BELLSOUTH

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'00 OCT 27 PM 2 15

October 27, 2000

VIA HAND DELIVERY

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

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

Dear Mr. Waddell:

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

Date Filed	**Description of Document(s)**
9/5/00	KPMG Exception 110 and BellSouth Response thereto
9/5/00	KPMG Closure Reports for Exceptions 56, 72 and 85
9/5/00	BellSouth's Sixth Amended Response to Exception 52; Third Amended Response to Exceptions 62, 86, 90 and 91
9/14/00	KPMG's Amended Exception 106; BellSouth's Response to Exception 101; Amended Response to Exception 65; Second Amended Response to Exceptions 70 and 71; Third Amended Response to Exception 35; Fourth Amended Response to Exceptions 62 and 86; Sixth Amended Response to Exception 16; Seventh Amended Response to Exception 89 and Eighth Amended Response to Exception 89
9/15/00	Interim Status Report
9/22/00	KPMG Closure Reports for Exceptions 12, 27, 47, 53, 59, 64, 67, 75, 80, 91, and 99

Date Filed	**Description of Document(s)**
9/22/00	KPMG Amended Exception 89; BellSouth's Response to Exception 104; Amended Response to Exceptions 103, 108, and 110; Second Amended Response to Exception 107; Third Amended Response to Exceptions 88 and 100; Fourth Amended Response to Exception 86; Fifth Amended Response to Exceptions 62 and 86; Sixth Amended Response to Exception 92; Seventh Amended Response to Exception 52; Ninth Amended Response to Exception 89

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

Very truly yours,

Guy M. Hicks

GMH:ch

CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2000, a copy of the foregoing document was served on counsel for the petitioner and the entities seeking intervention, via the method indicated, addressed as follows:

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Terry Monroe
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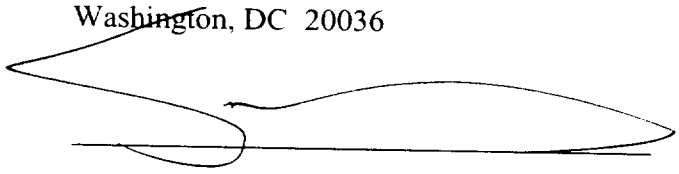

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RECEIVED
SEP 0 5 2000
EXECUTIVE SECRETARY
G.P.S.C.

September 5th, 2000

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

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

Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG Consulting LLC's Exception 110 along with BellSouth's response for filing in the above referenced matter.

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

Thank you for your assistance in this regard.

Very truly yours,

David Frey

David Frey
Manager

Enclosures

cc: Parties of Record

KPMG Consulting LLC. KPMG Consulting, LLC is a subsidiary of KPMG LLP, the U.S. member firm of KPMG International, a Swiss association

Date: August 8, 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 Consulting LLC cannot replicate four of BellSouth's reported Service Quality Measurements (SQMs).

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports[1].

As part of the BellSouth-Georgia OSS Evaluation, KCL is attempting to replicate these reports (i.e., achieve exactly the same results as reported by BellSouth). To complete validation of the calculations, KCL 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.

KCL has been unable to replicate the following SQM values for the KCL Test CLEC for the months of March and June:

1. ***Average Completion Notice Interval* in the Provisioning category for the KCL Test CLEC (June 2000).** KCL was unable to replicate the BellSouth-reported SQM values, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KCL Calculation	BellSouth Report
OCN 9990; ACNI Distribution 0-1 Hour; Business; Dispatch; <10 circuits	0	1
OCN 9990; Average Completion Notice Interval;	0	.02

[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.

Category	KCL Calculation	BellSouth Report
Business; Dispatch; <10 circuits		
OCN 9992; ACNI Distribution 0-1 Hour; UNE Non-Design; Dispatch; <10 circuits	0	1
OCN 9992; Average Completion Notice Interval; UNE Non-Design; Dispatch; <10 circuits	0	.02
OCN 9992; ACNI Distribution 0-1 Hour; UNE Non-Design; Non-Dispatch; <10 circuits	0	1
OCN 9992; Average Completion Notice Interval; UNE Non-Design; Non-Dispatch; <10 circuits	0	.02
OCN 9993; ACNI Distribution 0-1 Hour; Residence; Non-Dispatch; <10 circuits	0	1
OCN 9993; Average Completion Notice Interval; Residence; Non-Dispatch; <10 circuits	0	.95
OCN 9994; ACNI Distribution 0-1 Hour; UNE Non-Design; Non-Dispatch; <10 circuits	0	1

2. ***Firm Order Confirmation* in the Ordering category for the KCL Test CLEC (June 2000).** KCL was unable to replicate the BellSouth reported SQM values for the *Fully Mechanized* and *Total Mechanized* reports, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KCL Calculation	BellSouth Report
Mechanized; OCN 9991; Residence; LSR Count (0-<15)	110	185

Category	KCL Calculation	BellSouth Report
Mechanized; OCN 9991; Business; LSR Count (0-<15)	59	90
Mechanized; OCN 9991; UNE; LSR Count (0-<15)	206	356
Mechanized; OCN 9991; Other; LSR Count (0-<15)	112	222
Mechanized; OCN 9991; Residence; 0-<15 Min	0.092282	0.155201
Mechanized; OCN 9991; Business; 0-<15 Min	0.082633	0.126050
Mechanized; OCN 9991; UNE; 0-<15 Min	0.110160	0.190374
Mechanized; OCN 9991; Other; 0-<15 Min	0.078707	0.156008
Mechanized; OCN 9991; Residence; LSR Count (15-<30)	1035	960
Mechanized; OCN 9991; Business; LSR Count (15-<30)	623	592
Mechanized; OCN 9991; UNE; LSR Count (15-<30)	1624	1474
Mechanized; OCN 9991; Other; LSR Count (15-<30)	1288	1178
Mechanized; OCN 9991; Residence; 15-<30 Min	0.868289	0.805369
Mechanized; OCN 9991; Business; 15-<30 Min	0.872549	0.829132
Mechanized; OCN 9991; UNE; 15-<30 Min	0.868449	0.788235
Mechanized; OCN 9991; Other; 15-<30 Min	0.905130	0.827829
Total Mechanized; OCN 9991; Residence; LSR Count (0-<15)	110	185
Total Mechanized; OCN 9991; Business; LSR Count (0-<15)	59	90
Total Mechanized; OCN 9991; UNE; LSR Count (0-<15)	206	356
Total Mechanized; OCN	112	222

Category	KCL Calculation	BellSouth Report
9991; Other; LSR Count (0-<15)		
Total Mechanized; OCN 9991; Residence; 0-<15 Min	0.092282	0.155201
Total Mechanized; OCN 9991; Business; 0-<15 Min	0.082633	0.12605
Total Mechanized; OCN 9991; UNE; 0-<15 Min	0.11016	0.190374
Total Mechanized; OCN 9991; Other; 0-<15 Min	0.078652	0.155899
Total Mechanized; OCN 9991; Residence; LSR Count (15-<30)	1035	960
Total Mechanized; OCN 9991; Business; LSR Count (15-<30)	623	592
Total Mechanized; OCN 9991; UNE; LSR Count (15-<30)	1624	1474
Total Mechanized; OCN 9991; Other; LSR Count (15-<30)	1288	1178
Total Mechanized; OCN 9991; Residence; 15-<30 Min	0.868289	0.805369
Total Mechanized; OCN 9991; Business; 15-<30 Min	0.872549	0.829132
Total Mechanized; OCN 9991; UNE; 15-<30 Min	0.868449	0.788235
Total Mechanized; OCN 9991; Other; 15-<30 Min	0.904494	0.827247

3. ***Jeopardy Interval and Percent Jeopardy* in the Provisioning category for the KCL Test CLEC (June 2000).** KCL was unable to replicate the BellSouth reported SQM values, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KCL Calculation	BellSouth Report
OCN 9993; Business; # of Jpdy	0	1
OCN 9993; Business;	0	72

Category	KCL Calculation	BellSouth Report
Total Intvl (Hrs)		
OCN 9993; Business; Avg Intvl (Hrs)	0	72
OCN 9993; Business; Total Orders	0	3
OCN 9993; Business; % Jpdy	0	0.3333
OCN 9991; Residence; Total Orders	0	3
OCN 9991; Business; Total Orders	0	1
OCN 9991; Design; Total Orders	0	1
OCN 9991; UNE Non-Design; Total Orders	0	1
OCN 9992; Residence; Total Orders	0	1
OCN 9992; UNE Non-Design; Total Orders	0	3
OCN 9993; Residence; Total Orders	0	1
OCN 9994; UNE Non-Design; Total Orders	0	2

4. ***Jeopardy Interval and Percent Jeopardy* in the Provisioning category for the KCL Test CLEC (March 2000).** KCL was unable to replicate the BellSouth reported SQM values, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KCL Calculation	BellSouth Report
OCN 9991; Residence; # of Jpdy	3	4
OCN 9991; Residence; Total Intvl (Hrs)	504	600
OCN 9991; Residence; Avg Intvl (Hrs)	168.00	150.00
OCN 9991; Residence; Total Orders	46	47
OCN 9991; Residence; % Jpdy	6.52%	8.51%
OCN 9991; GA; # of Jpdy	9	10
OCN 9991; GA; Total Intvl (Hrs)	2328	2424

Category	KCL Calculation	BellSouth Report
OCN 9991; GA; Avg Intvl (Hrs)	258.67	242.40
OCN 9991; GA; Total Orders	139	140
OCN 9991; GA; % Jpdy	6.47%	7.14%
OCN 9991; 9991; # of Jpdy	9	10
OCN 9991; 9991; Total Intvl (Hrs)	2328	2424
OCN 9991; 9991; Avg Intvl (Hrs)	258.67	242.40
OCN 9991; 9991; Total Orders	139	140
OCN 9991; 9991; % Jpdy	6.47%	7.14%
OCN 9994; UNE Non-Design; Total Orders	52	53
OCN 9994; UNE Non-Design; % Jpdy	13.46%	13.21%
OCN 9994; GA; Total Orders	75	76
OCN 9994; GA; % Jpdy	13.33%	13.16%
OCN 9994; 9994; Total Orders	75	76
OCN 9994; 9994; % Jpdy	13.33%	13.16%
CKS; # of Jpdy	20	21
CKS; Total Intvl (Hrs)	4680	4776
CKS; Avg Intvl (Hrs)	515.47	227.43
CKS; Total Orders	426	428
CKS; % Jpdy	4.69%	4.91%

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. KCL's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the four 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 110

BELLSOUTH

August 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 cannot replicate four of BellSouth's reported Service Quality Measurements (SQMs).

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports[1].

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

KPMG has been unable to replicate the following SQM values for the KPMG CLEC for the months of March and June:

1. ***Average Completion Notice Interval*** **in the Provisioning category for the KPMG Test CLEC (June 2000).** KPMG was unable to replicate the BellSouth-reported SQM values, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
OCN 9990; ACNI Distribution 0-1 Hour; Business; Dispatch; <10 circuits	0	1
OCN 9990; Average	0	.02

[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.

Category	KPMG Calculation	BellSouth Report
Completion Notice Interval; Business; Dispatch; <10 circuits		
OCN 9992; ACNI Distribution 0-1 Hour; UNE Non-Design; Dispatch; <10 circuits	0	1
OCN 9992; Average Completion Notice Interval; UNE Non-Design; Dispatch; <10 circuits	0	.02
OCN 9992; ACNI Distribution 0-1 Hour; UNE Non-Design; Non-Dispatch; <10 circuits	0	1
OCN 9992; Average Completion Notice Interval; UNE Non-Design; Non-Dispatch; <10 circuits	0	.02
OCN 9993; ACNI Distribution 0-1 Hour; Residence; Non-Dispatch; <10 circuits	0	1
OCN 9993; Average Completion Notice Interval; Residence; Non-Dispatch; <10 circuits	0	.95
OCN 9994; ACNI Distribution 0-1 Hour; UNE Non-Design; Non-Dispatch; <10 circuits	0	1

2. ***Firm Order Confirmation* in the Ordering category for the KPMG Test CLEC (June 2000).** KPMG was unable to replicate the BellSouth reported SQM values for the *Fully Mechanized* and *Total Mechanized* reports, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
Mechanized; OCN 9991; Residence; LSR Count (0-<15)	110	185
Mechanized; OCN 9991;	59	90

BELLSOUTH'S RESPONSE TO EXCEPTION 110

Category	KPMG Calculation	BellSouth Report
Business; LSR Count (0-<15)		
Mechanized; OCN 9991; UNE; LSR Count (0-<15)	206	356
Mechanized; OCN 9991; Other; LSR Count (0-<15)	112	222
Mechanized; OCN 9991; Residence; 0-<15 Min	0.092282	0.155201
Mechanized; OCN 9991; Business; 0-<15 Min	0.082633	0.126050
Mechanized; OCN 9991; UNE; 0-<15 Min	0.110160	0.190374
Mechanized; OCN 9991; Other; 0-<15 Min	0.078707	0.156008
Mechanized; OCN 9991; Residence; LSR Count (15-<30)	1035	960
Mechanized; OCN 9991; Business; LSR Count (15-<30)	623	592
Mechanized; OCN 9991; UNE; LSR Count (15-<30)	1624	1474
Mechanized; OCN 9991; Other; LSR Count (15-<30)	1288	1178
Mechanized; OCN 9991; Residence; 15-<30 Min	0.868289	0.805369
Mechanized; OCN 9991; Business; 15-<30 Min	0.872549	0.829132
Mechanized; OCN 9991; UNE; 15-<30 Min	0.868449	0.788235
Mechanized; OCN 9991; Other; 15-<30 Min	0.905130	0.827829
Total Mechanized; OCN 9991; Residence; LSR Count (0-<15)	110	185
Total Mechanized; OCN 9991; Business; LSR Count (0-<15)	59	90
Total Mechanized; OCN 9991; UNE; LSR Count (0-<15)	206	356
Total Mechanized; OCN 9991; Other; LSR Count (0-<15)	112	222
Total Mechanized; OCN	0.092282	0.155201

Category	KPMG Calculation	BellSouth Report
9991; Residence; 0-<15 Min		
Total Mechanized; OCN 9991; Business; 0-<15 Min	0.082633	0.12605
Total Mechanized; OCN 9991; UNE; 0-<15 Min	0.11016	0.190374
Total Mechanized; OCN 9991; Other; 0-<15 Min	0.078652	0.155899
Total Mechanized; OCN 9991; Residence; LSR Count (15-<30)	1035	960
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Total Mechanized; OCN 9991; UNE; 15-<30 Min	0.868449	0.788235
Total Mechanized; OCN 9991; Other; 15-<30 Min	0.904494	0.827247

3. ***Jeopardy Interval and Percent Jeopardy* in the Provisioning category for the KPMG Test CLEC (June 2000).** KPMG was unable to replicate the BellSouth reported SQM values, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
OCN 9993; Business; # of Jpdy	0	1
OCN 9993; Business; Total Intvl (Hrs)	0	72
OCN 9993; Business; Avg Intvl (Hrs)	0	72
OCN 9993; Business; Total Orders	0	3

Category	KPMG Calculation	BellSouth Report
OCN 9993; Business; % Jpdy	0	0.3333
OCN 9991; Residence; Total Orders	0	3
OCN 9991; Business; Total Orders	0	1
OCN 9991; Design; Total Orders	0	1
OCN 9991; UNE Non-Design; Total Orders	0	1
OCN 9992; Residence; Total Orders	0	1
OCN 9992; UNE Non-Design; Total Orders	0	3
OCN 9993; Residence; Total Orders	0	1
OCN 9994; UNE Non-Design; Total Orders	0	2

4. ***Jeopardy Interval and Percent Jeopardy* in the Provisioning category for the KPMG Test CLEC (March 2000).** KPMG was unable to replicate the BellSouth reported SQM values, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
OCN 9991; Residence; # of Jpdy	3	4
OCN 9991; Residence; Total Intvl (Hrs)	504	600
OCN 9991; Residence; Avg Intvl (Hrs)	168.00	150.00
OCN 9991; Residence; Total Orders	46	47
OCN 9991; Residence; % Jpdy	6.52%	8.51%
OCN 9991; GA; # of Jpdy	9	10
OCN 9991; GA; Total Intvl (Hrs)	2328	2424
OCN 9991; GA; Avg Intvl (Hrs)	258.67	242.40
OCN 9991; GA; Total Orders	139	140
OCN 9991; GA; % Jpdy	6.47%	7.14%
OCN 9991; 9991; # of Jpdy	9	10
OCN 9991; 9991; Total	2328	2424

BELLSOUTH'S RESPONSE TO EXCEPTION 110

Category	KPMG Calculation	BellSouth Report
Intvl (Hrs)		
OCN 9991; 9991; Avg Intvl (Hrs)	258.67	242.40
OCN 9991; 9991; Total Orders	139	140
OCN 9991; 9991; % Jpdy	6.47%	7.14%
OCN 9994; UNE Non-Design; Total Orders	52	53
OCN 9994; UNE Non-Design; % Jpdy	13.46%	13.21%
OCN 9994; GA; Total Orders	75	76
OCN 9994; GA; % Jpdy	13.33%	13.16%
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OCN 9994; 9994; % Jpdy	13.33%	13.16%
CKS; # of Jpdy	20	21
CKS; Total Intvl (Hrs)	4680	4776
CKS; Avg Intvl (Hrs)	515.47	227.43
CKS; Total Orders	426	428
CKS; % Jpdy	4.69%	4.91%

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 four 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

Average Completion Notice Interval in the Provisioning category for the KPMG Test CLEC (June 2000).

BellSouth agrees that KPMG was unable to replicate the BellSouth-reported SQM values, *Average Completion Notice Interval* in the Provisioning category for the KPMG Test CLEC (June 2000), using BellSouth instructions.

Shortly after the reports were posted and viewed by KPMG, a data rerun for June was necessary due to code changes, specifically, Change Request #5922.
This code changed required that TSOCT_MTHD_ACQSTN_ID = '6'.
However, it also erroneously allowed TSOCT_MTHD_ACQSTN_ID = '3' in the report.

This was discovered immediately after the reports were posted. The reports were

subsequently removed from the web and rerun with the correct logic. BellSouth will provide KPMG with a new report for June 2000 for *Average Completion Notice Interval* for the KPMG Test CLEC.

Firm Order Confirmation in the Ordering category for the KPMG Test CLEC (June 2000).

BellSouth agrees that KPMG was unable to replicate *Firm Order Confirmation* for the KPMG Test CLEC (June 2000) data for Fully Mechanized, Partial Mechanized, and Total Mechanized reports using BellSouth instructions. The reason for this problem is that records are being placed into the incorrect time "buckets". Records are placed into buckets based on the value in the foc_duration field (* 60 to get minutes). Currently the code is placing records into the buckets based on different interval values than the ones defined in the SQM and displayed on the reports. The code is using the buckets of 0<=foc_duration<16 and 16<=foc_duration<30 while the SQM and reports use buckets of 0<=foc_duration<15 and 15<=foc_duration<30.

To resolve this problem the table DD_INTVL_MIN needs to be changed so that the value in the field INTVL_FOC_MIN_BLK_ID = 15 where INTVL_MIN_ID = 15. This change should also be made in the text file that loads the table DD_INTVL_MIN so that this change will be carried forward in future months. This change request has been entered in the Issue Tracker as # 5848.

Jeopardy Interval and Percent Jeopardy in the Provisioning category for the KPMG Test CLEC (June 2000)

KPMG was unable to replicate numbers from the BellSouth reports for *Jeopardy Interval and Percent Jeopardy* for June 2000. BellSouth was able to replicate all of the BellSouth reported values for this month using the most recent version of the Raw Data Users Guide. The instructions for *Jeopardy Interval & Percent Jeopardy* were updated in the July 26, 2000 version of the Raw Data Users Guide. Using the July 26, 2000 version of the Raw Data Users Guide, KPMG should be able to replicate the BellSouth reported values for *Jeopardy Interval and Percent Jeopardy* for June 2000.

Jeopardy Interval and Percent Jeopardy in the Provisioning category for the KPMG Test CLEC (March 2000).

KPMG was unable to replicate numbers from the BellSouth reports for *Jeopardy Interval and Percent Jeopardy* for March 2000. BellSouth was able to replicate all of the BellSouth reported values for this month using the most recent version of the Raw Data Users Guide. The instructions for *Jeopardy Interval & Percent Jeopardy* were updated in the July 26, 2000 version of the Raw Data Users Guide. Using the July 26, 2000 version of the Raw Data Users Guide, KPMG should be able to replicate the BellSouth reported values for *Jeopardy Interval and Percent Jeopardy* for March 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:

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Consumers' Utility Counsel
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SEP 05 2000
EXECUTIVE SECRETARY
G.P.S.C.

September 5th, 2000

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

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

Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG Consulting LLC's Closure Reports for Exceptions 56, 72 and 85 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

David Frey
Manager

Enclosures

cc: Parties of Record

KPMG Consulting LLC. KPMG Consulting LLC is a subsidiary of KPMG LLP, the U.S. member firm of KPMG International, a Swiss association.

Date: September 5, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth published incomplete PMAP Raw Data for December 1999 for the Service Quality Measurement (SQM) *Maintenance Average Duration*.

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 reports[1].

As part of the BellSouth-Georgia OSS Evaluation, KPMG Consulting LLC (KCL) is comparing the data that BellSouth uses to produce SQM reports for the KCL Test CLEC with the corresponding data that KCL collects using its own test management tools. For the SQM *Maintenance Average Duration*, KCL compared the raw data BellSouth used to calculate the SQM values for December with the data KCL maintains as part of functional testing. Each month, BellSouth provides raw data records for telephone numbers (TNs) for which trouble tickets were created.

For the month of December, BellSouth's PMAP raw data does not include records for the numbers listed bellow. KCL verified that these TNs had trouble tickets associated with them. Further, KCL confirmed that these trouble tickets were addressed, completed, and closed by BellSouth during December 1999.

404-320-9462
404-320-7011
404-320-6616
770-916-0198
770-933-9074

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

Summary of BellSouth Response:

"BellSouth investigated the numbers in Draft Exception 98 that KPMG states are not included in BellSouth's PMAP raw data for December, 1999. BellSouth found that for each of these five numbers, when the service order was created by KPMG, an OCO FID

was used that caused the unit number to be established as a 'special service' (i.e. 33188300).

KPMG is correct that these TNs had trouble tickets associated with them. However, the LMOS download to raw data file process looks for these 'special service' unit numbers and excludes them from the download. These are not POTS unit numbers and were excluded from the LMOS download. As a result, these numbers do not show up in the December, 1999 PMAP raw data.

KPMG is correct that these trouble tickets were addressed, completed, and closed by BellSouth during December 1999. The trouble history for these TNs is still available in the LMOS history files but will not be found in the PMAP raw data."

