CABS. (Found other 71D's from 7063689160). Ran verbatim - could not find match on ONL. Ran verbatim on TNL - found match from 7062955097 on 4/26/00. CTM : 154150, CTME: 154148. 7062955097 D & N cp 4/26/00 & post 4/28/00. Message sent to CABS	SOT-CABS (DTN)
7063689160	5185551212	7063689160	4/26/2000	15:47:30	0:00:19	109. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Did not find 71D to 5185551212 sent to CABS. (Found other 71D's from 7063689160). Ran verbatim - could not find match on ONL. Ran verbatim on TNL - found match from 7062955097 on 4/26/00, CTM : 154713, CTME: 154711. 7062955097 D & N cp 4/26/00 & post 4/28/00. Message sent to CABS.	SOT-CABS (DTN)
7708599604	5135551212	7708599604	4/25/2000	15:50:00	0:00:45	110. N cp 4/25 & post 4/26. Message sent to CABS.	SOT-CABS
9127440984	6365551212	9127440984	4/27/2000	09:03:42	00:00:47	111. Ran verbatim did not find call to 6365551212. Found CT 110 from ONL to 3145551212 @ CTM 090156, CTME: 090146 for 1 min 51 sec. Record sent out ADUF	OUT-DTN
9127440749	2125551212	9127440749	4/25/2000	11:25:29	00:01:25	112. Ran verbatim - found CT 110 from ONL to TNL @ CTM : 112341, CTME: 112339. Record sent out ADUF	OUT
9127550766	8505551212	9127550766	4/26/2000	14:16:49	00:01:49	113. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
9127550766	9045551212	9127550766	4/26/2000	14:22:55	00:00:18	114. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS
9127450679	7275551212	9127450679	4/26/2000	14:32:00	00:00:30	115. Change from Reseller to UNE on 4/26/00. D & N cp 4/26/00 and post 4/27/00. Message sent to CABS.	SOT-CABS

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:

Jim Hurt, Director
Consumers' Utility Counsel
2 Martin Luther King Jr. Drive
Plaza Level East
Atlanta, GA 30334-4600

Newton M. Galloway
Newton Galloway & Associates
Suite 400 First Union Bank Tower
100 South Hill Street
Griffin, GA 30229

Charles A. Hudak, Esq.
Gerry, Friend & Saprnov, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346-2131

Kent F. Heyman, Esq.
Sr. VP and General Counsel
Mpower Communications Corp.
171 Sully's Trail, Suite 202
Pittsford, NY 14534

Suzanne W. Ockleberry
AT&T
1200 Peachtree Street, NE
Suite 8100
Atlanta, GA 30309

John M. Stuckey, Jr.
Webb, Stuckey & Lindsey
7 Lenox Pointe, N.E.
Atlanta, GA 30324

Charles V. Gerkin, Jr.
Smith, Gambrell & Russell, LLP
Promenade II, Suite 3100
1230 Peachtree Street, N.E.
Atlanta, GA 30309-3592

Frank B. Strickland
Wilson, Strickland & Benson
One Midtown Plaza, Suite 1100
1360 Peachtree Street, NE
Atlanta, GA 30309

Jeremy D. Marcus, Esq.
Blumenfeld & Cohen
Co-Counsel for Rhythm, aka ACI Corp.
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036

Scott A. Sapperstein
Sr. Policy Counsel
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619

John P. Silk
Georgia Telephone Association
1900 Century Boulevard, Suite 8
Atlanta, GA 30345

Thomas K. Bond
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, GA 30334

Eric J. Branfman
Richard M. Rindler
Swidler & Berlin
3000 K Street, NW, Suite 300
Washington, DC 20007

Harris R. Anthony
BellSouth Long Distance
28 Perimeter Center East
Atlanta, GA 30346

Robert A. Ganton
Regulatory Law Office
Dept. Army
Suite 700
901 N. Stuart Street
Arlington, VA 22203-1837

Charles F. Palmer
Troutman Sanders LLP
5200 NationsBank Plaza
600 Peachtree Street, NE
Atlanta, GA 30308-2216

Peter C. Canfield
Dow Lohnes & Albertson
One Ravinia Drive, Suite 1600
Atlanta, GA 30346

Judith A. Holiber
One Market
Spear Street Tower, 32nd Floor
San Francisco, CA 94105

James M. Tennant
Low Tech Designs, Inc.
1204 Saville Street
Georgetown, SC 29440

Nanette S. Edwards, Esq.
Regulatory Attorney
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802

Peyton S. Hawes Jr.
127 Peachtree Street, NE
Suite 1100
Atlanta, GA 30303-1810

Daniel Walsh
Assistant Attorney General
Office of the Attorney General
40 Capitol Square
Atlanta, GA 30334-1300

Mark Brown
Director of Legal and Government Affairs
MediaOne, Inc.
2925 Courtyards Drive
Norcross, GA 30071

John McLaughlin
KMC Telecom Inc.
Suite 170
3025 Breckinridge Boulevard
Duluth, GA 30096

Jeffrey Blumenfeld
Elise P. W. Kiely
Blumenfeld & Cohen
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036

James A. Schendt
Regulatory Affairs Manager
Interpath Communications, Inc.
P. O. box 13961
Durham, NC 27709-3961

James A. Schendt
Regulatory Affairs Manager
Interpath Communications, Inc.
P. O. Box 13961
Durham, NC 27709-3961

William R. Atkinson
Sprint Communications Co. L.P.
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339

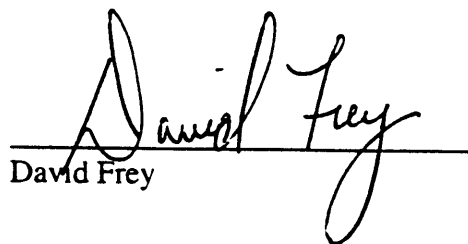
Nancy Krabill
Director of Regulatory Affairs
1300 W. Mockingbird Lane
Suite 200
Dallas, TX 75247

Dana R. Shaffer
Legal Counsel
105 Molloy Street
Suite 300
Nashville, TN 37201

Anne E. Franklin
Arnall Golden & Gregory, LLP
2800 One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309

Glenn A. Harris
Lori Anne Dolquest
NorthPointe Communications, Inc.
303 Second Street, South Tower
San Francisco, CA 94107

This 28th day of July 2000.


David Frey

KPMG
303 Peachtree Street, N.E.
Suite 2000
Atlanta, Georgia 30308
(404) 222-3000



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

Telephone 404 222 3000
Fax 404 222 3050

July 28th, 2000

RECEIVED

JUL 31 2000

EXECUTIVE SECRETARY
G.P.S.C.

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

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

Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG Consulting LLC's Exception 76 (Second Amended Version) for filing in the above referenced matter.

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

Thank you for your assistance in this regard.

Very truly yours,

David Frey
Manager

Enclosures

cc: Parties of Record



KPMG LLP KPMG LLP a US limited liability partnership is
a member of KPMG International a Swiss association



EXCEPTION 76 (2nd Amended Version)

BellSouth Georgia OSS Testing Evaluation

Date: July 26, 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, 98 post-order CSRs (35%) contained different information than their corresponding LSRs. Of the 98 orders, 42 (43%) were flow through and 56 (57%) were non-flow through¹.

Of the 315 Switch Translations for UNE lines, which were validated, 27 lines (9%) contained different information than their corresponding LSRs. Of the 27 lines, 19 (70%) were flow through and 8 (30%) were non-flow through.

Of the 138 Directory Listing for UNE orders, which were validated, 17 orders (12%) contained different information than their corresponding LSRs. Of the 17 orders, 6 (35%) were flow through and 11 (65%) 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.

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
402E223PTM000002	3	FV	7702268258	9994	Missing Feature (NSY)	No
424A314PTJ000001	2	MV	6785790524882	9994	Missing Feature Code from order on BTN (RJ11C)	No

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.



EXCEPTION 76 (2nd Amended Version)

BellSouth Georgia OSS Testing Evaluation

CSR VERIFICATION						
Incorrect Features						
PON	Ver	Req/Act.	TN	OCN	CSR Discrepancy	F/T
625A214PEJ100004	1	MC	6783932936441	9994	Incorrect Features	Yes
625A214PTJ100001	5	MC	7709538539932	9991	Missing Feature (HBY)	No
625A214PTJ100013	1	MC	7062920388	9991	Missing Feature (Hunting)	Yes
626A224PEJ100006	0	MC	7708501852613	9991	Missing Feature (HBY)	Yes
626A224PEJ101003	2	MC	7067246590649	9991	Missing Feature (HBY)	Yes
626A224PEJ101011	0	MC	7062359179255	9991	Missing Feature (HBY)	Yes
626A224PTJ100002	4	MC	7067244960	9991	Missing Feature (HBY); Incorrect address	No
626A224PTJ100013	0	MC	6785799353719	9991	Missing Feature (HBY)	Yes
626A224PTJ100014	1	MC	7062357249255	9991	Missing Feature (HBY)	Yes
626A224PTJ100017	0	MC	4046348771752	9991	Missing Feature (HBY)	Yes
627A214PTJ100007	1	MC	9127430461080	9991	Feature (HTG) not removed.	No
627A214PTJ101002	0	MC	7067246133543	9991	Feature (HTG) not removed.	No
409A223PTM100001	5	FC	7067225636	9991	Missing Feature (ESX)	Yes
428A224PTJ100002	1	MV	4046342841417	9994	Missing 1 (one) TN and feature. Missing Directory Listing; Incorrect "Q" account listed.	No
625A214PEJ100005	0	MC	9127434571318	9991	Incorrect Features	Yes
625A214PEJ100009	0	MC	7707771533133	9991	Incorrect Features	Yes
625A214PEJ100010	0	MC	6784419569837	9991	Incorrect Features	Yes
625A214PEJ101002	0	MC	7067248881302	9991	Missing Features (HBY)	Yes
625A214PTJ100008	0	MC	7067245832114	9991	Missing Features	Yes
625A214PTJ100011	0	MC	7702269352130	9991	Incorrect Features	Yes
626A224PEJ100015	0	MC	4043209327506	9991	Missing Features (HBY)	Yes
626A224PEJ101012	0	MC	6783667751725	9991	Missing Features (HBY)	Yes
626A224PTJ100007	6	MC	9127456926229	9991	LPIC not removed as ordered.	Yes



EXCEPTION 76 (2nd Amended Version)
BellSouth Georgia OSS Testing Evaluation

CSR VERIFICATION						
Incorrect Address						
PON	Ver	Req/Act.	TN	OCN	CSR Discrepancy	F/T
301A212PEH100006	3	AA	404M382906906	9994	Incorrect address listing; Incorrect customer account number	No
301A212PEH100008	1	AA	706U574638638	9994	Incorrect address listing; Incorrect customer account number.	No
301A212PEH101001	2	AA	706U572929929	9994	Incorrect address listing; Incorrect customer account number	No
305A112PTH100007	1	AV	4049820492554	9994	Incorrect address listing	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
317A122PTH100006	1	AM	706U090761761	9991	Incorrect address listing	No
317A122PTH101001	0	AM	404M360050050	9991	Incorrect address listing	No
320A212PEF000008	0	JA	7702740804	9991	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
432A214PTJ100004	5	MM	9127425789789	9991	Address did not change on Move order.	No
433A124PEJ101006	2	MM	9127508052443	9991	Incorrect address listing.	No
433A124PTJ100001	1	MM	4046346772772	9991	Incorrect address listing. Move not completed; Incorrect MAN	No
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
350D222PTI100001	2	BV	6785799295	7050	Incorrect address listing on CSRQ	No

KPMG Consulting LLC

07/27/00

Page 3 of 8

~TRE1E1C



EXCEPTION 76 (2nd Amended Version)
BellSouth Georgia OSS Testing Evaluation

CSR VERIFICATION						
Incorrect Address						
PON	Ver	Req/Act.	TN	OCN	CSR Discrepancy	F/T
351A212PTI000001	3	BV	7709330248	8758	Incorrect address listing; Incorrect "Q" account.	No
333A122PTI101001	1	BV	7062389184	9992	Incorrect address listing; Incorrect "Q" account	No
606A123PEM101006	3	FC	6786249526	9991	Incorrect address listing.	No

CSR VERIFICATION						
Incorrect Provisioning						
PON	Ver	Req/Act.	TN	OCN	CSR Discrepancy	F/T
317A122PTH002004	0	AM	706U098477477	9991	Facilities were changed with no notification from BLS.	No
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
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
408A313PEM000002	0	FV	7068020367	9991	Missing lines; Incorrect Q account information	Yes
409A223PTM100002	0	FC	9127425287	9991	Incorrect channel pair provisioned.	Yes
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
412A213PTM000003	0	FSS	7704751021	9991	Service not suspended	No
438A214PEJ000004	0	MSS	9127466851637	9991	Service not suspended	No



EXCEPTION 76 (2nd Amended Version)
BellSouth Georgia OSS Testing Evaluation

CSR VERIFICATION						
Incorrect Provisioning						
PON	Ver	Req/Act.	TN	OCN	CSR Discrepancy	F/T
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
603A224PTJ100004	0	MD	7062953890255	9991	CSR Discrepancy- shows “FINAL” on order, only 1 line is disconnected of two.	Yes
305A122PEH102010	7	AV	7068280776	9994	Account should read “Final” but does not since migrating from BST.	No

CSR VERIFICATION						
Other CSR Errors						
PON	Ver	Req/Act.	TN	OCN	CSR Discrepancy	F/T
305A212PTH100002	0	AV	7707409267221	9994	Post CSR reflects no UNE's.	No
406A213PTM100002	1	FV	7707773250	9991	Wrong “Q” Account on CSR.	Yes
382D225PEG101005	1	CD	7062357582	9991	No Misc. account number (Ban2)	Yes
305A212PTF100013	0	JA	7702550806	9994	Missing RESH code on CSR	No
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	7062347769744	9991	No “Q” account listed	Yes
406A213PEM100005	0	FV	4049296504	9991	Incorrect “Q” account on CSR.	Yes
406A213PTM100004	0	FV	7068283771	9991	Incorrect “Q” account on CSR	Yes



EXCEPTION 76 (2nd Amended Version)
BellSouth Georgia OSS Testing Evaluation

CSR VERIFICATION						
Incorrect Directory Listings (verified through CSR validation)						
PON	Ver	Req/Act.	TN	OCN	CSR Discrepancy	F/T
301A212PEF100002	1	JA	706U572929929	9994	Incorrect DL	No
305A122PTH100012	0	AV	4049820347564	9994	Incorrect DL	Yes
307A222PTF102015	2	JA	7063140805	9994	Incorrect DL	No
326A212PEI100003	2	BV	7062952450	9992	Incorrect DL	No
326C222PEI100002	0	BV	7062952828	9992	Incorrect DL	Yes
333A122PEI100003	0	BV	7062929565	9992	Incorrect DL	Yes
349A212PEI000004	5	BV	4049829424	7050	Incorrect DL	No
409A223PEM100003	0	FC	7709527166	9991	Incorrect DL	Yes
606A123PEM100002	0	FC	7062344197	9994	Incorrect DL	Yes
607A214PTJ101003	0	MC	7067227698203	9991	Incorrect DL	Yes
608A124PEJ101004	0	MC	7063689447255	9991	Incorrect DL	No
325C222PEI001001	3	BV	7062955413	9992	Incorrect DL	No
435A114PTJ002002	0	MT	7707771941359	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
452A216PEF100002	0	JR	7707775840	9991	Incorrect DL	No
452A216PTF100003	0	JR	7067246195	9991	Incorrect DL	No
453C126PEF100001	1	JR	4046399935	9991	Incorrect DL	No
607C214PEJ101010	0	MC	7707771445748	9991	Incorrect DL	Yes

Directory Listing Verification – (through BLS Directory Listing Database Validation)						
PON	Ver	Req/Act.	TN	OCN	Directory Listing Discrepancy	F/T
350D222PTI100001	2	BV	6785799294	7050	Listed as Non-Published	N
351A212PTI000001	3	BV	7709330793	8758	Address listed as "SE"	N
403A223PEM100002	0	FV	7702260527	9994	Listing Not Found	N
403A223PEM100004	0	FV	4043214029	9994	Wrong Name listed	Y
403A223PTM100003	0	FV	7067220159	9994	Listing Not Found	Y
405A312PEM001002	5	FV	9127461378	9994	Name listed backwards	N
452A216PEF100002	0	JR	7707775840	9991	Listed as Non-Published	N

KPMG Consulting LLC

07/27/00

Page 6 of 8

-TRE1E1C



EXCEPTION 76 (2nd Amended Version)
BellSouth Georgia OSS Testing Evaluation

Directory Listing Verification – (through BLS Directory Listing Database Validation)						
PON	Ver	Req/Act.	TN	OCN	Directory Listing Discrepancy	F/T
452A216PEF100003	0	JR	7067246195	9991	Listed as Non-Published	N
453C126PEF100001	1	JR	4046399935	9991	Wrong Name listed	N
455A116PTF100004	0	JR	7067241358	9991	Listing Not Found	N
607C214PEJ101010	0	MC	6786241459	9991	Listing Not Found	Y
626A224PTJ101002	0	MC	7067244960	9991	Listed as Non-Published	Y
615A122PEF102017	1	JA	7702550802	9991	Incorrect Street Address	N
610A224PEJ100001	0	MC	7709561097	9991	Name listed backwards	N
428A124PTJ100002	1	MV	6785790883	9994	Database listing does not indicate "non-listed"	N
610A224PTJ100016	0	MC	9127551751	9991	Listing Not Found	Y
325C222PEI001001	3	BV	7062955413	9992	Listing Not Found	N

Switch Translation Verification						
Pon	Ver	Req/Act.	TN	OCN	Switch Translation Discrepancy	F/T
626A224PTJ100007	6	MC	9127456926	9991	Should not have a PIC or LPIC	Y
625A214PTJ100012	0	MC	7062369570	9991	Missing PIC and Hunting	N
625A214PTJ100012	0	MC	7062369644	9991	Missing PIC and Hunting	N
625A214PTJ100008	0	MC	7067245832	9991	No Hunting	Y
625A214PEJ101002	0	MC	7067248881	9991	No Hunting	Y
625A214PEJ101002	0	MC	7067244105	9991	No Hunting	Y
625A214PEJ101002	0	MC	7067241016	9991	No Hunting	Y
625A214PEJ100005	3	MC	9127434571	9991	No Hunting	Y
412A213PEM000002	0	FSS	9127423859	9991	Service not suspended	N
409A223PTM100001	5	FC	7068280693	9991	No ESX	Y
403A223PTM100005	1	FV	7062350229	9994	No NSS	N
403A223PTM100005	1	FV	7062354725	9994	No NSS	N
403A223PTM100005	1	FV	7062358913	9994	No NSS	N
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
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
428A224PTJ100002	1	MV	4046342861	9994	3 Way Call, Call Forwarding, Call Waiting	N
412A213PTM000003	0	FSS	7704751021	9991	Service not suspended	N



EXCEPTION 76 (2nd Amended Version)
BellSouth Georgia OSS Testing Evaluation

Switch Translation Verification						
Pon	Ver	Req/Act.	TN	OCN	Switch Translation Discrepancy	F/T
406A213PTM100002	1	FV	7707773250	9991	Requested LPIC 5124, Received default 9199	Y
625A214PTJ100011	0	MC	7702260649	9991	No Hunting	Y
625A214PTJ100011	0	MC	7702269352	9991	No Hunting	Y
625A214PTJ100011	0	MC	7702269902	9991	No Hunting	Y
402E223PTM000002	0	FV	7702268073	9994	No NSY	N
402E223PTM000002	0	FV	7702268258	9994	No NSY	N

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.

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:

Jim Hurt, Director
Consumers' Utility Counsel
2 Martin Luther King Jr. Drive
Plaza Level East
Atlanta, GA 30334-4600

Newton M. Galloway
Newton Galloway & Associates
Suite 400 First Union Bank Tower
100 South Hill Street
Griffin, GA 30229

Charles A. Hudak, Esq.
Gerry, Friend & Saprnov, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346-2131

Kent F. Heyman, Esq.
Sr. VP and General Counsel
Mpower Communications Corp.
171 Sully's Trail, Suite 202
Pittsford, NY 14534

Suzanne W. Ockleberry
AT&T
1200 Peachtree Street, NE
Suite 8100
Atlanta, GA 30309

John M. Stuckey, Jr.
Webb, Stuckey & Lindsey
7 Lenox Pointe, N.E.
Atlanta, GA 30324

Charles V. Gerkin, Jr.
Smith, Gambrell & Russell, LLP
Promenade II, Suite 3100
1230 Peachtree Street, N.E.
Atlanta, GA 30309-3592

Frank B. Strickland
Wilson, Strickland & Benson
One Midtown Plaza, Suite 1100
1360 Peachtree Street, NE
Atlanta, GA 30309

Jeremy D. Marcus, Esq.
Blumenfeld & Cohen
Co-Counsel for Rhythm, aka ACI Corp.
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036

Scott A. Sapperstein
Sr. Policy Counsel
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619

John P. Silk
Georgia Telephone Association
1900 Century Boulevard, Suite 8
Atlanta, GA 30345

Thomas K. Bond
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, GA 30334

Eric J. Branfman
Richard M. Rindler
Swidler & Berlin
3000 K Street, NW, Suite 300
Washington, DC 20007

Harris R. Anthony
BellSouth Long Distance
28 Perimeter Center East
Atlanta, GA 30346

Robert A. Ganton
Regulatory Law Office
Dept. Army
Suite 700
901 N. Stuart Street
Arlington, VA 22203-1837

Charles F. Palmer
Troutman Sanders LLP
5200 NationsBank Plaza
600 Peachtree Street, NE
Atlanta, GA 30308-2216

Peter C. Canfield
Dow Lohnes & Albertson
One Ravinia Drive, Suite 1600
Atlanta, GA 30346

Judith A. Holiber
One Market
Spear Street Tower, 32nd Floor
San Francisco, CA 94105

James M. Tennant
Low Tech Designs, Inc.
1204 Saville Street
Georgetown, SC 29440

Nanette S. Edwards, Esq.
Regulatory Attorney
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802

Peyton S. Hawes Jr.
127 Peachtree Street, NE
Suite 1100
Atlanta, GA 30303-1810

Daniel Walsh
Assistant Attorney General
Office of the Attorney General
40 Capitol Square
Atlanta, GA 30334-1300

Mark Brown
Director of Legal and Government Affairs
MediaOne, Inc.
2925 Courtyards Drive
Norcross, GA 30071

John McLaughlin
KMC Telecom Inc.
Suite 170
3025 Breckinridge Boulevard
Duluth, GA 30096

Jeffrey Blumenfeld
Elise P. W. Kiely
Blumenfeld & Cohen
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036

James A. Schendt
Regulatory Affairs Manager
Interpath Communications, Inc.
P. O. box 13961
Durham, NC 27709-3961

James A. Schendt
Regulatory Affairs Manager
Interpath Communications, Inc.
P. O. Box 13961
Durham, NC 27709-3961

Nancy Krabill
Director of Regulatory Affairs
1300 W. Mockingbird Lane
Suite 200
Dallas, TX 75247

Anne E. Franklin
Arnall Golden & Gregory, LLP
2800 One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309

William R. Atkinson
Sprint Communications Co. L.P.
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339

Dana R. Shaffer
Legal Counsel
105 Molloy Street
Suite 300
Nashville, TN 37201

Glenn A. Harris
Lori Anne Dolquest
NorthPointe Communications, Inc.
303 Second Street, South Tower
San Francisco, CA 94107

This 28th day of July 2000.



David Frey

KPMG
303 Peachtree Street, N.E.
Suite 2000
Atlanta, Georgia 30308
(404) 222-3000



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

Telephone 404 222 3000
Fax 404 222 3050

July 28th, 2000

RECEIVED

JUL 31 2000

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

EXECUTIVE SECRETARY
G.P.S.C.

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

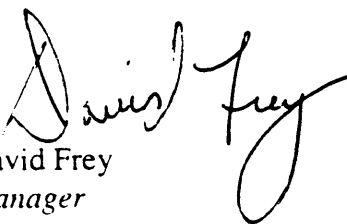
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG Consulting LLC's Exceptions 96, 97, 98, 99 and 100 along with BellSouth's Responses to Exceptions 96, 97, 98, 99 and 100 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'S RESPONSE TO EXCEPTION 96



July 17, 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 BellSouth ECTA Gateway does not allow CLECs to process trouble reports for PBX circuits in the state of Georgia.

BellSouth's ECTA Gateway is designed to allow CLECs to process trouble reports for all designed and non-designed circuits, including PBX circuits. During transaction testing, KPMG discovered that a trouble report for a PBX circuit in the state of Georgia cannot be entered into ECTA.

KPMG attempted to submit trouble reports for Georgia PBX circuits via ECTA. As a result, KPMG received error responses from the ECTA Gateway for each attempted submission. KPMG confirmed that no trouble ticket was created in either the LMOS or WFA databases.

Impact

The inability to submit trouble reports for Georgia PBX circuits via ECTA will impact CLECs in the following way:

- **Increase in operating costs.** CLEC ECTA users rely on the system to report troubles on all types of designed and non-designed circuits. In this particular case, CLECs must call BellSouth to report Georgia PBX circuit trouble. Georgia PBX trouble reports will not be recorded in or accessible through ECTA. Additionally, CLECs will not be able to track these trouble tickets through any electronic means. As a result, CLECs will experience an increase in operating costs associated with the extra resources needed to report and track PBX troubles manually.

BELLSOUTH'S RESPONSE TO EXCEPTION 96

BellSouth Response

BellSouth's ECTA Gateway was not designed to allow CLECs to process trouble reports for PBX circuits. The BellSouth Electronic Communications Trouble Administration (ECTA) gateway interface is built according to the ANSI standards T1.227, T1.228 and T1.262 as defined in the Joint Implementation Agreement (JIA) between BellSouth and each ECTA client.

The Managed Object Instance, MOI, formats (i.e., the various telephone number and circuit ID formats supported) are negotiated between the Manager (CLEC) and Agent (BellSouth) and defined in the JIA.

Initially, six MOI formats accommodated all of the BellSouth service offerings obtained by CLECs. At the request of the ECTA CLEC users, a seventh MOI was added to support SL1 UNE loops.

Not every BellSouth service offering is currently supported by the existing set of MOI formats, rather only those requested by the client community. PBX lines are such an example. If an ECTA using CLEC were to offer PBX lines provisioned from BellSouth and would like to use ECTA to process PBX trouble reports, they would negotiate a new MOI via the change control process. To date, no CLEC has requested the ability to report troubles on PBX lines.



EXCEPTION 97

BellSouth Georgia OSS Testing Evaluation

Date: June 28, 2000

EXCEPTION REPORT

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

Exception:

BellSouth does not deliver timely Firm Order Confirmation (FOC) responses to non-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.

Based on timeliness standards within Service Quality Measurements (SQMs) approved by the Georgia Public Service Commission on June 6, 2000, KPMG expects to receive 95% of Flow Through FOCs within three hours and 85% of Non-Flow Through FOCs within 36 hours.

BellSouth Performance²: In response to LSRs submitted via TAG and EDI, BellSouth failed to deliver timely non-flow through FOCs.

- 79% of non-flow through FOCs were returned via the TAG interface within the specified timeframe³.

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 This exception includes data for LSRs submitted through June 2, 2000. A number of Local Number Portability (LNP) service requests are *excluded* from this data set. Information on fully versus partially mechanized CLR responses for certain LNP orders was not available from BellSouth.

³ 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 non-flow through FOCs received between 2/8/00 and 6/2/00, 83% were returned within 36 hours via TAG.



EXCEPTION 97

BellSouth Georgia OSS Testing Evaluation

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

The following tables provide a detailed breakdown of response time for non-flow through FOCs⁵.

Non-Flow Through FOC Timeliness Summary

FOCs received via TAG					
< 24 hrs	24-36 hrs	36-48 hrs	48-72 hrs	> 72 hrs	Total
134	31	30	7	7	209
64%	15%	14%	3%	3%	100%
FOCs received via EDI					
< 24 hrs	24-36 hrs	36-48 hrs	48-72 hrs	> 72 hrs	Total
117	34	16	5	10	182
64%	19%	9%	3%	5%	100%

Non-Flow Through FOC Detail – Untimely TAG FOCs

PON	VER	CC	36-48 hrs	48-72 hrs	> 72 hrs
305A222PTH100010	00	9994	X		
353A222PTI000001	04	8758	X		
318A112PTH100001	00	9992	X		
615A122PTH101009	06	9991	X		
402E223PTM000002	00	9994	X		
627A214PTJ101002	00	9991	X		
627A214PTJ100007	01	9991	X		
407A213PTM100006	00	9991	X		
627A214PTJ100006	01	9991	X		
403A223PTM100005	01	9994	X		
403X223PTM100002	01	9994	X		
406C213PTM100006	02	9994	X		
403A223PTM100003	00	9994	X		
801A222PTI100002	00	7050	X		

⁴ Response timeliness improved after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness issues. For non-flow through FOCs received between 2/8/00 and 6/2/00, 87% were received within 36 hours via EDI.

⁵ 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.



EXCEPTION 97
BellSouth Georgia OSS Testing Evaluation

PON	VER	CC	36-48 hrs	48-72 hrs	> 72 hrs
606A123PTM101003	02	9991	X		
605A214PTJ000004	00	9994	X		
317A122PTH101001	00	9991	X		
323A122PTH100001	03	9991	X		
435A114PTJ002002	00	9991	X		
440A124PTM100004	00	9991	X		
417A223PTM000002	00	9991	X		
309A122PTH100009	00	9994	X		
309A122PTH100008	00	9994	X		
333A122PTI101001	01	9992	X		
402A223PTM000002	00	9994	X		
307X222PTH101001	09	9994	X		
350A122PTI100002	02	8758	X		
604A224PTJ001002	00	9994	X		
511A212PTH100003	00	9994	X		
349A222PTI000002	00	8758	X		
384D225PTI100002	00	7125		X	
301A212PTF101015	02	9994		X	
357A212PTI100001	00	7050		X	
301A212PTH102014	02	9994		X	
428A124PTJ100002	01	9991		X	
403A223PTM000001	01	9994		X	
441A214PTJ000003	00	9991		X	
419A223PTM100002	00	9991			X
403X223PTM100002	00	9994			X
329A212PTI100003	00	9992			X
309A222PTH100001	04	9994			X
455A116PTF100002	00	9991			X
440A124PTJ000002	00	9991			X
625A214PTJ100001	05	9991			X

Non-Flow Through FOC Detail – Untimely EDI FOCs

PON	VER	CC	36-48 hrs	48-72 hrs	> 72 hrs
607C214PEJ103001	04	9991	X		
627A214PEJ100004	02	9991	X		
607A214PEJ101002	01	9991	X		
301A112PEH101011	03	9994	X		



EXCEPTION 97

BellSouth Georgia OSS Testing Evaluation

PON	VER	CC	36-48 hrs	48-72 hrs	> 72 hrs
556A216PEF100001	02	9991	X		
325C222PEI001001	03	9992	X		
407A213PEM101005	00	9991	X		
329A222PEI100001	02	9992	X		
374A225PEG100008	00	9992	X		
311F212PEH100002	00	9994	X		
402A223PEM001001	00	9994	X		
412A213PEM000002	00	9991	X		
301A112PEF100011	04	9994	X		
428X224PEJ101001	03	9994	X		
443X224PEM000002	00	9991	X		
428A224PEJ100003	01	9994	X		
349A212PEI000001	00	7050		X	
801A222PEI100001	00	7727		X	
441C214PEM000001	00	9991		X	
607C214PEJ103001	02	9991		X	
414A223PEM000002	00	9991		X	
405A312PEM001002	05	9994			X
325A212PEI000003	00	9992			X
301A222PEH102006	05	9994			X
407A213PEM100007	00	9991			X
301A222PEF102008	02	9994			X
387A225PEG100001	00	9992			X
433A124PEH100002	00	9991			X
307A122PEK100001	04	9994			X
456A216PEF100003	01	9991			X
452A216PEF100002	00	9991			X

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.



EXCEPTION 98

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 does not deliver timely partially mechanized Clarification (CLR) responses.

Background: In response to a valid Local Service Request¹ (LSR) that contains an error, BellSouth returns a CLR to the CLEC. A CLR is generated in one of two ways:

1. Fully Mechanized

A fully mechanized CLR, or auto-clarification, is a system-generated error message.

2. Partially Mechanized

A partially mechanized CLR is generated by a BellSouth ordering representative after an electronically submitted service request falls out for manual handling in the Local Carrier Service Center (LCSC).

Based on timeliness standards within Service Quality Measurements (SQMs) approved by the Georgia Public Service Commission on June 6, 2000, KPMG expects to receive 95% of CLRs for fully mechanized service requests within one hour and 85% of CLRs for partially mechanized service requests within 24 hours.

BellSouth Performance²: In response to LSRs submitted via TAG and EDI, BellSouth failed to deliver timely partially mechanized CLR responses.

- 58% of partially mechanized CLRs were returned via the TAG interface within the specified timeframe³.
- 63% of partially mechanized CLRs were returned via the EDI 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 This exception includes data for LSRs submitted through June 2, 2000. A number of Local Number Portability (LNP) service requests are *excluded* from this data set. Information on fully versus partially mechanized CLR responses for certain LNP orders was not available from BellSouth.

³ Response timeliness did not significantly improve after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness of response issues. For partially mechanized CLRs received between 2/8/00 and 6/2/00, 66% were returned within 24 hours via TAG.



EXCEPTION 98

BellSouth Georgia OSS Testing Evaluation

The following tables provide a detailed breakdown of response time for partially mechanized CLR⁵.

Partially Mechanized CLR Timeliness Summary

CLRs Received via TAG				
< 24 hrs	24-48 hrs	48-72 hrs	> 72 hrs	TOTAL
141	77	11	14	243
58%	32%	5%	6%	100%
CLRs Received via EDI				
< 24 hrs	24-48 hrs	48-72 hrs	> 72 hrs	TOTAL
130	60	9	6	205
63%	29%	4%	3%	100%

Partially Mechanized CLR Detail – Untimely TAG CLRs

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours
301A112PTH100012	00	9994	X		
626A224PTJ100007	01	9991	X		
606A123PTM101005	00	9991	X		
301A112PTH100009	00	9994	X		
607A214PTJ100003	00	9991	X		
627A214PTJ100002	00	9991	X		
627A214PTJ100006	00	9991	X		
606A123PTM101003	00	9991	X		
606A123PTM100005	00	9991	X		
627A214PTJ100007	00	9991	X		
604A224PTJ000002	00	9994	X		
301A112PTH100009	02	9994	X		
608A124PTJ100001	00	9991	X		
301A222PTF100007	02	9994	X		
305A122PTH101002	05	9994	X		
615A122PTH101009	05	9991	X		
615A122PTH101009	04	9991	X		
620A212PTH101001	00	9992	X		

⁴ Response timeliness did not improve after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness issues. For partially mechanized CLRs received between 2/8/00 and 6/2/00, 67% were received within 24 hours.

⁵ KPMG used Actual Flow Through data (provided from BellSouth as part of the Flow Through Evaluation) to determine whether CLRs were fully or partially mechanized.



EXCEPTION 98
BellSouth Georgia OSS Testing Evaluation

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours
620A212PTH101001	07	9992	X		
301A212PTH100014	00	9994	X		
301A212PTF100015	00	9994	X		
608A124PTJ100001	02	9991	X		
301A222PTH101001	00	9994	X		
301A222PTH101001	03	9994	X		
615A122PTF100012	00	9991	X		
301A112PTH100027	01	9994	X		
626A224PTJ100002	02	9991	X		
303A212PTH101001	01	9994	X		
626A224PTJ100007	00	9991	X		
301A222PTH101001	02	9994	X		
435A114PTJ001002	00	9991	X		
399D213PTM100001	00	9994	X		
305A212PTH100007	00	9994	X		
650A224PTJ000001	00	9994	X		
402E223PTM000002	03	9994	X		
403A223PTM100003	00	9994	X		
403A223PTM100005	00	9994	X		
600C212PTH100001	02	9994	X		
307A222PTF101015	00	9994	X		
409A223PTM100001	02	9991	X		
415D213PTM001002	00	9991	X		
417X223PTM000002	01	9991	X		
323A122PTF100003	00	9991	X		
418A313PTM100002	00	9994	X		
323A122PTH100001	00	9991	X		
398D213PTM000001	00	9994	X		
307X222PTH100001	02	9994	X		
330A222PTI100001	00	9994	X		
333A122PTI101001	00	9992	X		
374A225PTG100005	00	9992	X		
307A222PTH100014	00	9994	X		
307A222PTF102018	03	9994	X		
308F312PTH000003	05	9994	X		
398A213PTM100001	02	9994	X		
398A213PTM100002	00	9994	X		
398D213PTM000001	01	9994	X		
419F223PTM101002	00	9991	X		
415D213PTM001002	01	9991	X		



EXCEPTION 98

BellSouth Georgia OSS Testing Evaluation

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours
423A114PTJ000001	01	9994	X		
307A122PTH101002	00	9994	X		
307A122PTH100006	00	9994	X		
307A122PTH100004	00	9994	X		
432A214PTJ100004	00	9991	X		
307A122PTF100015	05	9994	X		
433A124PTJ100001	00	9991	X		
317A122PTH000004	00	9991	X		
307A122PTF100015	00	9994	X		
435C114PTJ001019	00	9991	X		
307A122PTH101002	01	9994	X		
307A122PTH101002	02	9994	X		
428A224PTJ100009	00	9994	X		
424A314PTJ000001	00	9994	X		
307A122PTH103002	07	9994	X		
428A124PTJ100012	00	9994	X		
428A124PTJ100006	00	9994	X		
315A212PTH100023	00	9994	X		
307A222PTH101014	04	9994	X		
309A222PTH100001	03	9994		X	
604A224PTJ000001	03	9994		X	
625A214PTJ100001	05	9991		X	
305A212PTH101007	00	9994		X	
423F114PTJ100002	02	9994		X	
606A123PTM100003	00	9991		X	
403X223PTM100002	01	9994		X	
404A223PTM100001	00	9991		X	
428A224PTJ100002	00	9991		X	
407A213PTM100003	00	9991		X	
404A223PTM100001	01	9991		X	
328F312PTI000002	01	9992			X
301A112PTH100009	03	9994			X
309A222PTH100001	04	9994			X
406C213PTM100002	02	9994			X
329A212PTI100003	00	9992			X
398A213PTM100001	00	9994			X
398A213PTM100001	03	9994			X
398D213PTM000001	02	9994			X
398D213PTM000001	03	9994			X
417A223PTM000002	00	9991			X



EXCEPTION 98

BellSouth Georgia OSS Testing Evaluation

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours
423A114PTJ000001	00	9994			X
305A112PTH100007	00	9994			X
626A224PTJ100002	03	9991			X
315A212PTH101002	05	9994			X

Partially Mechanized CLR Detail – Untimely EDI CLR

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours
301A212PEH100006	01	9994	X		
600A212PEH000002	01	9994	X		
620A212PEH100002	00	9991	X		
301A212PEH100016	00	9994	X		
606A123PEM100006	00	9991	X		
456A216PEF100003	00	9991	X		
301A112PEF100007	05	9994	X		
615A122PEF101013	02	9991	X		
301A112PEH100001	00	9994	X		
556A216PEF100001	00	9991	X		
301A222PEH101006	00	9994	X		
301A222PEH100006	00	9994	X		
301A112PEH100011	00	9994	X		
608A124PEJ100002	10	9991	X		
607C214PEJ103001	02	9991	X		
301A112PEH100008	00	9994	X		
607C214PEJ102001	00	9991	X		
301A212PEH100008	00	9994	X		
301A112PEH100001	01	9994	X		
301A212PEF100017	00	9994	X		
301A212PEH100006	02	9994	X		
609A214PEJ100002	00	9991	X		
607A214PEJ103001	04	9991	X		
615A122PEH103010	00	9991	X		
301A222PEF102008	00	9994	X		
309A122PEH100007	02	9994	X		
428X224PEJ102001	04	9994	X		
302A312PEH000003	00	9994	X		
329A222PEI100001	01	9992	X		
329A212PEI100004	00	9992	X		

KPMG Consulting LLC

07/27/00

Page 5 of 7



EXCEPTION 98
BellSouth Georgia OSS Testing Evaluation

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours
307A222PEF100013	00	9994	X		
325C222PEI001001	02	9992	X		
325C222PEI001001	00	9992	X		
325C222PEI000001	00	9992	X		
627A214PEJ100004	00	9991	X		
307A122PEH101003	03	9994	X		
307A222PEF100021	02	9994	X		
307A222PEH101001	00	9994	X		
307A222PEH101001	01	9994	X		
324A112PEH100002	06	9991	X		
307A222PEH102001	04	9994	X		
319A122PEH000003	00	9991	X		
319A122PEF000003	00	9991	X		
309A122PEH100001	03	9991	X		
315X212PEH101001	02	9991	X		
307A222PEH100009	00	9994	X		
307A122PEH100005	01	9994	X		
378A315PEI001001	05	9992	X		
305A222PEH101009	00	9994	X		
428X224PEJ102001	00	9994	X		
428A224PEJ100005	01	9994	X		
428A224PEJ100005	00	9994	X		
428A224PEJ100003	00	9994	X		
427A314PEJ101001	00	9994	X		
307A122PEF100003	00	9994	X		
409X223PEM100001	00	9991	X		
405A312PEM001002	00	9994	X		
325A212PEI000003	01	9992	X		
400A313PEM000001	02	9994	X		
402A223PEM000001	00	9994	X		
607A214PEJ103001	03	9991		X	
456A216PEF100001	00	9991		X	
627A214PEJ100001	01	9991		X	
399A213PEM100002	01	9994		X	
378A315PEI001001	04	9992		X	
309A122PEH100001	00	9991		X	
400A313PEM000001	00	9994		X	
607A214PEJ103001	00	9991		X	
420A124PEJ101001	00	9994		X	
303A222PEH101001	03	9994			X



EXCEPTION 98

BellSouth Georgia OSS Testing Evaluation

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours
309A122PEH100001	01	9991			X
422A114PEJ101001	03	9994			X
400A313PEM000001	03	9994			X
399A213PEM100002	00	9994			X
373A215PEG100002	01	9992			X

Impact

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

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



EXCEPTION 99

BellSouth Georgia OSS Testing Evaluation

Date: July 6, 2000

EXCEPTION REPORT

The following exception has been identified as a result of the CRIS Resale Invoicing Functional Evaluation (BLG-7).

Exception:

BellSouth issued multiple bills to the KPMG Test CLEC incorrectly identifying recurring charges as non-recurring charges.

On bills issued by BellSouth to the KPMG Test CLEC, KPMG discovered Primary InterExchange Carrier Charge (PICC) charges listed as non-recurring charges instead of recurring charges, as specified in the *FCC No.1 Access Service tariff, 1st revised page 3-17.1 (July 1, 1999)* and *34th revised page 3-18 (April 1, 2000)*.

The following represent instances a sample of occurrences where PICC charges were incorrectly classified on KPMG Test CLEC bills.

<u>Telephone Number</u>	<u>Account Number</u>	<u>Invoice Date</u>
404-315-6510	770-Q97-0010-010	03/17/00
770-394-2408	770-Q97-0010-010	03/17/00
678-579-9354	770-Q97-0010-010	03/17/00

Impact

Issuing bills containing erroneous information will impact CLECs in the following ways:

- **Inability to Conduct Business Operations Reliably.** A CLEC may unknowingly rely on erroneous billing information in conducting business operations, including budgetary planning and resource management. Erroneous billing information prevents a CLEC from reliably conducting these functions.
- **Increasing resource usage.** Regardless of the net monetary effect of incorrect charges upon a CLEC's bills, a CLEC will be forced to regularly reconcile bills – identifying and correcting incorrect charges and rectifying the loss of service for its customers. The necessity of an extensive validation of each bill and facility will increase CLEC resource utilization, thereby increasing operating costs.



EXCEPTION 100

BellSouth Georgia OSS Testing Evaluation

Date: July 5, 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 was unable to replicate two of BellSouth's Service Quality Measurements (SQMs) in the May 2000 report.

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. Additionally, BellSouth 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 experienced replication problems for the following SQMs in the May 2000 report.

1. ***Coordinated Customer Conversions in the Provisioning category for the KPMG Test CLEC.*** KPMG was unable to replicate Average Interval values in the SQM report, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
Unbundled Loops Without Number Portability; Avg Interval(Min)	4.75	4
Total; Avg Interval(Min)	4.75	4

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.



EXCEPTION 100

BellSouth Georgia OSS Testing Evaluation

2. **Invoice Accuracy in the Billing category for the KPMG Test CLEC.** KPMG was unable to replicate the UNE product group in the SQM report, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
UNE; Total Billed Revenue	\$29,145.87	\$29,039.40
UNE; Total Adjustments	\$42,291.62	\$44,828.80
UNE; Percent Accuracy	-45.103%	-54.372%

Additionally, KPMG discovered that five cells in the "ADJUSTMENT" field in the May raw data contained commas, after the adjustment amount. Since these fields are non-numeric, they are not included in the calculation of the *Invoice Accuracy* metric.

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 two 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'S RESPONSE TO EXCEPTION 96



July 17, 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 BellSouth ECTA Gateway does not allow CLECs to process trouble reports for PBX circuits in the state of Georgia.

BellSouth's ECTA Gateway is designed to allow CLECs to process trouble reports for all designed and non-designed circuits, including PBX circuits. During transaction testing, KPMG discovered that a trouble report for a PBX circuit in the state of Georgia cannot be entered into ECTA.

KPMG attempted to submit trouble reports for Georgia PBX circuits via ECTA. As a result, KPMG received error responses from the ECTA Gateway for each attempted submission. KPMG confirmed that no trouble ticket was created in either the LMOS or WFA databases.

Impact

The inability to submit trouble reports for Georgia PBX circuits via ECTA will impact CLECs in the following way:

- **Increase in operating costs.** CLEC ECTA users rely on the system to report troubles on all types of designed and non-designed circuits. In this particular case, CLECs must call BellSouth to report Georgia PBX circuit trouble. Georgia PBX trouble reports will not be recorded in or accessible through ECTA. Additionally, CLECs will not be able to track these trouble tickets through any electronic means. As a result, CLECs will experience an increase in operating costs associated with the extra resources needed to report and track PBX troubles manually.

BELLSOUTH'S RESPONSE TO EXCEPTION 96

BellSouth Response

BellSouth's ECTA Gateway was not designed to allow CLECs to process trouble reports for PBX circuits. The BellSouth Electronic Communications Trouble Administration (ECTA) gateway interface is built according to the ANSI standards T1.227, T1.228 and T1.262 as defined in the Joint Implementation Agreement (JIA) between BellSouth and each ECTA client.

The Managed Object Instance, MOI, formats (i.e., the various telephone number and circuit ID formats supported) are negotiated between the Manager (CLEC) and Agent (BellSouth) and defined in the JIA.

Initially, six MOI formats accommodated all of the BellSouth service offerings obtained by CLECs. At the request of the ECTA CLEC users, a seventh MOI was added to support SL1 UNE loops.

•
Not every BellSouth service offering is currently supported by the existing set of MOI formats, rather only those requested by the client community. PBX lines are such an example. If an ECTA using CLEC were to offer PBX lines provisioned from BellSouth and would like to use ECTA to process PBX trouble reports, they would negotiate a new MOI via the change control process. To date, no CLEC has requested the ability to report troubles on PBX lines.

BELLSOUTH'S RESPONSE TO EXCEPTION 97



July 17, 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 non-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.

Based on timeliness standards within Service Quality Measurements (SQMs) approved by the Georgia Public Service Commission on June 6, 2000, KPMG expects to receive 95% of Flow Through FOCs within three hours and 85% of Non-Flow Through FOCs within 36 hours.

BellSouth Performance²: In response to LSRs submitted via TAG and EDI, BellSouth failed to deliver timely non-flow through FOCs.

- 79% of non-flow through FOCs were returned via the TAG interface within the specified timeframe³.

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 This exception includes data for LSRs submitted through June 2, 2000. A number of Local Number Portability (LNP) service requests are *excluded* from this data set. Information on fully versus partially mechanized CLR responses for certain LNP orders was not available from BellSouth.