Summary of KCL Re-Test Activities:

KCL's re-test activities consisted of: 1) a review of BellSouth's amended response; and 2) an investigation by KCL and BellSouth of the TNs listed in the exception. BellSouth researched the provisioning of these lines and provided additional information on its provisioning policies. KCL reviewed its work papers regarding the provisioning of these TNs.

KCL Re-Test Results:

As a result of its investigative activities, BellSouth informed KCL that the five TNs cited in the exception were provisioned as UNE Port Design Circuits.

Through its investigation, KCL determined that it had requested that these five TNs be provisioned as UNE Ports - POTS, rather than Design.

BellSouth informed KCL that it provisions all UNE Ports as Design Circuits. BellSouth further explained that the LMOS download process identifies "special service" unit numbers (such as those on Design Circuits) and excludes them from the raw data download. Therefore, these TNs would not appear in the raw data.

Based on this investigation and BellSouth's provisioning policy, KCL determined that BellSouth's PMAP raw data for December 1999 was not incomplete for the SQM *Maintenance Average Duration* as a result of the exclusion of these five TNs.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 56.

Attachments: None.

Date: September 5, 2000

EXCEPTION CLOSURE REPORT

Exception:

Bellsouth does not have a clear process for delivering Jeopardy and Missed Appointment notifications.

Summary of Exception:

In response to a valid Local Service Request (LSR), BellSouth returns a Firm Order Confirmation (FOC). This FOC provides the Due Date (DD) on which BellSouth commits to completing the requested service. Based on KPMG Consulting LLC's (KCL) understanding of BellSouth's processes[1], BellSouth provides notification to CLECs in one of two forms in the event a DD cannot be met:

1. *Jeopardy Notification*
   BellSouth transmits a Jeopardy Notice when it determines in advance that a committed DD is in jeopardy of being missed. For example, BellSouth delivers a Pending Facilities (PF) notice in the event facilities are not available to meet a CLEC service request. BellSouth commits to providing 95% of Jeopardy Notifications at least 24 hours before the FOC DD[2].

2. *Missed Appointment Notification*
   Missed Appointment notices are transmitted to CLECs after BellSouth is unable to meet the FOC DD. The missed DD may result from either a BellSouth- or a CLEC-caused delay. The Missed Appointment notice provides information on the reason for the delay and whether any CLEC action is required. For purposes of this evaluation, KCL has proposed that 99% of Missed Appointment responses should be returned within one business day following the FOC DD.

KCL has received response files from BellSouth that contain both Jeopardy and Missed Appointment indicators on the same notification. Some responses were received before the scheduled due date, while others were received after the due date had passed. However, the file names and messages do not clearly identify the type of response category.

[1] KCL's understanding of BellSouth procedures was derived from: a) a definition of Jeopardy Notifications provided in the *BellSouth-GA Service Quality Measurements* (SMQs); and b) definitions of Missed Appointment messages provided in the BellSouth *Pending Order Status Job Aid.* BellSouth is in the process of responding to a KPMG request for information on Jeopardy and Missed Appointment process flow.

[2] This standard, proposed by BellSouth, is under consideration by the Georgia Public Services Commission.

Summary of BellSouth's Response:

"KPMG understanding of Firm Order Confirmation (FOC), Jeopardy Notification and Missed Appointment Notification documented in this exception is incorrect. BellSouth provides the following documentation on the BellSouth Interconnection website for CLEC use in communicating the status of their orders: Products & Services Interval Guide, Pending Order Status Job Aid, and Local Exchange Ordering Information Guide (LEO IG) Volumes 1, 2 and 4.

Firm Order Confirmation -
Firm Order Confirmation (FOC) provides confirmation that the Local Service Request (LSR) has been received and processed by BellSouth. The FOC also provides the due date BellSouth has scheduled for provisioning the order. As with all service provisioning requests the due date provided via the FOC process assumes an error free request, normal working conditions including safety, load, weather and availability of equipment and facilities.

Pending Order Status -
Pending Order Status transactions via EDI and TAG provide the status of a PON related service order as it flows through the provisioning process. BellSouth provides Pending Order Status such as Assignable Order (AO), Pending Dispatch (PD), Completed Order (CP) and delays due to Pending Facilities (PF).

Pending Order Status transactions also provide notification of missed appointments due to subscriber/end user or company (BellSouth) reasons. Pending Order Status transactions for missed appointment reasons are sent when a due date is missed and a subsequent due date is not simultaneously requested. Fields within the Pending Order Status transaction indicate when and what CLEC action is required.

Pending Order Status transactions with subscriber/end user missed appointment reasons include specific codes and text to alert the CLEC action is required. Codes populated in the TRANSETPURPOSECD field of the Pending Order Status transaction alerts the CLEC what action is required. Field entry via EDI is "21" and via TAG is "JEOPARDY".

The BellSouth-Ga. Service Quality Measurements (SQM) report for Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices is based on orders with a due date in jeopardy for facility delay. The TRANSETPURPOSECD field entry of "21" or "JEOPARDY" referenced in this exception is not used to determine a jeopardy condition for this SQM report.

Pending Order Status Job Aid and Local Exchange Ordering Information Guide on the BellSouth Interconnection website will be enhanced by 6/30/00 to provide additional clarification."

Summary of KCL Re-test Activities:

KCL's re-test activities for this exception consisted of a review of the *Pending Order Status Job Aid for EDI/TAG Ordering* available on BellSouth's Interconnection Services Web site (www.interconnection.bellsouth) to ensure procedures are available for delivering Jeopardy and Missed Appointment notifications.

KCL Re-test Results:

As a result of the documentation review, KCL determined that BellSouth has developed and posted to its Web site adequately defined procedures for delivering Jeopardy and Missed Appointment notifications.

Procedures for delivering Jeopardy and Missed Appointment notifications contain the following components:

- Pending order status code definitions, including Jeopardy and Missed Appointment notifications
- Jeopardy and Missed Appointment notifications definitions
- Job Aid data field descriptions and usage
- Information on transaction codes and required CLEC action for Jeopardy and Missed Appointments notifications

BellSouth's *Pending Order Status Job Aid for EDI/TAG Ordering, Version 1B, dated June 2000* can be found on BellSouth's Interconnection Services Web site.

(See www.interconnection.bellsouth.com/markets/lec/oss_info.html for details.)

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 72.

Attachments: None.

Date: September 5, 2000

EXCEPTION CLOSURE REPORT

Exception:

The BellSouth ECTA Gateway did not automatically request a "Front-End Closeout" on a POTS line that produced negative Mechanized Loop Test (MLT) results.

Summary of Exception:

During functional testing, KPMG Consulting (KCL) created a trouble ticket on a working POTS line, which should have triggered an MLT and a subsequent Front-End Closeout request[1]. However, examination of the ECTA agent logs showed that no attribute value changes (AVCs) were sent by the ECTA Gateway requesting a Front-End Closeout.

Summary of BellSouth Response:

"A problem has been identified in the HAL interface between the BellSouth Gateway and LMOS/MLT. When the KPMG tester entered a 'testable' report, the MLT results that HAL obtained indicated a VER Code (MLT response) that was not in its Test Rules Table. Therefore, HAL could not determine the proper course of action so it sent the report to an MA for manual intervention.

The Test Rules that HAL uses will be updated by June 9, 2000 to correct this problem."

Summary of KCL Re-test Activities:

KCL's re-test activities consisted of the submitting two trouble tickets on a working POTS line that had previously produced negative MLT results.

[1] KPMG verified that the line used for this test had no trouble conditions by performing an MLT on the line before the trouble ticket was created. This MLT returned the result "Test OK." The trouble ticket submitted on this line had a trouble type of 101 (No Dial Tone). According to the *Joint Implementation Agreement (JIA) for Electronic Communications Trouble Administration (ECTA) Gateway for Local Service, Version 5/1/00*, this trouble type should have triggered an MLT.

KCL Re-Test Results:

During re-testing activities, KCL entered two trouble tickets on the working line. In each instance, the ECTA Gateway performed an MLT and returned negative results. Subsequently, in each case, the ECTA Gateway correctly changed the status of the trouble tickets to allow for a Front-End Closeout.

As a result, KCL determined that ECTA Gateway requests "Front-End Closeouts" on POTS lines that produce negative MLT results, adequately correcting the issue identified in Exception 85.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 85.

Attachments: None.

CERTIFICATE OF SERVICE
Docket No. 8354-U

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

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September 5th, 2000

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue SW, Room 520
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RE: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems; Docket No. 8354-U

Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of BellSouth's sixth amended response to Exception 52 and third amended responses to Exceptions 62, 86, 90 and 91 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 Consulting, LLC. KPMG Consulting, LLC is a subsidiary of KPMG LLP, the U.S. member firm of KPMG International, a Swiss association.

BELLSOUTH'S SIXTH AMENDED RESPONSE TO EXCEPTION 52

BELLSOUTH

August 25, 2000

EXCEPTION REPORT

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

Exception:

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

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports[1].

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). For this purpose, 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 report values for the following SQMs for the month of October 1999[3]:

1. ***Coordinated Customer Conversions* in the Provisioning category for the CLEC Aggregate.** KPMG was unable to replicate the following values in the BellSouth SQM report:

Category	KPMG Calculations	BellSouth's Report
Without Number Portability; Count <=5	1888	1880
Without Number Portability;	81.48 %	81.14 %

[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 *PMAP Raw Data User Manual* and the corresponding raw data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The *PMAP Raw Data User Manual* is posted and updated on the PMAP site.

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

% <=5		
Without Number Portability; Count >15	114	122
Without Number Portability; % >15	4.92 %	5.27 %
Without Number Portability; Total Minutes	9369	9969
Without Number Portability; Average Interval (Min)	4.0	4.3

2. ***Timeliness* in the E911 category for the combined CLEC Aggregate and BellSouth Retail.** KPMG was unable to replicate the following values in the BellSouth SQM report:

Category	KPMG Calculations	BellSouth's Report
Percent answered 0-4 hours	82.94%	82.45%
Percent answered 4-8 hours	1.41%	3.08%
Percent answered 8-12 hours	2.53%	4.10%
Percent answered 12-16 hours	3.13%	1.27%
Percent answered 16-20 hours	2.44%	4.28%
Percent answered 20-24 hours	2.87%	1.33%
Percent answered 24+ hours	4.69%	3.50%

3. ***Mean Interval* in the E911 category for the combined CLEC Aggregate and BellSouth Retail.** KPMG was unable to replicate the Mean Interval Duration in the BellSouth SQM report:

Category	KPMG Calculations	BellSouth's Report
Mean Interval Duration	0.03	3.81

4. ***Percent Rejected Service Requests* in the Ordering category for the CLEC Aggregate.** KPMG was unable to replicate the BellSouth-reported SQM values for the Non-Mechanized report, using BellSouth's instructions.

Category	KPMG Calculations	BellSouth's Report
Product = Special; Product Specific % Rejected	0.331	0.329
Product = Special; Product Specific % Rejected	0.144	0.142

5. ***Reject Interval* in the Ordering category for the CLEC Aggregate.** For several reports *(Partially Mechanized, Total Mechanized, and Non-Mechanized)*, KPMG was unable to replicate the BellSouth reported SQM values, using BellSouth's instructions.

6. ***FOC Timeliness* in the Ordering category for the CLEC Aggregate.**

BELLSOUTH'S SIXTH AMENDED RESPONSE TO EXCEPTION 52

For each report *(Fully Mechanized, Partially Mechanized, Total Mechanized, and Non-Mechanized)*, KPMG was unable to replicate the BellSouth reported SQM values, using BellSouth's instructions.

7. ***Mean Held Order Interval and Distributions Interval* in the Provisioning non-trunks category for the CLEC Aggregate and BellSouth Retail, and the Provisioning trunks category for the CLEC Aggregate.** KPMG was unable to replicate the BellSouth reported SQM values, using BellSouth's instructions.

8. ***Usage Data Delivery Completeness* in the Billing category for the CLEC Aggregate and BellSouth Retail.** KPMG was unable to replicate the BellSouth reported "Day >30 Cumulative % Completeness Benchmark" value. BellSouth reports a rounded value of 1, although there are usage data records delivered after 30 days.

Category	KPMG Calculations	BellSouth's Report
Day >30 Cumulative % Completeness Benchmark (CLEC Aggregate)	0.9974825	1
Day >30 Cumulative % Completeness Benchmark (BellSouth Retail)	0.9978706	1

9. ***Mean Time to Deliver Usage* in the Billing category for the CLEC Aggregate and BellSouth Retail.** 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 (CLEC Aggregate)	3.64	4.64
Mean Time (BellSouth Retail)	2.42	3.42

10. ***Usage Data Delivery Accuracy* in the Billing category for the CLEC Aggregate.** KPMG was unable to replicate the BellSouth reported 'Total Data Packs Sent" value.

Category	KPMG Calculations	BellSouth's Report
Total Data Packs Sent	5012	5024

11. ***Invoice Accuracy* in the Billing category for the CLEC Aggregate.** KPMG was unable to replicate any of the BellSouth reported SQM values.

12. ***Mean Time to Deliver Invoices* in the Billing category for the CLEC Aggregate.**

BELLSOUTH'S SIXTH AMENDED RESPONSE TO EXCEPTION 52

KPMG was unable to replicate the BellSouth reported "Mean Time to Deliver CABS Bills" value for the Interconnection type of service.

Category	KPMG Calculations	BellSouth's Report
Mean Time to Deliver CABS Bills -cal day; Interconnection	5.74	5.66

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 twelve 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 CLEC Aggregate.

The reason for the difference between the BellSouth report values and the KPMG report values is because of different calculation methods.

BellSouth calculation for the "avg." cut minutes per item is derived using the following:

avg. (cut time per item) = (cut comp – cut start) / # items

KPMG derived this by using the following:

avg. (cut time per item) = cut min / # items

The file that was used for generating the PMAP report for October 1999 contained manually calculated cut minutes. There were some errors in these calculations but the errors were of no consequence because the cut minutes were not used by the formula to calculate the CCC report. (There is a BellSouth group that uses cut minutes data for other reports.) These miscalculations in the cut minutes were discovered and beginning in November 1999 the cut minutes were calculated mechanically. The formula for calculating the cut minutes was applied to the October file which was inadvertently sent to KPMG instead of the original raw data file that was sent to the PMAP databases used calculating the CCC report. Also, when the cut complete and cut start times are the same the cut minutes are defaulted to 1 (one) minute when preparing the raw data file. When the PMAP databases calculate the cut minutes, the actual value is used in these cases instead of a default value. Both files used by KPMG and the original raw data file for October is available for re-testing as required.

Timeliness in the E911 category for the combined CLEC Aggregate and BellSouth Retail.

BELLSOUTH'S SIXTH AMENDED RESPONSE TO EXCEPTION 52

The values found in the October SQM are correct. The instructions provided to KPMG lacked the specificity to permit KPMG to replicate the data. BellSouth has revised the instructions to be more specific and corrected one calculation. As a result, KPMG was able to replicate the Timeliness values in the E911 category for the October 1999.

Mean Interval in the E911 category for the combined CLEC Aggregate and BellSouth Retail.

KPMG should follow the revised method included in Item No. 3 of BellSouth's instructions. By doing so, KPMG should be able to replicate the Mean Interval Duration found in BellSouth's October 1999 report.

Updated instructions were sent to KPMG for review in calculation of data. As of 5/02/00 KPMG advised BellSouth that they were unable to replicate the October 1999 E911 Mean Interval of 3.81. KPMG's derived number was 3.819. BellSouth's Application Developer revised the narrative of PMAP's E911 Duration Calculation Procedure and sent this to KPMG on 5/9/00. KPMG reported on 5/10/00 that they were able to replicate the BellSouth reported value for Mean Interval Duration for this SQM.

BellSouth has updated its instructions available to CLECs to reflect the information provided to KPMG. BellSouth does not provide Raw Data to the CLECs for *Mean Interval in the E911* categories and does not provide instructions to the CLECs.

Percent Rejected Service Requests in the Ordering category for the CLEC Aggregate.

BellSouth agrees with KPMG that they were unable to replicate the BellSouth reported SQM values for *Percent Rejected Service Request* for the Non-Mechanized report for the CLEC Aggregate for October 1999.

BellSouth discovered that there were reject count errors in the October raw data. PMAP coding changes implemented in November affecting LSRs received will not allow BellSouth to replicate the exclusions for October data. The February version of the Raw Data Users Manual will allow KPMG to replicate data from December 1999 through March 2000. The following changes are important if KPMG desires to review additional months for data validation for this metric. A PMAP coding change request (Issue Tracker # 5705) implemented in April 2000 modified the SQM report to exclude LSRs cancelled prior to being rejected. The Raw Data Users Manual is being updated to reflect this information. A PMAP coding change request (Issue Tracker # 5542) has been issued to modify PMAP reports to reflect the new LCSC hours of operation. This coding change was implemented for May data in June 2000. The Raw Data Users Manual was updated to reflect this information.

The Ordering Reports for May were rerun because, prior to May, two pieces of code were designed to exclude non-mechanized LSRs, which were received and/or processed on weekends. Although the first piece of code was correctly rewritten to exclude appropriate weekend hours, the second was overlooked and LSRs received and/or processed on

weekends continued to be excluded. The correction was made to include LSRs received and/or processed on weekends prior to posting the June reports. BellSouth did not rerun the May reports until July 27, however the June 2000 *Percent Rejected Service Request* Report was correct when it was posted and available for validation prior to the rerun of the May report.

Originally, BellSouth had offered KPMG the May 2000 Report but because June 2000 was already available, BellSouth requested that KPMG retest for replication with the June 2000 *Percent Rejected Service Request* Report. KPMG reported on 8/21/00 that they were able to replicate June 2000 for the CLEC Aggregate for the *Percent Rejected Service Request* Report.

Reject Interval in the Ordering category for the CLEC Aggregate.

The values found in the October 1999 SQM are correct. Using the February version of the Raw Data Users Manual, KPMG was able to replicate the reported SQM values. BellSouth provided KPMG with sample queries and as a result, KPMG was able to replicate the *Reject Interval* for the CLEC Aggregate data for October 1999.

FOC Timeliness in the Ordering category for the CLEC Aggregate.

BellSouth agrees that KPMG was unable to replicate the BellSouth reported SQM for *FOC Timeliness* for the CLEC Aggregate for October 1999. Upon further investigation, BellSouth identified a problem in the interval "buckets". The difference between KPMG's numbers and PMAP's numbers can be attributed to the LSRs FOC'd (orders confirmed) in the 15th minute. KPMG was putting those LSRs in the 15-30 minute "bucket" while PMAP was including them in the 0-15 minute "bucket".

As a result of this KPMG draft exception, System Change Request 5848 was opened to clarify the bucket definitions and was effective for May data that was published in June. An interval chart for CR 5848 is shown below. The Raw Data Users Manual was updated in May, reflecting these changes.

The *FOC Timeliness* for the May report had to be rerun because prior to May, two pieces of code were designed to exclude non-mechanized LSRs, which were received and/or processed on weekends. Although the first piece of code was correctly rewritten to exclude appropriate weekend hours, the second was overlooked and LSRs received and/or processed on weekends continued to be excluded. The code was corrected and the report was rerun on July 27. Notification that May Ordering Reports had been rerun was posted to the Web on August 1, 2000. The July SQM further clarified the bucketization issue. BellSouth has provided KPMG with *FOC Timeliness* data for May and June 2000 for retesting.

KPMG should be able to replicate the most recent June FOC Timeliness Report which was sent to them on 8/22/00. The raw data is correct and has not changed. However, on the report that KPMG attempted to replicate initially, records were placed into "buckets" based on different interval values than those defined in the SQM and displayed on the

reports. The changes, which were made in May, were inadvertently dropped in June but have now been corrected permanently.

Change Request 5848 corrected the "Mechanized" FOC interval buckets as shown:

0 - <15 min	12 - <16 hrs
15 - <30 min	16 - <20 hrs
30 - <45 min	20 - <24 hrs
45 - <60 min	24 - <48 hrs
60 - <90 min	>= 48 hrs
90 - <120 min	
120 - <240 min	
4 - <8 hrs	
8 - <12 hrs	

Mean Held Order Interval and Distributions Interval in the Provisioning non-trunks category for the CLEC Aggregate and BellSouth Retail, and the Provisioning trunks category for the CLEC Aggregate.

The instructions in the Raw Data User Manual were corrected in the 2.0.7 version dated 07/26/00, with multiple changes to further clarify the instructions for *Mean Held Order Interval*. This is an update to previous instructions provided to KPMG.
Also, prior to December 1999, a section of the Ardent DataStage code that is used to create Held Order and Held Order Trunking reports was incorrect. This was explained in the initial set of instructions. A correction was made to the code that changed the assignment of the synthetic key by ordering the loading of the table by CMTT_DATE ascending. This change made the minimum CMTT_DATE correspond to the minimum SO_CMTT HIST_ID and so forth so that the final and first commitments selected would be the final and first CMTT_DATE. Due to the nature of this error, the October 1999 Held Order and Held Order Trunking raw data cannot be used to replicate the end report.

A change request (CR 6070) was entered into issue tracker to make a correction to the Ardent code to exclude orders in 'CP', PC, CA status and to only include orders where CMPLTN_DT is null. This will be effective with the July data for August 15th reports.
Ardent DataStage code was corrected as stated above in CR 6070.
KPMG should use July data to replicate *Mean Held Order Interval and Distributions Interval.*

Usage Data Delivery Completeness in the Billing category for the CLEC Aggregate and BellSouth Retail.

The PMAP reports for BellSouth 'Day >30 Cumulative % Completeness Benchmark (CLEC Aggregate) & Day >30 Cumulative % Completeness Benchmark (BellSouth Retail)' show the same results for OCT 1999 as KPMG. There was a programming problem that was corrected in PMAP, Issue Tracker #5584 on Feb 18, 2000. This report has been re-run, verified to match, and resent to KPMG on 6/5/00. The file used by KPMG is available for retesting as required.

BELLSOUTH'S SIXTH AMENDED RESPONSE TO EXCEPTION 52

Mean Time to Deliver Usage in the Billing category for the CLEC Aggregate and BellSouth Retail.

There was a programming problem in PMAP that has been corrected.
The BellSouth team has researched these issues and they are now corrected as of 2/2/00. The weighting that is currently applied to this measure in an Excel spreadsheet 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 was change request 5419. This report has been re-run, verified to match, and resent to KPMG on 6/5/00.

Usage Data Delivery Accuracy in the Billing category for the CLEC Aggregate.

The OCN/ACNA files used by PMAP for mapping the CLEC is a manual process. There were OCNs provided in the Billing data that were not included in the OCN/ACNA mapping file for PMAP. The data associated with these OCNs represent the difference in the KPMG & BellSouth reports. The PMAP group must manually update the OCN/ACNA tables to coincide with the CLECs OCN/ACNA value reflected on the individual accounts. A process for automating this function has been addressed by the PMAP group.

BellSouth has provided KPMG with an electronic copy of the NODS_RQ Company file for October 1999 on 6/22/00. KPMG was able to replicate the BellSouth 'Total Data Packs Sent' value for October 1999.

Invoice Accuracy in the Billing category for the CLEC Aggregate.

For Invoice Accuracy in the Billing Category for the CLEC Aggregate KPMG compared their calculations to the PMAP results. BellSouth used KPMG's comparisons to evaluate why the replication cannot be done on this measure. BellSouth evaluation of the data reveals that there are some OCNs and ACNAs on the BBI data that KPMG didn't include. Those OCNs / ACNAs that are not in KPMG's data are also the same ones that are not on the CLECID file in their comparison. If those OCNs / ACNAs were added into KPMG's data, the KPMG and Billing data figures would be the same. After review of the PMAP revenue amounts (and excluding the revenue amounts without OCN / ACNAs values in PMAP), the difference is that PMAP used the absolute value of the total billed revenue for UNE and Interconnection.

On 6/22/00 KPMG requested a copy of the rerun results for October 99 data for Invoice Accuracy. BellSouth provided KPMG with an electronic copy of the NODS_RQ Company file for October 1999 on 6/22/00.

The differences in the data that Billing reported versus the figures that PMAP reported were due to the PMAP handling of the negative revenues and the fact that the October 1999 NODS_RQ Company file did not include some of the test accounts or ICOs. If KPMG excludes the fall out of the test accounts and ICOs from the totals, the results

would be the same as reported in PMAP. In summary, if 'fallout' from PMAP is determined to be 'BST test data' or BST accounts that have not been identified as a valid CLEC, PMAP will exclude it from the final reports.

Mean Time to Deliver Invoices in the Billing category for the CLEC Aggregate.

The OCN/ACNA files used by PMAP for mapping the CLEC is a manual process. There were ACNAs provided in the Billing data that were not included in the OCN/ACNA mapping file for PMAP. The data associated with these ACNAs represent the difference in the KPMG & BellSouth PMAP reports. The PMAP group must manually update the OCN/ACNA tables to coincide with the CLECs OCN/ACNA value reflected on the individual accounts. A process for automating this function has been addressed by the PMAP group.

The *Mean Time to Deliver Invoices in the Billing category for the CLEC Aggregate* report was rerun for October 1999 after the 2 ACNAs/OCNs into the NODS_RQ Company file for October 1999. The report was provided to KPMG on 6/22/00. KPMG verified that the *Mean Time to Deliver CABS Bills"* value for the Interconnection type of service matched the BellSouth reported value.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 62

BELLSOUTH

August 25, 2000

EXCEPTION REPORT

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

Exception:

KPMG cannot replicate four of BellSouth's Service Quality Measurements (SQMs) in the February 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. BellSouth also publishes the monthly raw data used to create these reports[1].

As part of the BellSouth-Georgia OSS Evaluation, KPMG is attempting to 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 February 2000 report.

1. ***Firm Order Confirmation Timeliness* in the Ordering category for the KPMG Test CLEC.** KPMG was unable to replicate values from the Fully Mechanized and Non-Mechanized SQM reports, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
Fully Mechanized; OCN = 9994; Product = Other; LSR Count (0-15)	1	2
Fully Mechanized;	9.09%	18.18%

[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.

Category	KPMG Calculation	BellSouth Report
OCN = 9994; Product = Other; % 0-15 minutes		
Fully Mechanized OCN = 9994 Product = Other LSR Count (15-30)	7	6
Fully Mechanized OCN = 9994 Product = Other % 15-30 minutes	63.64%	54.55%
Total Mechanized OCN = 9994 Product = Other LSR Count (0-15)	1	2
Total Mechanized OCN = 9994 Product = Other % 0-15 minutes	4.17%	8.33%
Total Mechanized OCN = 9994 Product = Other LSR Count (15-30)	7	6
Total Mechanized OCN = 9994 Product = Other % 15-30 minutes	29.17%	25.00%

2. ***Order Completion Interval*** **in the Provisioning category for the KPMG Test CLEC.** KPMG was unable to replicate the following values in the BellSouth SQM report. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch Total Orders 20-25 Days	0	1
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 0-5 Days	50.0%	45.5%

Category	KPMG Calculation	BellSouth Report
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 5-10 Days	50.0%	45.5%
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 20-25 Days	0.0%	9.1%
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch Average Interval (Days)	4.13	5.76

3. ***Total Service Order Cycle Time*** **in the Provisioning category for the KPMG Test CLEC.** KPMG was unable to replicate the following values in the Non-Mechanized report, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 0-5 Days	12.5%	16.7%
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 5-10 Days	75.0%	83.3%
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 20-25 Days	12.5%	0.0%
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch Average Interval (Days)	9.13	7.17

4. ***Invoice Accuracy*** **in the Billing category for the KPMG Test CLEC.**

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 62

KPMG was unable to replicate any of the BellSouth reported SQM values. The discrepancies are shown in the following table.

Category	KPMG Calculation	BellSouth Report
UNE Total Billed Revenue	$20,691.58	$62,556.44
UNE Total Adjustments	$43,152.09	$64,084.52
UNE % Accuracy	-108.5%	-2.4%
Interconnection Total Billed Revenue	$5,952.58	$6,030.44
Interconnection Total Adjustments	0	$38.93
Interconnection % Accuracy	100.0%	99.4%
Total Total Billed Revenue	$113,427.39	$155,370.11
Total Total Adjustments	$208,405.753	$229,377.11
Total % Accuracy	-83.7%	-47.6%

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 four applicable SQMs may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

BellSouth Response

1. Firm Order Confirmation Timeliness in the Ordering category for the KPMG Test CLEC.

BellSouth agrees that KPMG was unable to replicate the BellSouth reported SQM for *FOC Timeliness* for the KPMG Test CLEC for February 2000.
Upon further investigation, BellSouth identified a problem in the interval "buckets". The difference between KPMG's numbers and PMAP's numbers can be attributed to the LSRs FOC'd (orders confirmed) in the 15th minute. KPMG was putting those LSRs in the 15-30 minute "bucket" while PMAP was including them in the 0-15 minute "bucket".

As a result of this KPMG draft exception, System Change Request 5848 was opened to clarify the bucket definitions and was effective for May data that was published in

June. An interval chart for CR 5848 is shown below. The Raw Data Users Manual was updated in May, reflecting these changes.

The *FOC Timeliness* for the May report had to be rerun because prior to May, two pieces of code were designed to exclude non-mechanized LSRs, which were received and/or processed on weekends. Although the first piece of code was correctly rewritten to exclude appropriate weekend hours, the second was overlooked and LSRs received and/or processed on weekends continued to be excluded. The code was corrected and the report was rerun on July 27. Notification that May Ordering Reports had been rerun was posted to the Web on August 1, 2000. The July SQM further clarified the bucketization issue.

BellSouth has provided KPMG with *FOC Timeliness* data for May and June 2000 for retesting.

Change Request 5848 corrected the "Mechanized" FOC interval buckets as shown:

0 - <15 min	4 - <8 hrs
15 - <30 min	8 - <12 hrs
30 - <45 min	12 - <16 hrs
30 - <45 min	16 - <20 hrs
45 - <60 min	20 - <24 hrs
45 - <60 min	24 - <48 hrs
60 - <90 min	>= 48 hrs
90 - <120 min	
120 - <240 min	

2. Order Completion Interval in the Provisioning category for the KPMG Test CLEC.

BellSouth agrees that using the current raw data users manual, KPMG is unable to replicate the data in the above table. Currently, the instructions to create the Order Completion Interval report using the exclusion "so_cmtt_cd = 'L'" will not yield results identical to the SQM reports. The SQM report performs additional exclusions, permitting supplementary "L" orders into the final report. Specifically, "L" orders with commitment dates from prior months are not being excluded. The raw data users manual instructions are correct. BellSouth provided additional instructions in a raw data query that should enable KPMG to duplicate the data referenced in this exception.

BellSouth has issued a system change request # 5330 that addresses the issue of exclusion of "so_cmtt_cd = 'L'" and is scheduled to be effective for April data that will be published in May. The change will exclude the supplementary "L" orders from being included in the SQM report. This change will enable the monthly reports to match results created using the Raw Data Users Manual.

3. Total Service Order Cycle Time in the Provisioning category for the KPMG Test CLEC

BellSouth agrees that using Version 2.0 of the Raw Data users manual, KPMG is unable to replicate the Total Service Order Cycle Time for the KPMG Test CLEC as indicated in the above data for OCN 9991.

The instructions in the Manual utilized to perform the data replication, specifically the exclusion of records where "so_cmtt_cd = null", by grouping fields to eliminate duplicate records needs some additional clarification. BellSouth provided additional instructions in a raw data query that enabled KPMG to duplicate the data referenced in this exception. The Raw Data Users Manual was updated in June, to reflect changes made to ensure that duplicate records were eliminated and additional process steps were added to ensure that the reports could be duplicated.

4. Invoice Accuracy in the Billing category for the KPMG Test CLEC.

For Invoice Accuracy in the Billing Category for the KPMG Test CLEC, KPMG compared their calculations to the PMAP results. BellSouth used KPMG's comparisons to evaluate why the replication cannot be done on this measure. BellSouth evaluation of the data reveals that there are some OCNs and ACNAs on the BBI data that KPMG did not include in their calculations. Those OCNs / ACNAs that are not in KPMG's data are also the same ones that are not on the CLECID file in their comparison. If those OCNs / ACNAs were added into KPMG's data, the KPMG and Billing data figures would be the same. After review of the PMAP revenue amounts (and excluding the revenue amounts without OCN / ACNAs values in PMAP), the difference is that PMAP used the absolute value of the total billed revenue for UNE and Interconnection.

On 6/22/00 KPMG requested a copy of the rerun results for February 2000 data for Invoice Accuracy. BellSouth has provided KPMG with an electronic copy of the NODS_RQ Company file for February 2000 on 6/22/00. BellSouth provided KPMG with the DSS Agent report for February 2000.

The differences in the data that Billing reported versus the figures that PMAP reported were due to PMAP handling of the negative revenues and the fact that the February 2000 NODS_RQ Company file did not include some of the test accounts or ICOs. If KPMG excludes the fall out of the test accounts and ICOs from the totals, the results would be the same as reported in PMAP. In summary, if 'fallout' from PMAP is determined to be 'BellSouth test data' or BellSouth accounts that have not been identified as a valid CLEC, PMAP will exclude it from the final reports.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 86

BELLSOUTH

August 29, 2000

EXCEPTION REPORT

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

Exception:

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

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports[1].

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

KPMG has been unable to replicate the following SQMs[3]:

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

2. ***Order Completion Interval*** **in the provisioning category for the CLEC Aggregate and BellSouth Retail (October 1999).** Using BellSouth's instructions, KPMG was

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

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

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

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

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 86

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

Category	KPMG Calculations	BellSouth's Report
< 10 Circuits; Non-Dispatch; 15-20 Days		
UNE-Design CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; >= 30 Days	0.86%	0.92%
UNE-Design CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; Average Interval (Days)	6.03	6.06

3. ***Missed Installation Appointments*** **in the Provisioning category for the CLEC Aggregate and BellSouth Retail (October 1999).** KPMG could not replicate the BellSouth retail customer or the CLEC customer section for any of the product groupings.

Category	KPMG Calculations	BellSouth's Report
BellSouth Retail; Business; Dispatch; < 10 Circuits; Total Missed Appointments	25.14%	25.25%
BellSouth Retail; Business; Dispatch; >= 10 Circuits; Total Missed Appointments	39.49%	40.22%
BellSouth Retail; Business; Dispatch; >= 10 Circuits; End User Missed Appointments	21.38%	21.74%
CLEC Aggregate; Residence; Dispatch; < 10 Circuits; Total Missed Appointments	25.93%	26.16%
CLEC Aggregate; Business;	3.78%	3.97%

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

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

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

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 86

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

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

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

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

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

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

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 86

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

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

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

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

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

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 86

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

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

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

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

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

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

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

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

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

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. KPMG's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the six

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

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

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

This is the same issue as 23.4 for November and December. The raw data for Provisioning Troubles in 30 days for months prior to March 2000 cannot be utilized to replicate the report because of an error in the program. The program assigned the trouble to the lowest numbered cust-id thus allowing the assignment of troubles to the wrong CLEC. The error resulted in a small number of mismatched troubles. At the aggregate level the small error was not evident. KPMG, without the help of the appropriate BST SMEs, will have difficulty replicating the reports for those months. Replicating the report would require the identification of those troubles that appear in the report but not in the raw data and appropriately assigning these troubles to the correct CLEC. The code for Percent Provisioning within 30 days has been repaired and future months (March 2000 forward) will not have this problem.

Re-running the previous reports with the new code would involve extensive programming and is extremely labor-intensive, therefore, BellSouth asks that reports for March 2000 forward be used for validation.

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

BellSouth agrees that using the current raw data users manual KPMG was unable to replicate the reports for the CLEC Aggregate and BellSouth Retail data for October for POTS, UNE-Design, and Non-UNE Design for the "Dispatch" and Non-Dispatch categories.

Currently, the instructions to create the Order Completion Interval report using the exclusion "so_cmtt_cd = 'L'" will not yield results identical to the SQM reports. The SQM report performs additional exclusions, permitting supplementary "L" orders into the final report. Specifically, "L" orders with commitment dates from prior months are not being excluded. The raw data users manual instructions are correct. BellSouth provided additional instructions in a raw data query that should enable KPMG to duplicate the data referenced in this exception.

BellSouth issued a system change request # 5330 that addressed the issue of exclusion of "so_cmtt_cd = 'L'" and was effective for March data. This change enabled the monthly reports to match results created using the Raw Data Users Manual. The "L" exclusion differences were no longer an issue once the May reports were run with the fixed code.

BellSouth was unable to replicate two categories of reports. They were:

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

The reason 14,390 orders are not able to be replicated from Raw Data is because these records do not have an original commitment date. These orders are considered listing records. Since no provisioning work is required, an order is entered and marked complete at the same time, without a commitment date. Raw Data only selects orders where a valid commitment date exists. PMAP currently allows orders without a commitment to be passed through the system. A change request; # 5894, was opened in Issue Tracker on 5/25/00 to eliminate null appointment code records from the reports. Change request # 5894 was completed 7/15/00. Change request 5923 was opened on 6/12/00 to expand this exclusion to all provisioning measures. This change request was completed on 7/24/00.

For both OCI and OCI Trunks, an exclusion has been added to the Raw Data User Guide, August 2000, in Step 2: **exclude records where cmpld_dur < 0.**

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

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

1.) The last line in Step 8 should read:
Include records where the **cmpltn_dt >= issu_dt**
(The code reflects this statement because an order can be issued and completed on the same day)

2.) The following instruction should be added to steps 5 and 9:
If the **num_items_worked on** field is null or blank then replace it with a '1'
Filter on **num_items_worked_on** to include only the desired number of circuts (<10, >=10)

, The BellSouth retail customer and the CLEC customer sections of the PMI October 1999 report can be replicated with the above changes to the instructions for PMI in the Raw Data Users Manual. BellSouth Change Requests 5909, 5910, 5911 are addressing the above corrections.
The following change requests have been implemented as of 7/15/00 to correct the following problems in Provisioning reports:

CR# 5909 – Exclude orders with issue date later than completion date :
This was necessary to eliminate duplicate order numbers being matched to the incorrect order for processing. Some order numbers are duplicated within a month of completion of the previous order number. Without matching dates, incorrect fields were being populated

in NODS from the original order number. The PRSNS01p2 daily was changed to exclude these records before they get into NODS. This issue was completed for the June reports and closed in issue tracker.

CR# 5910 – Exclude orders where commit date is null:
This was necessary because to create raw data the service orders from NODS SO and NODS SO CMTT HIST are joined. The service orders that are not in both tables (those that do not have an original due date) are not included in the raw data but are included in the end report. Orders without a commit date have not been released into the system for processing, however, if their order number was previously used, the data can be incorrectly matched. This issue was completed for the June reports and closed in issue tracker.

CR# 5911 – Include issue date of Service Order from Extract:
This was necessary to work with CR 5909 and provide issue date information from Extract for exclusion of issue dates after completion dates. This was implemented with the June reports and closed in issue tracker.

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

BellSouth was able to replicate the *Total Service Order Cycle Time* in the Provisioning category for the CLEC Aggregate and BellSouth Retail (November 1999) using **prod_id** rather than **prod_desc.**

The Raw Data User Guide will be updated in July to correct Step 5; bullet 6 to use **prod_id** rather than **prod_desc**.

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

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

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

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

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

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 86

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

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

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

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

Exclude records where ckt_stat = 'IP'

The instructions are incorrect because the ckt_stat can be null or blank. Using the new instructions the report can be replicated correctly.
KPMG received a new data file that included UNE Non-Design.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 90

BELLSOUTH

August 25, 2000

EXCEPTION REPORT

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

Exception:

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

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports[1].

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

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

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

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

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

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

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

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

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

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

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 90

Impact

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

BellSouth Response

1. Ordering - *Firm Order Confirmation Timeliness*

BellSouth identified a problem in the interval "buckets". The difference between KPMG's numbers and PMAP's numbers can be attributed to the LSRs FOC'd (confirmed) in the 15th minute. KPMG was putting those LSRs in the 15-30 minute "bucket" while PMAP was including them in the 0-15 minute "bucket".

As a result of this KPMG draft exception, System Change Request 5848 was opened to clarify the bucket definitions and was effective for May data that was published in June. An interval chart for CR 5848 is shown below. The Raw Data Users Manual was updated in May, reflecting these changes.

The *FOC Timeliness* for the May report had to be rerun because prior to May, two pieces of code were designed to exclude non-mechanized LSRs, which were received and/or processed on weekends. Although the first piece of code was correctly rewritten to exclude appropriate weekend hours, the second was overlooked and LSRs received and/or processed on weekends continued to be excluded. The code was corrected and the report was rerun on July 27. Notification that May Ordering Reports had been rerun was posted to the Web on August 1, 2000. The July SQM further clarified the bucketization issue. BellSouth has provided KPMG with *FOC Timeliness* data for May and June 2000 for retesting.

Change Request 5848 corrected the "Mechanized" FOC interval buckets as shown:

0 - <15 min	4 - <8 hrs
15 - <30 min	8 - <12 hrs
30 - <45 min	12 - <16 hrs
30 - <45 min	16 - <20 hrs
45 - <60 min	20 - <24 hrs
45 - <60 min	24 - <48 hrs
60 - <90 min	>= 48 hrs
90 - <120 min	
120 - <240 min	

2. Provisioning - *Order Completion Interval*

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 90

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

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

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

3. Provisioning - *Coordinated Customer Conversions.*

The file sent to KPMG for replication was the original raw data file from WFA-C and did not contain some additional data (Cut Start Minutes) that had to be obtained from CCSS. This accounts for one record included in the BellSouth report which was not included in the KPMG replication. Also, there was a miscalculation in the summation of the number of items by the KPMG replication process (items for 5 orders were not counted).

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

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 91

BELLSOUTH

August 25, 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/ODUF[1] 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 EMI[2] 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):

Q-Account Number	Invoice Date
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 algorithm to calculate the invoice accuracy metric[3]. 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.

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, BellSouth is unable 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

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 mechanization enhancement: 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 modification 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): These two rate elements have a rate structure that calls for billing on a per minute basis, for operator work time (OWT). BellSouth was able to track the call records through the system and discovered that the OWT was not being passed down to the rating process. The duration field is being defaulted to one second and therefore during the rating process, these calls were being summarized, rounded up to a minute, and then rated. For a customer who is billed on a per minute basis for Verification and Interrupt, BellSouth also recognizes that OWT is not populated on the ODUF records that represent these calls, as that is an optional field and is populated at the provider's discretion. BellSouth recognizes the shortfall of the EMI standards in this area and have submitted a work request to our IT department to begin both passing the

OWT down through the system and populating this field on the appropriate EMI records on the ODUF feed to the customer. The target date for implementation is 9/19/00.

CERTIFICATE OF SERVICE
Docket No. 8354-U

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

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This 5th day of September, 2000.

David Frey

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EXECUTIVE SECRETARY
G.P.S.C.

September 14th, 2000

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

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

Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG Consulting LLC's Amended Exception 106 along with BellSouth's Response to Exception 101, Amended Response to Exception 65, Second Amended Responses to Exceptions 70 and 71, Third Amended Response to Exception 35, Fourth Amended Responses to Exceptions 62 and 86, Sixth Amended Response to Exception 16, Seventh Amended Response to Exception 89 and Eight Amended Response to Exception 89.

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 Consulting LLC. KPMG Consulting LLC is a subsidiary of KPMG LLP, the U.S. member firm of KPMG International, a Swiss association.

Date: September 8, 2000

EXCEPTION REPORT

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

Exception:

BellSouth failed to meet the agreed upon Frame Due Time (FDT) for six loop migrations.

Background: A "coordinated Hot-Cut" (loop migration) is a synchronized process for converting an end-user's service from one service provider (in this case BellSouth) to another. In a coordinated Hot-Cut, provisioning activities between the service providers occur in a coordinated, sequential fashion. Service is terminated by the old service provider and then immediately re-provisioned by the new service provider. In this manner, the end-user experiences little or no noticeable delay in the provisioning of the new service.

KPMG Consulting LLC (KCL) began observing Hot-Cuts (loop migration) installations on April 24, 2000. Through the course of these initial observations, KCL documented a number of instances where Bell South demonstrated inconsistencies in their adherence to their own methods and procedures. This initial phase of observations was temporarily suspended at the request of BellSouth, so that the company could implement changes to their methods and procedures.

Testing resumed on May 15, 2000. During this phase, KCL observed fifty-four Hot-Cut (loop migration orders). Six of these fifty-four orders were scored "Not Satisfied" because BellSouth was unable to meet the agreed upon Frame Due Time[1] (FDT). Through this phase, BellSouth performed at a success rate of 89%. The KCL standard for performance is 95%.

KCL's Observations: KCL observed six loop migration installation attempts during which BellSouth was unable to meet the agreed upon FDT. In each case, BellSouth accepted the CLEC's Local Service Request (LSR) and responded with a Local Service Confirmation (LSC) and an associated due date/time.

Based on BellSouth's response, the CLEC believed its subscriber would be provided service at the due date/time referenced in the LSC. However, on the actual cut date, BellSouth informed the CLEC that the FDT would not be met. In turn, the CLEC was

[1] "Frame Due Time" refers to the time the coordinated Hot-Cut is scheduled to occur.

forced to report to its subscriber that access to the loop could not be delivered at the previously committed time.

The following table identifies CLEC loop migrations for which BellSouth did not meet the FDT.