BELLSOUTH'S RESPONSE TO EXCEPTION 97

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

The following tables provide a detailed breakdown of response time for non-flow through FOCs⁵.

Non-Flow Through FOC Timeliness Summary

FOCs received via TAG					
< 24 hrs	24-36 hrs	36-48 hrs	48-72 hrs	> 72 hrs	Total
134	31	30	7	7	209
64%	15%	14%	3%	3%	100%
FOCs received via EDI					
< 24 hrs	24-36 hrs	36-48 hrs	48-72 hrs	> 72 hrs	Total
117	34	16	5	10	182
64%	19%	9%	3%	5%	100%

Non-Flow Through FOC Detail – Untimely TAG FOCs

PON	VER	CC	36-48 hrs	48-72 hrs	> 72 hrs	BellSouth Response
305A222PTH100010	00	9994	X			
353A222PTI000001	04	8758	X			
318A112PTH100001	00	9992	X			
615A122PTH101009	06	9991	X			Agree
402E223PTM000002	00	9994	X			
627A214PTJ101002	00	9991	X			Do not agree. BellSouth received PON 2/8/00 15:19. BellSouth sent FOC 2/9/00 19:32. KPMG did not acknowledge until 2/10/00 10:17. Apparent KPMG problem.
627A214PTJ100007	01	9991	X			
407A213PTM100006	00	9991	X			Agree
627A214PTJ100006	01	9991	X			

³ 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 non-flow through FOCs received between 2/8/00 and 6/2/00, 83% were returned within 36 hours via TAG.

⁴ Response timeliness improved after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness issues. For non-flow through FOCs received between 2/8/00 and 6/2/00, 87% were received within 36 hours via EDI.

⁵ 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 RESPONSE TO EXCEPTION 97

PON	VER	CC	36-48 hrs	48-72 hrs	> 72 hrs	BellSouth Response
403A223PTM100005	01	9994	X			Agree
403X223PTM100002	01	9994	X			
406C213PTM100006	02	9994	X			Agree
403A223PTM100003	00	9994	X			
801A222PTI100002	00	7050	X			
606A123PTM101003	02	9991	X			Agree
605A214PTJ000004	00	9994	X			
317A122PTH101001	00	9991	X			Agree
323A122PTH100001	03	9991	X			
435A114PTJ002002	00	9991	X			Agree
440A124PTM100004	00	9991	X			
417A223PTM000002	00	9991	X			Agree
309A122PTH100009	00	9994	X			
309A122PTH100008	00	9994	X			Agree
333A122PTI101001	01	9992	X			
402A223PTM000002	00	9994	X			Agree
307X222PTH101001	09	9994	X			
350A122PTI100002	02	8758	X			
604A224PTJ001002	00	9994	X			
511A212PTH100003	00	9994	X			Agree
349A222PTI000002	00	8758	X			
384D225PTI100002	00	7125		X		Agree
301A212PTF101015	02	9994		X		Do not agree. BellSouth received PON 4/10/00 9:35. BellSouth sent FOC 4/11/00 8:26. KPMG did not acknowledge until 4/12/00 9:49. Apparent KPMG problem.
357A212PTI100001	00	7050		X		Do not agree BellSouth received PON 1/17/00 21:38. BellSouth sent FOC 1/19/00 16:55. Should be in 36-48 hrs category.
301A212PTH102014	02	9994		X		Do not agree. BellSouth received PON 4/10/00 9:35. BellSouth sent FOC 4/11/00 8:26. KPMG did not acknowledge until 4/12/00 9:49. Apparent KPMG problem.

BELLSOUTH'S RESPONSE TO EXCEPTION 97

PON	VER	CC	36-48 hrs	48-72 hrs	> 72 hrs	BellSouth Response
428A124PTJ100002	01	9991		X		PON over 6 months old. Data has been archived.
403A223PTM000001	01	9994		X		PON over 6 months old. Data has been archived.
441A214PTJ000003	00	9991		X		PON over 6 months old. Data has been archived.
419A223PTM100002	00	9991			X	PON over 6 months old. Data has been archived.
403X223PTM100002	00	9994			X	Agree
329A212PTI100003	00	9992			X	Agree
309A222PTH100001	04	9994			X	Agree
455A116PTF100002	00	9991			X	PON over 6 months old. Data has been archived.
440A124PTJ000002	00	9991			X	PON over 6 months old. Data has been archived.
625A214PTJ100001	05	9991			X	PON over 6 months old. Data has been archived.

Non-Flow Through FOC Detail – Untimely EDI FOCs

PON	VER	CC	36-48 hrs	48-72 hrs	> 72 hrs	BellSouth Response
607C214PEJ103001	04	9991	X			
627A214PEJ100004	02	9991	X			
607A214PEJ101002	01	9991	X			
301A112PEH101011	03	9994	X			Agree
556A216PEF100001	02	9991	X			
325C222PEI001001	03	9992	X			Agree
407A213PEM101005	00	9991	X			
329A222PEI100001	02	9992	X			Agree
374A225PEG100008	00	9992	X			
311F212PEH100002	00	9994	X			Agree
402A223PEM001001	00	9994	X			
412A213PEM000002	00	9991	X			Agree
301A112PEF100011	04	9994	X			
428X224PEJ101001	03	9994	X			Agree
443X224PEM000002	00	9991	X			
428A224PEJ100003	01	9994	X			Agree
349A212PEI000001	00	7050		X		Unable to locate PON.
801A222PEI100001	00	7727		X		Agree

BELLSOUTH'S RESPONSE TO EXCEPTION 97

PON	VER	CC	36-48 hrs	48-72 hrs	> 72 hrs	BellSouth Response
441C214PEM000001	00	9991		X		Do not agree. BellSouth received PON 1/14/00 10:00. BellSouth sent clarification 1/14/00 15:31. PON should not be included in this FOC timeliness exception.
607C214PEJ103001	02	9991		X		Do not agree. BellSouth received PON 2/12/00 12:00. BellSouth sent FOC 2/12/00 12:11.
414A223PEM000002	00	9991		X		PON over 6 months old. Data has been archived.
405A312PEM001002	05	9994			X	Agree
325A212PEI000003	00	9992			X	Do not agree. BellSouth received PON 2/16/00 12:00. BellSouth sent clarification 2/16/00 17:35. BellSouth sent FOC 2/25/00 19:02. PON should not be included in this FOC timeliness exception.
301A222PEH102006	05	9994			X	Do not agree. BellSouth received PON 4/12/00 16:00. BellSouth sent FOC 4/12/00 21:11.
407A213PEM100007	00	9991			X	Agree
301A222PEF102008	02	9994			X	Do not agree. BellSouth received PON 4/12/00 07:00. BellSouth sent FOC 4/12/00 20:56.
387A225PEG100001	00	9992			X	Unable to locate

BELLSOUTH'S RESPONSE TO EXCEPTION 97

						PON.
433A124PEH100002	00	9991			X	Agree
307A122PEK100001	04	9994			X	Agree
456A216PEF100003	01	9991			X	Do not agree. BellSouth received PON 2/19/00 10:30. BellSouth sent clarification 2/21/00 14:23. PON should not be in this FOC timeliness exception.
452A216PEF100002	00	9991			X	PON over 6 months old. Data has been archived.

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'S RESPONSE TO EXCEPTION 97

BellSouth Response:

The PONs listed in this exception were processed by BellSouth through 6/2/00. BellSouth standard was 48 hours for returning non-flow through Firm Order Confirmations (FOCs) at the time of this test. On 6/6/00, the Georgia PSC set new standards for BellSouth as described by KPMG in this exception, 85% within 36 hours.

BellSouth results based on BellSouth standards at the time of this test:

FOCs received via TAG					
		< 48 hrs	48-72 hrs	> 72 hrs	Total
		195	7	7	209
		94%	3%	3%	100%
FOCs received via EDI					
		< 48 hrs	48-72 hrs	> 72 hrs	Total
		167	5	10	182
		92%	3%	5%	100%

Since the BellSouth internal standard for non-flow through FOCs was 48 hrs at the time of this test, a sample of the 46 PONs included in the 36-48 hrs categories were reviewed. All of the PONs included in the 48-72 hrs and >72 hrs categories were reviewed. Due to the time elapsed from receipt of the listed PONs and receipt of this exception, data for 9 PONs has been archived. In addition, 2 of the PONs listed were not received by BellSouth.

Summary of findings for PONs reviewed by BellSouth:

Category	Total PONs in Category	PONs Reviewed in Category	BellSouth Does not agree	BellSouth Agrees	Unable to locate PON
TAG 36-48 hrs	30	12	1	11	
EDI 36-48 hrs	16	7	0	7	
TAG 48-72 hrs	7	7	3	1	3
EDI 48-72 hrs	5	5	2	1	2
TAG > 72 hrs	7	7	0	3	4
EDI > 72 hrs	10	10	4	4	2

In summary, BellSouth disagrees with the categorization of 4 out of 26 sampled TAG FOCs (15%). Additionally, BellSouth disagrees with the categorization of 6 out of 22 sampled EDI FOCs (27%). Given this analysis, BellSouth's results would increase to

BELLSOUTH'S RESPONSE TO EXCEPTION 97

82% and 88% of FOCs within 36 hours, respectively for TAG and EDI. All of these LSRs were processed prior to the new standards. BellSouth is currently developing and executing procedures to meet the interim standards that were set by the Georgia PSC on 6/6/00. The progress of these efforts will be tracked in the Service Quality Measures results that are filed each month with the GA PSC.

BELLSOUTH'S RESPONSE TO EXCEPTION 98



July 17, 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 partially mechanized Clarification (CLR) responses.

Background: In response to a valid Local Service Request¹ (LSR) that contains an error, BellSouth returns a CLR to the CLEC. A CLR is generated in one of two ways:

1. Fully Mechanized

A fully mechanized CLR, or auto-clarification, is a system-generated error message.

2. Partially Mechanized

A partially mechanized CLR is generated by a BellSouth ordering representative after an electronically submitted service request falls out for manual handling in the Local Carrier Service Center (LCSC).

Based on timeliness standards within Service Quality Measurements (SQMs) approved by the Georgia Public Service Commission on June 6, 2000, KPMG expects to receive 95% of CLRs for fully mechanized service requests within one hour and 85% of CLRs for partially mechanized service requests within 24 hours.

BellSouth Performance²: In response to LSRs submitted via TAG and EDI, BellSouth failed to deliver timely partially mechanized CLR responses.

- 58% of partially mechanized CLRs were returned via the TAG interface within the specified timeframe³.

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 This exception includes data for LSRs submitted through June 2, 2000. A number of Local Number Portability (LNP) service requests are *excluded* from this data set. Information on fully versus partially mechanized CLR responses for certain LNP orders was not available from BellSouth.

³ Response timeliness did not significantly improve after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness of response issues. For partially mechanized CLRs received between 2/8/00 and 6/2/00, 66% were returned within 24 hours via TAG.

BELLSOUTH'S RESPONSE TO EXCEPTION 98

- 63% of partially mechanized CLR's were returned via the EDI interface within the specified timeframe⁴.

The following tables provide a detailed breakdown of response time for partially mechanized CLR's⁵.

Partially Mechanized CLR Timeliness Summary

CLR's Received via TAG				
< 24 hrs	24-48 hrs	48-72 hrs	> 72 hrs	TOTAL
141	77	11	14	243
58%	32%	5%	6%	100%
CLR's Received via EDI				
< 24 hrs	24-48 hrs	48-72 hrs	> 72 hrs	TOTAL
130	60	9	6	205
63%	29%	4%	3%	100%

Partially Mechanized CLR Detail – Untimely TAG CLR's

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours	BellSouth Response
301A112PTH100012	00	9994	X			Agree
626A224PTJ100007	01	9991	X			
606A123PTM101005	00	9991	X			Agree
301A112PTH100009	00	9994	X			
607A214PTJ100003	00	9991	X			Agree
627A214PTJ100002	00	9991	X			
627A214PTJ100006	00	9991	X			Agree
606A123PTM101003	00	9991	X			
606A123PTM100005	00	9991	X			
627A214PTJ100007	00	9991	X			
604A224PTJ000002	00	9994	X			Agree
301A112PTH100009	02	9994	X			
608A124PTJ100001	00	9991	X			Agree
301A222PTF100007	02	9994	X			
305A122PTH101002	05	9994	X			Agree
615A122PTH101009	05	9991	X			Agree
615A122PTH101009	04	9991	X			Do not agree. BellSouth received PON 2/22/00 8:06:49. BellSouth sent CLR 2/23/00 8:06:44. Acknowledgment received from KPMG 2/23/00 8:06:49.

⁴ Response timeliness did not improve after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness issues. For partially mechanized CLR's received between 2/8/00 and 6/2/00, 67% were received within 24 hours.

⁵ KPMG used Actual Flow Through data (provided from BellSouth as part of the Flow Through Evaluation) to determine whether CLR's were fully or partially mechanized.

BELLSOUTH'S RESPONSE TO EXCEPTION 98

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours	BellSouth Response
620A212PTH101001	00	9992	X			Agree
620A212PTH101001	07	9992	X			Agree
301A212PTH100014	00	9994	X			
301A212PTF100015	00	9994	X			Agree
608A124PTJ100001	02	9991	X			
301A222PTH101001	00	9994	X			Do not agree. BellSouth received PON 2/8/00 7:33. BellSouth sent CLR 2/8/00 17:57. Acknowledgement not received from KPMG until 2/9/00 9:55. Apparent KPMG problem.
301A222PTH101001	03	9994	X			Agree
615A122PTF100012	00	9991	X			
301A112PTH100027	01	9994	X			
626A224PTJ100002	02	9991	X			Agree
303A212PTH101001	01	9994	X			
626A224PTJ100007	00	9991	X			Do not agree. BellSouth received PON 2/8/00 17:12. BellSouth sent CLR 2/9/00 14:35. Acknowledgment not received from KPMG until 2/10/00 9:47. Apparent KPMG problem
301A222PTH101001	02	9994	X			
435A114PTJ001002	00	9991	X			Agree
399D213PTM100001	00	9994	X			
305A212PTH100007	00	9994	X			Agree
650A224PTJ000001	00	9994	X			
402E223PTM000002	03	9994	X			Agree
403A223PTM100003	00	9994	X			
403A223PTM100005	00	9994	X			Agree
600C212PTH100001	02	9994	X			
307A222PTF101015	00	9994	X			Agree
409A223PTM100001	02	9991	X			
415D213PTM001002	00	9991	X			Agree
417X223PTM000002	01	9991	X			
323A122PTF100003	00	9991	X			Agree
418A313PTM100002	00	9994	X			
323A122PTH100001	00	9991	X			Agree
398D213PTM000001	00	9994	X			
307X222PTH100001	02	9994	X			Agree
330A222PTI100001	00	9994	X			
333A122PTI101001	00	9992	X			
374A225PTG100005	00	9992	X			
307A222PTH100014	00	9994	X			Agree
307A222PTF102018	03	9994	X			
308F312PTH000003	05	9994	X			
398A213PTM100001	02	9994	X			Agree

BELLSOUTH'S RESPONSE TO EXCEPTION 98

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours	BellSouth Response
398A213PTM100002	00	9994	X			
398D213PTM000001	01	9994	X			
419F223PTM101002	00	9991	X			Agree
415D213PTM001002	01	9991	X			
423A114PTJ000001	01	9994	X			
307A122PTH101002	00	9994	X			Do not agree. BellSouth received PON 2/08 13:05. BellSouth sent CLR 2/09 11:08. Acknowledgement not received from KPMG until 2/10 09:47. Apparent KPMG problem.
307A122PTH100006	00	9994	X			
307A122PTH100004	00	9994	X			
432A214PTJ100004	00	9991	X			
307A122PTF100015	05	9994	X			
433A124PTJ100001	00	9991	X			
317A122PTH000004	00	9991	X			
307A122PTF100015	00	9994	X			
435C114PTJ001019	00	9991	X			
307A122PTH101002	01	9994	X			
307A122PTH101002	02	9994	X			
428A224PTJ100009	00	9994	X			
424A314PTJ000001	00	9994	X			
307A122PTH103002	07	9994	X			
428A124PTJ100012	00	9994	X			
428A124PTJ100006	00	9994	X			
315A212PTH100023	00	9994	X			
307A222PTH101014	04	9994	X			
309A222PTH100001	03	9994		X		Agree
604A224PTJ000001	03	9994		X		Agree
625A214PTJ100001	05	9991		X		PONs over 6 months old. Data has been archived.
305A212PTH101007	00	9994		X		Do not agree. BellSouth sent FOC and then sent CLR due to working cable pairs assigned by KPMG in error. BellSouth followed established process.
423F114PTJ100002	02	9994		X		PONs over 6 months old. Data has been archived.
606A123PTM100003	00	9991		X		Agree
403X223PTM100002	01	9994		X		Agree
404A223PTM100001	00	9991		X		PONs over 6 months old. Data has been archived.
428A224PTJ100002	00	9991		X		Agree
407A213PTM100003	00	9991		X		PONs over 6 months old. Data has been archived.
404A223PTM100001	01	9991		X		PONs over 6 months old. Data has been archived.

BELLSOUTH'S RESPONSE TO EXCEPTION 98

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours	BellSouth Response
328F312PTI000002	01	9992			X	Do not agree. BellSouth sent FOC and then sent CLR due to working cable pairs assigned by KPMG in error. BellSouth followed established process.
301A112PTH100009	03	9994			X	Do not agree. Service rep inappropriately used CLR to notify KPMG of missed appointment. BellSouth mechanized missed ppointment notice was correctly sent. Service reps were covered 6/29/00.
309A222PTH100001	04	9994			X	Agree
406C213PTM100002	02	9994			X	Do not agree. BellSouth sent FOC and then sent CLR due to working cable pairs assigned by KPMG in error. BellSouth followed established process.
329A212PTI100003	00	9992			X	Agree
398A213PTM100001	00	9994			X	Do not agree. BellSouth received PON 11/23/99 16:38. BellSouth sent CLR 11/26/99 15:54 (Thanksgiving holiday was 11/25/99). BellSouth continued to resend CLR to KPMG through 11/30/99. Apparent KPMG problem.
398A213PTM100001	03	9994			X	Agree
398D213PTM000001	02	9994			X	Agree
398D213PTM000001	03	9994			X	Agree
417A223PTM000002	00	9991			X	Do not agree. BellSouth sent FOC and then sent CLR due to working cable pairs assigned by KPMG in error. BellSouth followed established process.
423A114PTJ000001	00	9994			X	PONs over 6 months old. Data has been archived.
305A112PTH100007	00	9994			X	Do not agree. BellSouth sent FOC and then sent CLR due to working cable pairs assigned by KPMG in error. BellSouth followed established process.

BELLSOUTH'S RESPONSE TO EXCEPTION 98

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours	BellSouth Response
626A224PTJ100002	03	9991			X	Do not agree. BellSouth received PON 12/6/99 13:46. BellSouth sent CLR 12/8/99 10:59. Acknowledgement not received from KPMG until 12/10/99 14:16. Apparent KPMG problem.
315A212PTH101002	05	9994			X	Agree

Partially Mechanized CLR Detail – Untimely EDI CLR

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours	BellSouth Response
301A212PEH100006	01	9994	X			
600A212PEH000002	01	9994	X			Agree
620A212PEH100002	00	9991	X			
301A212PEH100016	00	9994	X			Agree
606A123PEM100006	00	9991	X			
456A216PEF100003	00	9991	X			Agree
301A112PEF100007	05	9994	X			
615A122PEF101013	02	9991	X			Do not agree. BellSouth received PON 4/12/00 13:40. BellSouth sent CLR 4/13/00 10:05.
301A112PEH100001	00	9994	X			
556A216PEF100001	00	9991	X			Agree
301A222PEH101006	00	9994	X			
301A222PEH100006	00	9994	X			Agree
301A112PEH100011	00	9994	X			
608A124PEJ100002	10	9991	X			Agree
607C214PEJ103001	02	9991	X			
301A112PEH100008	00	9994	X			Agree
607C214PEJ102001	00	9991	X			
301A212PEH100008	00	9994	X			Agree
301A112PEH100001	01	9994	X			
301A212PEF100017	00	9994	X			Agree
301A212PEH100006	02	9994	X			
609A214PEJ100002	00	9991	X			Agree
607A214PEJ103001	04	9991	X			
615A122PEH103010	00	9991	X			Do not agree. BellSouth received PON 4/12/00 13:28. BellSouth sent CLR 4/13/00 10:10.
301A222PEF102008	00	9994	X			
309A122PEH100007	02	9994	X			Agree
428X224PEJ102001	04	9994	X			
302A312PEH000003	00	9994	X			Agree

BELLSOUTH'S RESPONSE TO EXCEPTION 98

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours	BellSouth Response
329A222PEI100001	01	9992	X			
329A212PEI100004	00	9992	X			Agree
307A222PEF100013	00	9994	X			
325C222PEI001001	02	9992	X			Agree
325C222PEI001001	00	9992	X			Agree
325C222PEI000001	00	9992	X			
627A214PEJ100004	00	9991	X			Do not agree. BellSouth received PON 2/8/00 18:21. BellSouth sent CLR 2/9/00 17:49.
307A122PEH101003	03	9994	X			
307A222PEF100021	02	9994	X			
307A222PEH101001	00	9994	X			Agree
307A222PEH101001	01	9994	X			Agree
324A112PEH100002	06	9991	X			
307A222PEH102001	04	9994	X			
319A122PEH000003	00	9991	X			Do not agree. BellSouth received PON 4/24/00 17:22. BellSouth sent CLR 4/25/00 15:52.
319A122PEF000003	00	9991	X			Do not agree. BellSouth received PON 4/24/00 17:22. BellSouth sent CLR 4/25/00 15:47.
309A122PEH100001	03	9991	X			
315X212PEH101001	02	9991	X			
307A222PEH100009	00	9994	X			
307A122PEH100005	01	9994	X			
378A315PEI001001	05	9992	X			
305A222PEH101009	00	9994	X			
428X224PEJ102001	00	9994	X			
428A224PEJ100005	01	9994	X			Agree
428A224PEJ100005	00	9994	X			Agree
428A224PEJ100003	00	9994	X			
427A314PEJ101001	00	9994	X			
307A122PEF100003	00	9994	X			
409X223PEM100001	00	9991	X			
405A312PEM001002	00	9994	X			
325A212PEI000003	01	9992	X			
400A313PEM000001	02	9994	X			
402A223PEM000001	00	9994	X			
607A214PEJ103001	03	9991		X		Agree
456A216PEF100001	00	9991		X		Agree
627A214PEJ100001	01	9991		X		Agree
399A213PEM100002	01	9994		X		PONs over 6 months old. Data has been archived.
378A315PEI001001	04	9992		X		Do not agree. BellSouth sent FOC and then sent CLR due to working cable pairs assigned by KPMG in error. BellSouth followed established

BELLSOUTH'S RESPONSE TO EXCEPTION 98

						process.

BELLSOUTH'S RESPONSE TO EXCEPTION 98

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours	BellSouth Response
309A122PEH100001	00	9991		X		Agree
400A313PEM000001	00	9994		X		Agree
607A214PEJ103001	00	9991		X		Do not agree. BellSouth sent FOC and then sent CLR due to working telephone number assigned by KPMG in error. BellSouth followed established process.
420A124PEJ101001	00	9994		X		Do not agree. BellSouth sent FOC and then sent CLR due to working telephone number assigned by KPMG in error. BellSouth followed established process.
303A222PEH101001	03	9994			X	Do not agree. Service rep inappropriately used CLR to notify KPMG of missed appointment. BellSouth mechanized missed appointment notice was correctly sent. Service reps were covered 6/29/00.
309A122PEH100001	01	9991			X	Agree
422A114PEJ101001	03	9994			X	Do not agree. Service rep inappropriately used CLR to notify KPMG of missed appointment. BellSouth mechanized missed appointment notice was correctly sent. Service reps were covered 6/29/00.
400A313PEM000001	03	9994			X	Agree
399A213PEM100002	00	9994			X	PONs over 6 months old. Data has been archived.
373A215PEG100002	01	9992			X	Agree

Impact

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

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

BELLSOUTH'S RESPONSE TO EXCEPTION 98

BellSouth Response:

The PONs listed in this exception were processed by BellSouth through 6/2/00. BellSouth's standard for returning partially mechanized Clarifications (CLRs) at the time of this test was 48 hours. On 6/6/00, the Georgia PSC set new standards for BellSouth as described by KPMG in this exception.