Observation Date	Order Number	Number of Lines
5/15	60630	3
5/16	59643	7
5/25	61832	8
6/07	63715	5
6/13	63232	2
6/14	65202	3

Impact

BellSouth's failure to complete loop migrations at the agreed upon FDT impacts CLECs in the following way:

- **Decreased Customer Satisfaction.** If BellSouth cannot meet an agreed upon FDT, provisioning on a CLEC order will be delayed. Service provisioning delays will result in a decrease in CLEC end-user customer satisfaction. In some cases, CLEC customers may cancel an order, resulting in a loss of revenue for the CLEC.

BELLSOUTH'S RESPONSE TO EXCEPTION 101

BELLSOUTH

September 11, 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:

BellSouth-reported raw data values in usage data delivered to the KPMG Test CLEC, used in the calculation of three SQMs do not match the KPMG-collected values for April 2000.

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) 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 comparing the data that BellSouth uses to produce SQM reports for the KPMG Test CLEC with the corresponding data that KPMG collects using its own test management tools.

For three usage metrics: 1) *Usage Data Delivery Completeness, 2) Usage Data Delivery Timeliness, and 3) Mean Time to Deliver usage,* KPMG compared BellSouth raw data used to calculate the SQM values for each month from November 1999 to April 2000 with the data KPMG maintains as part of functional testing.

KPMG could not match the BellSouth-reported raw data values regarding the number of recorded usage records delivered (REC_VOL) to the KPMG Test CLEC with the data collected by KPMG for April 2000.

The following table lists the discrepancies found between the BellSouth-reported data and KPMG-collected data.

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

BELLSOUTH'S RESPONSE TO EXCEPTION 101

DAYS_DELAYED[2]	BLS-REPORTED VALUES OF REC_VOL	KPMG-CALCULATED VALUES OF REC_VOL
1	159	158
2	1229	1802
3	449	610
4	466	699
5	393	407
6	272	456
7	181	236
8	7	7
16	0	2
17	11	28
18	0	1
19	0	7
20	0	10
21	8	27
23	0	6
25	0	4
27	0	2
30+	11	5
Total Count	3,186	4,467

BellSouth Response

The original April file problems were related to a corrupt macro that was being used to strip the usage data from the ADUF files. This problem has been corrected for future use and additional quality control measures have been implemented. Those measures include additional verification steps to be performed after each macro is used. The stripped data will be verified back to the original file.

BellSouth sent a revised April file that contains the corrected data files for the Usage reports. The April Usage data files had missing usage data information. That was corrected with this file. KPMG requested that the April usage reports would need to be rerun in PMAP to correct. BellSouth will rerun the report and provide a copy to KPMG.

[2] DAYS_DELAYED is the number of days to deliver the usage records.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 65

BELLSOUTH

August 29, 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 inputs[1] 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 AMENDED 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 REQTYPs B and C with ACTTYP W in both pre-order and firm order. The defect will be corrected in TAG 2.2.0.11 scheduled for implementation 9/21/00.

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

The TAG defect has been uncovered regarding calculating due dates for REQTYPs B and C with ACTTYP W in both pre-order and firm order. The defect will be corrected in TAG 2.2.0. 11 scheduled for implementation 9/21/00.

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 SECOND AMENDED RESPONSE TO EXCEPTION 70

BELLSOUTH

September 7, 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 reports[1].

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.

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[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.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 70

BellSouth has a validation process that compares record counts processed by the legacy/source systems and PMAP and reviews the reports produced. While this validation process may identify some legacy/source system changes, it does not constitute an adequate change management process, as evidenced by the problems cited above.

Impact

The Georgia Public Service Commission requires BellSouth to provide the CLECs with performance measurements regarding BellSouth's business functions. BellSouth's lack of an adequate change management process regarding the generation of raw data from the legacy/source systems could result in inaccurate or incomplete SQM reports. Without accurate and complete SQM reports, CLECs are unable to assess the quality of service provided by BellSouth and conduct their business functions reliably.

BellSouth Response

On one occasion, a data format change caused data to be entered incorrectly into PMAP

BellSouth does have a process in place where legacy system support groups notify the Performance Measurement Analysis group of pending upgrades or system changes. There was one occasion where the notification failed and a data format change resulted in incorrect data. The PMAP Subject Matter Expert found the error during the data validation process and made the necessary corrections. This validation process is a normal component of the process to publish the SQMs. This process was followed and the published SQMs were accurate.

On 9/6/00, BellSouth sent to KPMG copies of internal correspondence and directives outlining a Change Control Plan requirement to keep the Performance Measurement Group informed of legacy systems changes. Specifically, these changes include any that would impact the production and accuracy of the monthly PMAP reports.

Through the internal correspondence, the Systems Teams have been notified of this requirement and have incorporated this as part of their systems notification process.

Trunk Group Performance reports were not posted from October 1999 to December 1999.

In the fall of 1999, the system providing trunk group data for the Network Information Warehouse (NIW) was taken out of service due to Y2K issues. Just prior to the system being taken out of service, the group responsible for the system that produces the Trunk Group Performance Reports experienced a vendor relationship issue. The vendor relationship issue resulted in a delayed implementation of the new Trunk Group Performance Reports data source. The vendor issue was resolved, and the reports became available in March, 2000.

The PMAP personnel were aware as the issue was communicated to all parties involved in this data source. When the data became available, the reports were published.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 70

Partial data and incomplete reports were inadvertently posted for several months for the pre-ordering SQM *Average Response Time and Response Interval*

This exception refers to the loss of the data from the RNS servers in late 1999, which were taken out of service because the servers were not Y2K compliant. The replacement servers had not been programmed to capture the required data. Once the PMAP SME identified the problem, action was taken to get the Legacy system owners to perform an upgrade to again produce the data required for the PMAP reports. Since this incident, the legacy system owners have been proactive in keeping the PMAP Team informed of system impacting changes. The 'data feeds' for RNS and ROS began in February and the change request is being worked to pull this information into PMAP.

The *Average Response Time and Response Interval Reports* were not inadvertently posted with incomplete data. The BellSouth Service Quality Measurements group had discovered that the RNS and ROS data was missing. The 'data feeds' for these measures have been reestablished and the BellSouth data was in the May report posted in June.

As a result, BellSouth changes to legacy systems and data sources are handled appropriately and communicated via e-mail to the PMAP SME. The RNS data is now in the reports as well as the ROS data. The BellSouth Issues Management and Change Control Plan has been updated, and all members of the team retrained on their responsibilities to prevent this type of problem. The legacy system owners are aware of the Performance Measurement Group and its requirements for support.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 71

BELLSOUTH

August 29, 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.

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[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 SECOND AMENDED RESPONSE TO EXCEPTION 71

REQ TYPE	ACT TYPE	UNE Product Type (1)	ORDER TYPE	Nbr. Lines	CDD Interval (2)			Documentation Interval
					Submit Dt	Due Date	Days (3)	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 SECOND 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 SECOND AMENDED RESPONSE TO EXCEPTION 71

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

ACT → / REQTYP ↓	A New Install	C Change	D Disconnect	M: Inside move	T Outside move	R Record	V Conversion as specified	SS Suspend	RS Restore	W Conversion 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 – REQTYP/ACT Intervals

REQTYP	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

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 SECOND 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

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.

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.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 71

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 workweek, 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.

The TAG defect has been uncovered regarding calculating due dates for REQTYP E in both pre-order and firm order. The defect will be corrected in TAG 2.2.0.11 scheduled for implementation 9/21/00.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 35

BELLSOUTH

August 29, 2000

EXCEPTION REPORT

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

Exception:

BellSouth issued multiple bills containing erroneous charges to KPMG.

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

Undocumented Charges

USOC VE1R2: BellSouth billed the KPMG CLEC a one-time charge of $12.60 for a UNE service component identified by the Universal Service Order Code (USOC) VE1R2 (Virtual Expanded Interconnection). USOC VE1R2 is not defined in applicable BellSouth tariffs or in rate spreadsheets created for the KPMG CLEC in lieu of an Interconnection Agreement.

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

Telephone Number	Account Number	Invoice Date
770 933-9530	770 Q85 8252-252	10/05/99
770 933-0190	770 Q85 8252-252	10/05/99

Incorrectly Rated Charges

USOC UEPLX: BellSouth inappropriately billed the KPMG CLEC for the one-time charge for Universal Service Order Code (USOC) UEPLX, Unbundled Voice Grade Loop. This USOC is listed in the rate spreadsheets created for the KPMG CLEC in lieu of an Inter-Connection Agreement with the following rates:

- $42.54 Non-recurring charge for the first service
- $31.33 Non-recurring charge for each additional service

Review of the invoice shows that BellSouth billed the KPMG CLEC the following:

- $42.54 Non-recurring charge for the first service
- $42.54 Non-recurring charge for each additional service.

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

Telephone Number	Account Number	Invoice Date
404 633-5740	770 Q97 9808 808	10/17/99
404 633-5251	770 Q97 9808 808	10/17/99

Missing Charges

USOC UEAL2: BellSouth did not bill the KPMG CLEC for the one-time charge for Universal Service Order Code (USOC) UEAL2, Unbundled Voice Grade SL1 Loop. This USOC is listed in the rate spreadsheets created for the KPMG CLEC in lieu of an Inter-Connection Agreement with the following rates:

- $42.54 Non-recurring charge for the first service
- $31.33 Non-recurring charge for each additional service

Review of the invoice shows that BellSouth did not bill the KPMG CLEC for these charges when applicable. Representative occurrences of this error are found on the following invoices:

Circuit	Account Number	Invoice Date
40.TYNU.526413	770 Q85 4226 226	10/05/99
40.TYNU.526414	770 Q85 4226 226	10/05/99

Unbilled Unbundled Loop: The KPMG CLEC submitted a Local Service Request to BellSouth for the migration of two SL1 Unbundled Analog Loops PON B141. The two Loops ordered had the following circuit IDs:

50.TYNU.000337...SB
50.TYNU.000338...SB

Of the two SL1 Loops ordered, only the circuit 50.TYNU.000337...SB appeared on the 10/5/99, 11/5/99 and 12/5/99 invoices[1] of the 706-Q85-4226-226 account. For the second circuit, BellSouth did not bill the appropriate monthly-recurring, pro-rated and non-recurring charges for the USOCs UEAL2 and UEAC2.

Impact

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

- **Altering expected operating costs.** All applicable charges should appear in Interconnection Agreements or in BellSouth Intra-State or Inter-State tariff documentation. By not adhering to documented rates, BellSouth potentially alters a

[1] KPMG reviewed bills for at least two cycles per PON. In some cases, when data was available, KPMG reviewed bills for 3 cycles.

CLEC's expected operating costs, and could affect CLEC budgetary planning and related activities.

Increased operating costs. Regardless of the net monetary effect of incorrect charges upon a CLEC's bills, a CLEC will be forced to regularly reconcile these bills by identifying and correcting the incorrect charges and discovering and disaggregating mislabeled charges. The necessity of an extensive validation of each bill.

BellSouth Response

Undocumented Charges:

USOC VE1R2: The standard agreements refer to the applicable tariffs if specific rates are not provided in the contracts. For Virtual Collocation, that tariff is the F.C.C. Tariff No. 1. However, no service comparable to a DS0 cross-connect is described in that Tariff. To resolve this gap, rates for this specific USOC were developed by the Virtual Interconnection Product Team. A non-recurring rate of $12.60 per month was authorized for use when this service was ordered by and provisioned for a customer.

BellSouth has plans to add the USOC VE1R2 to the standard agreement. This should be completed by 4Q00. BellSouth did investigate and determine that no CLECs, other than the third party test CLEC, has ever been billed for this USOC.

Incorrectly Rated Charges:

BellSouth is currently developing the system capability and process capability to support a two-tier pricing structure for SL1 services. This will include an update to LCSC Methods and Procedures and a system enhancement. The system enhancement is currently being developed so a firm timeframe has not been established. However, the implementation should occur during 4Q00.

Missing Charges:

USOC UEAL2: When the order that added these circuits was processed, the UEAL2 USOC was updated to the CRIS rate tables only for residence classes of service. The accounts which contain these USOCs are defined as business accounts. As such, the rate defaulted to zero. The USOC was added to the CRIS rate file for business classes of service on 2/23/00. This corrected the rates so that on a going forward basis, the proper rates will be used for non-recurring charges.

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.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 35

Unbilled Unbundled Loop: The billing system never received a service order that contained the circuit - 50.TYNU.000338..SB during the dates of the test. The service order, NPF3K268, that established this circuit completed 3/1/00. The service order that added the circuit - 50.TYNU.000337..SB did not have the circuit - 50.TYNU.000338..SB on the order. The two circuits on that order were 50.TYNU.000336..SB and 50.TYNU.000337..SB.

BellSouth and KPMG have attempted to replicate this issue, but were unsuccessful. A possible cause for the missing circuit ordered in 1999 could not be identified due to the age of the service orders and the purging of historical data.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 62

BELLSOUTH

September 7, 2000

EXCEPTION REPORT

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

Exception:

KPMG cannot replicate four of BellSouth's Service Quality Measurements (SQMs) in the February 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. BellSouth also publishes the monthly raw data used to create these reports[1].

As part of the BellSouth-Georgia OSS Evaluation, KPMG is attempting to 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 February 2000 report.

1. ***Firm Order Confirmation Timeliness* in the Ordering category for the KPMG Test CLEC.** KPMG was unable to replicate values from the Fully Mechanized and Non-Mechanized SQM reports, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
Fully Mechanized; OCN = 9994; Product = Other; LSR Count (0-15)	1	2
Fully Mechanized;	9.09%	18.18%

[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.

Category	KPMG Calculation	BellSouth Report
OCN = 9994; Product = Other; % 0-15 minutes		
Fully Mechanized OCN = 9994 Product = Other LSR Count (15-30)	7	6
Fully Mechanized OCN = 9994 Product = Other % 15-30 minutes	63.64%	54.55%
Total Mechanized OCN = 9994 Product = Other LSR Count (0-15)	1	2
Total Mechanized OCN = 9994 Product = Other % 0-15 minutes	4.17%	8.33%
Total Mechanized OCN = 9994 Product = Other LSR Count (15-30)	7	6
Total Mechanized OCN = 9994 Product = Other % 15-30 minutes	29.17%	25.00%

2. ***Order Completion Interval*** **in the Provisioning category for the KPMG Test CLEC.** KPMG was unable to replicate the following values in the BellSouth SQM report. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch Total Orders 20-25 Days	0	1
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 0-5 Days	50.0%	45.5%

Category	KPMG Calculation	BellSouth Report
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 5-10 Days	50.0%	45.5%
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 20-25 Days	0.0%	9.1%
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch Average Interval (Days)	4.13	5.76

3. ***Total Service Order Cycle Time*** **in the Provisioning category for the KPMG Test CLEC.** KPMG was unable to replicate the following values in the Non-Mechanized report, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 0-5 Days	12.5%	16.7%
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 5-10 Days	75.0%	83.3%
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 20-25 Days	12.5%	0.0%
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch Average Interval (Days)	9.13	7.17

4. ***Invoice Accuracy*** **in the Billing category for the KPMG Test CLEC.**

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 62

KPMG was unable to replicate any of the BellSouth reported SQM values. The discrepancies are shown in the following table.

Category	KPMG Calculation	BellSouth Report
UNE Total Billed Revenue	$20,691.58	$62,556.44
UNE Total Adjustments	$43,152.09	$64,084.52
UNE % Accuracy	-108.5%	-2.4%
Interconnection Total Billed Revenue	$5,952.58	$6,030.44
Interconnection Total Adjustments	0	$38.93
Interconnection % Accuracy	100.0%	99.4%
Total Total Billed Revenue	$113,427.39	$155,370.11
Total Total Adjustments	$208,405.753	$229,377.11
Total % Accuracy	-83.7%	-47.6%

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 four applicable SQMs may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

BellSouth Response

1. Firm Order Confirmation Timeliness in the Ordering category for the KPMG Test CLEC.

   BellSouth agrees that KPMG was unable to replicate the BellSouth reported SQM for *FOC Timeliness* for the KPMG Test CLEC for February 2000.
   Upon further investigation, BellSouth identified a problem in the interval "buckets". The difference between KPMG's numbers and PMAP's numbers can be attributed to the LSRs FOC'd (orders confirmed) in the 15th minute. KPMG was putting those LSRs in the 15-30 minute "bucket" while PMAP was including them in the 0-15 minute "bucket".

   As a result of this KPMG draft exception, System Change Request 5848 was opened to clarify the bucket definitions and was effective for May data that was published in

June. An interval chart for CR 5848 is shown below. The Raw Data Users Manual was updated in May, reflecting these changes.

The *FOC Timeliness* for the May report had to be rerun because prior to May, two pieces of code were designed to exclude non-mechanized LSRs, which were received and/or processed on weekends. Although the first piece of code was correctly rewritten to exclude appropriate weekend hours, the second was overlooked and LSRs received and/or processed on weekends continued to be excluded. The code was corrected and the report was rerun on July 27. Notification that May Ordering Reports had been rerun was posted to the Web on August 1, 2000. The July SQM further clarified the bucketization issue.

BellSouth has provided KPMG with *FOC Timeliness* data for May and June 2000 for retesting.

Change Request 5848 corrected the "Mechanized" FOC interval buckets as shown:

0 - <15 min	4 - <8 hrs
15 - <30 min	8 - <12 hrs
30 - <45 min	12 - <16 hrs
30 - <45 min	16 - <20 hrs
45 - <60 min	20 - <24 hrs
45 - <60 min	24 - <48 hrs
60 - <90 min	>= 48 hrs
90 - <120 min	
120 - <240 min	

2. Order Completion Interval in the Provisioning category for the KPMG Test CLEC.

BellSouth agrees that using the current raw data users manual, KPMG is unable to replicate the data in the above table. Currently, the instructions to create the Order Completion Interval report using the exclusion "so_cmtt_cd = 'L'" will not yield results identical to the SQM reports. The SQM report performs additional exclusions, permitting supplementary "L" orders into the final report. Specifically, "L" orders with commitment dates from prior months are not being excluded. The raw data users manual instructions are correct. BellSouth provided additional instructions in a raw data query that should enable KPMG to duplicate the data referenced in this exception.

BellSouth has issued a system change request # 5330 that addresses the issue of exclusion of "so_cmtt_cd = 'L'" and is scheduled to be effective for April data that will be published in May. The change will exclude the supplementary "L" orders from being included in the SQM report. This change will enable the monthly reports to match results created using the Raw Data Users Manual.

3. Total Service Order Cycle Time in the Provisioning category for the KPMG Test CLEC

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 62

BellSouth agrees that using Version 2.0 of the Raw Data users manual, KPMG is unable to replicate the Total Service Order Cycle Time for the KPMG Test CLEC as indicated in the above data for OCN 9991.

The instructions in the Manual utilized to perform the data replication, specifically the exclusion of records where "so_cmtt_cd = null", by grouping fields to eliminate duplicate records needs some additional clarification. BellSouth provided additional instructions in a raw data query that enabled KPMG to duplicate the data referenced in this exception. The Raw Data Users Manual was updated in June, to reflect changes made to ensure that duplicate records were eliminated and additional process steps were added to ensure that the reports could be duplicated.

4. Invoice Accuracy in the Billing category for the KPMG Test CLEC.

On 6/22/00 KPMG requested a copy of the rerun results for February 2000 data for Invoice Accuracy. BellSouth has provided KPMG with an electronic copy of the NODS_RQ Company file for February 2000 on 6/22/00. BellSouth provided KPMG with the DSS Agent report for February 2000.

The differences in the data that Billing reported versus the figures that PMAP reported were due to PMAP handling of the negative revenues and the fact that the February 2000 NODS_RQ Company file did not include some of the test accounts or Independent Companies (ICOs). If KPMG excludes the fall out of the test accounts and ICOs from the totals, the results would be the same as reported in PMAP. In summary, if 'fallout' from PMAP is determined to be 'BST test data' or BST accounts that have not been identified as a valid CLEC, PMAP will exclude it from the final reports.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

BELLSOUTH

September 7, 2000

EXCEPTION REPORT

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

Exception:

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

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports[1].

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

KPMG has been unable to replicate the following SQMs[3]:

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

2. ***Order Completion Interval*** **in the provisioning category for the CLEC Aggregate and BellSouth Retail (October 1999).** Using BellSouth's instructions, KPMG was

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

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

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

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

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

Category	KPMG Calculations	BellSouth's Report
< 10 Circuits; Non-Dispatch; 15-20 Days		
UNE-Design CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; >= 30 Days	0.86%	0.92%
UNE-Design CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; Average Interval (Days)	6.03	6.06

3. ***Missed Installation Appointments* in the Provisioning category for the CLEC Aggregate and BellSouth Retail (October 1999).** KPMG could not replicate the BellSouth retail customer or the CLEC customer section for any of the product groupings.

Category	KPMG Calculations	BellSouth's Report
BellSouth Retail; Business; Dispatch; < 10 Circuits; Total Missed Appointments	25.14%	25.25%
BellSouth Retail; Business; Dispatch; >= 10 Circuits; Total Missed Appointments	39.49%	40.22%
BellSouth Retail; Business; Dispatch; >= 10 Circuits; End User Missed Appointments	21.38%	21.74%
CLEC Aggregate; Residence; Dispatch; < 10 Circuits; Total Missed Appointments	25.93%	26.16%
CLEC Aggregate; Business;	3.78%	3.97%

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

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

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

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

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

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

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

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

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. KPMG's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the six

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

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

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

This is the same issue as 23.4 for November and December. The raw data for Provisioning Troubles in 30 days for months prior to March 2000 cannot be utilized to replicate the report because of an error in the program. The program assigned the trouble to the lowest numbered cust-id thus allowing the assignment of troubles to the wrong CLEC. The error resulted in a small number of mismatched troubles. At the aggregate level the small error was not evident. KPMG, without the help of the appropriate BST SMEs, will have difficulty replicating the reports for those months. Replicating the report would require the identification of those troubles that appear in the report but not in the raw data and appropriately assigning these troubles to the correct CLEC. The code for Percent Provisioning within 30 days has been repaired and future months (March 2000 forward) will not have this problem.

Re-running the previous reports with the new code would involve extensive programming and is extremely labor-intensive, therefore, BellSouth asks that reports for March 2000 forward be used for validation.

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

BellSouth agrees that using the current raw data users manual KPMG was unable to replicate the reports for the CLEC Aggregate and BellSouth Retail data for October for POTS, UNE-Design, and Non-UNE Design for the "Dispatch" and Non-Dispatch categories.

Currently, the instructions to create the Order Completion Interval report using the exclusion "so_cmtt_cd = 'L'" will not yield results identical to the SQM reports. The SQM report performs additional exclusions, permitting supplementary "L" orders into the final report. Specifically, "L" orders with commitment dates from prior months are not being excluded. The raw data users manual instructions are correct. BellSouth provided additional instructions in a raw data query that should enable KPMG to duplicate the data referenced in this exception.