BellSouth's results are based on the 48-hour timeframe which was in effect at the time of the test:

CLRs Received via TAG				
	< 48 hrs	48-72 hrs	> 72 hrs	TOTAL
	218	11	14	243
	89%	5%	6%	100%
CLRs Received via EDI				
	< 48 hrs	48-72 hrs	> 72 hrs	TOTAL
	190	9	6	205
	93%	4%	3%	100%

Since the BellSouth internal standard for partially mechanized CLRs was 48 hrs at the time of this test, a sample of the 137 PONs included in the 24-48 hrs categories were reviewed. All of the PONs included in the 48-72 hrs and >72 hrs categories were reviewed. Due to the time elapsed from receipt of the listed PONs and receipt of this exception, data for 8 PONs has been archived.

Category	Total PONs in Category	PONs Reviewed in Category	BellSouth Does not agree	BellSouth Agrees	Unable to locate PON
TAG 24-48 hrs	77	29	4	25	
EDI 24-48 hrs	60	24	5	19	
TAG 48-72 hrs	11	11	1	5	5
EDI 48-72 hrs	9	9	3	5	1
TAG > 72 hrs	14	14	7	6	1
EDI > 72 hrs	6	6	2	3	1

In summary, BellSouth disagrees with the categorization of 12 out of 48 sampled TAG CLRs (25%). Additionally, BellSouth disagrees with the categorization of 10 out of 37

BELLSOUTH'S RESPONSE TO EXCEPTION 98

sampled EDI CLR's (27%). Given this analysis, BellSouth's results would increase to 95% and 98% of CLR's within 48 hours, respectively for TAG and EDI. All of these LSR's were processed prior to the new standards. BellSouth is currently developing and executing procedures to meet the interim standards that were set by the Georgia PSC on 6/6/00. The progress of these efforts will be tracked in the Service Quality Measures results that are filed each month with the GA PSC.

BELLSOUTH'S RESPONSE TO EXCEPTION 99



July 13, 2000

EXCEPTION REPORT

The following exception has been identified as a result of the CRIS Resale Invoicing Functional Evaluation (BLG-7).

Exception:

BellSouth issued multiple bills to the KPMG Test CLEC incorrectly identifying recurring charges as non-recurring charges.

On bills issued by BellSouth to the KPMG Test CLEC, KPMG discovered Primary InterExchange Carrier Charge (PICC) charges listed as non-recurring charges instead of recurring charges, as specified in the *FCC No.1 Access Service tariff, 1st revised page 3-17.1 (July 1, 1999)* and *34th revised page 3-18 (April 1, 2000)*.

The following represent instances a sample of occurrences where PICC charges were incorrectly classified on KPMG Test CLEC bills.

<u>Telephone Number</u>	<u>Account Number</u>	<u>Invoice Date</u>
404-315-6510	770-Q97-0010-010	03/17/00
770-394-2408	770-Q97-0010-010	03/17/00
678-579-9354	770-Q97-0010-010	03/17/00

Impact

Issuing bills containing erroneous information will impact CLECs in the following ways:

- **Inability to Conduct Business Operations Reliably.** A CLEC may unknowingly rely on erroneous billing information in conducting business operations, including budgetary planning and resource management. Erroneous billing information prevents a CLEC from reliably conducting these functions.
- **Increasing resource usage.** Regardless of the net monetary effect of incorrect charges upon a CLEC's bills, a CLEC will be forced to regularly reconcile bills – identifying and correcting incorrect charges and rectifying the loss of service for its customers. The necessity of an extensive validation of each bill and facility will increase CLEC resource utilization, thereby increasing operating costs.

BELLSOUTH'S RESPONSE TO EXCEPTION 99

BellSouth Response

PICC charges are considered a non-recurring charge because once a Presubscribed Carrier has been assigned there is no monthly recurring charge. As a result, these charges are subject to change by the customer assigning an Interexchange Carrier (PIC code) on that particular station line. In the OC&C section the charge appears with the statement, "Charge for No Presubscribed Interexchange Carrier for (line number). If our information is incorrect, please call your Service Ordering Business office or correct this statement and mail it with your payment." Once the customer has assigned a carrier, PICC fees will not be charged to the customer.

BELLSOUTH'S RESPONSE TO EXCEPTION 100



July 21, 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 was unable replicate two of BellSouth's Service Quality Measurements (SQMs) in the May 2000 report.

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. Additionally, BellSouth 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 experienced replication problems for the following SQMs in the May 2000 report.

1. ***Coordinated Customer Conversions in the Provisioning category for the KPMG Test CLEC.*** KPMG was unable to replicate Average Interval values in the SQM report, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
Unbundled Loops Without Number Portability; Avg Interval(Min)	4.75	4
Total; Avg Interval(Min)	4.75	4

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.

BELLSOUTH'S RESPONSE TO EXCEPTION 100

2. **Invoice Accuracy in the Billing category for the KPMG Test CLEC.** KPMG was unable to replicate the UNE product group in the SQM report, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
UNE; Total Billed Revenue	\$29,145.87	\$29,039.40
UNE; Total Adjustments	\$42,291.62	\$44,828.80
UNE; Percent Accuracy	-45.103%	-54.372%

Additionally, KPMG discovered that five cells in the "ADJUSTMENT" field in the May raw data contained commas, after the adjustment amount. Since these fields are non-numeric, they are not included in the calculation of the *Invoice Accuracy* metric.

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 two 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

Coordinated Customer Conversions in the Provisioning category for the KPMG Test CLEC.

Effective with the July SQM report, the CCC report will report the "Average Interval" in minutes and seconds (4:45). Previously this was reported in minutes and hundredths of a minute (4.75). Prior to May 2000, the file that was used to generate the CCC report was created manually. Seconds were not included because they were not available. Now, beginning in May 2000, the file is created mechanically and seconds are available. A software change was made due to this new time format (yyyy-mm-dd hh:mm:ss). The first time the report was run, the report had the seconds truncated. The report has now been rerun and the "Average Interval" is now reported in minutes and seconds.

Invoice Accuracy in the Billing category for the KPMG Test CLEC

Under investigation

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:

Jim Hurt, Director
Consumers' Utility Counsel
2 Martin Luther King Jr. Drive
Plaza Level East
Atlanta, GA 30334-4600

Newton M. Galloway
Newton Galloway & Associates
Suite 400 First Union Bank Tower
100 South Hill Street
Griffin, GA 30229

Charles A. Hudak, Esq.
Gerry, Friend & Sapronov, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346-2131

Kent F. Heyman, Esq.
Sr. VP and General Counsel
Mpower Communications Corp.
171 Sully's Trail, Suite 202
Pittsford, NY 14534

Suzanne W. Ockleberry
AT&T
1200 Peachtree Street, NE
Suite 8100
Atlanta, GA 30309

John M. Stuckey, Jr.
Webb, Stuckey & Lindsey
7 Lenox Pointe, N.E.
Atlanta, GA 30324

Charles V. Gerkin, Jr.
Smith, Gambrell & Russell, LLP
Promenade II, Suite 3100
1230 Peachtree Street, N.E.
Atlanta, GA 30309-3592

Frank B. Strickland
Wilson, Strickland & Benson
One Midtown Plaza, Suite 1100
1360 Peachtree Street, NE
Atlanta, GA 30309

Jeremy D. Marcus, Esq.
Blumenfeld & Cohen
Co-Counsel for Rhythm, aka ACI Corp.
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036

Scott A. Sapperstein
Sr. Policy Counsel
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619

John P. Silk
Georgia Telephone Association
1900 Century Boulevard, Suite 8
Atlanta, GA 30345

Thomas K. Bond
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, GA 30334

Eric J. Branfman
Richard M. Rindler
Swidler & Berlin
3000 K Street, NW, Suite 300
Washington, DC 20007

Harris R. Anthony
BellSouth Long Distance
28 Perimeter Center East
Atlanta, GA 30346

Robert A. Ganton
Regulatory Law Office
Dept. Army
Suite 700
901 N. Stuart Street
Arlington, VA 22203-1837

Charles F. Palmer
Troutman Sanders LLP
5200 NationsBank Plaza
600 Peachtree Street, NE
Atlanta, GA 30308-2216

Peter C. Canfield
Dow Lohnes & Albertson
One Ravinia Drive, Suite 1600
Atlanta, GA 30346

Judith A. Holiber
One Market
Spear Street Tower, 32nd Floor
San Francisco, CA 94105

James M. Tennant
Low Tech Designs, Inc.
1204 Saville Street
Georgetown, SC 29440

Nanette S. Edwards, Esq.
Regulatory Attorney
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802

Peyton S. Hawes Jr.
127 Peachtree Street, NE
Suite 1100
Atlanta, GA 30303-1810

Daniel Walsh
Assistant Attorney General
Office of the Attorney General
40 Capitol Square
Atlanta, GA 30334-1300

Mark Brown
Director of Legal and Government Affairs
MediaOne, Inc.
2925 Courtyards Drive
Norcross, GA 30071

John McLaughlin
KMC Telecom Inc.
Suite 170
3025 Breckinridge Boulevard
Duluth, GA 30096

Jeffrey Blumenfeld
Elise P. W. Kiely
Blumenfeld & Cohen
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036

James A. Schendt
Regulatory Affairs Manager
Interpath Communications, Inc.
P. O. box 13961
Durham, NC 27709-3961

James A. Schendt
Regulatory Affairs Manager
Interpath Communications, Inc.
P. O. Box 13961
Durham, NC 27709-3961

Nancy Krabill
Director of Regulatory Affairs
1300 W. Mockingbird Lane
Suite 200
Dallas, TX 75247

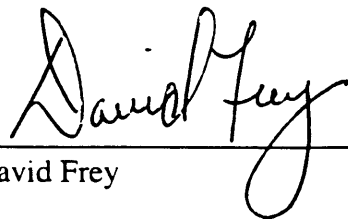
Anne E. Franklin
Arnall Golden & Gregory, LLP
2800 One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309

William R. Atkinson
Sprint Communications Co. L.P.
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339

Dana R. Shaffer
Legal Counsel
105 Molloy Street
Suite 300
Nashville, TN 37201

Glenn A. Harris
Lori Anne Dolquest
NorthPointe Communications, Inc.
303 Second Street, South Tower
San Francisco, CA 94107

This 28th day of July 2000.



David Frey

KPMG
303 Peachtree Street, N.E.
Suite 2000
Atlanta, Georgia 30308
(404) 222-3000



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

Telephone 404 222 3000
Fax 404 222 3050

RECEIVED

August 4th, 2000

AUG 04 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 25, 29, 34, 37, 44, 48 and 58 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 25

BellSouth Georgia OSS Testing Evaluation

Date: August 4, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth's systems capacity management process does not include established ongoing procedures for forecasting business volumes and transactions.

Summary of Exception:

Based on interview sessions and documentation reviews conducted as part of the PRE-6, O&P-6, BLG-3, M&R-5, and M&R-6 Tests, KPMG has observed that BellSouth's systems capacity management process does not include established, ongoing procedures for forecasting business volumes and transactions for its mainframe (EDI, LEO, SOCS, CRIS, CABS, ADUF, ODUF) and mid-range (TAG, LESOG, LNP, TAFI, ECTA) electronic interfaces. BellSouth's capacity management process should contain safeguards and procedures to plan for and manage projected growth in the use of these interfaces.

Key elements of a comprehensive capacity management process include:

- Collection, reporting, analysis, and verification of 1) system performance, 2) system resource utilization, and 3) business and transaction volume data
- Forecasting of business volumes and transactions
- Consideration of business requirements and existing system capacity, usage, and performance data during the capacity planning process

Summary of BellSouth's Response

"BellSouth has implemented a Capacity Management Group within the Asset Management District of the Engineering and Design Organization. This group, formed in late 1999, has established several processes designed to move toward a comprehensive capacity management process. The following specific actions are underway:

- A. Collection, reporting and analysis of capacity trends for system resources are being tracked for a majority of the systems managed by IT within the Midrange Services Model (MSM). All systems that do not have technical problems will have reporting by the end of the second quarter. Of the systems mentioned above, TAG and LNP generate reports on a monthly basis. The LESOG application was initially designated as a stable system and reporting was instituted on an annual basis; a decision on frequency of reporting intervals will be reviewed with the user community by the end of March. The TAFI system utilized the SAR reporting capabilities which are more difficult to trend, but processes will be in place to handle this by June 30, 2000. The



CLOSURE REPORT FOR EXCEPTION 25

BellSouth Georgia OSS Testing Evaluation

Capacity Management Group reviews these reports and is responsible for investigating systems whose trended growth will rise above the system engineering levels within the next 18 months. Recommendations are then forwarded to specific asset planners, as well as the solutions designers, who work with the application contacts to implement detailed plans involving methods to reduce growth; funding for new systems, if required; detailed system solutions; and timing of acquisitions.

- B. Specific personnel handle all day-to-day performance analysis for both Mid-Range and Main Frame systems. Exception reports are generated to the BellSouth capacity planning personnel when these problems are viewed as capacity related. These resources assist with the analysis of normal, trended growth patterns that are input into the functions performed by the capacity planning organization. This is another check in the process to ensure these systems are not "out of capacity".
- C. IT personnel are also responsible for developing the capacity plan for all the mainframe assets. They provide a quarterly asset plan for review by BellSouth planners to ensure that overall capacity needs are met. Specific application growth for all mainframe applications are captured monthly and the top growth applications are identified and managed such that capacity will not become a problem.
- D. Through the implementation of new corporate-wide IT engagement processes, the requirement for adequate forecast data is assigned to the prime project manager. This data can be gathered according to defined templates based on the level of project detail known at the time. Training for implementation of this process is currently underway, with full operation planned prior to March 31, 2000.
- E. Overall, BellSouth's current capacity management process obtains inputs from the following sources:
 - CLEC transaction forecasts, if provided
 - Analysis of Business Unit Driver, BUD, reports
 - Joint discussions with the Project Management groups that support our core business products and electronic interfaces and Interconnection Marketing to ensure all systems, whether pre-ordering, ordering, billing or maintenance and repair can accommodate forecasted transactional volumes.
 - Analysis from the appropriate IT organizations that support the affected applications to review if additional hardware/software is required to meet forecast levels."

Summary of KPMG Re-test Activities:

KPMG's retest activities consisted of additional interviews with individuals involved in the forecasting and capacity management processes at BellSouth. During these interviews, additional reports and process documentation was requested and collected. KPMG validated the interview summaries with BellSouth and has reviewed interview results and subsequent documentation.



CLOSURE REPORT FOR EXCEPTION 25

BellSouth Georgia OSS Testing Evaluation

KPMG Re-test Results:

KPMG retest activities found the following:

PRE-6 - Pre-order Processing Systems:

BellSouth does not forecast pre-order transactions. The ratio of pre-order transactions to Local Service Requests (LSRs) is estimated, based upon historical data. Current LSR to pre-order transaction ratio data are extracted from system performance data. These current ratios are incorporated into the mid-range capacity-planning model and are assumed to hold as the volume of LSRs (order workload) is increased according to the LSR forecast.

O&P-6 - Order Processing Systems

LSR forecasts are developed; these include EDI transactions (copies were provided to KPMG). The LSR forecast was used to estimate the future workload for the recent ENCORE Capacity Study. The Network & Carrier Services (N&CS) forecasting process outlines steps to compare actual results to the forecast on a monthly and year-to-date basis, to identify reasons for significant differences and to revise the forecast, as necessary. The BellSouth *Capacity Planning Methodology, Practices and Requirements* defines ongoing Forecast Business Application Activities, which includes steps to review the accuracy of the most recent forecast, identify large variances, and prioritize improvements in the forecast cycle methodology.

BLG-3 - Billing Systems

Retest activities confirmed that BellSouth business volumes are not used in the mainframe capacity management process. CPU utilization data is trended and future CPU utilization projections are compared to CPU capacity. If the trend line exceeds system capacity, then load balancing is done or system resources are added to remove the capacity constraint. Normal growth is planned for and additional capacity can be added within days for emergency situations.

M&R-5 - TAFI

Retest activities confirmed that no ongoing process exists for forecasting TAFI transactions. TAFI performance is monitored, capacity planning responsibility is assigned and triggers are in place to initiate the capacity planning process, if necessary. Based on these factors, KPMG believes that additional capacity can be added quickly, when needed.



CLOSURE REPORT FOR EXCEPTION 25

BellSouth Georgia OSS Testing Evaluation

M&R-6 - ECTA

Retest activities revealed that the ECTA Joint Implementation Agreement (JIA) requests from the CLEC a forecast for the number of POTS and WFA Basic and Complex trouble reports per year. KPMG found no evidence of a process for regularly collecting CLEC trouble ticket forecast data following the JIA; this exercise appears to be limited to the initial JIA. However, ECTA transaction volume continues to be well below engineered system capacity, processes are established to monitor system performance and triggers are in place to initiate capacity planning activities if system resource utilization increases.

BellSouth has indicated to KPMG that it has provided all available information and documentation regarding the current systems capacity management processes. Additionally, BellSouth has informed KPMG that it has no plans for changes to the existing processes. As a result, KPMG has completed re-testing activities.

KPMG will assign a result of "Not Satisfied" to the relevant evaluation criteria in its final report. In the absence further planned test activity, KPMG closes this exception for testing purposes.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, closes Exception 25.

Attachments: None.



CLOSURE REPORT FOR EXCEPTION 29

BellSouth Georgia OSS Testing Evaluation

Date: August 4, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth did not deliver timely DUF records to KPMG.

Summary of Exception:

During the usage test call period, November 18-20, 1999, KPMG placed 846 test calls that were expected to generate Daily Usage File (DUF) records. KPMG identified 389 test calls (46%) for which no corresponding DUF records were transmitted by BellSouth. Of the 457 DUF records received 8% were received in greater than four days.

Summary of BellSouth's Response:

"BellSouth has a requirement to be at parity with our Retail operations for usage data timeliness. BellSouth will deliver 95% of the messages over the Optional Daily Usage File (ODUF) and the Access Daily Usage File (ADUF) within 6 workdays from the recording date of messages. This is the same measure we use for our process called the Centralized Message Distribution System (CMDS) that is used to deliver messages to other BellSouth Revenue Accounting Offices, and to other carriers. The 95% message delivery measure is an industry standard that is documented in the CMDS Settlements User Group (CSUG) documentation. Service Order completion problems caused most late messages to be delivered past the 6-day objective. Some messages were delivered late due to some standard billing system error conditions that had to be manually corrected before being passed to KPMG.

Based on BellSouth's definition of Usage Timeliness, we delivered 95.8% of ODUF/ADUF records within the prescribed interval".

Summary of KPMG Re-test Activities:

KPMG's re-test activities consisted of: 1) a review of BellSouth's response to Exception 29; and 2) the application of the Usage Data Delivery Timeliness measurement in Attachment 9 of the Agreement Between BellSouth Telecommunications, Inc. and CKS, Inc. (*Interconnection Agreement*) to DUF data from the initial test call period and the first re-test call period¹. This measurement provides percentage of recorded usage data (usage

¹ The "first re-test call period" refers to a UNE DUF re-test that KPMG conducted from April 25-27, 2000. During this re-test, 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.



CLOSURE REPORT FOR EXCEPTION 29

BellSouth Georgia OSS Testing Evaluation

recorded by BellSouth and usage recorded by other companies and sent to BST for billing) that is delivered to the appropriate CLEC within six (6) calendar days from the receipt of the initial recording.

KPMG Re-test Results:

The application of the measurement as stated in the Interconnection Agreement by KPMG to DUF data from the initial and first re-test call periods revealed that BellSouth delivered 96% of the ODUF/ADUF records within six calendar days from the receipt of the initial recording².

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, closes Exception 29.

Attachments: None.

² Exception 29 was published solely to address the timeliness of DUF records actually delivered to KPMG. Issues regarding the percentage of expected DUF records actually delivered to KPMG are addressed in Exception 28.



CLOSURE REPORT FOR EXCEPTION 34

BellSouth Georgia OSS Testing Evaluation

Date: August 4, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth's ODUF/ADUF documentation is deficient in the breadth and depth of topical coverage.

Summary of Exception:

Background: The Daily Usage Feed (ODUF/ADUF) documentation test (BLG-6) evaluated DUF documentation provided by BellSouth for use by the CLECs. The objective of this test was to determine whether the DUF documentation provided by BellSouth adequately supports the CLECs in receipt and validation of BellSouth-provided local port (ODUF) and access (ADUF) usage records.

A major part of this documentation evaluation concentrated on KPMG's review of the breadth and depth of topical coverage. Topics considered were:

- Understanding DUF
- Set-up and Testing of DUF
- Receiving and Processing DUF
- Validating DUF
- Getting Help

During testing, KPMG determined that four of these five major topical areas addressed by the test were deficient:

Set-up and Testing of DUF. BellSouth's DUF documentation regarding the overall process flow and responsibilities for DUF set-up and testing was inadequate in the following ways:

1. Various departments are referenced for the set-up and testing of DUF. However, the department names are abbreviated and there is no explanation for the departments' responsibilities.
2. A set-up process flow is not available.
3. No description for the process for relaying the status of a DUF set-up to a CLEC is provided.
4. Information is provided that states that test data can be requested through a generic file. However, no information is provided regarding obtaining the generic file, or the requirements for submitting the generic file request.



CLOSURE REPORT FOR EXCEPTION 34

BellSouth Georgia OSS Testing Evaluation

5. Conflicting information is provided regarding the necessity of processing optional test data, or its intended purpose.
6. No explanation is provided regarding the distribution and/or communication of test results.
7. No outline is provided to detail DUF set-up and testing responsibilities and activities.
8. A Test Request Form is included in the documentation. Instructions on form completion and the associated responsibilities for completion are also included. However, another form is referenced, but not included, in the documentation.

Receiving and Processing DUF. BellSouth's DUF documentation regarding the overall process flow and responsibilities for receiving and processing DUF was inadequate in the following ways:

1. Transmission schedules and data retention periods are not provided.
2. Procedures for ADUF re-creation/re-sending are not clear.
3. No information is provided to assist with requesting changes to distribution media or documentation, or filing a change of address notification.

Validating DUF. BellSouth's DUF documentation regarding the overall process flow and responsibilities for validating DUF was inadequate in the following ways:

1. The primary tool by which a CLEC can validate the DUF records is the EMI standard which is published by the Alliance for Telecommunications Industry Solutions (ATIS). While CLECs are expected to obtain this tool directly from ATIS, BellSouth does excerpt and re-publish portions. These excerpts are inadequate to support DUF validation.
2. DUF records produced for each type of telephone call are not adequately defined in the documentation which hampers validation of received DUF files.

Getting Help. BellSouth's DUF documentation regarding the overall process flow and responsibilities for requesting help on DUF problems was inadequate in the following ways:

1. The process to be followed by a CLEC for placing trouble calls is not documented.
2. Escalation procedures are not documented.

Summary of BellSouth's Responses:

"Set-up and Testing of DUF"

ADUF and ODUF documentation will be revised to address these issues. (See also Overall BellSouth Reply below.)



CLOSURE REPORT FOR EXCEPTION 34

BellSouth Georgia OSS Testing Evaluation

Receiving and Processing DUF

ADUF and ODUF documentation will be revised to address these issues. (See also Overall BellSouth Reply below.)

Validating DUF

As stated by KPMG, the EMI document produced by ATIS is the primary tool used by CLECs to validate DUF records. As such, information provided in the BellSouth documentation is not intended to serve in that role but only to supplement the information provided by ATIS.

Language will be added to the DUF documentation which clearly describes the intended supplemental role of these documents. (See also Overall BellSouth Reply below.)

Getting Help

ADUF and ODUF documentation will be revised to address these issues. (See also Overall BellSouth Reply below.)

BellSouth's Overall Response

All changes to be made to the ODUF documentation were completed and updated to the Interconnection Web site on March 31, 2000. These modifications addressed the concerns raised in the exception. BellSouth created a new ADUF document similar to the ODUF document which addressed these same issues and concerns raised by KPMG. The ADUF document was added to the Web site on April 7, 2000.