BellSouth issued a system change request # 5330 that addressed the issue of exclusion of "so_cmtt_cd = 'L'" and was effective for March data. This change enabled the monthly reports to match results created using the Raw Data Users Manual. The "L" exclusion differences were no longer an issue once the May reports were run with the fixed code.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

BellSouth was unable to replicate two categories of reports. They were:

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

The reason 14,390 orders are not able to be replicated from Raw Data is because these records do not have an original commitment date. These orders are considered listing records. Since no provisioning work is required, an order is entered and marked complete at the same time, without a commitment date. Raw Data only selects orders where a valid commitment date exists. PMAP currently allows orders without a commitment to be passed through the system. A change request, # 5894, was opened in Issue Tracker on 5/25/00 to eliminate null appointment code records from the reports. Change request # 5894 was completed 7/15/00. Change request 5923 was opened on 6/12/00 to expand this exclusion to all provisioning measures. This change request was completed on 7/24/00.

For both OCI and OCI Trunks, an exclusion has been added to the Raw Data User Guide, August 2000, in Step 2: **exclude records where cmpld_dur < 0.**

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

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

1.) The last line in Step 8 should read:
Include records where the **cmpltn_dt >= issu_dt**
(The code reflects this statement because an order can be issued and completed on the same day)

2.) The following instruction should be added to steps 5 and 9:
If the **num_items_worked on** field is null or blank then replace it with a '1'
Filter on **num_items_worked_on** to include only the desired number of circuts (<10, >=10)

, The BellSouth retail customer and the CLEC customer sections of the PMI October 1999 report can be replicated with the above changes to the instructions for PMI in the Raw Data Users Manual. BellSouth Change Requests 5909, 5910, 5911 are addressing the above corrections.
The following change requests have been implemented as of 7/15/00 to correct the following problems in Provisioning reports:

CR# 5909 – Exclude orders with issue date later than completion date :
This was necessary to eliminate duplicate order numbers being matched to the incorrect order for processing. Some order numbers are duplicated within a month of completion of the previous order number. Without matching dates, incorrect fields were being populated

in NODS from the original order number. The PRSNS01p2 daily was changed to exclude these records before they get into NODS. This issue was completed for the June reports and closed in issue tracker.

CR# 5910 – Exclude orders where commit date is null:
This was necessary because to create raw data the service orders from NODS SO and NODS SO CMTT HIST are joined. The service orders that are not in both tables (those that do not have an original due date) are not included in the raw data but are included in the end report. Orders without a commit date have not been released into the system for processing, however, if their order number was previously used, the data can be incorrectly matched. This issue was completed for the June reports and closed in issue tracker.

CR# 5911 – Include issue date of Service Order from Extract:
This was necessary to work with CR 5909 and provide issue date information from Extract for exclusion of issue dates after completion dates. This was implemented with the June reports and closed in issue tracker.

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

BellSouth was able to replicate the *Total Service Order Cycle Time* in the Provisioning category for the CLEC Aggregate and BellSouth Retail (November 1999) using **prod_id** rather than **prod_desc.**

The Raw Data User Guide will be updated in July to correct Step 5; bullet 6 to use **prod_id** rather than **prod_desc**.

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

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

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

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

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

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

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

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

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

Exclude records where ckt_stat = 'IP'

The instructions are incorrect because the ckt_stat can be null or blank. Using the new instructions the report can be replicated correctly.
KPMG received a new data file that included UNE Non-Design.

BELLSOUTH

August 29, 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) Mislabeled information.

Undocumented Charges

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

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

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

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

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

Representative occurrences of errors are detailed on the following invoices:

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

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

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

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

Incorrect Rates

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

Representative occurrences of this error are detailed below.

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

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.

BellSouth has plans to add the USOC VE1R2 to the standard agreement. This should be completed by 4Q00. BellSouth did investigate and determine that no CLECs, other than the third party test CLEC, has ever been billed for this USOC.

Undocumented Charges – USOC SOMEC

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 SOMEC. If a standard interconnection agreement 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 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

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.

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.

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 SEVENTH AMENDED RESPONSE TO EXCEPTION 89

BELLSOUTH

August 29, 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 data[1] used in the calculation of BellSouth Service Quality Measurement (SQM) reports are not accurately derived from or supported by their component early-stage data[2].

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.

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[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.

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_BLKG (*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.

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 record[6] 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 order[7].

[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.

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

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 SEVENTH 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 Reports[8].

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	SMYRGA~~MA~~PF-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	SMYRGA~~MA~~PF-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.

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. The Time Consistent Busy Hour (TCBH) is determined based on half-hour increments of each 24-hour day during the study period. The data previously being provided to KPMG by BellSouth was in one-hour increments of each 24-hour day during the study period. BellSouth is now providing the data to KPMG in half-hour increments. 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 SEVENTH 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% (hour21)	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.

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. BellSouth is currently debugging the code to determine how the **TRAN TIME** 'value' is being calculated as a negative number. 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.

BellSouth has investigated the issue of the negative transaction times in the Navigator debug facility. Using a utility called 'navswim', BellSouth traced the **TRAN TIME** calculation back to a file in one of Navigator's libraries. The logic in this file is incorrect. The dequeue time was occasionally being computed incorrectly, affecting the SNA time, and ultimately affecting the calculation of the transaction time. The logic has been changed to correct the problem, has been checked into the CMVC, and will be included in the next Navigator release. The last Navigator release (Rls. 4.6.2) was made available on July 10, 2000. The next Navigator release is currently being scheduled for 4Q2000.

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

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

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.

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)

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)

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?

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 December, 1999 data for *Percent Provisioning Troubles within 30 Days of Service Order Activity* for KPMG to revalidate early stage data and raw data.

'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

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 SEVENTH 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 validate 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 inclusion in the Billing SQM.

BELLSOUTH'S EIGHTH AMENDED RESPONSE TO EXCEPTION 89

BELLSOUTH

September 7, 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 data[1] used in the calculation of BellSouth Service Quality Measurement (SQM) reports are not accurately derived from or supported by their component early-stage data[2].

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.

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[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.

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_BLKG (*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.

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 record[6] 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 order[7].

[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.

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

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 EIGHTH 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 Reports[8].

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.

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. The Time Consistent Busy Hour (TCBH) is determined based on half-hour increments of each 24-hour day during the study period. The data previously being provided to KPMG by BellSouth was in one-hour increments of each 24-hour day during the study period. BellSouth is now providing the data to KPMG in half-hour increments. 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.

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% (hour21)	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.

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. BellSouth is currently debugging the code to determine how the **TRAN TIME** 'value' is being calculated as a negative number. 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.

BellSouth has investigated the issue of the negative transaction times in the Navigator debug facility. Using a utility called 'navswim', BellSouth traced the **TRAN TIME** calculation back to a file in one of Navigator's libraries. The logic in this file is incorrect. The dequeue time was occasionally being computed incorrectly, affecting the SNA time, and ultimately affecting the calculation of the transaction time. The logic has been changed to correct the problem, has been checked into the CMVC, and will be included in the next Navigator release. The last Navigator release (Rls. 4.6.2) was made available on July 10, 2000. The next Navigator release is currently being scheduled for 4Q2000.

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

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

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.

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)

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)

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?

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".

On 8/28/00 BellSouth sent KPMG additional information, that KPMG had requested, regarding raw data file rerun notification procedures, as a result of several CCC conference calls. On 8/30/00, KPMG reported that the document adequately provided for the definition of the CCC process.

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 December, 1999 data for *Percent Provisioning Troubles within 30 Days of Service Order Activity* for KPMG to revalidate early stage data and raw data.

BELLSOUTH'S EIGHTH 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_cmtt_cd' field did not match for the following five service orders from ICAIS/BARNEY to raw data: ('NO1MTCP0', 'NO85N2Y9', 'NOB4GHY7', 'NO83B1R1', 'NO3WTR51')

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

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

BellSouth was unable to replicate the discrepancies identified by KPMG for the 'status' field for the 17 service orders listed above. Queries were run in the ICAIS/BARNEY and raw data databases. The results from these queries show that the 'status' field matches for 14 distinct service orders. There were three service orders that were exceptions. These service orders fell out of raw data because they possess a cmpltn_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',

'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

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 EIGHTH 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 validate 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 inclusion in the Billing SQM.

CERTIFICATE OF SERVICE
Docket No. 8354-U

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

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This 14th day of September, 2000.

David Frey

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EXECUTIVE SECRETARY
G.P.S.C.

September 15th, 2000

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

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

Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG Consulting LLC's Interim Status Report, dated September 15, 2000, for filing in the above referenced matter.

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

Thank you for your assistance in this regard.

Very truly yours,

David Frey

David Frey
Manager

Enclosures

cc: Parties of Record

KPMG Consulting LLC. KPMG Consulting LLC is a subsidiary of KPMG LLP the U.S. member firm of KPMG International, a Swiss association

1.0 Document Objective

In this document, KPMG Consulting LLC (KCL) provides an interim summary status report on developments related to the BellSouth-GA OSS Test. A brief overview of key developments is provided in section 2.0. Key upcoming activities are summarized in section 3.0. A detailed report on specific Master Test Plan (MTP) items is provided in the table in section 4.0; Supplemental Test Plan (STP) activities are discussed in the table in section 5.0. Each item presented in the tables in section 4.0 and 5.0 includes a reference number that identifies the item from a previous status report, where applicable. A detailed report on Exceptions is provided in the table in section 6.0.

2.0 Key Developments

- Ordering:
  - KCL is conducting an ordering functional re-test. KCL will use the results of this functional re-test to evaluate a number of open exceptions.
- Maintenance and Repair:
  - Excluding exception closure activities, KCL has completed all M&R testing activities.
- Performance measurement reporting (Metrics):
  - KCL has substantially completed the process of replicating the calculations of Service Quality Measurement (SQMs) for the KCL Test CLEC, as applicable, for the months of June and July 2000. KCL had previously completed the process of replicating the calculations for November 1999 through May 2000.
  - KCL has completed the process of replicating the calculations of SQMs for the CLEC aggregate and BellSouth retail data for October 1999 and other selected months.
- Capacity Management:
  - MTP: KCL has completed all capacity management testing activities.
  - STP: KCL continues to evaluate BellSouth documentation associated with *PO&P15: Work Center Capacity Management Evaluation – xDSL* and *PO&P16: xDSL Process Parity Evaluation.*

- Change Management:
  - As part of finalizing test activities associated with *CM2: OSS '99 Release Evaluation*, KCL recently requested additional documentation related to BellSouth's systems test environment.
- Billing:
  - MTP: On August 1st – 4th, 2000, KCL conducted a second UNE DUF re-test. Results of the re-test are being analyzed.
  - STP: Excluding exception closure activities, KCL has completed all testing activities associated with *BLG7: CRIS Resale Invoicing Functional Evaluation* and *BLG8: Resale Usage Functional Evaluation.*

3.0 Key Upcoming Activities

- KCL expects to focus further efforts on: 1) completing all initial testing efforts; 2) exception re-testing and closure activities; 3) drafting and reviewing the MTP and STP reports.

4.0 Master Test Plan Specific Item Status

Ref	Item	Status	Issues	Next Step Resolution
I-6	EDI functional testing	• KCL issued the following exceptions, related to EDI functional testing, that remain open: Exceptions 9, 18, 22, 26, 31, 32, 38, 39, 47, 60, 67, 77, 78, 95, 97 & 98. KCL is reviewing closure reports internally for Exceptions 9, 18, 32. KCL is awaiting the GSPC's comments on draft closure reports for Exceptions 39, 47, and 67.	• The status of exceptions and draft exceptions is detailed in *Section 6.0 Exceptions Status.*	• All exceptions must be closed for purposes of the test before reports can be finalized.
		• KCL is in the process of conducting a functional re-test to re-evaluate BLS performance with respect to the following issues identified in previous status reports: 1) Completion Notification (CN) timeliness; 2) Functional Acknowledgement (FA) timeliness; 3) FOC Due Date accuracy compared to LSR Desired Due Date requests; 4) Loop Service with Directory Listing ordering process; 5) Order validation process for invalid LPIC entries on UNE-Port service requests; and 6) Inaccurate FOC responses (confirmations received on invalid service requests).	• None. • The following issue presented in the 4/06/00 interim status report remains open and will be evaluated as part of the functional re-test: A timeliness deficiency in BLS's delivery of fully-mechanized Clarifications (CLRs) and Flow-Through Firm Order Confirmations (FOCs);	• KCL will employ the results of this functional re-test to evaluate a number of open exceptions. • KCL is evaluating these issues as part of the functional re-test.
		• KCL has reviewed an amended version of BLS's LEO Guide (Volume 1). KCL determined that BLS's modified documentation adequately addresses the issue regarding missing or extraneous data elements and data values on service order responses (FOCs and CNs).	• None.	• N/A.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL previously identified a response timeliness deficiency on Non Flow-Through Firm Order Confirmations (NFT FOCs) and Partially Mechanized Clarifications (PM CLRs). These issues are documented in Exception 97 and 98.	• Further updates regarding this issue will be published in *Section 6.0 Exceptions Status.*	• N/A.
I-7	TAG functional testing	• KCL issued the following exceptions, related to TAG functional testing, that remain open: Exceptions 9, 18, 22, 26, 31, 32, 38, 39, 47, 60, 67, 77, 78, 95, 97 & 98. KCL is reviewing closure reports internally for Exceptions 9, 18, 32. KCL is awaiting the GSPC's comments on draft closure reports for Exceptions 39, 47, and 67.	• The status of exceptions and draft exceptions is detailed in *Section 6.0 Exceptions Status.*	• All exceptions must be closed for purposes of the test before reports can be finalized.
		• KCL is in the process of conducting a functional re-test to re-evaluate BLS performance with respect to the following issues identified in previous status reports: 1) Completion Notification (CN) timeliness; 2) Functional Acknowledgement (FA) timeliness; 3) FOC Due Date accuracy compared to LSR Desired Due Date requests; 4) Loop Service with Directory Listing ordering process; 5) Order validation process for invalid LPIC entries on UNE-Port service requests; and 6) Inaccurate FOC responses (confirmations received on invalid service requests).	• None.	• KCL will employ the results of this functional re-test to evaluate a number of open exceptions.

Ref	Item	Status	Issues	Next Step Resolution
			• The following issue presented in the 4/06/00 interim status report remains open and will be evaluated as part of the functional re-test: A timeliness deficiency in BLS's delivery of fully-mechanized Clarifications (CLRs) and Flow-Through Firm Order Confirmations (FOCs);	• KCL is evaluating these issues as part of the functional re-test.
		• KCL has reviewed an amended version of BLS's LEO Guide (Volume 1). KCL determined that BLS's modified documentation adequately addresses the issue regarding missing or extraneous data elements and data values on service order responses (FOCs and CNs).	• None.	• N/A.
		• KCL previously identified a response timeliness deficiency on Non Flow-Through Firm Order Confirmations (NFT FOCs) and Partially Mechanized Clarifications (PM CLRs). These issues are documented in Exception 97 and 98.	• Further updates regarding this issue will be published in *Section 6.0 Exceptions Status.*	• N/A.

Ref	Item	Status	Issues	Next Step Resolution
	Pre-Order Functional Testing	• KCL issued the following exceptions, related to Pre-Order functional testing, that remain open: Exceptions 24, 65, 66 & 71.	• The status of exceptions and draft exceptions is detailed in *Section 6.0 Exceptions Status*.	• All exceptions must be closed for purposes of the test before reports can be finalized.
		• KCL previously noted several issues identified as a result of pre-order functional testing.	• The following issue presented in previous interim status reports remain open: 1) discrepancies between the service establishment intervals obtained from BLS documentation (*Product and Services Interval Guide*) versus those obtained from the Calculate Due Date (CDD) pre-order query; 2)A system limitation in processing Calculate Due Date (CDD) queries for Loop with Number Portability migrations, Stand-Alone Number Portability migrations, and Loop-Port Combination service requests; 3) Missing or extraneous data elements and data values on pre-order responses.	• These issues have been identified to BLS through exceptions. Further updates will be published in *Section 6.0 Exception Status*.
I-8	CRIS/CABS Invoicing Functional Test	• KCL issued the following exceptions, related to CRIS/CABS invoicing functional testing, that remain open: Exception 16 & 35. KCL is drafting closure reports for Exceptions 16 & 35.	• The status of exceptions and draft exceptions is detailed in *Section 6.0 Exceptions Status*.	• All exceptions must be closed for purposes of the test before reports can be finalized.

Ref	Item	Status	Issues	Next Step Resolution
II-1	Metrics	• KCL issued the following exceptions, related to Metrics (MTP – Performance Measures Evaluations) that remain open: Exceptions 23, 42, 43, 46, 62, 63, 74, 90, 100, 101, 104 & 110. KCL is awaiting the GSPC's comments on draft closure reports for Exceptions 23 & 64. KCL is drafting closure reports for Exceptions 42, 43, 74 and 101. KCL has submitted two draft exceptions to BLS that will be publicly issued if the information is substantiated by the BLS response.	• The status of exceptions and draft exceptions is detailed in *Section 6.0 Exceptions Status*.	• All exceptions must be closed for purposes of the test before reports can be finalized.
		• KCL is updating the calculation validation programs to apply to July SQM values for the KCL Test CLEC.	• KCL anticipates identifying issues, if any, within the next week.	• If KCL finds any discrepancies, KCL will bring them to the attention of BLS via draft exceptions.
II-4	Volume Test	• KCL/HP conducted Normal Volume, Day One Third Re-test on 6/24/00 and Normal Volume, Day Two on 8/01/00.	• BLS satisfied all performance criteria.	• N/A.
		• KCL/HP successfully submitted Peak Volume Day Two 7/17/00.	• KCL has identified specific PONs to BLS for which FOCs were not received	• BLS is currently investigating the cause of missing FOCs.
		• KCL is performing an evaluation of the RSIMMS and production environments to identify any significant differences in hardware, applications, and data loads.	• BLS is currently gathering a final set of data required by KCL to complete the analysis.	• KCL will submit its final report to the GA-PSC.
		• KCL completed the Production Volume test on 7/27/00. KCL completed the Production Volume re-test on 7/31/00.	• BLS satisfied all performance criteria during the Production Volume re-test.	• N/A.

Ref	Item	Status	Issues	Next Step Resolution
II-5	Change Management (CM-1)	• At the August 23, 2000 Monthly Status Meeting, BLS solicited a vote from CLECs present on the conference call to adopt what had had been the *Interim Change Control Process (I-CCP)* as a non-interim baseline process. Six of nine CLECs present on the call voted to remove the "interim" status from the document and process. One CLEC voting in the affirmative subsequently reversed its vote.	• Selected CLECs have objected to the manner in which BLS conducted the voting. The GPSC determined that the vote would stand as recorded during the meeting.	• KCL will continue to observe and monitor the implementation and use of the *Change Control Process* among CLECs and BLS.
		• At the August 23, 2000 Monthly Status Meeting, further discussions took place regarding the implementation of an Expedited Feature/Defect Type 6 change request and process flow. BLS's proposed process, which includes CLEC-requested impact levels, was incorporated in the *CCP* document in draft form, subject to further revisions.	• None.	• KCL will continue to monitor the BLS-CLEC discussions and implementation around this newly-implemented Type 6 process.
III-1	Flow-Through Evaluation	• KCL has completed test activity and has no open exceptions related to Flow-Through.	• None.	• N/A.
III-3	Capacity Management	• Capacity Management testing activities have been completed. KCL has no open exceptions related to capacity management.	• None.	• N/A.
IV-1	TAFI functional testing	• TAFI functional testing activities have been completed. KCL has no open exceptions related to TAFI functional testing.	• None.	• N/A.

Ref	Item	Status	Issues	Next Step Resolution
IV-2	ECTA functional testing	• KCL issued the following exceptions related to ECTA functional testing which remain open: Exceptions 12 & 96. KCL is awaiting the GPSC's comments on the draft closure report for Exception 12. KCL is reviewing a closure report for Exception 96 internally. Otherwise, ECTA functional testing activities have been completed.	• The status of exceptions and draft exceptions is detailed in *Section 6.0 Exceptions Status.*	• All exceptions must be closed for purposes of the test before reports can be finalized.
IV-3	ODUF/ADUF usage functional test	• KCL issued the following exceptions related to ODUF/ADUF usage functional testing that remain open: Exception 27 & 28. KCL is awaiting the GPSC's comments on the draft closure report for Exception 27.	• The status of exceptions and draft exceptions is detailed in *Section 6.0 Exceptions Status.*	• All exceptions must be closed for purposes of the test before reports can be finalized.
		• KCL conducted a second UNE DUF re-test during the period from August 1 - 4. Results of the re-test are being analyzed.	• None.	• Upon completion of its analysis, KCL will amend or close Exception 28, as appropriate.
IV-4	CRIS/CABS invoicing documentation evaluation	• KCL issued the following exception related to the CRIS/CABS documentation evaluation that remains open: Exception 73. KCL is drafting a closure report for Exception 73.	• The status of exceptions and draft exceptions is detailed in *Section 6.0 Exceptions Status.*	• All exceptions must be closed for purposes of the test before reports can be finalized.
V-2	Provisioning Verification	• KCL issued the following exceptions related to Provisioning Verification that remain open: 76, & 106.	• The status of exceptions and draft exception is detailed in *Section 6.0 Exceptions Status.*	• All exceptions must be closed for purposes of the test before reports can be finalized.
		• KCL is conducting a provisioning re-test, including evaluations of Switch translations, CSRs and DL records. KCL will observe provisioning activities associated with the ordering functional re-test.	• None.	• KCL will employ the results of this functional re-test to evaluate a number of open exceptions.

Ref	Item	Status	Issues	Next Step Resolution
V-3	Pre-ordering, Ordering and Provisioning Documentation Review	• KCL issued the following exceptions related to Pre-Ordering, Ordering and Provisioning Documentation Reviews that remain open: Exception 33, 53, 55, 59, 63, 71, 75 & 80. KCL is reviewing a closure report for Exception 63 internally. KCL is awaiting the GPSC's comments on draft closure reports for Exceptions 53, 55, 59, 75 & 80.	• The status of exceptions and draft exceptions is detailed in *Section 6.0 Exceptions Status.*	• All exceptions must be closed for purposes of the test before reports can be finalized.
		• As of September 6, 2000, KCL's *Documentation Issues Log* contains 19 active issues.	• None.	• KCL will work with BLS to identify and resolve outstanding documentation deficiencies.
V-4	ODUF/ADUF Documentation Evaluation	• ODUF/ADUF documentation evaluations activities have been completed. KCL has no open exceptions related to ODUF/ADUF documentation.	• None.	• N/A.

5.0 Supplemental Test Plan Specific Item Status

Ref[1]	Item	Status	Issues	Next Step Resolution
VII-2	Test Bed Development	• Provisioning of the STP test bed was completed by BellSouth and validated by KCL on 8/11/00.	• None.	• N/A.
VII-4	Metrics	• KCL issued the following exceptions, related to Metrics (STP - Performance Measures Evaluations) that remain open: Exceptions 52, 61, 70, 79, 83, 84, 86, 87, 88, 89,92, 93 & 105. KCL is drafting closure reports for Exceptions 83, 84, 87, 93 and 105.	• The status of exceptions and draft exceptions is detailed in *Section 6.0 Exceptions Status*.	• All exceptions must be closed for purposes of the test before reports can be finalized.
		• KCL continues the following testing activities: 1) Calculation of SQM values of PMAP-generated and manually-generated SQMs for the CLEC aggregate and BLS retail; 2) Reviewing the definitions of PMAP-generated and manually-generated SQMs; 3) Comparison of early stage data to raw data; Reviewing system data flows and Metrics change management issues.	• KCL has identified a number of exceptions related to these activities.	• KCL will continue testing and exception re-testing activities.
IX-2	PO&P11 – EDI & TAG Resale Functional Evaluation	• KCL issued the following exceptions related to EDI & TAG resale functional testing, that remain open: Exception 49 & 102. KCL has submitted 1 draft exception to BLS that will be publicly issued if the information is substantiated by the BLS response.	• The status of exceptions and draft exceptions is detailed in *Section 6.0 Exceptions Status*.	• All exceptions must be closed for purposes of the test before reports can be finalized.
		• KCL has completed its evaluation of BLS's additional business rules and training material.	• None.	• KCL's analysis will be included in the final report.

Ref	Item	Status	Issues	Next Step Resolution
IX-3	PO&P12 – xDSL Functional Evaluation	• KCL issued the following exception, related to xDSL functional testing, that remains open: Exception 57. KCL has submitted 2 draft exceptions to BLS that will be publicly issued if the information is substantiated by the BLS response.	• The status of exceptions and draft exceptions is detailed in *Section 6.0 Exceptions Status*.	• All exceptions must be closed for purposes of the test before reports can be finalized.
		• KCL submitted pre-order LMU Service Inquires via fax and e-mail to BLS for both test bed accounts and live CLEC end-user customers.	• KCL has identified the following potential issues: 1) Inconsistent responses from LMU Service Inquiries; 2) An LMU/SI timeliness issue; 3) the lack of acknowledgement and tracking processes for manually submitted LMU/SIs.	• KCL has raised these issues with BLS. BLS is investigating.
		• KCL submitted order LSRs and for xDSL capable loops.	• KCL has identified the following potential issues: 1) An LSR/SI timeliness issue; 2) the lack of acknowledgement and tracking processes for manually submitted LSR/SIs.	• KCL has raised these issues with BLS. BLS is investigating.
IX-4	PO&P-14 - Resale and xDSL Documentation Evaluation	• KCL continues to review BLS's xDSL documentation for structure and format.	• BLS's xDSL documentation contains some minor structural and formatting inconsistencies.	• KCL will review the new release of documentation scheduled for September 15, 2000.
		• KCL conducted interviews with CLEC personnel and BLS personnel, regarding xDSL documentation, during the week of 8/14/00.	• KCL is evaluating the clarity, accuracy and availability of BLS's xDSL documentation from the CLEC perspective.	• KCL has documented the CLEC and BLS interviews.
		• KCL continues its documentation review of BLS's ordering guidelines to determine whether they adequately define ordering requirements.	• None.	• KCL's further activities will be based on the completion of this documentation review.
IX-5	PO&P15 – Work Center Capacity Management - xDSL	• KCL issued the following exception, related to xDSL work center capacity management, that remains open: Exception 109. KCL is drafting a closure report for this exception.	• The status of exceptions and draft exceptions is detailed in *Section 6.0 Exceptions Status*.	• All exceptions must be closed for purposes of the test before reports can be finalized.
		• KCL has reviewed work center capacity management-related documentation received to-date.	• None.	• KCL will document its findings and analysis in the final report.
IX-6	PO&P16 – xDSL Process Parity	• KCL issued the following exceptions, related to xDSL process parity, that remain open: Exceptions 107 & 108.	• The status of exceptions and draft exceptions is detailed in *Section 6.0 Exceptions Status*.	• All exceptions must be closed for purposes of the test before reports can be finalized.

Ref[1]	Item	Status	Issues	Next Step Resolution
		• KCL has reviewed all xDSL process-related documentation received to-date.	• None.	• KCL will document its findings and analysis in the final report.
XI-1	M&R11 - Maintenance and Repair Process Evaluation of xDSL-Capable Loops	• KCL has completed all activities associated with the M&R Process Evaluation of xDSL-Capable Loops.	• None.	• N/A.
IX-7	M&R12 – TAFI Functional Test of Resale Lines	• KCL has completed all activities associated with the TAFI Functional Test of Resale Lines.	• None.	• N/A.
IX-8	M&R13 – ECTA Functional Test of Resale Lines	• KCL has completed all activities associated with the ECTA Functional Test of Resale Lines.	• None.	• N/A.
IX-9	BLG7 – CRIS Resale Invoicing Functional Evaluation	• KCL issued the following exceptions, related to the CRIS Resale Invoicing Functional Evaluation, that remain open: Exceptions 99 & 103. KCL is awaiting the GPSC's comments on a draft closure report for Exception 99. KCL is drafting a closure report for Exception 103.	• The status of exceptions and draft exceptions is detailed in *Section 6.0 Exceptions Status*.	• All exceptions must be closed for purposes of the test before reports can be finalized.
		• Excluding exception closure activities, KCL has completed testing activities related to BLG7.	• None.	• N/A.
IX-10	BLG8 – Resale Usage Functional Evaluation	• KCL issued the following exception, related to EDI functional testing, that remains open: Exception 94. KCL is awaiting the GPSC's comments on a draft closure report for Exception 94.	• The status of exceptions and draft exceptions is detailed in *Section 6.0 Exceptions Status*.	• All exceptions must be closed for purposes of the test before reports can be finalized.
		• Excluding exception closure activities, KCL has completed testing activities related to BLG8.	• None.	• N/A.
IX-11	CM2 – OSS '99 Release Evaluation	• KCL is currently finalizing CM2 testing activities.	• KCL recently requested from BLS additional documentation related to BLS's systems test environment.	• BLS will provide additional documentation regarding interface testing conducted during the OSS '99 Release.

6.0 Exceptions[2] Status

Ref[1]	Item	Status	Issues	Next Step Resolution
IV-5	Exceptions	• KCL filed a closure report for Exception 1, regarding Pre-ordering, with the GPSC on 8/25/00. As a result of several iterations of documentation review, KCL found that BLS has developed and posted to its Web site adequate business rules for submitting electronic pre-order transactions via the TAG interface.	• KCL indicated that BLS does not currently provide comprehensive and usable business rule documentation for submitting electronic pre-order transactions via the TAG interface.	• N/A.
		• KCL is reviewing a closure report for Exception 9, regarding Ordering and Provisioning, internally.	• KCL indicated that BellSouth failed to deliver Firm Order Confirmations (FOCs) and Completion Notices (CNs) in response to electronic service order requests.	• KCL expects to submit this closure report to the GPSC for review upon completion of this internal review.
		• The GPSC is reviewing KCL's closure report for Exception 12, regarding Maintenance and Repair.	• KCL indicated that the ECTA Gateway does not accurately notify CLECs when invalid information is entered into a trouble ticket.	• KCL expects to file this closure statement upon completion of the GPSC's review.
		• KCL is drafting a closure report for Exception 16, regarding Billing.	• KCL indicated that BellSouth issued multiple bills containing erroneous information to KCL.	• After internal review, KCL expects to submit this closure report to the GPSC.
		• KCL is reviewing a closure report for Exception 18, regarding Ordering and Provisioning.	• KCL indicated that BLS's requirements for values entered in the Line Class of Service data element for EDI and TAG are not consistent, and the documentation is incomplete.	• KCL expects to submit this closure report to the GPSC for review upon completion of this internal review.
		• KCL is conducting a re-test for Exception 22, regarding Ordering & Provisioning.	• KCL indicated that BLS disconnected retail accounts on loop migration orders without re-connecting the UNE loop component.	• KCL's further activities will be based on the outcome of this re-test.
		• The GPSC is reviewing KCL's closure report for Exception 23, regarding Metrics	• KCL indicated that it cannot replicate five of BellSouth's reported Service Quality Measurements.	• KCL expects to file this closure statement upon completion of the GPSC's review.
		• KCL is monitoring pre-order responses as part of re-testing activities for Exception 24, regarding Pre-Ordering.	• KCL indicated that BellSouth's TAG API does not deliver timely responses to pre-order transactions.	• KCL's further activities will be based on the outcome of its observations of pre-order response timeliness.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL filed a closure report for Exception 25, regarding Capacity Management, with the GPSC on 8/4/00. KCL was unable to determine that adequate, established ongoing procedures for forecasting business volumes and transactions exist across all tested interfaces.	• KCL indicated that BLS's systems capacity management process does not include established ongoing procedures for forecasting business volumes and transactions.	• N/A.
		• KCL is conducting a re-test for Exception 26, regarding Ordering and Provisioning.	• KCL indicated that BLS does not deliver timely Completion Notices (CNs).	• KCL's further activities will be based on the outcome of this re-test.
		• The GPSC is reviewing KCL's closure report for Exception 27, regarding Billing.	• KCL indicated that BLS provided incorrect DUF records to KCL.	• KCL expects to file this closure statement upon completion of the GPSC's review.
		• KCL has completed a UNE DUF re-testing for Exception 28, regarding Billing.	• Amended Exception: BellSouth failed to deliver DUF records for twenty-seven percent (27%) of the re-test calls for which records were expected. Initial Exception: KCL indicated that BLS failed to deliver 46% of expected DUF records to KCL.	• KCL is evaluating the results of re-testing activities.
		• KCL filed a closure report for Exception 29, regarding Billing, with the GPSC on 8/04/00. The application of the measurement as stated in the Interconnection Agreement by KCL to DUF data from the initial and first re-test call periods revealed that BLS delivered 96% of the ODUF/ADUF records within six calendar days from the receipt of the initial recording	• KCL indicated that BLS did not deliver timely DUF records to KCL.	• N/A.
		• KCL is conducting a re-test for Exception 31, regarding Ordering and Provisioning.	• KCL indicated that BLS's electronic ordering systems do not adequately support CLEC requests for Directory Listings associated with UNE loop customers.	• KCL's further activities will be based on the outcome of this re-test.
		• KCL is reviewing a closure report for Exception 32, regarding Ordering and Provisioning, internally.	• KCL indicated that BLS delivered FOCs on transactions after issuing Clarifications (CLRs).	• KCL expects to submit this closure report to the GPSC for review upon completion of this internal review.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL clarified some discrepancies that occurred during re-testing activities for Exception 33, regarding Ordering and Provisioning.	• KCL indicated that BLS's *LEO Guide, Volume I, Version N* does not define data element requirements and valid entries for loop service requests.	• Based on these clarifying conversations, KCL expects to complete re-testing activities in the near future.
		• KCL filed a closure report for Exception 34, regarding Billing, with the GPSC on 8/04/00. KCL believes that BellSouth's updated ODUF and ADUF documentation has adequately addressed the following topical issues: "Set-up and Testing of DUF," "Receiving and Processing DUF," "Validating DUF," and "Getting Help"	• KCL indicated that BLS's ODUF/ADUF documentation is deficient.	• N/A.
		• KCL is drafting a closure report for Exception 35, regarding Billing.	• KCL indicated that BLS issued multiple bills containing erroneous information to the KCL CLEC.	• After internal review, KCL expects to submit this closure report to the GPSC.
		• KCL filed a closure report for Exception 37, regarding Maintenance and Repair, with the GPSC on 8/04/00. Based on re-testing, KCL determined that TAFI, Version 2000.3.1.1 no longer inappropriately presents an unfiltered list of all in-session TAFI users.	• KCL indicated that during testing of the "supervisor" functions, KCL was presented with an unfiltered list of all in-session TAFI users.	• N/A.
		• KCL is conducting a re-test for Exception 38, regarding Ordering and Provisioning.	• KCL indicated that BLS does not consistently provide CLECs with a service Due Date matching their Desired Due Date.	• KCL's further activities will be based on the outcome of this re-test.
		• The GPSC is reviewing KCL's closure report for Exception 39, regarding Ordering and Provisioning.	• KCL indicated that BLS's electronic ordering systems do not provide the functionality required for submitting partial migrations to UNE loops.	• KCL expects to file this closure statement upon completion of the GPSC's review.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL filed a closure report for Exception 41, regarding Flow-Through, with the GPSC on 8/25/00. KCL's review found that the documentation identified by BLS in its response to this exception does provide adequate information on the expected flow through status of LSRs by products and Requisition/Activity types for different types of transactions. Further, KCL's determination of the flow through status of individual LSRs, based on instructions for using the raw data, produced results identical to the independent determinations made by BLS and KCL.	• KCL indicated that BLS does not provide Competitive Local Exchange Carriers (CLECs) with comprehensive flow-through documentation.	• N/A.
		• KCL is drafting a closure report for Exception 42, regarding Metrics.	• KCL indicated that BLS published incomplete KCL test CLEC Service Quality Measurement (SQM) reports for the months of November 1999, December 1999, and January 2000 for the billing metric Mean Time to Deliver Invoices.	• After internal review, KCL expects to submit this closure report to the GPSC.
		• KCL is drafting a closure report for Exception 43, regarding Metrics.	• KCL indicated that BLS has not provided KCL with the raw data necessary to calculate values for the Service Quality Measurements ("SQM"), Mean Time to Deliver Invoices (Billing), for the KCL Test CLEC.	• After internal review, KCL expects to submit this closure report to the GPSC.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL filed a closure report for Exception 44, regarding Ordering and Provisioning, with the GPSC on 8/04/00. KCL received Firm Order Confirmations (FOCs) on all five LSRs submitted for the re-test. Additionally, KCL has not observed any similar problems during volume testing activities. As a result, KCL believes that BellSouth's LESOG, Release 6.1C system fix has adequately addressed the issue raised in this exception.	• KCL indicated that KCL was unable to change the telephone number (TN) of a resale auxiliary line in certain instances.	• N/A.
		• KCL filed a closure report for Exception 45, regarding Metrics, with the GPSC on 8/02/00. KCL was ultimately able to match all KCL-calculated values to all BLS-reported SQMs.	• KCL indicated that it cannot replicate four of BLS's reported Service Quality Measurements.	• N/A.
		• KCL is performing replication of revised reports as part of re-testing activities for Exception 46, regarding Metrics.	• KCL indicated that it cannot replicate seven of BLS's reported Service Quality Measurements.	• KCL's further activities will be based on the outcome of these replication activities.
		• KCL is reviewing a closure report for Exception 47, regarding Ordering and Provisioning, internally.	• KCL indicated that BLS delivered inconsistent and inaccurate responses to Local Service Requests.	• KCL expects to file this closure statement upon completion of the GPSC's review.
		• KCL filed a closure report for Exception 48, regarding Flow-Through, with the GPSC on 8/04/00. KCL believes that the benefits gained from modifications can not be justified given the low probability of the errors cited in this exception, and the likelihood of introducing other programming errors that could affect Flow Through Reporting or service to CLECs.	• KCL indicated that minor errors in categorizing LSRs for BLS's Flow Through Reports indicate the potential for future, material reporting errors.	• N/A.

Ref[1]	Item	Status	Issues	Next Step Resolution
		• KCL is drafting a closure report for Exception 49, regarding Ordering and Provisioning.	• KCL indicated that BLS did not provide an accurate and timely update to CLECs when implementing a Universal Service Order Code (USOC) change.	• After internal review, KCL expects to submit this closure report to the GPSC.
		• KCL is performing replication of revised reports as part of re-testing activities for Exception 52, regarding Metrics.	• KCL indicated that it cannot replicate twelve of BLS's reported Service Quality Measurements (SQMs).	• KCL's further activities will be based on the outcome of these replication activities.
		• The GPSC is reviewing KCL's closure report for Exception 53, regarding Ordering and Provisioning.	• KCL indicated that BLS's *LEO Guide, Volume I, Versions J-N* contains numerous revision-related errors.	• KCL expects to file this closure statement upon completion of the GPSC's review.
		• KCL is planning further re-testing activities for Exception 54, regarding Ordering and Provisioning.	• KCL indicated that BLS's electronic ordering systems do not support UNE-to-UNE migration service requests.	• KCL's further activities will be based on the outcome of these re-testing activities.
		• The GPSC is reviewing KCL's closure report for Exception 55, regarding Ordering and Provisioning.	• KCL indicated that BLS's pre-ordering and ordering documentation contain numerous errors and omissions in structure and format.	• KCL expects to file this closure statement upon completion of the GPSC's review.
		• KCL filed a closure report for Exception 56, regarding Metrics, with the GPSC on 9/05/00. BLS informed KCL that the five TNs cited in the exception were provisioned as UNE Port Design Circuits. KCL determined that it had requested that these five TNs be provisioned as UNE Ports - POTS, rather than Design. BLS informed KCL that it provisions all UNE Ports as Design Circuits. BLS further explained that the LMOS download process identifies "special service" unit numbers (such as those on Design Circuits) and excludes them from the raw data download. Therefore, these TNs would not appear in the raw data. As a result, KCL determined that BellSouth's PMAP raw data for December 1999 was not incomplete for the SQM *Maintenance Average Duration* as a result of the exclusion of these five TNs.	• KCL indicated that BLS published incomplete PMAP Raw Data for December 1999 for the Service Quality Measurement (SQM) Maintenance Average Duration.	• N/A.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL is awaiting BLS's posting of related documentation (scheduled for 9/18) to perform additional re-testing activities for Exception 57, regarding xDSL.	• KCL indicated that BLS guidelines for submitting xDSL pre-order Service Inquiry (SIs) for Loop Make-Up (LMU) information do not exist.	• KCL's further activities will be based on the outcome of these re-testing activities.
		• KCL filed a closure report for Exception 58, regarding Ordering and Provisioning, with the GPSC on 8/04/00. KCL'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. KCL employed the *CLEC Contact Requirements Matrix for the UNE Center* in its analysis of coordinated hot-cut observations. As a result, KCL issued Exception 82 to address the lack of procedural adherence by BLS Central Office technicians and Unbundled Network Element Center (UNEC) coordinators to BLS's methods and procedures for provisioning coordinated hot-cuts. Exception 82 presents a comprehensive analysis of BLS's lack of procedural adherence, inclusive of the issues identified in Exception 58.	• KCL indicated that BLS's UNE Center does not consistently adhere to the methods and procedures for provisioning Unbundled Network Elements (UNEs).	• N/A.
		• The GPSC is reviewing KCL's closure report for Exception 59, regarding Ordering and Provisioning.	• KCL indicated that BLS's documentation does not define rules for submission of batched orders.	• KCL expects to file this closure statement upon completion of the GPSC's review.
		• KCL is conducting a re-test for Exception 60, regarding Ordering and Provisioning.	• KCL indicated that BLS does not deliver timely Functional Acknowledgements (FAs) via Electronic Data Interchange (EDI).	• KCL's further activities will be based on the outcome of this re-test.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL is drafting a closure statement for Exception 61, regarding Metrics.	• KCL indicated that for certain Service Quality Measurements ("SQMs"), BLS does not report values at all levels of disaggregation specified in the Service Quality Measurements Georgia Performance Report 10/22/99 (SQM Reports).	• After internal review, KCL expects to submit this closure report to the GPSC.
		• KCL is performing replication of revised reports as part of re-testing activities for Exception 62, regarding Metrics.	• KCL indicated that it cannot replicate four of BLS's Service Quality Measurements (SQMs) in the February 2000 report.	• KCL's further activities will be based on the outcome of these replication activities.
		• KCL is reviewing a closure statement for Exception 63, regarding Ordering and Provisioning, internally.	• KCL indicated that it discovered numerous inconsistencies between BLS's *TAG API Guide, Version 2.2.0.5* and *Pre-Order Business Rules* documentation.	• KCL expects to submit this closure report to the GPSC for review upon completion of this internal review.
		• The GPSC is reviewing KCL's closure report for Exception 64, regarding Metrics.	• KCL indicated that it cannot replicate BLS's reported values for the *"Provisioning – Service Order Accuracy"* Service Quality Measurement.	• KCL expects to file this closure statement upon completion of the GPSC's review.
		• KCL expects to execute a re-test for Exception 65, regarding Ordering and Provisioning, in late September.	• KCL indicated that BLS's Calculate Due Date (CDD) pre-order query does not support all order requisition (REQ) and activity (ACT) types.	• KCL's further activities will be based on the outcome of this re-rest.
		• KCL is conducting a re-test for Exception 66, regarding Pre-Ordering.	• KCL indicated that BellSouth does not provide complete pre-order responses via the TAG interface.	• KCL's further activities will be based on the outcome of this re-rest.
		• KCL is reviewing a closure statement for Exception 67, regarding Ordering and Provisioning.	• KCL indicated that BLS does not deliver timely Missed Appointment (MA) notices via the EDI and TAG interfaces.	• KCL expects to submit this closure report to the GPSC for review upon completion of this internal review.
		• KCL is planning further re-testing activities for Exception 68, regarding Ordering and Provisioning.	• KCL indicated that BLS does not provide complete Firm Order Confirmation (FOC) and Completion Notice (CN) responses.	• KCL's further activities will be based on the outcome of this re-rest.
		• KCL continues to observe Metrics change management process related events as part of re-testing activities for Exception 70, regarding Metrics.	• KCL indicated that BLS does not have an adequate change management process for the generation of Service Quality Measurement (SQM) data from its legacy/source systems.	• KCL's further activities will be based on these observations.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL filed BLS's second amended response to Exception 71, regarding Ordering and Provisioning, with the GPSC.	• KCL indicated that the service establishment intervals returned on Calculate Due Date (CDD) pre-order responses are not consistent with intervals defined in the BLS *Product and Services Interval Guide.*	• KCL's further activities will be based on its review of BLS's second amended response.
		• KCL filed a closure report for Exception 72, regarding Ordering and Provisioning, with the GPSC on 9/05/00. As a result of the documentation review, KCL determined that BLS has developed and posted to its Web site adequately defined procedures for delivering Jeopardy and Missed Appointment notifications. Procedures for delivering Jeopardy and Missed Appointment notifications contain the following components: 1) Pending order status code definitions, including Jeopardy and Missed Appointment notifications; 2) Jeopardy and Missed Appointment notifications definitions; 3) Job Aid data field descriptions and usage; 4) Information on transaction codes and required CLEC action for Jeopardy and Missed Appointments notifications.	• KCL indicated that BLS does not have a clear process for delivering Jeopardy and Missed Appointment notifications.	• N/A.
		• KCL is drafting a closure report for Exception 73, regarding Billing.	• KCL indicated that BLS's CRIS/CABS billing documentation is deficient in the breadth and depth of topical coverage.	• After internal review, KCL expects to submit this closure report to the GPSC.
		• KCL is drafting a closure report for Exception 74, regarding Metrics.	• KCL indicated that BLS does not report certain Georgia Service Quality Measurements at the levels of dissaggregation specified in the Service Quality Measurements Georgia Performance Reports.	• After internal review, KCL expects to submit this closure report to the GPSC.
		• KCL is reviewing a closure report for Exception 75, regarding Ordering and Provisioning, internally.	• KCL indicated that BLS's Local Exchange Ordering Guide, Volume 1, Version 7N (LEO Guide) omits definitions for certain BLS ordering responses.	• KCL expects to submit this closure report to the GPSC for review upon completion of this internal review.