ODUF and ADUF documentation will be revised by June 1, 2000 to address the additional issues brought up by KPMG on DUF setup and testing."

Summary of KPMG Re-test Activities:

KPMG's retest activities consisted of: 1) an analysis of BellSouth's response and amended response; and 2) an examination of updated ODUF and ADUF documentation available via BellSouth's Interconnection Services Web site.

Summary of KPMG Re-test Results:

KPMG believes that BellSouth's updated ODUF and ADUF documentation has adequately addressed the following topical issues:



CLOSURE REPORT FOR EXCEPTION 34

BellSouth Georgia OSS Testing Evaluation

Set-up and Testing of DUF

- Abbreviations have been eliminated and/or adequately explained.
- A process flow has been defined, including processes for relaying set-up status and test results to a CLEC. The process flow adequately outlines the DUF set-up process and testing responsibilities and activities.
- Information regarding the generic test file and processing additional test data has been adequately clarified.
- All forms referenced in the documentation are available.

Receiving and Processing DUF

- Transmission schedules and data retention periods are clearly detailed.
- Procedures for DUF re-creation and re-transmission have been adequately clarified.
- Change request procedures are adequately defined and supported through an available form.

Validating DUF

- The ATIS EMI documentation excerpts have been adequately enhanced to address BellSouth-specific utilization of the EMI guidelines.
- The type of DUF record produced by specific call types has been adequately defined.

Getting Help

- Trouble call and escalation procedures have been adequately documented.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, closes Exception 34.

Attachments: None.



CLOSURE REPORT FOR EXCEPTION 37

BellSouth Georgia OSS Testing Evaluation

Date: August 4, 2000

EXCEPTION CLOSURE REPORT

Exception:

During the testing of the “supervisor” functions, KPMG was presented with an unfiltered list of all in-session TAFI users.

Summary of Exception:

According to the *CLEC TAFI End-User Training and User Guide, Issue 6 (User Guide)*, “individuals with ‘supervisor’ authority in their TAFI profile are given certain tools to manage the business.” Supervisors can manage TAFI queues, re-assign queued reports and perform other functions.

As part of functional testing, KPMG executed a variety of supervisor functions, including the ability of a supervisor to re-assign reports in the queue from one user to another. This capability is used for load balancing purposes as well as to ensure that if a TAFI user has completed their shift, any tickets left in the queue can be addressed properly.

According to BellSouth personnel and the *User Guide*, when the supervisor accesses this function, they will be presented with a filtered list of internal CLEC users. However, during a test of this function, KPMG was presented with an unfiltered list that included all in-session users.

Summary of BellSouth Response:

“The initial design of the CLEC TAFI system responded as defined (a CLEC supervisor could only view his companies queued reports). When the system was enhanced to allow CLECs with multiple OCN values to have a single user_id, (i.e., their group_ID value began with ZX instead of ZR), the limitation on the supervisor function failed to get updated. In other words, CLEC supervisors that have a group_ID beginning with “ZR” (companies with one OCN value) work as advertised, while CLEC supervisors with a group_ID beginning with “ZX” (companies with multiple OCNs) can view unfiltered data. (The KPMG tester’s group_ID began with ZX).”

BellSouth indicated that a software change to correct this issue was being negotiated and was scheduled for May 20, 2000.



CLOSURE REPORT FOR EXCEPTION 37

BellSouth Georgia OSS Testing Evaluation

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 issue identified in Exception 37; and 2) a re-test of the supervisor trouble ticket reassignment function in TAFI versions 2000.3 and 2000.3.1.1.

KPMG Re-test Results:

KPMG's evaluation of BellSouth's response determined that the proposed solution should adequately address the issue identified in Exception 37.

On June 19, 2000, KPMG attempted to reassign two trouble tickets created in TAFI, Version 2000.3 using the supervisor function. When presented with the list of users in the "Reassign Queue," KPMG found that the list remained unfiltered, viewing all CLEC community users logged in at the time. KPMG reported these findings to BellSouth and were presented with a new date of July 24, 2000 for additional re-testing.

On July 25, 2000, KPMG executed the same transaction process in TAFI, Version 2000.3.1.1. During this re-test, when presented with the list of users in the "Reassign Queue," KPMG found that only KPMG user ids were listed, indicating that the list was now filtered as described in BellSouth's response.

TAFI, Version 2000.3.1.1 no longer inappropriately presents an unfiltered list of all in-session TAFI users. As a result, KPMG has concluded that BellSouth has adequately addressed Exception 37.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, closes Exception 37.

Attachments: None.



CLOSURE REPORT FOR EXCEPTION 44

BellSouth Georgia OSS Testing Evaluation

Date: August 4, 2000

EXCEPTION REPORT

Exception:

KPMG was unable to change the telephone number (TN) of a resale auxiliary¹ line in certain instances.

Summary of Exception:

KPMG submitted Local Service Requests (LSRs) to change the number of an auxiliary line on a resale account. KPMG received a Clarification (CLR) message indicating that the "Account is Final".

As explanation, BellSouth stated that their Local Exchange Service Order Generator (LESOG) system checked the status of the TNs associated with the transaction (the main number², the current auxiliary number and the new auxiliary number), and found that the current auxiliary number had once been a main account number for an account that had been terminated. The main account number remained tagged in the LESOG system as a "Final Account," although this was no longer relevant.

As a result of these errors, KPMG discovered that the number of an auxiliary line cannot be changed on a resale account if the current auxiliary number was previously a main account number for an account that is now inactive.

Summary of BellSouth's Response:

"A defect was identified in LESOG which was corrected on February 25, 2000 with Release 6.1C."

Summary of KPMG Re-test Activities:

KPMG's re-test activities for this exception consisted of: 1) re-submission of the five original LSRs cited during identification of the defect, after implementation of this system fix; and 2) continued testing of resale accounts as part of volume testing activities.

¹ Auxiliary line(s) are all line(s) in addition to the main account number.

² The main account number is the number used by BellSouth for tracking and billing purposes.



CLOSURE REPORT FOR EXCEPTION 44

BellSouth Georgia OSS Testing Evaluation

KPMG Re-test Results:

KPMG received Firm Order Confirmations (FOCs) on all five submitted LSRs. Additionally, KPMG has not observed any similar problems during volume testing activities.

As a result, KPMG believes that BellSouth's LESOG, Release 6.1C system fix has adequately addressed the issue raised in Exception 44.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, closes Exception 44.

Attachments: None.



CLOSURE REPORT FOR EXCEPTION 48

BellSouth Georgia OSS Testing Evaluation

Date: August 4, 2000

EXCEPTION CLOSURE REPORT

Exception:

Minor errors in categorizing LSRs for BellSouth's Flow Through Reports indicate the potential for future, material reporting errors.

Summary of Exception:

Background: An LSR's flow through status is determined based on special message fields that document the LSR's progress through BellSouth's Operational Support Systems (OSS). These special message fields indicate how an LSR should be categorized by BellSouth's Flow Through Reporting program. In certain cases, problems with data entered into these special message fields have lead to inaccurate flow through reporting.

Corrupt Text Strings: To identify LSRs that have been electronically referred back to the submitting CLECs for clarification, BellSouth's Flow Through Reporting program searches the special message fields associated with LSRs for the text string, "AUTO CLARIFICATION". As written, the Flow Through Reporting program only recognizes this fixed, literal text and does not allow for any variation.

During the Flow Through Reporting evaluation, KPMG identified messages that had originally contained the correct text, but, apparently due to system errors, were changed. (For example, the text string "AUTO CLARIFICATION" became "M 2-CACLARIFICATION", in one case, and "-99TO CLARIFICATION", in another instance.). Since the changed text messages did not exactly match the correct text string, the LSRs containing these messages were not recognized, resulting in incorrect flow-through categorization. A total of 21 LSRs out of 22,127 LSRs submitted in the "auto clarified errors" category over the three month evaluation period were incorrectly categorized due to text string corruption of this type.

Misinterpretation of Manual Entries: To identify LSRs which are not eligible for flow through, the Flow Through Reporting program looks for the text "MANUAL"¹ in the first six characters of a special message field associated with the LSR. As written, the Flow Through Reporting program classifies any LSR with a message that begins with the text "MANUAL" as ineligible for flow through regardless of the actual status of the LSR.

During the Flow Through Reporting evaluation, KPMG identified LSRs eligible for mechanized flow through that contained messages which began with the word

¹ The program was modified to search for "MANUALP" as of October 1, 1999.



CLOSURE REPORT FOR EXCEPTION 48

BellSouth Georgia OSS Testing Evaluation

“MANUAL”, as entered into the special message field by a BellSouth service representative. (The following are two examples of this type of message: “MANUAL FOC SENT ESJ” and “MANUAL FOC SENT 9-30-99---GB”). As these LSRs contained the text “MANUAL”, the Flow Through Reporting program classified these LSRs as ineligible for flow through and excluded them from the Flow Through Report calculation. Messages manually entered into the special message fields of LSRs by BellSouth service representatives caused the Flow Through Reporting program to incorrectly categorize an additional 37 LSRs out of 22,889 LSRs in the “ineligible for flow through” category submitted over the three month evaluation period.

As a result of the corrupt text strings and misinterpretation of manual entries, BellSouth’s Flow Through Reports for September - November 1999 are not completely accurate.

Summary of BellSouth Responses:

Initial Response:

“Corrupt Text Strings:

Since the text message “AUTO CLARIFICATION” in the LEO audit notes field is the only indication of when an LSR has been clarified back to the CLEC, BellSouth is using the appropriate logic for identifying those LSRs. The text strings are mechanically generated in LESOG and sent to LEO on the originating end. The fact that corrupt text strings occasionally occur (.017%) is unavoidable. During the report period in which the snapshot is taken for the flow through report, the most recent audit notes table where the “AUTO CLARIFICATION” text message is contained consisted of approximately 10.5 million lines of text. With that volume, it would not be uncommon for there to be a very small amount of corrupt text. The same will be true for retail systems as well. Additionally, it is not possible to predict all the different variations of corrupt text, therefore not possible to program to capture it.

Misinterpretation of Manual Entries:

During November of 1999, the logic used to identify manual fallout was changed from the word “MANUAL” to “MANUALP” using only those first seven characters within the logic for the identification. This change will eliminate the problem with the program misinterpreting text messages written by LCSC Service Representatives that contain the word “MANUAL”. Thus, this should not be an issue in the future.”



CLOSURE REPORT FOR EXCEPTION 48

BellSouth Georgia OSS Testing Evaluation

Amended Response:

“Extensive research has been conducted by BellSouth programmers to determine what would be required to develop modifications in LEO which would mechanically generate a “hard code”, not subject to the small amount (.017%) of corruption now being experienced in the current text messages. It was determined that major modifications would be required at significant cost and time to implement. The current condition poses

an insignificant impact on the overall flow through totals, therefore system modifications at this time would be impractical.”

Summary of KPMG Re-test Activities:

KPMG’s re-test activities consisted of: 1) a review of BellSouth’s responses; and 2) an examination and evaluation of data throughout relevant BellSouth systems for possible alternatives to the use of text strings in the determination of flow through status.

KPMG Re-test Results:

Corrupt Text Strings: KPMG's evaluation of BellSouth's amended response determined that major modifications to LESOG and SOCS, the systems used to process LSRs, would be required to replace the use of text strings (including those entered manually – see below) in preparing Flow Through Reports.

KPMG believes that these modifications are significant and are not justified for the following reasons:

- The probability of the types of errors addressed by the exception is very small. The modifications considered do eliminate the risk of one type of programming error only to introduce the risk of another, if substantially smaller, type of programming error that would affect the accuracy of Flow Through Reporting. The effective reduction in overall risk appears marginal.
- All modifications to existing systems run the risk of introducing new programming errors. KPMG believes that the required modifications are of such a magnitude that they not only increase the probability of related errors that would affect the accuracy of Flow Through Reporting, they introduce the risk of other types of unrelated programming errors that could directly affect the level of service provided to CLECs.
- The required changes provide no direct improvement in service to CLECs or in operational efficiency for BellSouth. They are significant enough that they would



CLOSURE REPORT FOR EXCEPTION 48

BellSouth Georgia OSS Testing Evaluation

divert resources that could be otherwise used to improve functionality of the affected systems to the CLECs' benefit.

Misinterpretation of Manual Entries: The risk associated with the misinterpretation of manual entries is based on the probability of specific text strings appearing in requests for clarifications on CLEC LSRs made by BellSouth Customer Service Representatives. BellSouth's programming modification to use the text "MANUALP" rather than "MANUAL" substantially reduces the most significant risk because, while the word "MANUAL" is fairly common, "MANUALP" would not be expected to appear in a message except as a typographical error. The other text strings that could introduce this error are uncommon and the probability of them appearing in sufficient quantities to significantly affect Flow Through Reporting appears quite low.

The modifications considered to address the corrupt text string issues (see above) would have automatically addressed the misinterpretation of manual entries. KPMG's analysis of those modifications takes into account the probability of errors related to the misinterpretation of manual entries. KPMG believes that the benefits gained from those modifications can not be justified given the low probability of these errors and the likelihood of introducing other programming errors that could affect Flow Through Reporting or service to CLECs.

Based on this analysis, KPMG believes that BellSouth has adequately addressed the issues raised in Exception 48.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, closes Exception 48.

Attachments: None.



CLOSURE REPORT FOR EXCEPTION 58

BellSouth Georgia OSS Testing Evaluation

Date: August 4, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth's UNE Center does not consistently adhere to the methods and procedures for provisioning Unbundled Network Elements (UNEs).

Summary of Exception:

BellSouth's methods and procedures for provisioning UNE elements specify that the UNE Center is required to: 1) Call a CLEC to obtain concurrence on an order before beginning provisioning activities; and 2) Place a second call to the CLEC after provisioning completion to seek concurrence that provisioning has been completed and to obtain the CLECs acceptance of the provisioned service.

During testing, KPMG submitted 107 port and loop orders to BellSouth which were processed by BellSouth's UNE Center. The UNE Center failed to call KPMG to seek concurrence before commencing provisioning activities on 20 (19%) of these orders.

KPMG provided two tables with details regarding accounts for which BellSouth did not call KPMG to seek concurrence before provisioning activities began.

Summary of BellSouth's Response:

"There were 107 orders evaluated by KPMG with 20 findings indicating no pre-call to obtain concurrence for conversion. BellSouth's analysis of those 20 requests revealed the following:

- 4 – BST errors (2 UNEC No call; CPG late design causing delay of call; 1 Duplicate CKTID resulting in improper routing and no call)
- 2 – CLEC/BST reasons (2 missed calls were due to CLEC NDT (no dial tone). Appropriate calls were made to advise of NDT situation. Another call was made immediately prior to the cut.
- 14 – Process followed
94% UNEC Procedural Adherence

Of the remaining 87 calls evaluated for post-conversion, there were 15 KPMG findings indicating no completion notification and acceptance. BellSouth's analysis of those 15 requests indicate the following:



CLOSURE REPORT FOR EXCEPTION 58

BellSouth Georgia OSS Testing Evaluation

2 – Canceled orders

5 – Completion calls notification provided by the UNEC tech to Terry at KPMG
Acceptance provided by Terry

1 – No IMPCOM reflected on the service order. This was referred to Bobby Hutchinson and accepted by Bobby.

7 – Disconnect orders, no post completion calls are made on disconnect orders
100% UNEC Procedural Adherence”

Summary of KPMG Re-test Activities:

KPMG's retest activities consisted of evaluations of 1) BellSouth's response to Exception 58; 2) BellSouth's modified methods and procedures for Coordinated Hot Cuts (5/8/00), and 3) the *CLEC Contact Requirements Matrix for the Unbundled Network Element Center* located at:

www.interconnection.BellSouth.com/guides/other_guides/pdf/contact.pdf. (Please also see copy of Matrix attached.)

KPMG Re-test Results:

KPMG's evaluation of the *CLEC Contact Requirements Matrix for the UNE Center* revealed that the UNE Center is only responsible for contacting CLECs for designed and non-designed loop conversions and new installs.

KPMG employed the *CLEC Contact Requirements Matrix for the UNE Center* in its analysis of coordinated hot-cut observations. As a result, KPMG issued Exception 82 to address the lack of procedural adherence by BellSouth Central Office technicians and Unbundled Network Element Center (UNEC) coordinators to BellSouth's methods and procedures for provisioning coordinated hot-cuts. Exception 82 presents a comprehensive analysis of BellSouth's lack of procedural adherence, inclusive of the issues identified in Exception 58.

As the issues identified in Exception 58 have been wholly incorporated within Exception 82, KPMG closes Exception 58. KPMG's assessment of the relevant evaluation criteria in the final report will be based on the outcome of Exception 82.

KPMG, with the concurrence of the Georgia Public Services Commission, closes Exception 58.



CLOSURE REPORT FOR EXCEPTION 58

BellSouth Georgia OSS Testing Evaluation

CLEC Contact Requirements Matrix for the Unbundled Network Element Center

Provisioning Activity	Designed (SL2) or Non-designed (SL1) conversion <u>with</u> coordination	Non-Designed (SL1) Conversion <u>without</u> coordination	New Loop Designed (SL2)	New Loop Non-designed (SL1)	Disc. Only
24 to 48 hours prior to Due Date, contact to verify order activity.	X		X		
Due Date in jeopardy.	X	X	X	X	
On Due Date, contact to confirm conversion schedule.	X				
After conversion, notify CLEC conversion or provisioning is complete.	X	X	X	X	

An "X" indicates the Unbundled Network Element Center will attempt to contact the CLEC for the activity unless other contact requirements are specifically defined within the CLEC contract.

Document Name: CLEC Contact Requirements Matrix for the UNEC
Document Owner: Glen Miller
Document Version: 1
May 17, 2000

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:

Jim Hurt, Director
Consumers' Utility Counsel
2 Martin Luther King Jr. Drive
Plaza Level East
Atlanta, GA 30334-4600

Charles A. Hudak, Esq.
Gerry, Friend & Sapronov, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346-2131

Suzanne W. Ockleberry
AT&T
1200 Peachtree Street, NE
Suite 8100
Atlanta, GA 30309

Charles V. Gerkin, Jr.
Smith, Gambrell & Russell, LLP
Promenade II, Suite 3100
1230 Peachtree Street, N.E.
Atlanta, GA 30309-3592

Jeremy D. Marcus, Esq.
Blumenfeld & Cohen
Co-Counsel for Rhythm, aka ACI Corp.
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036

John P. Silk
Georgia Telephone Association
1900 Century Boulevard, Suite 8
Atlanta, GA 30345

Newton M. Galloway
Newton Galloway & Associates
Suite 400 First Union Bank Tower
100 South Hill Street
Griffin, GA 30229

Kent F. Heyman, Esq.
Sr. VP and General Counsel
Mpower Communications Corp.
171 Sully's Trail, Suite 202
Pittsford, NY 14534

John M. Stuckey, Jr.
Webb, Stuckey & Lindsey
7 Lenox Pointe, N.E.
Atlanta, GA 30324

Frank B. Strickland
Wilson, Strickland & Benson
One Midtown Plaza, Suite 1100
1360 Peachtree Street, NE
Atlanta, GA 30309

Scott A. Sapperstein
Sr. Policy Counsel
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619

Thomas K. Bond
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, GA 30334

Eric J. Branfman
Richard M. Rindler
Swidler & Berlin
3000 K Street, NW, Suite 300
Washington, DC 20007

Robert A. Ganton
Regulatory Law Office
Dept. Army
Suite 700
901 N. Stuart Street
Arlington, VA 22203-1837

Peter C. Canfield
Dow Lohnes & Albertson
One Ravinia Drive, Suite 1600
Atlanta, GA 30346

James M. Tennant
Low Tech Designs, Inc.
1204 Saville Street
Georgetown, SC 29440

Peyton S. Hawes Jr.
127 Peachtree Street, NE
Suite 1100
Atlanta, GA 30303-1810

Mark Brown
Director of Legal and Government Affairs
MediaOne, Inc.
2925 Courtyards Drive
Norcross, GA 30071

Jeffrey Blumenfeld
Elise P. W. Kiely
Blumenfeld & Cohen
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036

Harris R. Anthony
BellSouth Long Distance
28 Perimeter Center East
Atlanta, GA 30346

Charles F. Palmer
Troutman Sanders LLP
5200 NationsBank Plaza
600 Peachtree Street, NE
Atlanta, GA 30308-2216

Judith A. Holiber
One Market
Spear Street Tower, 32nd Floor
San Francisco, CA 94105

Nanette S. Edwards, Esq.
Regulatory Attorney
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802

Daniel Walsh
Assistant Attorney General
Office of the Attorney General
40 Capitol Square
Atlanta, GA 30334-1300

John McLaughlin
KMC Telecom Inc.
Suite 170
3025 Breckinridge Boulevard
Duluth, GA 30096

James A. Schendt
Regulatory Affairs Manager
Interpath Communications, Inc.
P. O. box 13961
Durham, NC 27709-3961

William R. Atkinson
Sprint Communications Co. L.P.
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339

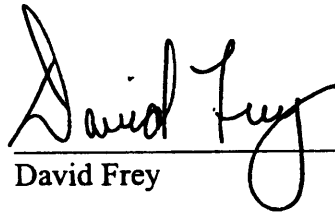
Dana R. Shaffer
Legal Counsel
105 Molloy Street
Suite 300
Nashville, TN 37201

Glenn A. Harris
Lori Anne Dolquest
NorthPointe Communications, Inc.
303 Second Street, South Tower
San Francisco, CA 94107

This 4th day of August, 2000.

Nancy Krabill
Director of Regulatory Affairs
1300 W. Mockingbird Lane
Suite 200
Dallas, TX 75247

Anne E. Franklin
Arnall Golden & Gregory, LLP
2800 One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309



David Frey

KPMG
303 Peachtree Street, N.E.
Suite 2000
Atlanta, Georgia 30308
(404) 222-3000



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

Telephone 404 222 3000
Fax 404 222 3050

RECEIVED

August 8th, 2000

AUG 08 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**

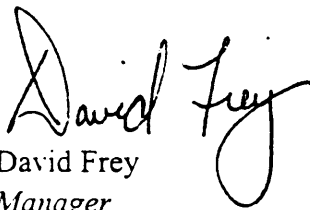
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG Consulting LLC's Closure Report for Exception 45 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 45

BellSouth Georgia OSS Testing Evaluation

Date: August 2, 2000

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

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:

1. ***Average OSS Response Time and Response Interval³ in the Pre-Ordering category for the CLEC Aggregate (October 1999).*** KPMG was unable to replicate the "Average Seconds" and "Number of Calls" for the TAG server / DSAP system.

Category	KPMG Calculations	BellSouth's Report
Average Seconds	.53	.59
Number of Calls	119	60

Additionally, there were records in the data file for the ATLAS-MLH system (TAG server) that BellSouth did not include in its report.

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, since the information was not available via the PMAP site.



CLOSURE REPORT FOR EXCEPTION 45

BellSouth Georgia OSS Testing Evaluation

2. **Percent Rejected Service Requests in the Ordering category for the KPMG CLEC (December 1999).** For each report (*Fully Mechanized, Partially Mechanized, Total Mechanized, and Non-Mechanized*), KPMG was unable to replicate the UNE and OTHER products, using BellSouth's instructions.
3. **Reject Interval in the Ordering category for the KPMG CLEC (December 1999).** For each report (*Fully Mechanized, Partially Mechanized, Total Mechanized, and Non-Mechanized*), KPMG was unable to replicate the UNE and OTHER products, using BellSouth's instructions.
4. **Mean Time to Deliver Usage⁴ in the Billing category for the KPMG CLEC (December 1999).** BellSouth weighted the record volume by adding 1.5 to the "Days Delayed," rather than the 0.5 indicated in their written instructions. Thus, the BellSouth calculated value is greater than the KPMG-calculated value by 1.

Category	KPMG Calculations	BellSouth's Report
Mean Time	5.89	6.89

Summary of BellSouth Response:

BellSouth's initial response addressed issues two through four. BellSouth's amended response addressed issue one, as well as the previous responses to the other three issues.

BellSouth's responses are listed by issue number, and are as follows:

1. Average OSS Response Time and Response Interval⁵ in the Pre-Ordering category for the CLEC Aggregate (October 1999).
KPMG's calculations for the October 1999 "Average Response Interval Report" are correct. An error was made when the Average Response Interval report was posted to the Web. The "Average Seconds" and "Number of Calls" for ATLAS-MLH were incorrectly populated in the DSAP fields. The notification of the corrected report has been posted to the PMAP Web Site as of April 17, 2000.

Currently, BellSouth does not report ATLAS-MLH, however a Change Request has been submitted to add data for both ATLAS-MLH and ATLAS-DID to the Average Response Interval Report.

2. Percent Rejected Service Requests in the Ordering category for the KPMG CLEC (December 1999).
"Combos" are included in the "Other" category rather than "UNE" or "UNE Other".

⁴ 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.

⁵ BellSouth provided KPMG with the raw data, since the information was not available via the PMAP site.



CLOSURE REPORT FOR EXCEPTION 45

BellSouth Georgia OSS Testing Evaluation

However, a Change Request is pending that would move the product "Combos" from the "Other" category to a separate category called "Combos". Business requirements are being developed and this change request will be prioritized with other pending changes.

3. Reject Interval in the Ordering category for the KPMG CLEC (December 1999).
"Combos" are included in the "Other" category rather than "UNE" or "UNE Other". However, a Change Request is pending that would move the product "Combos" from the "Other" category to a separate category called "Combos". Business requirements are being developed and this change request will be prioritized with other pending changes.
4. Mean Time to Deliver Usage in the Billing category for the KPMG CLEC (December 1999).
The weighting applied to this measure is in a spreadsheet which is used by an Ardent job as a lookup table. The Excel table has been changed to provide the correct lookup for each interval by adding .5 rather than 1.5 to each interval. This change was implemented 1/17/00 and would have been apparent with the February results.

Summary of KPMG Re-Test Activities (by Issue Number):

1. Based upon BellSouth's responses, KPMG requested and received the revised report from BellSouth. KPMG then compared all of the values in this revised report to the original KPMG calculations. KPMG also reviewed the PMAP Web site to determine if the CLEC community was notified of the availability of the revised report. Additionally, KPMG looked at the May SQM report to determine whether the ATLAS-MLH and ATLAS-DID values were now being reported. Finally, KPMG requested and received an additional month of data and SQM reports (December 1999), in order to compare KPMG-calculated values to BLS-reported values for an additional month.
2. Based upon BellSouth's responses, KPMG revised its computer programs to map the "Combos" products to the "Other" category. KPMG then compared its calculations using these new instructions to the BellSouth report originally provided. KPMG has used these new instructions consistently for all months since the December report, for calculation verification purposes⁶. KPMG also examined all recent reports for evidence of the aforementioned change request creating the new report category "Combos."
3. Based upon BellSouth's responses, KPMG revised its computer programs to map the "Combos" products to the "Other" category. KPMG then compared its calculations

⁶ KPMG reviews the KPMG Test CLEC reports for every month as a part of its regular testing activities.



CLOSURE REPORT FOR EXCEPTION 45

BellSouth Georgia OSS Testing Evaluation

using these new instructions to the BellSouth report originally provided. KPMG has used these new instructions consistently for all months since the December report, for calculation verification purposes⁷. KPMG also examined all recent reports for evidence of the aforementioned change request, creating the new report category "Combos."

4. Based upon BellSouth's responses, KPMG requested and received the revised report from BellSouth. KPMG then compared the values in this revised report to the original KPMG calculations. Additionally, KPMG reviewed all the KPMG Test CLEC SQM reports since December, particularly the reports since the Change Request was implemented on 1/17/00 (i.e., the reports for February through April).

KPMG Re-Test Results:

1. All the values reported in the revised SQM report matched the corresponding values in the original KPMG calculations. As noted in BellSouth's response, BellSouth did not report ATLAS-MLH in October, but both ATLAS-MLH and ATLAS-DID appear with reported values in the May SQM report. Further, the availability of the revised report is mentioned on the PMAP Web site, under "Prior Months Report Updates." Finally, KPMG's calculations of the December 1999 SQM values matched the values reported by BLS.
2. When KPMG followed BellSouth's revised instructions indicating that the "Combos" product should be mapped to the "OTHER" category, all of the KPMG-calculated values matched the BellSouth-reported values. BellSouth has not implemented its Change Request to create a separate "Combos" category, as of the May SQM reports.
3. When KPMG followed BellSouth's revised instructions indicating that the "Combos" product should be mapped to the "OTHER" category, all of the KPMG-calculated values matched the BellSouth-reported values. BellSouth has not implemented its Change Request to create a separate "Combos" category, as of the May SQM reports.
4. The BellSouth-reported value in the revised SQM report matches the KPMG calculated value. Further, the values KPMG calculated for the reports beginning with the February SQM report match those reported by BellSouth.

As a result, KPMG believes that BellSouth has adequately addressed the issues identified in Exception 45.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, closes Exception 45.

⁷ KPMG reviews the KPMG Test CLEC reports for every month as a part of its regular testing activities.



CLOSURE REPORT FOR EXCEPTION 45

BellSouth Georgia OSS Testing Evaluation

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:

Jim Hurt, Director
Consumers' Utility Counsel
2 Martin Luther King Jr. Drive
Plaza Level East
Atlanta, GA 30334-4600

Newton M. Galloway
Newton Galloway & Associates
Suite 400 First Union Bank Tower
100 South Hill Street
Griffin, GA 30229

Charles A. Hudak, Esq.
Gerry, Friend & Sapronov, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346-2131

Kent F. Heyman, Esq.
Sr. VP and General Counsel
Mpower Communications Corp.
171 Sully's Trail, Suite 202
Pittsford, NY 14534

Suzanne W. Ockleberry
AT&T
1200 Peachtree Street, NE
Suite 8100
Atlanta, GA 30309

John M. Stuckey, Jr.
Webb, Stuckey & Lindsey
7 Lenox Pointe, N.E.
Atlanta, GA 30324

Charles V. Gerkin, Jr.
Smith, Gambrell & Russell, LLP
Promenade II, Suite 3100
1230 Peachtree Street, N.E.
Atlanta, GA 30309-3592

Frank B. Strickland
Wilson, Strickland & Benson
One Midtown Plaza, Suite 1100
1360 Peachtree Street, NE
Atlanta, GA 30309

Jeremy D. Marcus, Esq.
Blumenfeld & Cohen
Co-Counsel for Rhythm, aka ACI Corp.
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036

Scott A. Sapperstein
Sr. Policy Counsel
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619

John P. Silk
Georgia Telephone Association
1900 Century Boulevard, Suite 8
Atlanta, GA 30345

Thomas K. Bond
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, GA 30334

Eric J. Branfman
Richard M. Rindler
Swidler & Berlin
3000 K Street, NW, Suite 300
Washington, DC 20007

Harris R. Anthony
BellSouth Long Distance
28 Perimeter Center East
Atlanta, GA 30346

Robert A. Ganton
Regulatory Law Office
Dept. Army
Suite 700
901 N. Stuart Street
Arlington, VA 22203-1837

Charles F. Palmer
Troutman Sanders LLP
5200 NationsBank Plaza
600 Peachtree Street, NE
Atlanta, GA 30308-2216

Peter C. Canfield
Dow Lohnes & Albertson
One Ravinia Drive, Suite 1600
Atlanta, GA 30346

Judith A. Holiber
One Market
Spear Street Tower, 32nd Floor
San Francisco, CA 94105

James M. Tennant
Low Tech Designs, Inc.
1204 Saville Street
Georgetown, SC 29440

Nanette S. Edwards, Esq.
Regulatory Attorney
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802

Peyton S. Hawes Jr.
127 Peachtree Street, NE
Suite 1100
Atlanta, GA 30303-1810

Daniel Walsh
Assistant Attorney General
Office of the Attorney General
40 Capitol Square
Atlanta, GA 30334-1300

Mark Brown
Director of Legal and Government Affairs
MediaOne, Inc.
2925 Courtyards Drive
Norcross, GA 30071

John McLaughlin
KMC Telecom Inc.
Suite 170
3025 Breckinridge Boulevard
Duluth, GA 30096

Jeffrey Blumenfeld
Elise P. W. Kiely
Blumenfeld & Cohen
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036

James A. Schendt
Regulatory Affairs Manager
Interpath Communications, Inc.
P. O. box 13961
Durham, NC 27709-3961

William R. Atkinson
Sprint Communications Co. L.P.
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339

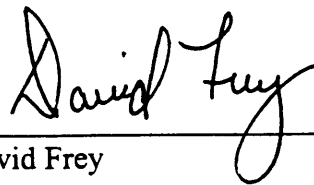
Dana R. Shaffer
Legal Counsel
105 Molloy Street
Suite 300
Nashville, TN 37201

Glenn A. Harris
Lori Anne Dolquest
NorthPointe Communications, Inc.
303 Second Street, South Tower
San Francisco, CA 94107

This 8th day of August, 2000.

Nancy Krabill
Director of Regulatory Affairs
1300 W. Mockingbird Lane
Suite 200
Dallas, TX 75247

Anne E. Franklin
Arnall Golden & Gregory, LLP
2800 One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309

A handwritten signature in black ink, appearing to read "David Frey", is written over a horizontal line.

David Frey

KPMG
303 Peachtree Street, N.E.
Suite 2000
Atlanta, Georgia 30308
(404) 222-3000



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

271
Telephone 404 222 3000
Fax 404 222 3050

RECEIVED

AUG 08 2000

EXECUTIVE SECRETARY
G.P.S.C.

August 8th, 2000

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

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

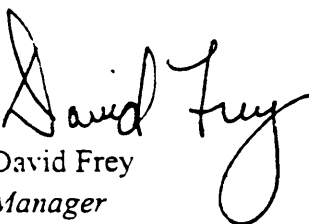
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of BellSouth's Amended Responses to Exceptions 91 and 100, Second Amended Responses to Exceptions 61, 74, and 87, and Fourth Amended Responses to Exceptions 84, 89, and 92 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's Second Amended Response to Exception 61



August 3, 2000

EXCEPTION REPORT

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

Exception:

For certain Service Quality Measurements ("SQMs"), BellSouth does not report values at all levels of disaggregation specified in the *Service Quality Measurements Georgia Performance Report 10/22/99 (SQM 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 reports.¹

As part of the BellSouth-Georgia OSS Evaluation, KPMG is reviewing the accuracy and completeness of BellSouth's reported SQMs. In the course of this review, KPMG is evaluating whether BellSouth reports SQM values at the levels of disaggregation specified in the *SQM Reports*.

KPMG discovered that in one or more months during the period October 1999 to December 1999, BellSouth did not report SQMs at the appropriate levels of disaggregation.

The following table details the missing levels of disaggregation for the specified SQMs during this period.²

Missing Levels of Disaggregation in Reported SQM Values

Service Domain	SQM Name	Missing Levels of Disaggregation
Ordering	Percent Rejected Service Requests	Trunks
Ordering	Reject Interval	Interconnection Trunks Resale Design UNE Design UNE Non-Design UNE Loop without NP

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

² BellSouth reported all SQMs at the appropriate levels of disaggregation, as specified in the *SQM Reports*, excepted as noted in the table.

BellSouth's Second Amended Response to Exception 61

Service Domain	SQM Name	Missing Levels of Disaggregation
Ordering	Firm Order Confirmation Timeliness	Interconnection Trunks Resale Design UNE Design UNE Non-Design UNE Loop without NP
Provisioning	Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notice	Local Interconnection Trunks
Provisioning	Average Completion Notice Interval	Interconnection Trunks
Provisioning	Total Service Order Cycle Time	Interconnection Trunks
Maintenance & Repair	Missed Repair Appointments	PBX CENTREX and ISDN UNE 2 Wire Loop (Design and Non-Design) UNE Loop Other (Design and Non-Design) UNE Other (Design and Non-Design)
Maintenance & Repair	Customer Trouble Report Rate	PBX CENTREX and ISDN UNE 2 Wire Loop (Design and Non-Design) UNE Loop Other (Design and Non-Design) UNE Other (Design and Non-Design)
Maintenance & Repair	Maintenance Average Duration	PBX CENTREX and ISDN UNE 2 Wire Loop (Design and Non-Design) UNE Loop Other (Design and Non-Design) UNE Other (Design and Non-Design)
Maintenance & Repair	Percent Repeat Troubles within 30 Days	PBX CENTREX and ISDN UNE 2 Wire Loop (Design and Non-Design) UNE Loop Other (Design and Non-Design) UNE Other (Design and Non-Design)
Maintenance & Repair	Out of Service > 24 Hours	PBX CENTREX and ISDN UNE 2 Wire Loop (Design and Non-Design) UNE Loop Other (Design and Non-Design) UNE Other (Design and Non-Design)

Impact

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. Without adequate and complete performance measurement reports, as specified in the *SQM Reports*, CLECs are unable to assess the quality of service provided by BellSouth and conduct their business functions reliably.

BellSouth Response

The SQM that KPMG received was the first attempt by BellSouth to produce a regional SQM document. The regional SQM reflected the measurements and disaggregations for all states. Each individual state report reflected only those levels of disaggregation ordered by that state's PSC. The regional SQM was updated on 5/15/00 to more clearly show the disaggregation levels for each state. BellSouth has furnished KPMG the October SQM that was Georgia specific reflecting the disaggregation ordered by the GA PSC.

BellSouth added an introduction on 5/19/00 to the SQM that explains that it is a regional document and that the state specific measures and disaggregations are noted in each

BellSouth's Second Amended Response to Exception 61

section. These measures and disaggregations were based on GA and LA State orders for Performance Measurements and associated product disaggregations. BellSouth posted the introduction on the PMAP website at the end of May 2000.

KPMG will continue to attempt to replicate the test CLEC SQM reports for all months in which the KPMG test CLEC generated transactions. KPMG will replicate one month of the CLEC aggregate/ BellSouth Retail reports, typically October 1999. If KPMG needs to re-test based upon an Exception, they will pick additional months of SQM reports to replicate, as appropriate.

To address the question of which levels of disaggregation BellSouth should have been reporting since October, for both the test CLEC and CLEC aggregate / BellSouth Retail reports, KPMG will use the SQM manuals BellSouth has been publishing, focusing on the May 15 SQM manual. Originally, the KPMG comparison of the reports with the October 22, 1999 SQM Manual resulted in Exception 61.

BellSouth will not re-create any reports (in particular, the December 1999, January 2000, or February 2000 CLEC aggregate reports) according to the June 6 documented levels of disaggregation, nor is KPMG expanding replication activities to cover additional reports, except as noted above.

For statistical comparison, BellSouth will instruct KPMG on how to take the data they already have, and assign them to the levels of disaggregation in the June 6 document. This applies to both the test CLEC data, as well as the Retail data. KPMG will meet with BellSouth programmers and other personnel as appropriate to discuss this mapping of data. The instructions, however, on this assignment of data to the June 6 categories will be created by BellSouth.

BellSouth's Second Amended Response to Exception 74



August 3, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Performance Measures Evaluation test.

Exception:

BellSouth does not report certain Georgia Service Quality Measurements ("SQMs") at the levels of disaggregation specified in the *Service Quality Measurements Georgia Performance 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 reports.¹

As part of the BellSouth-Georgia OSS Evaluation, KPMG is reviewing the adequacy and completeness of the process for reporting SQMs, as specified in the *SQM Georgia Performance Reports*.² KPMG is evaluating whether BellSouth reports performance measurement details at the levels of disaggregation specified in the *SQM Georgia Performance Reports*.

KPMG discovered that BellSouth does not report SQMs at the levels of disaggregation specified in the *SQM Georgia Performance Reports* for the SQMs in the table below.

Table 1: SQMs Reported by BellSouth with Missing Levels of Disaggregation

Service Domain	SQM Name	Levels of Disaggregation Missing from SQM Reports
Ordering	Reject Interval	Design, UNE Non-Design, UNE Loop without NP
Ordering	Firm Order Confirmation Timeliness	Design, UNE Non-Design, UNE Loop without NP
Provisioning	Service Order Accuracy	Dispatch/No Dispatch
Billing	Mean Time to Deliver Invoices	Interconnection
Maintenance & Repair	Missed Repair Appointments	PBX, CENTREX and ISDN, UNE 2 Wire Loop, UNE Loop Other, and UNE Other

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

² KPMG used BellSouth's *SQM Georgia Performance Reports, Version 10/22/99* as the basis for performing this test.

BellSouth's Second Amended Response to Exception 74

Service Domain	SQM Name	Levels of Disaggregation Missing from SQM Reports
Maintenance & Repair	Customer Trouble Report Rate	PBX, CENTREX and ISDN, UNE 2 Wire Loop, UNE Loop Other, and UNE Other
Maintenance & Repair	Maintenance Average Duration	PBX, CENTREX and ISDN, UNE 2 Wire Loop, UNE Loop Other, and UNE Other
Maintenance & Repair	Percent Repeat Troubles within 30 Days	PBX, CENTREX and ISDN, UNE 2 Wire Loop, UNE Loop Other, and UNE Other
Maintenance & Repair	Out of Service > 24 Hours	PBX, CENTREX and ISDN, UNE 2 Wire Loop, UNE Loop Other, and UNE Other

BellSouth Response

The SQM that KPMG received was the first attempt by BellSouth to produce a regional SQM document. The regional SQM reflected the measurements and disaggregations for all states. Each individual state report reflected only those levels of disaggregation ordered by that state's PSC. The regional SQM was updated on 5/15/00 to more clearly show the disaggregation levels for each state. BellSouth has furnished KPMG the October SQM that was Georgia specific reflecting the disaggregation ordered by the GA PSC.

BellSouth added an introduction on 5/19/00 to the SQM that explains that it is a regional document and that the state specific measures and disaggregations are noted in each section. These measures and disaggregations were based on GA and LA State orders for Performance Measurements and associated product disaggregations. BellSouth posted the introduction on the PMAP website at the end of May 2000.

KPMG will continue to attempt to replicate the test CLEC SQM reports for all months in which the KPMG test CLEC generated transactions. KPMG will replicate one month of the CLEC aggregate/ BellSouth Retail reports typically October 1999. If KPMG needs to re-test based upon an Exception, they will pick additional months of SQM reports to replicate, as appropriate.

To address the question of which levels of disaggregation BellSouth should have been reporting since October, for both the test CLEC and CLEC aggregate / BellSouth Retail reports, KPMG will use the SQM manuals BellSouth has been publishing, focusing on the May 15 SQM manual. Originally, the KPMG comparison of the reports with the October 22, 1999 SQM Manual resulted in Exception 74.

BellSouth will not re-create any reports (in particular, the December 1999, January 2000, or February 2000 CLEC aggregate reports) according to the June 6 documented levels of disaggregation, nor is KPMG expanding replication activities to cover additional reports, except as noted above.

For statistical comparison, BellSouth will instruct KPMG on how to take the data they already have, and assign them to the levels of disaggregation in the June 6 document.

BellSouth's Second Amended Response to Exception 74

This applies to both the test CLEC data, as well as the Retail data. KPMG will meet with BellSouth programmers and other personnel as appropriate to discuss this mapping of data. The instructions, however, on this assignment of data to the June 6 categories will be created by BellSouth.

BellSouth's Fourth Amended Response to Exception 84



August 3, 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 Fourth 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. These orders are issued and worked/completed on same day. They can be either flow through orders (no field work-non-dispatched) or field orders (dispatched).”

BellSouth's Fourth Amended Response to Exception 84

The Calculation will be corrected to read: **" Σ (Completion Date of Service Order) - (Date of Service Request Receipt) / (Count of Orders Completed in Reporting Period)"**

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. These orders are issued and worked/completed on same day. They can be either flow through orders (no field work-non-dispatched) or field orders (dispatched)."

The Calculation 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 calendar days. There was a mixture of customer contracts (some with business days, others with calendar days) which should not be averaged together, 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 revised 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's Fourth Amended Response to Exception 84

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:

<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.

BellSouth's Second Amended Response to Exception 87



August 3, 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:

Computation instructions provided by BellSouth for thirteen PMAP Service Quality Measurements (SQMs) are inconsistent with the information provided in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*¹.

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 comparing the instructions provided by BellSouth³ for computing SQMs to their definitions as documented in the *SQM Reports*⁴ in order to assess their consistency.

1. Ordering – *Firm Order Confirmation Timeliness*

For the *Firm Order Confirmation Timeliness* SQM, the second exclusion listed in the *SQM Reports*, "Partially Mechanized or Non-Mechanized LSRs received and/or FOC'd outside of normal business hours," is not addressed either in the computation instructions or in the raw data creation process.

When Local Service Requests (LSRs) are either confirmed or received outside of normal business hours, the date confirmed/received as recorded in the BellSouth systems is converted to a date falling within business hours. Therefore, such service requests are included when computing the *Firm Order Confirmation Timeliness* SQM, and the second

¹ Relevant PMAP SQM information is documented in the Definitions, Exclusions, Calculation and Business Rules sections of the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*.

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

⁴ KPMG used the 10/22/99 version of the *SQM Reports* as a basis to perform this test. KPMG also took into consideration changes published in the 2/24/00 version of the *SQM Reports*.

BellSouth's Second Amended Response to Exception 87

exclusion listed in the *SQM Reports* is inconsistent with the computation instructions provided by BellSouth.

2. Ordering – Percent Rejected Service Requests

For the *Percent Rejected Service Requests* SQM, the exclusion listed in the *SQM Reports*, “Service Requests cancelled by the CLEC prior to being rejected/clarified,” is not addressed either in the computation instructions or in the raw data creation process.

Service requests cancelled by the CLEC prior to being rejected or clarified manually are automatically excluded from the numerator when calculating this SQM, since such service requests would not generate rejection records. However, KPMG could not find instructions to exclude cancelled service requests from the denominator of the SQM (“service requests received during the reporting period”). Therefore, the exclusion listed in the *SQM Reports* is inconsistent with the computation instructions provided by BellSouth.

3. Ordering – Reject Interval

For the *Reject Interval* SQM, the computation instructions do not include fatal rejects when computing this SQM for the fully mechanized category. The *SQM Reports* specify that fatal rejects are included in the fully mechanized category⁵. Since fatal rejects are effectively instantaneous, the numerator (time interval) would be unchanged. However, the denominator (volume) would differ from its current calculation by the number of fatal rejects.

4. Provisioning – Percent Provisioning Troubles within 30 days of Service Order Activity

KPMG identified two inconsistencies between the computation instructions and the *SQM Reports*:

- The instructions provided by BellSouth prescribe excluding trouble records for which cause_id < 0.⁶ Some of the records excluded through this operation are consistent with exclusions stated in the *SQM Reports* (“cancelled and non-customer generated troubles”). However, this also excludes troubles due to Customer Provided Equipment (“CPE”), which is not listed as an exclusion in the *SQM Reports*.
- The *SQM Reports* describe the denominator of this SQM as “all service orders completed in the report calendar month,” and does not list an exclusion for provisioning appointments on which the customer requested a later due date. The instructions for denominator computation provided by BellSouth prescribe excluding records for which ‘so_cmtt_cd = “L”’ from the “Provisioning: Order Completion

⁵ *SQM Reports*, Business Rules section.

⁶ Step 2 of the *PMAP Raw Data User Manual – Troubles Within 30 Days of Provisioning (Non Trunks)*.

BellSouth's Second Amended Response to Exception 87

Interval" raw data file.⁷ Such records are associated with service orders that were not provisioned on the committed due date because the customer requested that the provisioning appointment be postponed (so_cmmt_desc_dd = "Customer request later due date"). Subsequently the instructions prescribe including records for which so_cmmt_type_cd = 1.⁸ This results in keeping only records with an original due date, thereby excluding all records with subsequent due dates. The effect of these stipulations is to exclude (among other records) all service order records relating to original provisioning appointments for which the customer requested a later due date.

5. Provisioning – Total Service Order Cycle Time

For the *Total Service Order Cycle Time* SQM, the fourth exclusion listed in the *SQM Reports* – "L Appointment coded orders" – is not addressed either in the computation instructions or in the raw data creation process.

6. Provisioning – Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices

For the *Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices* SQM, none of the exclusions listed in the *SQM Reports* are addressed in either the computation instructions or the raw data creation process.