Ref[1]	Item	Status	Issues	Next Step Resolution
		• KCL is conducting a re-test for Exception 76, regarding Ordering and Provisioning.	• KCL indicated that it encountered numerous BLS provisioning errors for UNE orders.	• KCL's further activities will be based on the outcome of this re-test.
		• KCL is conducting a re-test for Exception 77, regarding Ordering and Provisioning.	• KCL indicated that BLS does not deliver timely fully mechanized Clarification (CLR) responses.	• KCL's further activities will be based on the outcome of this re-test.
		• KCL is conducting a re-test for Exception 78, regarding Ordering and Provisioning.	• KCL indicated that BLS does not deliver timely Firm Order Confirmation (FOC) responses to flow through local service requests (LSRs).	• KCL's further activities will be based on the outcome of this re-test.
		• KCL filed an amended version of Exception 79, regarding Metrics, with the GPSC during late August.	• KCL indicated that BLS does not adequately retain certain source data used in the calculation of several Service Quality Measurement (SQM) reports that are not generated wholly or primarily by the Performance Measurement and Analysis Platform (PMAP).	• KCL's further activities will be based on BLS's response to this amended exception.
		• The GPSC is reviewing KCL's closure report for Exception 80, regarding Ordering and Provisioning.	• KCL indicated that BLS guidelines for submitting an order Service Inquiry (SI) and Loop Service Requests (LSR) do not provide complete, consistent information.	• KCL expects to file this closure statement upon completion of the GPSC's review.
		• KCL filed a closure report for Exception 82, regarding Ordering and Provisioning. KCL observed 54 coordinated hot-cuts during the re-test period, which contained a total of 1157 tasks. KCL determined that BLS achieved a 97% rate of adherence to the methods and procedures for provisioning coordinated hot-cuts identified in the latest version of the *BellSouth Unbundled Network Element Methods and Procedures.*	• KCL indicated that BLS Central Office (CO) technicians and Unbundled Network Element Center (UNEC) coordinators do not adhere to BLS's methods and procedures for provisioning coordinated hot-cuts.	• N/A.
		• KCL is drafting a closure report for Exception 83, regarding Metrics.	• KCL indicated that exclusions listed in the "Exclusions" section of the SQM Georgia Performance Reports are not correctly applied when creating raw data or calculating SQMs.	• After internal review, KCL expects to submit this closure report to the GPSC.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL is drafting a closure report for Exception 84, regarding Metrics.	• KCL indicated that the information in the SQM Georgia Performance Reports is inconsistent with the computational instructions provided by BellSouth for five SQMs.	• After internal review, KCL expects to submit this closure report to the GPSC.
		• KCL filed a closure report for Exception 85, regarding Maintenance & Repair, with the GPSC on 9/05/00. During re-testing, the ECTA Gateway performed an MLT and returned negative results. Subsequently, in each case, the ECTA Gateway correctly changed the status of the trouble tickets to allow for a Front-End Closeout.	• KCL indicated the BellSouth ECTA Gateway did not automatically request a "Front-End Closeout" on a POTS line that produced negative MLT results.	• N/A.
		• KCL is performing replication of revised reports as part of re-testing activities for Exception 86, regarding Metrics.	• KCL indicated that it cannot replicate six of BLS's reported Service Quality Measurements (SQMs).	• KCL's further activities will be based on the outcome of these replication activities.
		• KCL is drafting a closure report for Exception 87, regarding Metrics.	• KCL indicated that BLS incorrectly billed KCL for usage charges for messages processed in the Augusta central office.	• After internal review, KCL expects to submit this closure report to the GPSC.
		• KCL forwarded an amended version of Exception 88, regarding Metrics, to BLS. KCL expects to file this amended exception with the GPSC shortly.	• KCL indicated that computational instructions provided by BLS for 13 PMAP SQMs are inconsistent with the information provided in the SQM Georgia Performance Reports.	• KCL's further activities will be based on BLS's response to this amended exception.
		• KCL is clarifying some discrepancies related to re-testing activities for Exception 89, regarding Metrics, with BLS.	• KCL indicated that BLS's raw data used in the calculation of the BLS SQM reports are not accurately derived from or supported by their early-stage data.	• Based on these clarifying conversations, KCL expects to complete re-testing activities in the near future.
		• As part of re-testing activities, KCL is replicating revised report related to Exception 90, regarding Metrics.	• KCL indicated that it cannot replicate three of BLS's reported SQMs in the March 2000 performance measurement reports.	• KCL's further activities will be based on the outcome of these replication activities.
		• KCL is reviewing a closure report for Exception 91, regarding Metrics, internally.	• KCL indicated that raw data used in the calculation of BLS SQM reports are not accurately derived from or supported by their early-stage data (Instance 2).	• KCL expects to submit this closure report to the GPSC for review upon completion of this internal review.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL is clarifying some discrepancies related to re-testing activities for Exception 82, regarding Metrics, with BLS.	• KCL indicated that BLS's raw data, used in the calculation of BLS SQM reports, are not accurately derived from or supported by their component early-stage data.	• Based on these clarifying conversations, KCL expects to complete re-testing activities in the near future.
		• KCL is drafting a closure report for Exception 93, regarding Metrics.	• KCL indicated that it encountered ten Service Quality Measurements ("SQMs") for which there are inconsistencies among the statements of the definition, calculation and business rules sections in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*.	• After internal review, KCL expects to submit this closure report to the GPSC.
		• The GPSC is reviewing KCL's closure report for Exception 94, regarding Billing.	• KCL indicated that BLS failed to deliver 20% of expected resale DUF records to KCL.	• KCL expects to file this closure statement upon completion of the GPSC's review.
		• KCL is conducting a re-test for Exception 95, regarding Ordering and Provisioning.	• KCL indicated that BLS has delivered Firm Order Confirmations (FOCs) in response to Local Service Requests (LSRs) that should have received error messages.	• KCL's further activities will be based on the outcome of this re-test.
		• KCL is drafting a closure report for Exception 96, regarding Maintenance and Repair.	• KCL indicated that the BLS ECTA Gateway does not allow CLECs to process trouble reports for PBX circuits in the state of Georgia.	• After internal review, KCL expects to submit this closure report to the GPSC.
		• KCL is conducting a re-test for Exception 97, regarding Ordering and Provisioning.	• KCL indicated that BLS does not deliver timely Firm Order Confirmation (FOC) responses to non-flow through local service requests.	• KCL's further activities will be based on the outcome of this re-test.
		• KCL is conducting a re-test for Exception 98, regarding Ordering and Provisioning.	• KCL indicated that BLS does not deliver timely partially mechanized Clarification (CLR) responses.	• KCL's further activities will be based on the outcome of this re-test.
		• The GPSC is reviewing KCL's closure report for Exception 99, regarding Metrics.	• KCL indicated that BLS issued multiple bills to the KCL Test CLEC incorrectly identifying recurring charges as non-recurring charges.	• KCL expects to file this closure statement upon completion of the GPSC's review.
		• KCL is performing replication on revised BLS reports as part of re-testing activities for Exception 100, regarding Metrics.	• KCL indicated that it was unable to replicate two of BLS's Service Quality Measurements (SQMs) in the May 2000 report.	• KCL's further activities will be based on the outcome of these replication activities.

Ref[1]	Item	Status	Issues	Next Step Resolution
		• KCL is drafting a closure report for Exception 101, regarding Metrics.	• KCL indicated that BLS-reported raw data values in usage data delivered to the KCL Test CLEC, used in the calculation of three SQMs, do not match the KCL-collected values for April 2000.	• After internal review, KCL expects to submit this closure report to the GPSC.
		• KCL is reviewing a closure report for Exception 102, regarding Ordering and Provisioning, internally.	• KCL indicated that BLS does not allow telephone number changes with measured classes of service.	• KCL expects to submit this closure report to the GPSC for review upon completion of this internal review.
		• KCL is drafting a closure report for Exception 103, regarding Billing.	• KCL indicated that it received invoices from BLS containing inaccurate information.	• After internal review, KCL expects to submit this closure report to the GPSC.
		• KCL is performing re-testing activities for Exception 104, regarding Metrics.	• KCL indicated that BLS-reported raw data values for the KCL Test CLEC do not match the KCL-collected values for certain billing accounts involved in the calculation of Mean Time to Deliver Invoices, for both CRIS and CABS.	• KCL's further activities will be based on the outcome of these re-testing activities.
		• KCL is drafting a closure report for Exception 105, regarding Metrics.	• KCL indicated that computation instructions provided by BLS for Provisioning – Mean Held Order Interval and Distribution Intervals are inconsistent with the information provided in the SQM Reports.	• After internal review, KCL expects to submit this closure report to the GPSC.
		• KCL filed an amended version of Exception 106, regarding Ordering and Provisioning, with the GPSC.	• KCL indicated that BLS failed to meet the agreed upon Frame Due Time (FDT) for six loop migrations.	• KCL is awaiting BLS's response to this exception.
		• KCL filed Exception 107, regarding xDSL, along with BellSouth's response and amended response with the GPSC on 8/25/00.	• KCL indicated that parity does not exist between BLS's CLEC xDSL pre-ordering loop qualification process and its retail xDSL ordering process.	• KCL is awaiting a second amended response from BLS.
		• KCL filed Exception 108, regarding xDSL, along with BellSouth's response with the GPSC on 8/25/00.	• KCL indicated that parity does not exist between BLS's CLEC xDSL ordering process and its retail xDSL ordering process.	• KCL is awaiting an amended response from BLS.
		• KCL is drafting a closure report for Exception 109, regarding xDSL.	• KCL indicated that formal procedures for managing the capacity of the BLS work centers, which perform wholesale cDSL pre-order and ordering activities, are not defined and documented.	• After internal review, KCL expects to submit this closure report to the GPSC.

Ref[1]	Item	Status	Issues	Next Step Resolution
		• KCL is performing replication on revised BLS reports as part of re-testing activities for Exception 110, regarding Metrics.	• KCL indicated that it cannot replicate four of BLS's reported SQMs.	• KCL's further activities will be based on the outcome of these replication activities.
		• KCL forwarded a Draft Exception, regarding Metrics, to BLS.	• KCL indicated that BLS- reported raw data values for Completion Date and Commitment Date for the KCL Test CLEC do not match the KCL-collected values for certain Service Order numbers for six provisioning metrics.	• KCL is clarifying the issues involved in this draft exception internally. Based on this internal clarification and BLS's response, KCL will file or withdraw this draft exception.
		• KCL forwarded a Draft Exception, regarding Ordering and Provisioning, to BLS for its response.	• KCL indicated that it encountered BLS provisioning errors for Resale orders.	• BLS submitted a response to this draft exception to KCL. KCL is evaluating this response, and will file or withdraw this exception shortly.
		• KCL forwarded a Draft Exception, regarding xDSL, to BLS for its response.	• KCL indicated that BLS does not have a process for returning acknowledgements or tracking manually-submitted Loop Make-up Service Inquiry pre-order queries or Local Service Request Service Inquiries.	• KCL is awaiting BLS's response. Based on this response, KCL will file or withdraw this draft exception.
		• KCL forwarded a Draft Exception, regarding xDSL, to BLS for its response.	• KCL indicated that BLS does not respond to Loop Make-Up Service Inquiries within the specified seven-day interval.	• KCL is awaiting BLS's response. Based on this response, KCL will file or withdraw this draft exception.
		• KCL forwarded a Draft Exception, regarding Metrics, to BLS for its response.	• KCL indicated that it cannot replicate one of BLS's reported SQMs for the month of July 2000.	• KCL is awaiting BLS's response. Based on this response, KCL will file or withdraw this draft exception.

[1] Referencing Methodology: An item referenced as I-n indicates that the item was first discussed in the July 22, 1999 status report. An item referenced as II-n indicates that the item was first referenced in the September 10, 1999 status report. An item referenced as III-n indicates that the item was first referenced in the October 21, 1999 report. An item referenced as IV-n indicates that the item was first referenced in the November 19, 1999 report. An item referenced as V-n indicates that the item was first referenced in the December 17, 1999 report. An item referenced as VI-n indicates that this item was first referenced in the January 28, 2000 report. An item referenced as VII-n indicates that this item was first referenced in the March 3, 2000 report. An item referenced as VIII-n indicates that this item was first referenced in the April 6, 2000 report. An item referenced as IX-n indicates that this item was first referenced in the May 12, 2000 report. An item referenced as X-n indicates that this item was first referenced in the June 9, 2000 report. An item referenced as XI-n indicates that this item was first referenced in the July 21, 2000 report. There were no new items for this report.

[2] According to the exception process agreed to by KCL, BellSouth and the Georgia Public Service Commission, when KCL discovers a potential component defect (e.g., a deficiency in a procedure, system or document) written substantiation is submitted to BellSouth detailing KCL's findings. BellSouth provides a written response to this finding. KCL's written substantiation is considered a "Draft Exception" until the potential defect has been confirmed. If KCL's assessment of the potential error is determined to be inaccurate, KCL will withdraw the Draft Exception. If the issue is substantiated, the Draft Exception and BellSouth response will be submitted to and published by the Commission, and the parties will agree on resolution steps. A complete exception listing, including all exceptions, responses, amended responses and closure reports, may be found on the Georgia Public Service Commission's Web site at www.psc.state.ga.us.

CERTIFICATE OF SERVICE
Docket No. 8354-U

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

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This 15th day of September, 2000.

David Frey

David Frey

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September 22nd, 2000

RECEIVED
SEP 22 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 (20) copies, as well as an electronic copy, of KPMG Consulting LLC's closure reports for Exceptions 12, 27, 47, 53, 59, 64, 67, 75, 80, 91 and 99 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

David Frey
Manager

Enclosures

cc: Parties of Record

KPMG Consulting, LLC. KPMG Consulting, LLC is a subsidiary of KPMG LLP, the U.S. member firm of KPMG International, a Swiss association.

Date: September 22, 2000

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

1. **The ECTA Gateway did not inform KPMG Consulting (KCL) of an improper value transmitted for the troubleType object.**

   Within the ECTA Gateway, the troubleType object of a trouble report allows a CLEC to describe the trouble condition. The troubleType object is used by the ECTA Gateway to specify the type of automatic testing that a circuit will undergo, as well as to guide the BellSouth Maintenance Administrator in performing repairs. During the course of functional testing, KCL intentionally submitted an incorrect non-numeric value for the troubleType object[1]. The ECTA Gateway created a trouble ticket and sent back the normal successful trouble ticket response. The ECTA Gateway did not indicate that any erroneous information had been included in this instance. KCL examined the trouble ticket created, and discovered that the ECTA Gateway had assigned a value of NDT (No Dial Tone) to the troubleType object.

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

   The ECTA Gateway generates a request for a CLEC to verify that a reported trouble has been corrected when either repairs to a WFA ticket have been completed, or when automated testing on an LMOS ticket indicates that no trouble is present. The closeOutVerification object allows a CLEC to respond to this request. Through this response, the CLEC indicates either that they concur that the trouble has been corrected and the report may be closed, or that the trouble has not been corrected and the report should remain open. During the course of functional testing, KCL intentionally submitted an incorrect value for the closeOutVerification object[2]. The response for this transaction did not indicate that testers had submitted an invalid

[1] Valid troubleType entries are numeric as defined in ANSI T1.227.
[2] The allowable values for this attribute are: 0 (NoAction), 1 (Verified), 2 (Denied), 3 (DeniedActivityDurationDisputed) or 4 (DeniedCloseOutNarrDisputed). KCL submitted a value of 9.

entry. KCL examined the trouble ticket and found that the ECTA Gateway had assigned a value of "2" (Denied) to the closeOutVerification object.

Summary of BellSouth Response[3]:

"The ECTA gateway assumes that the Manager gateway submits valid attribute values and it does not perform attribute validation edits with corresponding error messages. In a traditional Manager/Agent gateway relationship, both parties adhere to the ANSI T1.227, T1.228 and T1.262 standards and, therefore, value validation is not required.

The CLEC's user accesses some front-end presentation layer to interact with their customers. When their system indicates that a trouble report should be generated in BellSouth, their system initiates a transaction between their Manager gateway and BellSouth's Agent gateway. Error checking for user mistakes takes place at the CLEC's front-end and/or Manager gateway – before the data is sent to BellSouth.

During testing, the BellSouth gateway was accessed from a "non-Manager" interface (i.e., the BST Test Tool) that did not have the same error checking safeguards in place. When the tester entered some non-numeric string for troubleType object, the Test Tool translated the non-numeric value to a numeric value and sent it to the gateway. By coincidence, the value sent was a valid code to generate a No Dial Tone (NDT) report.

The original BellSouth gateway was designed such that if an invalid troubleType object was received, the gateway will submit a default report listing Can't Call Others (CCO) as the trouble description code. This value was negotiated with the initial IXC clients since this was the most likely report they would be submitting as an agent for the end user. This default management was carried forward to the CLEC version of ECTA. The ...updated JIA now informs clients of this default processing.

If the BellSouth gateway receives an inappropriate value for the closeOutVerification object it defaults to 'denied' (#2) thereby forcing additional action by BellSouth. Since the rational for this default was not documented, this action is being considered a defect in the code and will be corrected. If anything other than the anticipated values of 0, 1, 2, 3 or 4 are received for the closeOutVerification object, the gateway will return an appropriate error message forcing the Manager to resubmit his response. This patch will be implemented by, May 15, 2000."

Summary of KCL Re-Test Activities:

KCL re-test activities consisted of: 1) a review of the BellSouth's second amended

[3] The response cited in KCL's closure statement is BellSouth's Second Amended Response to Exception 12.

response; 2) submission of valid and erroneous transactions against the closeOutVerification object in ECTA; 3) a review of the standard *Joint Implementation Agreement* (JIA) to ensure the inclusion of default processing information regarding the troubleType object in ECTA (as specified in the BellSouth response).

KCL Re-Test Results

During re-testing activities, KCL submitted three transactions with valid data and two transactions with erroneous data against ECTA's closeOutVerification. All three valid transactions were accepted by the ECTA gateway, while both transactions with erroneous closeOutVerification object values resulted in an appropriate error message from the ECTA Gateway.

Additionally, KCL verified that an updated version of the standard JIA includes the default processing information for the troubleType object in ECTA.

Based on BellSouth's response, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 12.

Attachments: None.

Date: September 22, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth provided incorrect DUF records to KPMG Consulting.

Summary of Exception:

During the usage test call period, November 18-20, 1999, KPMG Consulting LLC (KCL) placed 846 test calls that were expected to generate Daily Usage File (DUF) records. Through evaluation of these DUF records, KCL determined that BellSouth provided incorrect DUF records for certain test calls. The incorrect DUF records were categorized as misidentified DUF records and improper DUF records.

Misidentified DUF Records

KCL received numerous ODUF records inappropriately identifying toll calls as local calls. EMI standards dictate that EMI record type 100101 is to be used to identify toll call detail. BellSouth failed to adhere to the EMI standard by sending EMI record type 100131 (signifying local call detail) for these calls.

Improper DUF Records

BellSouth submitted DUF records for zero-minus calls[1] placed by testers requesting operator assistance in placing inter-LATA calls. DUF records indicate that local BellSouth operators attempted to place these inter-LATA calls. Inter-LATA calls cannot be completed by local operators, therefore no attempt should have been made to place the calls and no DUF record should have been created.

Summary of BellSouth's Response:

Misidentified Toll Calls

"BellSouth has issued a policy for UNE Local / Toll determination. A work request has been issued to make changes to our systems to match this policy. This policy will be updated in the ODUF documentation provided to CLECs." BellSouth then quoted the updated official ODUF policy which is to be posted to the web by the 4th quarter 2000. The issue of local versus toll was specifically addressed by BellSouth in the following policy statement:

[1] Calls placed by dialing zero and waiting for the operator to come on line for assistance.

"Records sent to UNE CLECs that subscribe to ODUF will reflect call types as recorded by the originating switch. Calls that are recorded by the switch as Local, that remain within the originating LATA, and are carried over the BellSouth network will be sent on ODUF as local records. Calls that are recorded by the originating switch as toll, that remain within the LATA, and are carried on the BellSouth network will be sent on ODUF as toll records. Operator handled records record as toll, and will be sent on ODUF as toll records".

Improper DUF Records

"The call detail records for the above two calls reflect that the calls originated from a UNE Switch Port, and terminated to a BellSouth Operator because both calls were Zero-Minus (0-) dialed. Both of the calls were not completed to the called party and as such the EMI records were marked as an Attempt Message with Indicator 18 to 2 in the 10-01-01 records. The DUF Records include all Attempt/Incomplete calls that are handled by an operator using a Category 10 EMI record, and not the 11-01-01 EMI record. The purpose of these records is to notify the CLEC that their customer of record used BellSouth Operator Services, and the CLEC will be billed an Operator surcharge on their UNE bill. The use of a Category 10 EMI record is consistent with the EMI guidelines with respect to operator calls. The practice is covered in the training provided to CLECs on the ODUF feed.

In an attempt to clarify this treatment further, a notation was added to the BellSouth Optional Daily Usage File document, Attachment B ODUF EMI Call Detail Records.

In addition, the Interconnection Contracts signed by CLECs describe the charges that will be billed for Operator Handled calls. It is BellSouth's position that the contract language along with the rate sheets for these services provide the authorization for BellSouth to bill operator surcharges for incomplete calls, regardless of the reason the call did not complete."

Summary of KCL Re-test Activities:

KCL retest activities consisted of reviewing the updated ODUF documentation referenced in BellSouth's responses to both issues raised in this exception.

KCL Re-test Results:

KCL believes that the updated ODUF documentation clarifies the BellSouth policy regarding the generation and receipt of local and toll records.

KCL also believes that the updated ODUF documentation clarifies the BellSouth position that all operator handling originating from a UNE switch port is subject to billing whether or not the action being attempted by the operator was successful.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 27.