7. Provisioning – Average Completion Notice Interval

For the *Average Completion Notice Interval* SQM, KPMG identified two inconsistencies between the computation instructions and the *SQM Reports*:

- The instructions provided by BellSouth prescribe including records for which "tsocs_mthd_acqstn = 0, 1 or 2."⁹ This equates to excluding non-mechanized orders (tsocs_mthd_acqstn = 3, 4 or 5), which is consistent with exclusions listed in the *SQM Reports*; excluding mechanized orders acquired through TAG (tsocs_mthd_acqstn = 6); and excluding all partially mechanized orders (tsocs_mthd_acqstn = 7, 8 or 9) acquired through any interface. The *SQM Reports* does not list mechanized orders acquired through TAG and partially mechanized orders as exclusions for this SQM.
- This SQM is computed from the "Provisioning: Average Completion Notice Interval raw data file." BellSouth has described this file as providing "all service orders within a given reporting period." Both the computation instructions and the raw data creation process call for orders to be limited to those completed before the end of the reporting period. However, there are no instructions to exclude orders completed before the beginning of the reporting period. The *SQM Reports* specifically state that

⁷ Step 7 of the *PMAP Raw Data User Manual – Troubles Within 30 Days of Provisioning (Non Trunks)*.

⁸ Step 8 of the *PMAP Raw Data User Manual – Troubles Within 30 Days of Provisioning (Non Trunks)*.

⁹ Step 3 of the *PMAP Raw Data User Manual – Average Completion Notice Interval*.

BellSouth's Second Amended Response to Exception 87

the denominator of this SQM should be the number of orders completed during the reporting period.

8. Provisioning – Mean Held Order Interval

For the *Mean Held Order Interval* SQM, KPMG identified three inconsistencies between the computation instructions and the *SQM Reports*:

- In computing this SQM, the instructions provided by BellSouth prescribe including records for which “so_cmmt_cd = ‘W, X, F, L, or is null’”¹⁰. This computation excludes records for the appointment code “so_cmmt_cd is ‘C, Y and Z,’” which are listed as exclusions in the *SQM Reports* (BellSouth internal/administrative orders). However, the computation also excludes records for which the appointment code is ‘A’ (Special construction in rural area), and M (Work stoppage), which are not listed as exclusions in the *SQM Reports*.
- The instructions provided by BellSouth prescribe including only records for which “so_missed_cmmt_cd begins with a ‘C’.”¹¹ These records represent appointments missed due to BellSouth reasons. However, records for which “so_missed_cmmt_cd begins with an ‘E’” represent appointments missed due to BellSouth reasons as well. Therefore, not all of the appointments missed due to BellSouth reasons are included in this SQM. This is inconsistent with the *SQM Reports* which specify that “all held orders for BST reasons” should be included in this SQM.
- The instructions provided by BellSouth prescribe computing the “held duration” as the difference between the report end date and the earliest commitment date for each service order.¹² This is inconsistent with the *SQM Reports* which specify that “held order interval” is computed on service orders that are not complete and passed the currently committed due date.¹³ Service orders might be associated with various commitment dates as provisioning appointments are missed or postponed. The currently committed due date logically implies the latest or most up-to-date committed due date rather than the earliest committed due date.

9. Provisioning - Mean Held Order Interval and Distribution Interval, and Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices

For the *Mean Held Order Interval and Distribution Interval*, and *Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices* SQMs, the computation instructions provided by BellSouth prescribe excluding orders for disconnection of service (so_type_cd = “D”), which is not listed as an exclusion in the *SQM Reports* for either SQM.

¹⁰ Step 5 of the *PMAP Raw Data User Manual – Held Order Interval*.

¹¹ Step 6 of the *PMAP Raw Data User Manual – Held Order Interval*.

¹² Step 8 and 7 of the *PMAP Raw Data User Manual – Held Order Interval*.

¹³ See Business Rules section for *Provisioning – Mean Held Order Interval and Distribution Interval* in the *SQM Reports*.

BellSouth's Second Amended Response to Exception 87

10. Provisioning – *Service Order Accuracy*

Computation instructions for the *Service Order Accuracy* SQM provided by BellSouth indicate that for large sample sizes of service orders¹⁴, when a service request cannot be matched with a specific service order, it is not identified as inaccurate (by default, it becomes classified as an order completed without error) in the numerator, but it is still counted in the denominator. This is inconsistent with the *SQM Reports*.

11. Maintenance and Repair – *Percent Repeat Trouble Within 30 Days*

According to the *SQM Reports*, the *Percent Repeat Trouble Within 30 Days* SQM includes "Customer trouble reports received within 30 days of an original customer trouble report".¹⁵ The instructions provided by BellSouth prescribe counting the number of closed trouble tickets reported during the reporting month that were identified as a repeat trouble. Repeat trouble is defined as any trouble that has previously been reported.

KPMG identified two inconsistencies between the computation instructions and the *SQM Reports*:

- Computation instructions include only closed trouble reports in the numerator of the SQM, while the *SQM Reports* describe this SQM as including all troubles reported during the reporting month (i.e. including pending trouble reports).
- Computation instructions prescribe including repeat troubles that occur during the reporting month (without further qualification), while the *SQM Reports* describe the SQM as including only repeat troubles within 30 days of an original customer trouble report.

12. Maintenance and Repair – *Customer Trouble Report Rate*

Computation instructions for the *Customer Trouble Report Rate* SQM include only closed trouble reports in the numerator, while the *SQM Reports* describe the calculation as including all initial and repeated troubles reported during the reporting period (i.e., including pending trouble reports).

13. Maintenance and Repair – *Maintenance Average Duration*

Computation instructions for the *Maintenance Average Duration* SQM prescribe counting all closed trouble tickets received within the reporting period in the denominator, while the *SQM Reports* describe it as the count of trouble tickets closed during the reporting period (some of which might have been received prior to the reporting period).

¹⁴ A "large" sample size is described in the *SQM Reports* as consisting of 200 or more service orders.

¹⁵ *SQM Reports*, *Business Rules* section.

BellSouth's Second Amended Response to Exception 87

Impact

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. If SQM computation instructions differ from the steps taken by BellSouth to produce the SQMs, CLECs' will not correctly interpret the SQMs, as calculated.

BellSouth Response

Ordering – Firm Order Confirmation Timeliness

KPMG is correct, the LSRs were included in the reports but weekend hours were excluded. Based on Carrier Notification SN91081623, the hours of operation in the LCSC changed on February 1, 2000. The SQM was updated in the May 2000 SQM to correct the Exclusion and will reflect the new LCSC hours of operation. The Raw Data User Manual was updated for May 2000 to correct the Exclusion.

The SQM update dated May 2000 includes the following Exclusions:

- Rejected LSRs
 - Designated Holidays
 - The following hours for Non-mechanized LSRs*:
 - Residence Resale Group – from 10:00 PM EST Saturday until 7:00 AM EST Monday
 - Business Resale, Complex, UNE Groups – from 8:00 PM EST Friday until 8:00 AM EST Monday
 - IPC – 4:30 PM CST Friday until 8:00 AM CST Monday
- * The hours excluded will be altered to reflect changes in the Center operating hours.

The SQM update scheduled for July 2000 will contain the following Exclusion:

- The following hours for Non-mechanized LSRs are excluded from the interval computation:
 - Residence Resale Group – from 10:00 PM EST Saturday until 7:00 AM EST Monday
 - Business Resale, Complex, UNE Groups – from 8:00 PM EST Friday until 8:00 AM EST Monday
 - IPC – 4:30 PM CST Friday until 8:00 AM CST Monday
 - Designated Holidays

PMAP is not currently excluding weekend hours from the Interconnection Trunk Ordering (Reject Interval and FOC Timeliness) Reports. The following "bullet" will be deleted from the July 2000 SQM update:

- IPC – 4:30 PM CST Friday until 8:00 AM CST Monday

BellSouth's Second Amended Response to Exception 87

Change Request 5986 was submitted on July 17, 2000 to exclude weekend hours from the Interconnection Trunk reports for Reject Interval and FOC Timeliness. BellSouth has scheduled this Change Request to be worked no later than September 15, 2000.

Ordering – Percent Rejected Service Requests

Changes made to the code in November 1999 created the problem delineated in the Exception. On March 15, 2000, the discrepancy was identified and a Change Request opened. That Request, #5705, was worked with the May upload of April data. Therefore, LSRs that are canceled by the CLEC prior to being rejected/clarified, are now excluded from the data.

The exclusion of Service Requests canceled by the CLEC prior to being clarified / rejected is done from Staging to NODS and therefore, not included in PMAP raw data.

The following is included in the Resolution of Change Request 5705:
The job that was affected by this change was ORSNSRqLon. This change was made and ran in May/April data. Exclusions done from Staging to NODS, does not affect the Raw Data Users Manual.

A copy of CLOSED Change Request #5705 with information from Issue Tracker was provided to KPMG on July 20, 2000.

Ordering – Reject Interval

In the May 2000 SQM, the Business Rules were amended to delete the reference to Fatal Rejects. The Reject Interval Definition reads "Reject Interval is the average reject time from receipt of an LSR to the distribution of a Reject. An LSR is considered valid when it is submitted by the CLEC and passes edit checks to insure the data received is correctly formatted and complete." When a "Fatal Reject" occurs, a valid LSR is not created, therefore, Fatal Rejects should not be included in the calculation.

Provisioning – Percent Provisioning Troubles within 30 days of Service Order Activity

The following exclusion will be added to the next SQM update scheduled for July 2000:
"*Exclude all troubles caused by CPE (Customer Provided Equipment)."

This report measures all completed service orders, so the "L" exclusion does not apply. The original raw data guide did refer to excluding "L" and that entry was removed in the May 15, 2000 version of the Raw Data User Manual.

Provisioning – Total Service Order Cycle Time

This exclusion was added to the May 15th version of the Raw Data User Manual in Step 2 as: **"Exclude any records where so_cmmt_cd = 'L'."**

BellSouth's Second Amended Response to Exception 87

Provisioning – Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices

BellSouth does not issue Jeopardy Notices for reasons other than facility delays. All records in the raw data for Average Jeopardy Notice Interval capture only orders that have been in jeopardy for facility delay (PF) and therefore, performing the actual exclusion of end user reasons is not needed. BellSouth does feel the note of excluding these orders is necessary to remove any question of customer caused delays being included in the report.

Regarding the non-mechanized order exclusion, BellSouth will remove this entry in the July 2000 version of the SQM. All orders are accessible through CSOTS for all CLECs to review status of their order. This measure reports the time the notice has been released to all systems including electronic systems for the CLECs and CSOTS and therefore the exclusion is no longer valid.

Regarding the order cancelled by the CLEC exclusion, BellSouth removed this entry in the May 2000 version of the SQM.

Provisioning – Average Completion Notice Interval

The following exclusion will be added in the July 2000 update of the SQM:

***Partially mechanized orders.**

In addition, orders received fully mechanized through TAG will be included in this measurement. The May 2000 update to the Raw Data User Manual now reflects the following instructions in Step 3: **'Include records that have a 0,1,2, or 6 in the tsocs_mthd_acqstn field.'** '6' represents fully mechanized orders received through TAG. Partially mech orders received through TAG are included in '9'.

The May 15th version of the Raw Data user manual was updated to change the entry in Step 4 to read: **'Include records with a cmplt_n_dt between the first and last day of the reporting month for which the raw data is valid'.**

Provisioning – Mean Held Order Interval

An exclusion will be added to exclude orders held for Special Construction in rural areas in the July 2000 update of the SQM manual. Service order commit codes of 'M' were added to computation in the May 15th Raw Data Users Manual as orders due to work stoppage would be considered held orders in the event of a strike.

"E" missed appointment codes have been added to all areas of the May 15th Raw Data User Manual that apply to so_missed_cmtt_cd of "C".

BellSouth attempts to complete the work on all held service orders as soon as possible. This sometimes necessitates trying different methods to provide service and may involve

BellSouth's Second Amended Response to Exception 87

more than one due date change depending upon facility work, situations regarding load or weather conditions, or equipment delays. This report measures if the order is held for company reasons on or after its current due date. An order may have had previous due dates that were held for company reasons and changed to the new due date to attempt to provide service. BellSouth reports the total held time from the first BellSouth caused missed appointment, using the current held reason for the current due date. BellSouth will update the SQM Business Rules and Calculation in the July 2000 SQM as follows:

Business Rules: Mean Held Order Interval: This metric is computed at the close of each report period. The held order interval is established by first identifying all orders, at the close of the reporting interval, that both have not been reported as completed in SOCs and have passed the currently committed due date for the order. For each such order, the number of calendar days **between the earliest committed due date on which BellSouth had a company missed appointment** and the close of the reporting period is established and represents the held order interval for that particular order. The held order interval is accumulated by the standard groupings, unless otherwise noted, and the reason for the order being held. The total number of days accumulated in a category is then divided by the number of held orders within the same category to produce the mean held order interval. The interval is by calendar days with no exclusions for Holidays or Sundays. CLEC Specific reporting is by type of held order (facilities, equipment, other), total number of orders held, and the total and average days.

Calculation: Mean Held Order Interval: $\Sigma(\text{Reporting Period Close Date} - \text{Earliest Committed Order Due Date with a BellSouth missed appointment}) / (\text{Number of Past Due Orders Held and Pending but not completed and Past The Committed Due Date}).$

Held Order Distribution Interval:

$(\# \text{ Of Orders Held for } \geq 90 \text{ days}) / (\text{Total } \# \text{ of Past Due Orders Held and Pending But Not Completed and past the committed due date}) \times 100$

$(\# \text{ Of Orders Held for } \geq 15 \text{ days}) / (\text{Total } \# \text{ of Past Due Orders Held and Pending But Not Completed and past the committed due date}) \times 100$

Provisioning - Mean Held Order Interval and Distribution Interval, and Average Jeopardy Notice Interval and Percentage of Orders Given Jeopardy Notices

The exclusion of D and F (total disconnect and from disconnects on transfer orders) will be added to the July 2000 version of the SQM for Jeopardy Notice Interval. These orders were not mentioned in the previous SQM's as they apply to disconnects which are worked on the due date requested by the subscriber and would not be placed in jeopardy for company reasons.

However, it is not necessary to exclude D & F orders from Held Order Interval, as they would not be counted in this measure or in the base of orders.

Orders are held for company reasons and this does not affect D&F orders. As these are disconnect orders placed at the customer request, they are worked on the requested due date. Held Order is a Mean Interval report that only calculates orders that are held and

BellSouth's Second Amended Response to Exception 87

does not use the base of total orders which would include D&F orders. Therefore, since D&F orders are not considered in the calculation of the interval, as they are not held, it is not deemed necessary to specify they are excluded. BellSouth has clarified this policy for KPMG and will update the SQM, in the July 2000 version, to say that D&F orders are excluded.

Provisioning – Service Order Accuracy

The following statement will be added to the July 2000 version of the SQM: "For both small and large sample sizes, when a Service Request cannot be matched with a corresponding Service Order, it will not be counted. For small sample sizes an effort will be made to replace the service request."

Maintenance and Repair – Percent Repeat Trouble Within 30 Days

The definition will be updated in the July 2000 SQM version. 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 Calculation and Business Rules will be updated in the July 2000 SQM version. 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**

The updated Business Rules will read: **Closed customer troubles received within 30 days of an original closed customer trouble report.**

LMOS uses a flag to score troubles that have met the requirements of a repeat. When a original trouble report has been received and closed and a second trouble is received, LMOS waits for the completion of the second trouble and then looks at the issue date of the repeat and if this trouble report is within 30 days, strokes the flag with a one.

Maintenance and Repair – Customer Trouble Report Rate

The Definition, Business Rules, and Calculation for the *Customer Trouble Report Rate* SQM will be updated in the July 2000 SQM version. They will read as follows:

Definition: Initial and repeated customer direct or referred troubles closed within a calendar month per 100 lines/circuits in service.

Business Rule: Customer trouble report rate is computed by accumulating the number of maintenance initial and repeated trouble reports closed in the reporting period.

Calculation: Customer Trouble report rate = (Count of initial and repeated trouble reports closed in the current period) / (Number of service access lines in service at the end of the report period) X 100

BellSouth's Second Amended Response to Exception 87

For Maintenance measurements, all trouble reports must be closed to be counted in both the WFA and LMOS systems. This process ensures that only valid trouble reports are included in the measurement. For example, trouble reports that are cancelled by the customer or excluded by BellSouth (due to a non-telephone problem) would not be valid trouble reports.

Maintenance and Repair – Maintenance Average Duration

The actual computation for the Maintenance Average duration SQM prescribes counting all closed troubles tickets within the reporting period in the denominator.

BellSouth's Fourth Amended Response to Exception 89



August 3, 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.

BellSouth's Fourth Amended Response to Exception 89

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.

BellSouth's Fourth Amended Response to Exception 89

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.

BellSouth's Fourth Amended Response to Exception 89

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

BellSouth's Fourth Amended Response to Exception 89

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.

BellSouth's Fourth Amended Response to Exception 89

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.

BellSouth's Fourth Amended Response to Exception 89

tracked on Excel spreadsheets with no built-in edit process. BellSouth is testing a web-based order interface that is designed to eliminate typographical errors as well as mitigate the errors caused by the manual preparation of these documents. The resulting database will also serve as a collection point for tracking dates, further reducing the opportunity for human error. Tentative implementation is scheduled for late 2000.

As an additional interim step, BellSouth is using Collocation Program Managers in each state to facilitate the collocation process, by tracking dates, and removing roadblocks to completing collocation orders.

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. The field for determining time consistent busy hour is the OFFD_CCS field. The calculation is the same as the calculation used for the MEAS_BLK field.

This difference in the formula explains several of the differences in the blocking percentage derived by BellSouth and KPMG. The following table shows the hour used by BellSouth and the hour used by KPMG in their calculations, with explanations of each difference.

For trunk groups AC158303, AC 198084, and AC203657, the data provided was corrupted and unusable for replicating the trunk blocking report. The database that produced the data for the report being analyzed was discontinued in October 1999, therefore the source was not available to reproduce the data for those three trunk groups. KPMG requested to review trunk blocking data for another month and BellSouth provided January 2000 Trunking Data on 7/24/00.

Quality control of trunk blocking data is assured in two ways. First, BellSouth Practice 002-500-017BT, Issue A, July 1996, sets forth guidelines for the inclusion and exclusion of data in the trunk blocking calculation. Second, the inclusion and exclusion of data has to be approved by Director level or above and can only be executed by Network Planning and Support personnel with written approval.

BellSouth's Fourth Amended Response to Exception 89

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 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

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

BellSouth's Fourth Amended Response to Exception 89

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. BellSouth began the alternate option process in October 1999 which has resulted in a very low number of missed calls.

BellSouth is in the process of cutting each GEO in the region to the new G3 switch. As BellSouth converts GEO by GEO to the new switch, there is a method to retrieve alternate option calls separately from the NCO (Calls Offered) data. After the last cutover is completed, in Florida on September 26th, BellSouth plans to eliminate the manual process and begin tracking alternate option data separately on a regionwide basis. This process change will enhance quality control by reducing the need for manual additions. Therefore, additional review of the data could be performed beginning with the October 1st 2000 data.

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

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 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

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

BellSouth's Fourth Amended Response to Exception 89

indeed be 43.8 as reported in the Early Stage value (PMAP raw data) for each instance of this LSR.

Two additional sample LSR's provided by KPMG are in the table below.

SOURCE	OCN	PON	VER	RQ ID
STAG_LSR	7574	1001JM-1	1	8725
STAG_LSR	4110	G101011-D10	0	169020

According to the explanation previously provided, KPMG has claimed that the two following records (LSRs) should have been reclassified as "Partially Mechanized". The explanation previously provided was incomplete and did include all the criteria required for reclassification from "Mechanized" into "Partially Mechanized".

In order for PMAP to reclassify a record as "Partially Mechanized", the record must adhere to one of the following three groups of criteria (All the conditions within each group must all be true for the record to classified as "Partially Mechanized"):

- 1)
 - a) It must be a FOC LSR. FOC LSR's must contain the string "FOC STAGED FOR LSR" in the NOTES field of STAG_AUDIT (LEO)
 - b) Must contain "Claimed By" or "CLAIMED BY" in NOTES field of STAG_AUDIT (LEO)
 - c) The first three characters of SIGNOUT_CUID are not 'DB0' in STAG_LSR (LEO)
- 2)
 - a) It must be a REJECTED LSR. A REJECTED LSR contains the string "CLARIFICATION RETURNED" in the NOTES field of STAG_AUDIT (LEO)
 - b) LSR must have been manually claimed. This is true when the string "CLAIMED BY" or "Claimed By" is found in the Notes field of STAG_AUDIT (LEO).
 - c) The first three characters of SIGNOUT_CUID are not 'DB0' in STAG_LSR (LEO)
- 3.)
 - a) Records must be manually rejected after they were received in LEO. This is true when the FIRST_CLAR_DT in STAG_LON is greater than CREATE_TS in LEO.
 - b) The record must contain the string "Claimed By", or "CLAIMED BY" in Notes field of STAG_AUDIT (LEO)
 - c) Purchase Order Number (PON) must be found in STAG_LON_COPY (LON)
 - d) The first three characters of SIGNOUT_CUID are not 'DB0' in STAG_LSR (LEO)

BellSouth's Fourth Amended Response to Exception 89

3) 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.

An LSR can have multiple "audit notes" entries. Each entry would have its own date/time stamp.

The date and time of the rejection is the notes timestamp from the STAG_AUDIT_TABLE if the LSR reads either "CLAIMED BY" or Claimed By" in the audit notes field and all of the following are true of the LSR:

- It was electronically submitted
- It was manually rejected
- It's Purchase Order Number (PON) exists in LON
- It has not been cancelled prior to being rejected or clarified
- The LON system first clarification date/time is greater than the date/time it was first submitted electronically.

If any of the audit notes field reads either "CLAIMED BY" or Claimed By" and any of the other above requirements are not met, the reject date and time would be the notes timestamp from STAG_AUDIT_TBL where "CLARIFICATIONS RETURNED" appears in the audit notes field.

Additional data was provided to KPMG on 7/27/00 to support the explanation of this Exception.

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)

BellSouth's Fourth Amended Response to Exception 89

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.

Trunk information is currently captured from two tables in EXACT (EXACT_seg1 and EXACT_seg2). The first table identifies the request for Trunks, the second table indicates Local Trunks opposed to Access Trunks, which are also ordered on ASRs. The log screens reviewed by KPMG didn't match because the site code is not currently captured from EXACT.

Change Request 5928 has been submitted to assure BST captures the correct data for each ASR in the future. It will be worked with June data to be posted to the Web in July.

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 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.

As indicated in Table 1 below, the earliest system for the "Cut Start" and "Cut Complete" times is CCSS. WFA-C is the earliest system for the "Completion Date" and "# Items". A program is run which extracts the respective data from CCSS and WFA-C and creates a data file for use in preparing the CCC report.

**Table 1: Data Fields from "CCCMAY00.xls"
Under Examination**

	Raw Data Field	Corresponding Field in Earliest System
1	Completion Date	WFA-C OSSOID screen "EVT" field = "DD" + "CMP DATE" field, see example below.
2	# Items	WFA-C OSSOID screen "ITEM"
3	Cut start	CCSS system "Cut Started" field
4	Cut comp	CCSS system "Cut Completed" field
5	Cut comp	Is this a duplicate of item 4?

BellSouth's Fourth Amended Response to Exception 89

As requested to clarify the explanation of the Exception, screen prints from CCSS for obtaining the "Cut Start" and "Cut Complete" data were sent to KPMG in a separate file on 7/20/00. Following each CCSS screen print is the WFA-C screen print(s) for determining the "# Items" and "Completion Date".

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 necessary to start with the December 1999 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.

BellSouth's Fourth Amended Response to Exception 89

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_cmmt_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')

BellSouth provided snapshot data from the ICAIS/BARNEY database rather than data from the live ICAIS/BARNEY database.

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_cmmt_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_cmmt_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_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

- select order_number, issue_date, telephone_number, status from socs_1099 where order_number in ('CO6MGHF9', 'COC7JLV3', 'NO3X2QG6', 'NO6G2K01', 'NO8MDNW9', 'NODJ7T32', 'NOF8K257', 'NP2X9380', 'CO6923J6',

BellSouth's Fourth Amended Response to Exception 89

'NO1MTCP0', 'NO3WTR51', 'NO83B1R1', 'NO85N2Y9', 'NOB4GHY7') order by
order_number, issue_date

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
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

BellSouth's Fourth Amended Response to Exception 89

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 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.

BellSouth's Fourth Amended Response to Exception 89

On June 21st, KPMG requested that Early Stage data for retesting the Billing – *Invoice Accuracy* for the CLEC aggregate metric be provided to KPMG for the month of March 2000.

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

KPMG received incomplete data from BellSouth. After providing KPMG with additional reports to assist KPMG in validating the data, KPMG was able to replicate the BellSouth reported values.

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 91



August 3, 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

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.

BellSouth's Amended Response to Exception 91

BellSouth algorithm to calculate the invoice accuracy metric³. This calculation demonstrates a 723% under-billing.

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	-

³ ((Total Billed Revenue – Total Adjustments[Variance])/Total Billed Revenues) X 100 – This is invoicing accuracy metric as defined in the Georgia Master Test Plan (Appendix D2).

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.

BellSouth's Amended Response to Exception 91

Operator Call Handling	31	0	31	0.9680296	30.01	0.00	30.01	-
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.

BellSouth Response

BellSouth was able to determine the specific source of the discrepancies for the billing variances for two of the billing elements referenced above: Operator Call Handling and Automated Call Handling. For the remaining billing elements, we are not able to complete the investigation due to the retention period of our historical records.

The investigation determined that during the November time frame, there were multiple service orders issued against these line numbers. The service order activity resulted in usage guides that were not always properly assigned, and identified, as belonging to KPMG (a facilities based provider). It was assumed that some of the usage was processed at a time when the usage guide(s) would have directed the usage to our error process. , There is no way to specifically determine the root cause of discrepancy without being able to trace this usage back through the processed error usage. BellSouth recommends that the UNE billing rate elements be verified during any subsequent UNE re-test.

Operator Call Handling

BellSouth determined that the rate file system authorizes Operator Call Handling(OPCH) with a LIDB dip to be rated in one of two ways. . A CLEC contract can contain a) two separate rates; one for the OPCH portion and one for the LIDB portion; or b) a combined rate for both the OPCH and the LIDB. The KPMG billing was set up for the combined rate. The design for the rate file maintenance process requires BellSouth to enter rates for both the rate structure that has two separate rates, and the rate structure that has the combined rate. When a CLEC contract contains the two-rate structure, BellSouth enters the appropriate rate in the OPCH rate field and the appropriate rate in the LIDB rate field, and a rate of zero in the combined rate field. When a CLEC contract contains the

BellSouth's Amended Response to Exception 91

combined rate structure, the appropriate rate is entered in the combined rate field, and a zero rate is entered in both the OPCH rate field and the LIDB rate field.

There is a design flaw in the rating process that will look for the two-rate structure as the first step in the process. If there are entries for the two-rate structure, then those rates are applied for billing purposes. If the entries for the two-rate structure are not found, then the process will look for the combined rate structure. The problem with this design is that both rate structure entries are required, and as a result, when a CLEC has a combined rate structure, the two rate structure will always be found with zero rate entries.

The programming staff has recommended the following work around: For a CLEC that has a combined rate structure, the two rate structure entries can be entered with a zero rate, and the effective dates and end dates can be entered such that both date ranges will fall prior to the effective date of the contract. This will in effect make these rate entries invalid for use, and the system will then bypass them and use the combined rate structure.

There are two options for a long term fix: a) change the rate file maintenance process such that both rate structures are not required, or b) change the rate file maintenance process such that zero rates are not required and a given rate structure can be shown as not/applicable. Either option will require an enhancement to the system which will have to be scheduled and worked into the IT work request process. BellSouth will investigate the appropriate option for correcting this process, issue a work request, and coordinate to determine an implementation date.

Automated Call Handling

The rate element is processed in the same way as stated above. It is the two-rate structure vs. the combined rate structure.

For the subsequent re-test of the UNE Invoice:

BellSouth was able to show that the manual work-around process for the rate file system for Operator Call Handling and Automated Call Handling resulted in accurate billing for these rate elements.

For the two rate elements that were still in question from the initial UNE Invoice Test (Verification and Interrupt): BellSouth was able to show accurate billing for these rate elements as well. These two rate elements have a rate structure that calls for billing on a per minute basis, for operator work time, and records show that the duration(s) for these calls match the billing shown on the May Invoices. BellSouth recognizes that Operator Work time is not populated on the ODUF records that represent these calls, since that is an optional field and is populated at the provider's discretion. BellSouth will investigate the possibility of populating this field and will issue a work request to enhance this process and pass this data to the CLEC when the investigation is complete and proper requirements developed.

BellSouth's Fourth Amended Response to Exception 92



August 3, 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.

BellSouth's Fourth Amended Response to Exception 92

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.

BellSouth's Fourth Amended Response to Exception 92

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. The directory filled up on these dates, 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.

BellSouth's Fourth Amended Response to Exception 92

This issue was corrected on 7/10/00 by moving the TAG data feed to a new directory. The new directory contains over 4 gigabytes of free space, thus eliminating the issue of capacity on the TAG server.

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

During normal operations activities, BellSouth discovered an omission of problem records related to SL13GTWY (LEO-EDI). Corrections were made to the database in March 2000. As a result there is a discrepancy in outage reporting for the LEO-EDI application components between September 1999 and February 2000. Additionally, there are two BSIS (MARCH) records included in this report that were not included in the January OSS Interface Availability 302 Report.

KPMG found that the Raw Data from December was incomplete. KPMG issued another raw data request for the same Pre-Ordering *OSS Interface Availability* to review March 2000. KPMG reviewed March 2000 raw data request for the same Pre-Ordering *OSS Interface Availability* and did not find any discrepancies.

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

Only one of the 25 ASRs provided to KPMG is a valid Local Access Message Trunk.

Local Trunks are identified by:

Reqtyp[1,1] = 'M' and

ECCKT[12,1] = 'J' (ECCKT[12,1] = TRKMOD[1,1])

Item 16, ASR = 9928800124 PON = A473 is the only one that meets the Local Trunk criteria. This ASR is not loaded into the PMAP system because it fails to meet criteria - Date Confirmed (D_CNF) is greater than Date Received (D_REC). Date variables "D_REC" & "D_CNF" do not include time, only month, day and year. Because it is not loaded into PMAP, it's not included in the Raw Data provided by PMAP.

Item 20, ASR = 9928800124 PON = 04269123-D9998 is not a valid Local Trunk. It is included in the Early Stage Data (PMAP Raw Data) due to an error in the logic. As ASR is unique within an EXACT Site. EXACT% Source Data is extracted as two tables, STAG_EXACT_SEG1 and STAG_EXACT_SEG2. These two tables are currently joined using ASR. Both tables contain ASRs from all 5 EXACT Sites

Change Request 5928 was submitted on 6/21/00 to assure BST captures and reports correct data for each ASR in the future. It is scheduled to be worked with June data to be posted to the Web in July.

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

BellSouth's Fourth Amended Response to Exception 92

BellSouth's response is broken into two individual responses for each record in question. Record identifier information that was provided to BellSouth by KPMG is also included for each record.

Record #1

Record	LON	OCN	PON	VER
1	2816098	7050	20-00039790A	0

This record is not in the PMAP database because certain selection criteria are not met. As certain selection criteria were not met, this record will not be stored in PMAP and will be diverted to a temporary error table. This record is not included in raw data because it is not stored in PMAP.

The text shown below in *italics* lists the selection criteria that caused this particular record to fall out to an error table. The table immediately following the italicized text shows partial detail about this particular record and includes the reasons that caused each field in the record to error out.

*IF (SUP = 1 and IsNull(FIRST_CLAR_DT)) Then 0 Else 1
and (
((FIRST_RCVD > '01-Jan-1997') AND (isnull(FOC_DATE)))
or
(not(isnull(FOC_DATE)) and (LAST_RCVD < FOC_DATE) and
isnull(FIRST_CLAR_DT))
or
(not(isnull(FIRST_CLAR_DT)) and (FIRST_RCVD < FIRST_CLAR_DT)))*

Field Name	Field Value	Error Description
first_rcvd	1999-10-15 10:49	Only include LSR's that have not been Clarified or that were Clarified after the LSR was First Received
last_rcvd	1999-10-21 15:50	Only include LSR's that are not Firm Order Confirmed or that were Firm Order Confirmed after the LSR was Last Received
Foc_date	1999-10-21 15:50	Only include LSR's that are not Firm Order Confirmed or that were Firm Order Confirmed after the LSR was Last Received
first_clar_dt		Only include LSR's that have not been Clarified or that were Clarified after the LSR was First Received

BellSouth's Fourth Amended Response to Exception 92

Record #2
Record LON OCN PON VE
 R
 2 2816295 7268 W192
 99

The OCN of '7268' is not a valid OCN number in PMAP and therefore this record fell out to an error table. Because this record is not included in the PMAP database it will not be included in raw data.

The following text references three text boxes located further down the page. Throughout the text they are referred to as boxes 1 through 3 with box 1 as the leftmost box.

The boxes below represent a breakdown of the original logic statement into smaller more manageable parts.

The leftmost box contains the original logic statement.

The second box from the left substitutes *Statement1*, *Statement2*, *Statement3*, and *Statement4* for longer statements in the first box (e.g. *(SUP = 1 and IsNull(FIRST_CLAR_DT)) Then 0 Else 1* becomes *Statement1*). This makes it easier to see the overall logic involved and helps to break the logic into more manageable pieces. Also in the second box *Statement2*, *Statement3* and *Statement4* are grouped together because of the location of the parentheses in the original logic statement. This means that the comparison between *Statement2*, *Statement3*, and *Statement4* will be performed before any of the other logic.

The third and final box represents the most basic form of the more complex logic from the first box. In this box *Statement5* represents the results of the comparison between *Statement2*, *Statement3*, and *Statement4* from the previous box. In order for the entire statement in the fourth box to be TRUE both *Statement1* and *Statement5* must be true. If either *Statement1* or *Statement5* is FALSE then the entire statement in the fourth box will evaluate to FALSE.

To find if the entire logic statement is TRUE or FALSE first evaluate *Statement1* using the instructions below. If *Statement1* is FALSE then there is no need to continue the evaluation because the entire original statement will be FALSE. If *Statement1* is TRUE then *Statement5* must be evaluated as discussed below.

BellSouth's Fourth Amended Response to Exception 92

If the entire logic statement evaluates to TRUE then the associated record is kept in PMAP for further processing. If the entire logic statement evaluates to FALSE then the associated record drops out to an error table

Now that the original logic statement has been broken down into smaller more manageable pieces, each piece can be further evaluated. This next section will break down *Statement1*, and *Statement5* into their individual components.

If (SUP = 1 and IsNull(FIRST_CLAR_DT)) Then 0 Else 1 and ((FIRST_RCVD > '01-Jan-1997') AND (isnull(FOC_DATE))) or (not(isnull(FOC_DATE)) and (LAST_RCVD < FOC_DATE) and isnull(FIRST_CLAR_DT)) or (not(isnull(FIRST_CLAR_DT)) and (FIRST_RCVD < FIRST_CLAR_DT)))	Statement1 and (Statement2 or Statement3 or Statement4)	Statement1 and Statement5
If (SUP = 1 and IsNull(FIRST_CLAR_DT)) Then 0 Else 1 and ((FIRST_RCVD > '01-Jan-1997') AND (isnull(FOC_DATE))) or (not(isnull(FOC_DATE)) and (LAST_RCVD < FOC_DATE) and isnull(FIRST_CLAR_DT)) or (not(isnull(FIRST_CLAR_DT)) and (FIRST_RCVD < FIRST_CLAR_DT)))	Statement1 and (Statement2 or Statement3 or Statement4)	Statement1 and Statement5

Statement1

Statement1 is the same thing as (SUP = 1 and IsNull(FIRST_CLAR_DT)) Then 0 Else 1. To evaluate this statement first analyze the first part (SUP = 1 and IsNull(FIRST_CLAR_DT)). If both SUP = 1 and the field FIRST_CLAR_DT is null then this part of the statement evaluates to TRUE. If SUP does not = 1 or FIRST_CLAR_DT is not null then the first part of Statement1 will evaluate to FALSE.

BellSouth's Fourth Amended Response to Exception 92

In Then 0 Else 1 part of Statement1 the 0 equals a value of FALSE and the 1 equals a value of TRUE. This part of Statement1 has the effect of reversing the value that was found in the first part of the statement. This second part of Statement1 can be thought of as saying 'If first part is TRUE then Statement1 is FALSE' or 'If first part is FALSE then Statement1 is TRUE'.

Statement5

Statement5 is actually a representation of the (Statement2 or Statement3 or Statement4). For Statement5 to evaluate to TRUE Statement2, Statement3, or Statement4 need to be TRUE. If any of these three statements is TRUE then all of Statement5 will be TRUE and there is no need to evaluate the rest of the statements. For Statement5 to evaluate to FALSE all three of the statements (Statement2, Statement3, and Statement4) need to be FALSE.

Statement2

Statement2 is the same thing as ((FIRST_RCVD > '01-Jan-1997') AND (isnull(FOC_DATE))). If the FIRST_RCVD date is greater than January 1, 1997 and the FOC_DATE field is null then Statement2 will evaluate to TRUE. If the FIRST_RCVD date is less than or equal to January 1, 1997 or the FOC_DATE field is not null then Statement2 will evaluate to FALSE.

Statement3

Statement3 is the same thing as (not(isnull(FOC_DATE)) and (LAST_RCVD < FOC_DATE) and is null(FIRST_CLAR_DT)). Statement3 can also be represented as Statement6 and Statement7 and Statement8. For Statement3 to be TRUE, Statement6, Statement7, and Statement7 all need to be TRUE. If any of the statements (Statement6, Statement7, or Statement8) are FALSE then Statement3 will be FALSE.

Statement4

Statement4 is the same thing as (not(isnull(FIRST_CLAR_DT)) and (FIRST_RCVD < FIRST_CLAR_DT)). If the field FIRST_CLAR_DT is not null and the FIRST_RCVD date is less than the FIRST_CLAR_DT then Statement4 will evaluate to TRUE. If the field FIRST_CLAR_DT is null or the FIRST_RCVD date is greater than or equal to FIRST_CLAR_DT then Statement4 will evaluate to FALSE.

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.

BellSouth's Fourth Amended Response to Exception 92

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 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.
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/PMI/TROUBLES WITHIN 30 DAYS - This record has a status of "pending". These measurements only report on completed orders.

BellSouth's Fourth Amended Response to Exception 92

BellSouth's Fourth Amended Response to Exception 92

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*

The component MRLM53BM is a redundant LMOS system to MRLM53AM. These components share the same hard drive therefore have the same data. Due to this arrangement both components are not on line at the same time. There are a total of 26 LMOS processors. These two components are for the Southeast Florida LMOS processor only. There are 24 other LMOS processors that cover the remaining 8 States and all of these processors also have redundant components.

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.

BellSouth's Fourth Amended Response to Exception 92

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.

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 implementation date of the final mechanization for CABS Billing Account Numbers is scheduled for September 2000, however the manual process for review is currently in place to be tested.

(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.

BellSouth's Fourth Amended Response to Exception 92

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.

The Spreadsheets produced by Bill Distribution for the BellSouth Aggregate billing raw data are checked for reasonableness. Th errors identified in the October 1999 data were the result of human error. The spreadsheet providing the incorrect state percentages has been corrected and manually reviewed. Bill Distribution will continue to do monthly random reasonableness checks in the future to ensure accurate reporting.

BellSouth's Amended Response to Exception 100



August 3, 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 was unable replicate two of BellSouth's Service Quality Measurements (SQMs) in the May 2000 report.

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. Additionally, BellSouth 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 experienced replication problems for the following SQMs in the May 2000 report.

1. ***Coordinated Customer Conversions in the Provisioning category for the KPMG Test CLEC.*** KPMG was unable to replicate Average Interval values in the SQM report, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
Unbundled Loops Without Number Portability; Avg Interval(Min)	4.75	4
Total; Avg Interval(Min)	4.75	4

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.

BellSouth's Amended Response to Exception 100

2. **Invoice Accuracy in the Billing category for the KPMG Test CLEC.** KPMG was unable to replicate the UNE product group in the SQM report, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
UNE; Total Billed Revenue	\$29,145.87	\$29,039.40
UNE; Total Adjustments	\$42,291.62	\$44,828.80
UNE; Percent Accuracy	-45.103%	-54.372%

Additionally, KPMG discovered that five cells in the "ADJUSTMENT" field in the May raw data contained commas, after the adjustment amount. Since these fields are non-numeric, they are not included in the calculation of the *Invoice Accuracy* metric.

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 two 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

Coordinated Customer Conversions in the Provisioning category for the KPMG Test CLEC.

Effective with the July SQM report, the CCC report will report the "Average Interval" in minutes and seconds (4:45). Previously this was reported in minutes and hundredths of a minute (4.75). Prior to May 2000, the file that was used to generate the CCC report was created manually. Seconds were not included because they were not available. Now, beginning in May 2000, the file is created mechanically and seconds are available. A software change was made due to this new time format (yyyy-mm-dd hh:mm:ss). The first time the report was run, the report had the seconds truncated. The report has now been rerun and the "Average Interval" is now reported in minutes and seconds.

Invoice Accuracy in the Billing category for the KPMG Test CLEC

(1) The five cells in the "ADJUSTMENT" field in the May raw data (which contained commas) should be included in the adjustment amount totals. The original values appeared with a comma following the value. This error occurred when converting the manual file into EXCEL. BellSouth will review the manual files in the future prior to submitting the final report to PMAP to avoid this problem.

BellSouth's Amended Response to Exception 100

If KPMG includes the corrected values in their calculations, their results should be the same as the total adjustments that the Billing E&Y file reflected. The five cell values are listed below:

UNE	Orig. ADJ value	Corrected ADJ value	Revenue	Name	BAN
UNE	785.001,	785.00	70.00	KPMG 271 TESTING	706 Q59-4610
UNE	1,023.921,	1,023.92	91.66	KPMG 271 TESTING	706 Q85-5625
UNE	876.091,	876.09	70.00	KPMG 271 TESTING	770 Q85-5625
UNE	1,030.036,	1,030.03	14.81	KPMG 271 TESTING	770 Q85-8252
UNE	876.091,	876.09	70.00	KPMG 271 TESTING	770 Q85-8415

- (2) The BellSouth Reported calculations on the Draft Exception 124 for UNE Total Billed Revenue & Total Adjustments were the values that were in PMAP (and not the E&Y MAY 2000 totals).
- (3) Based on BellSouth's investigation, it appears that PMAP excluded the following two records:

OCN	Month	State	Type	Adjustment	Revenue	Name	Billing Number
9990	May-00	GA	UNE	1023.92	91.66	KPMG 271 Testing	706 Q85-5625
9990	May-00	GA	UNE	1030.03	14.81	KPMG 271 Testing	770 Q85-8252
TOTALS				2053.95	106.47		

The two records with commas in the adjustment column were excluded from the PMAP calculations. When processing, PMAP searches for commas in the "Company Name" column, then replaces commas with a space. This command resulted in invalid numbers for those cells with numbers less than \$1,000.00. For values greater than \$1,000.00 both columns were replaced with a space. Data stage was able to process those cells with values less than 1,000, but not able to process the two records with values greater than 1,000.

The net result was that PMAP's adjustment difference of \$2053.95 was the sum of what should have been \$1023.92 and \$1030.03. In the future, the pre-run check will include formatting the number columns as "Number". This will ensure that the "find/replace" command will not affect the results."

- (4) The difference between the PMAP reported values for UNE (KPMG CLEC), KPMG calculated values and E&Y reported values for UNE (KPMG CLEC) is as follows:

BellSouth's Amended Response to Exception 100

Calculation Source	TYPE	Total Billed Revenue	Total Adjustments
E&YMayFile	UNE	29145.87	46882.75
KPMG	UNE	29145.87	42291.62
Difference (5 records w/ commas)			4591.13
PMAP	UNE	29039.40	44828.80
Difference PMAP & E&Yfile		106.47	2053.95

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:

Jim Hurt, Director
Consumers' Utility Counsel
2 Martin Luther King Jr. Drive
Plaza Level East
Atlanta, GA 30334-4600

Newton M. Galloway
Newton Galloway & Associates
Suite 400 First Union Bank Tower
100 South Hill Street
Griffin, GA 30229

Charles A. Hudak, Esq.
Gerry, Friend & Sapronov, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346-2131

Kent F. Heyman, Esq.
Sr. VP and General Counsel
Mpower Communications Corp.
171 Sully's Trail, Suite 202
Pittsford, NY 14534

Suzanne W. Ockleberry
AT&T
1200 Peachtree Street, NE
Suite 8100
Atlanta, GA 30309

John M. Stuckey, Jr.
Webb, Stuckey & Lindsey
7 Lenox Pointe, N.E.
Atlanta, GA 30324

Charles V. Gerkin, Jr.
Smith, Gambrell & Russell, LLP
Promenade II, Suite 3100
1230 Peachtree Street, N.E.
Atlanta, GA 30309-3592

Frank B. Strickland
Wilson, Strickland & Benson
One Midtown Plaza, Suite 1100
1360 Peachtree Street, NE
Atlanta, GA 30309

Jeremy D. Marcus, Esq.
Blumenfeld & Cohen
Co-Counsel for Rhythm, aka ACI Corp.
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036

Scott A. Sapperstein
Sr. Policy Counsel
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619

John P. Silk
Georgia Telephone Association
1900 Century Boulevard, Suite 8
Atlanta, GA 30345

Thomas K. Bond
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, GA 30334

Eric J. Branfman
Richard M. Rindler
Swidler & Berlin
3000 K Street, NW, Suite 300
Washington, DC 20007

Robert A. Ganton
Regulatory Law Office
Dept. Army
Suite 700
901 N. Stuart Street
Arlington, VA 22203-1837

Peter C. Canfield
Dow Lohnes & Albertson
One Ravinia Drive, Suite 1600
Atlanta, GA 30346

James M. Tennant
Low Tech Designs, Inc.
1204 Saville Street
Georgetown, SC 29440

Peyton S. Hawes Jr.
127 Peachtree Street, NE
Suite 1100
Atlanta, GA 30303-1810

Mark Brown
Director of Legal and Government Affairs
MediaOne, Inc.
2925 Courtyards Drive
Norcross, GA 30071

Jeffrey Blumenfeld
Elise P. W. Kiely
Blumenfeld & Cohen
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036

Harris R. Anthony
BellSouth Long Distance
28 Perimeter Center East
Atlanta, GA 30346

Charles F. Palmer
Troutman Sanders LLP
5200 NationsBank Plaza
600 Peachtree Street, NE
Atlanta, GA 30308-2216

Judith A. Holiber
One Market
Spear Street Tower, 32nd Floor
San Francisco, CA 94105

Nanette S. Edwards, Esq.
Regulatory Attorney
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802

Daniel Walsh
Assistant Attorney General
Office of the Attorney General
40 Capitol Square
Atlanta, GA 30334-1300

John McLaughlin
KMC Telecom Inc.
Suite 170
3025 Breckinridge Boulevard
Duluth, GA 30096

James A. Schendt
Regulatory Affairs Manager
Interpath Communications, Inc.
P. O. box 13961
Durham, NC 27709-3961

William R. Atkinson
Sprint Communications Co. L.P.
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339

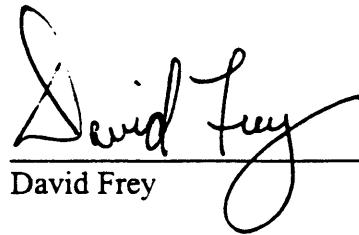
Dana R. Shaffer
Legal Counsel
105 Molloy Street
Suite 300
Nashville, TN 37201

Glenn A. Harris
Lori Anne Dolquest
NorthPointe Communications, Inc.
303 Second Street, South Tower
San Francisco, CA 94107

This 8th day of August, 2000.

Nancy Krabill
Director of Regulatory Affairs
1300 W. Mockingbird Lane
Suite 200
Dallas, TX 75247

Anne E. Franklin
Arnall Golden & Gregory, LLP
2800 One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309



David Frey

KPMG
303 Peachtree Street, N.E.
Suite 2000
Atlanta, Georgia 30308
(404) 222-3000