Attachments: None.

Date: September 22, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth delivered inaccurate partially-mechanized CLRs.

Summary of Initial Exception:

An electronically submitted LSR may proceed through the BellSouth order validation process in one of the following ways:

- A "flow through" service request proceeds through the ordering systems to generate a Firm Order Confirmation (FOC) with no manual intervention required along the way.
- A "non-flow through" service request drops out of the ordering systems and requires manual handling by a BellSouth ordering representative prior to the generation of an FOC.
- A "Fully-mechanized" service request proceeds through the ordering systems to generate a Clarification (CLR) with no manual intervention required along the way.
- A "partially-mechanized" service requests drops out of the ordering systems and requires manual handling by a BellSouth ordering representative prior to the generation of a CLR.

In response to LSRs submitted via TAG and EDI, BellSouth delivered inconsistent and inaccurate responses. KPMG Consulting, LLC (KCL) divided these deficiencies into two groups.

Category 1 – BellSouth returned inconsistent responses to orders. In these cases, BellSouth delivered different responses to identically-populated LSRs.

Category 2 – BellSouth returned inaccurate responses to orders. In these cases, BellSouth delivered incorrect responses on the orders submitted.

Summary of BellSouth's Initial Response:

"BellSouth provided supplemental work group training to its Service Representatives on 3/20/00 and individual SR training on 4/5/00 to enhance the ability to deliver consistent and accurate responses to LSRs.

BellSouth's long term plans are to continue to enhance the functionality of its systems to support electronic ordering of services and to minimize manual intervention. BellSouth has opened the following enhancements to further address the inaccuracy issues raised in this exception:

Feature 9252
Feature 9484
Feature 6176

These features are currently going through the change control process to be prioritized and scheduled in a future release."

Summary of Amended Exception:
Exception 47 was amended to exclusively address inaccurate Clarifications. References to inaccurate Firm Order Confirmations (FOCs) have been removed from this exception and inserted into Exception 95.

Based on representative training conducted by BellSouth, KCL reviewed a sample of representative-generated[1] CLRs received after April 5, 2000 for accuracy. During the re-test period, KCL reviewed 61 partially-mechanized CLRs. Of those, 13% (8 out of 61) were determined to be inaccurate.

Summary of BellSouth's Amended Response:
BellSouth reviewed the eight service requests that KCL identified as receiving inaccurate CLRs. BellSouth disagreed with KCL's determination on 5 of the eight CLRs identified.

"The order types above are non-flow through requests and required manual handling. BellSouth agrees that there were 3 errors in the sample base of 60 PONs (one PON/VER could not be found) which results in a 95% accuracy rate."

Summary of KCL Re-test Activities:

KCL's re-test activities for this exception consisted of conducting a review of partially-mechanized CLRs received after completion of BellSouth representative training. KCL also reviewed BellSouth's internal change control process document dated July 19th, 2000. KCL examined the Targeted Release Dates and analyzed specific features that BellSouth indicated they will implement to address this exception.

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

Summary of KCL Re-test Results:

Following BellSouth's training of its ordering service representatives, KCL experienced 3 additional occurrences of inaccurate CLRs, representing less than 5% of partially-mechanized CLRs reviewed[2]. BellSouth subsequently generated confirmations for these transactions following a review requested by KCL. This percentage of inaccurate CLRs did not significantly affect KCL's ability to proceed with its ordering processes.

In addition, BellSouth has proposed system modifications to enhance its ability to electronically process service requests, reducing the need to rely on manual intervention in certain instances. KCL's experience indicates that, if properly implemented, Feature 6176 (LESOG to support Deny/Restore on REQTYPES "M" (Port Loop Combo) and "F" (Port) and Feature 9484 (LESOG to clarify when touchtone is added on REQTYPES M and F) will assist in addressing the issues identified in Exception 47.

Since BellSouth's Targeted Release Dates for these features are outside the expected timeframe of the BellSouth-Georgia OSS Evaluation, KCL does not expect to issue orders to re-test system functionality following feature implementation.

In the absence of any other planned test activity related to this exception, KCL closes this exception. The Georgia Public Service Commission may elect to monitor this issue in the future.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 47.

Attachments: None.

[2] Upon further investigation, KCL agreed with BellSouth's assessment of 'disputed' data points and determined that 5 of 8 transactions initially categorized as "inaccurate" were due to KCL error.

Date: September 22, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth's *Local Exchange Ordering Guide, Volume 1, Versions J - N (LEO Guide)* contains numerous revision-related errors.

Summary of Exception:

During testing activities, KPMG Consulting (KCL) discovered multiple instances of errors, relating to revisions between document versions, in BellSouth's *LEO Guide, Versions J – N*. These errors fall into two categories:

1. A change has been identified in the *LEO Guide's* "Revisions Table," but is not included in the document content.

2. A change has been made to the *LEO Guide*, but is not noted in the "Revisions Table."

Summary of BellSouth Response:

"BellSouth has reviewed the data supplied by KPMG the this exception and has the following findings:

In LEO-IG, Volume 1, issue 7J, BellSouth agrees there were 20 updates made in this issue. BellSouth agrees there was one typographical error in the Summary of Change section.

In LEO-IG, Volume 1, issue 7K, BellSouth concurs with KPMG's findings on all omissions except one. BellSouth disagrees with the issue "ORD was not required for REQTYPs F and M in 7J, but is now required in 7K. 7M changed the chart back to what appeared in 7J and stated the change in the Revisions section." BellSouth found that the Summary of Changes for issue 7M captured this item correctly and the information in the body reflected the change as prescribed (Summary of Changes – Issue 7M, section 11.3.1).

In LEO-IG, Volume 1, issue 7L, BellSouth concurs with KPMG's findings on all omissions except one. BellSouth disagrees with the finding that, "Revisions to SECNCI is stated as note 8 (Version 7J), in text it is note 2 –Note 2 was removed in version 7L but not stated in Revision (7L) as being removed." BellSouth reviewed 7L and found that this information was not corrected in 7L but rather in 7M's Summary of Changes

(both the 12/30/99 Summary of Changes and the 11/01/99 Summary of Changes) and it shows the correction had been made accordingly.

In LEO-IG, Volume 1, issue 7M, BellSouth concurs with all of KPMG's findings except for three. KPMG stated that the TOS field was not updated. BellSouth did not report any change to this field in the Summary of Changes nor made any changes in the body. Second, KPMG Consulting stated, BellSouth did not update in their Summary of Changes to reflect REQTYP E/ ACT R as "Required". BellSouth found this to be documented in the Summary of Changes Section 6.3.1.1. Third, KPMG stated that BellSouth did not update the Summary of Change table to report TC PER DATE field as optional. Research found that this field does show "Optional" for REQTYP C/ACT D in Section 8.3.14.

In conclusion, BellSouth acknowledges that some errors were made, primarily in the area of section numbers being one digit off and listing fields in the field arrangement section.

On 12/6/99, BellSouth implemented additional quality checks to the documentation update process. Changes to the LEO IG are checked for accuracy prior to posting to the Customer Guides Pages of the BellSouth web site for CLECs. The effectiveness of this process improvement is demonstrated by the significant reduction in revision-related errors after 12/6/99."

Summary of KCL Re-test Activities:

KCL's re-test activities for this exception consisted of: 1) a review of BellSouth's *Local Exchange Ordering Guide, Volume 1, Versions J - Q (LEO Guide)*; 2) a review of BellSouth's internal documentation quality review process to ensure that adequate measures have been taken to reduce the re-occurrence of revision-related errors; 3) a review of BellSouth's quality control checklists (implemented on May 31, 2000).

KCL Re-test Results:

As a result of the documentation review, KCL found that BellSouth developed and posted revisions of the *LEO Guide, Versions J* – Q to its Web site.

The versions contain the following components:

1. Missing changes have now been identified in the *LEO Guide's* "Revisions Table," and are included in the document content;

2. Changes have now been made to the *LEO Guide*, and have been noted in the "Revisions Table."

Additionally, KCL reviewed the quality review process and the associated quality control checklists implemented on May 31, 2000. With proper maintenance and compliance, this process should adequately mitigate revision-related errors in versions of the *LEO Guide*.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 53.

Attachments: None.

Date: September 22, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth's ordering documentation does not define rules for submission of batched orders.

Summary of Exception:

BellSouth's ordering documentation does not define rules for batch submission of orders through the EDI interface.

Specific issues include the following:

1. The documentation does not state any restrictions on the length of a batch file.
2. The documentation does not state the number of batch files that can be submitted within a given time frame.
3. The documentation does not state a specific time interval between batch order submissions.[1]
4. The documentation does not state when batch orders may be submitted.

Summary of BellSouth's Response:

"The documentation does not state any restrictions on the length of a batch file.

The only restrictions on the length on a batch file are those identified in the ASC X12 Guidelines. These are national standards and are contained in documentation that all EDI shops would have in-house in order to perform EDI transactions. The documents may be obtained from independent national standards organization. All parties using EDI for telecommunications related business exchanges have agreed to comply with the standards defined in the X12 manual. These guidelines are referred to in Section 1 of the BellSouth EDI Specifications on the Interconnection website.

The documentation does not state the number of batch files that can be submitted within a given time frame.

[1] KCL was advised verbally by BellSouth that batch orders must have a ten minute interval between submissions.

There are no current restrictions on the number of batch files that can be submitted within a given time frame. There is no required time interval between batch order submissions. Limitations in this area are produced as a result of the business decisions made by the CLEC during the installation and testing of their EDI system. BellSouth works with the CLEC during system installation and testing to provide support and fine tune the communications process. This allows the CLEC to determine the optimum use of their system and communications interface.

The time limits imposed by KPMG for the test setup did not allow for this fine tuning process. Input was provided by BellSouth that other CLECs using the delivery method chosen by KPMG had experienced problems when submission frequency exceeded once every ten minutes. To insure a successful setup BellSouth recommended limiting delivery to once every ten minutes unless a tuning process could be completed.

The documentation does not state a specific time interval between batch order submissions.[2]

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The time limits imposed by KPMG for the test setup did not allow for this fine tuning process. Input was provided by BellSouth that other CLECs using the delivery method chosen by KPMG had experienced problems when submission frequency exceeded once every ten minutes. To insure a successful setup BellSouth recommended limiting delivery to once every ten minutes unless a tuning process could be completed.

The documentation does not state when batch orders may be submitted.

EDI operates on a 24x7 basis and batch orders may be submitted at any time. Any order processing time limits present are the due to requirements of business applications and customer support functions downstream from EDI functions.

There is an edit in Issue 7 that required the Date Sent field to be today's date or a future date. Due to the batch nature of EDI, it was determined that 25 minutes of lead time was required to ensure the LSR was processed through EDI, picked up and processed by internal BellSouth systems before midnight. This edit was changed for Issue 9 to allow the Date Sent to be up to 2 days prior to today's date.

[2] KPMG was advised verbally by BellSouth that batch orders must have a ten minute interval between submissions.

LEO-IG Volume 1, Issue 7P, Note 2 states 'If LSR is received after 11:35 PM CST, it will reflect the next day's date as the date received.'"

Summary of KCL Re-test Activities:

KPMG Consulting LLC's (KCL) re-test activities for this exception consisted of: 1) a review of guidelines in Section 1 of the *BellSouth EDI Specifications, Version 9D*, dated August 30, 2000 on the Interconnection Web site; and 2) a review of BellSouth's *Local Exchange Ordering (LEO) Implementation Guide (IG), Volume 1, Version 7R, dated August 28, 2000.*

KCL Re-test Results:

As a result of the documentation review and BellSouth's response, KCL has concluded that BellSouth's request to KCL for ten-minute intervals between batched orders for volume testing was intended as a guideline only.

As BellSouth's response indicates, CLECs should experience no restrictions regarding: 1) the length of a batch file; 2) the number of batch files that can be submitted within a given time frame; 3) the specific timeframes for time intervals between batch order submissions[3]; and 4) when batch orders may be submitted.

Based on its professional experience, KCL believes that BellSouth's response adequately addresses the issues raised by this exception.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 59.

Attachments: None.

[3] KCL was advised verbally by BellSouth that batch orders must have a ten minute interval between submissions.

Date: September 22, 2000

EXCEPTION CLOSURE REPORT

Exception:

KPMG Consulting LLC cannot replicate BellSouth's reported values for the "Provisioning – Service Order Accuracy" Service Quality Measurement (SQM).

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 reports[1].

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

KCL has been unable to replicate the SQM values for *Service Order Accuracy* in the Provisioning category for the CLEC Aggregate (October 1999).[3] The table below shows the discrepancies.

	Service Order Accuracy	
Level of Disaggregation	**KPMG-Calculated SQM Value**	**BellSouth-Reported SQM Value**
Non-Mech <10 Circuits UNE Loop w/INP Orders Reviewed	81	79

[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.

	Service Order Accuracy	
Level of Disaggregation	**KPMG-Calculated SQM Value**	**BellSouth-Reported SQM Value**
Mech <10 Circuits Resale Residence Orders Reviewed	58	60
Non-Mech >10 Circuits UNE Loop w/INP Orders Reviewed	4	3
Non-Mech >10 Circuits UNE Loop w/INP % Order Accuracy	93.83%	93.67%

Summary of BellSouth Response:

"Three sources were used during the validation of this calculation: the SOA report, Excel spreadsheets and the paper copies. It should be noted that the SOA report is based upon the paper copies and not the Excel spreadsheets. Two reasons for this is when the report is prepared the Excel spreadsheets have not been updated for the final errors and the spreadsheets have not been reconciled to the paper copies. For example, KPMG has 4 sampled items listed for non-mech UNE loop > 10 circuits while the report has 3 sampled items. There were four items listed in the spreadsheet, but the paper copies indicate insufficient information on one LSR prohibited the comparison to the service order. As a result, 3 LSRs/service orders were reviewed and one was not reviewed. This is one reason why the paper copies were made available to KPMG and more reliance should have been put on the paper copies versus the spreadsheets.
BellSouth also supplied additional paperwork to support the inclusion of the missing two orders for the Non-Mech <10 Circuits UNE Loop w/INP Orders.

BellSouth reported that two of these orders were duplicates and that the correct number is 58 and that KPMG's number is correct. The report will be corrected on the Web site, with the corrected values even though the error rate will not change. The report will be filed with the GA PSC."

Summary of KCL Re-Test Activities:

KCL received additional Service Orders and Local Service Requests to address the discrepancies listed above. KCL also reviewed BellSouth's revised SQM report for October 1999, and compared it to KCL's revised calculations.

Additionally, KCL re-tested on the month of May 2000, by calculating SQM values based on the May 2000 data, and comparing these calculations to the corresponding BellSouth-reported values.

KCL Re-Test Results:

Based upon KCL's review of additional supporting material (Service Orders and Local Service Requests) supplied by BellSouth, KCL confirmed that BellSouth's original reported SQM values were accurate for the following levels of disaggregation:

- Non-Mechanized, less than 10 Circuits, UNE Loop w/INP – Orders Reviewed;
- Non-Mechanized, greater than 10 Circuits, UNE Loop w/INP – Orders Reviewed; and
- Non-Mechanized, greater than 10 Circuits, UNE Loop w/INP – Percent Order Accuracy.

As BellSouth mentioned in its response above, the discrepancies initially identified for these levels of disaggregation were the result of the fact that the Microsoft Excel sheets supplied to KCL were not the final source of information used to calculate the SQM values. Rather, the actual Service Orders and Local Service Requests were used to calculate the SQM reports directly. Therefore, when supplied with the additional source documents, KCL was able to agree with the BellSouth values for the three levels above.

However, KCL and BellSouth did agree that the KCL-calculated value of 58 for "Mechanized, less than 10 Circuits, Resale Residence – Orders Reviewed" was correct. BellSouth prepared a revised SQM report for October 1999 to reflect this revised value. All values in the revised October 1999 BellSouth SQM report matched the revised KCL calculations, exactly.

Additionally, KCL reviewed the May 2000 data, and calculated SQM values for the various levels of disaggregation. KCL then compared its calculations to the BellSouth-reported values, and confirmed that all of KCL's calculations matched BellSouth's values, exactly.

As a result, KCL believes that BellSouth has adequately addressed the issues identified in Exception 64.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 64.

Attachments: None.

Date: September 22, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth does not deliver timely Missed Appointment (MA) notices via the EDI and TAG interfaces

Summary of Exception:

In response to a CLEC's valid Local Service Request (LSR), BellSouth delivers a Firm Order Confirmation (FOC). The FOC provides: 1) confirmation that the service request has been validated; 2) notification of BellSouth's internal service order(s) generated to work the request; and 3) verification of the order's confirmed due date (DD).

In the event an order is unable to be provisioned on its DD as a result of either BellSouth or CLEC action, BellSouth sends an MA notice to the CLEC. According to BellSouth documentation, this file should include an MA code (e.g., 'SR') and description (e.g., 'Subscriber/End User Not Ready'). BellSouth documentation also indicates the CLEC activity required in response to each MA status (e.g., ''Supplemental service request required for new Due Date).[1]

For purposes of this evaluation, KPMG Consulting LLC (KCL) has proposed a benchmark for MA response timeliness of one business day after the FOC DD[2]. Of the 31 total MAs received:

- 77% (24 of 31) were received within one business day after the DD.
- 13% (4 of 31) were received later than one business day after the DD.
- 10% (3 of 31) were received earlier than the FOC DD.

Summary of BellSouth's Responses:

Initial Response: "BellSouth's Service Quality Measurements (SQM) Georgia Performance Report provides "Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices" when BellSouth can determine in advance that a committed due date is in jeopardy for facility delay. This jeopardy report is based on a Pending Facility

[1] *BellSouth Pending Order Status Job Aid, June 30, 2000.*
[2] A Georgia Public Service Commission-approved standard for MA timeliness does not currently exist, nor does BellSouth provide a guideline in its documentation for receipt of MAs. In the absence of a published standard, KCL has identified a benchmark based on its professional judgement to be used for purposes of this evaluation.

(PF) status of the pending service order in SOCS. The SQM report document has been enhanced to clarify 'jeopardy for facility delay.' Other delays such as subscriber/end user or company (BellSouth) reasons are not included in this report.

BellSouth's Pending Order Status transactions delivered via the EDI and TAG interfaces contain a TRANSETPURPOSECD field entry of '21' in EDI and 'JEOPARDY' in TAG for order delays due to subscriber/end user reasons. This transaction is delivered when the due date is missed and a subsequent due date is not simultaneously requested. If the customer negotiates a new due date prior to the service order being placed in a missed appointment status in SOCS this transaction is not sent. BellSouth delivers Pending Order Status for due date delays due to subscriber/end user reasons within 24 hours of the status condition.

The Pending Order Status job aid will be enhanced by 6/30/00 to provide additional clarification."

Amended Response: "In accordance with BellSouth's processes, the missed appointment notice is delivered to the CLEC when the service order is placed in a missed appointment status and a subsequent due date is not simultaneously established. If the customer negotiates a new due date prior to or without the service order being placed in a missed appointment status in SOCS, the missed appoint notice transaction is not sent.

Further, BellSouth delivers Pending Order Status for due date delays due to subscriber/end user reasons within 24 hours of the missed appointment status condition if a subsequent due date is not simultaneously established.

The Pending Order Status Job Aid on the BellSouth web site was enhanced on 6/13/00 to provide additional clarification.

The PONs provided in this draft exception were several months old. The service order history has purged and some PONs were canceled by KPMG making investigation difficult.

BellSouth investigated details of the 9 PONs in question with the follow results.

6 no problem found, notification appropriately sent
2 unable to determine if a problem exists due to the length of elapsed time
1 possible KPMG problem, failed to activate TAG Listener

The KPMG proposed benchmark of one business day after the FOC DD, in the opinion of BellSouth, does not take into account missed appointment conditions that may occur prior to or after the FOC DD based on the needs of the CLEC (e.g., end user or CLEC will not be ready on scheduled due date). BellSouth notifies CLECs of a missed appointment status condition whenever it occurs, including prior to the FOC DD.

BellSouth recommends closing this exception based on KPMG's misunderstanding of missed appointment notices via the EDI and TAG interfaces. In addition, findings of PONs provided do not indicate a BellSouth problem exists."

BellSouth's amended response also contained individual responses to each specific PON cited in this exception.

Summary of KCL Re-test Activities:

KCL's re-test activities consisted of: 1) a review of BellSouth's response to Exception 67; and 2) a review of updated BellSouth documentation describing the process for returning MA notifications. In response to Exception 72 (*BellSouth does not have a clear process for delivering Jeopardy and Missed Appointment notifications*), BellSouth amended its *Pending Service Order Job Aid* on June 30th, 2000 to more clearly define the process for returning MA notices. KCL utilized the updated definition of MA deliveries provided in this document to refine its methodology for classifying late MA notices.

KCL Re-test Results:

Based on BellSouth's responses, KCL conducted a further investigation of the MA notifications cited in Exception 67.

For the PONs associated with this exception, due date modifications were initiated by KCL testers following conversations with BellSouth Unbundled Network Element (UNE) Center personnel. New FOCs (containing modified Due Dates) are not transmitted in these cases.

As a result, KCL initially compared the original FOC Due Dates with the MA receipt time/date, resulting in the generation of this exception. Subsequently, KCL compared the MA receipt times/dates to the modified Due Dates. In all cases, the MAs were delivered in a timely manner relative to the modified Due Dates.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 67.

Attachments: None.

Date: September 22, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth's *Local Exchange Ordering Guide, Volume 1, Version 7N (LEO Guide)* omits definitions for certain BellSouth ordering responses.

Summary of Exception:

BellSouth's *LEO Guide* omits definitions (including field names, usage [optional, required, prohibited], data characteristics, valid entries and notes) for Clarifications (CLRs), Electronic Errors (ERRs), Missed Appointments (MAs) and Jeopardy order responses. Definitions similar to those provided for Firm Order Completions (FOCs) and Completion Notices (CNs) are not included in the body of the document or the glossary of terms.

Summary of BellSouth's Response:

"The BellSouth Local Exchange Ordering Guide, Volume 1, Version 7N is intended to provide a common point of reference to simplify the electronic ordering process. Detailed field information for ordering responses are published in the BellSouth Local Exchange Ordering Guide, Volume 4, the BellSouth EDI Specifications Guide, the BellSouth Pending Order Status Job Aid, and the Local Service Request Error Messages documents.

BellSouth will enhance the BellSouth Local Exchange Ordering Guide, Volume 1 to include definitions for Clarification, Pending Order Status and Jeopardy similar to those provided for Firm Order Confirmation (FOC) and Completion Notification (CN). An update of the BellSouth Local Exchange Ordering Guide, Volume 1 to include this information will be available by 06/30/00."

Summary of KPMG Consulting LLC (KCL) Re-test Activities:

KCL's re-test activities for this exception consisted of: 1) a review of BellSouth's response; and 2) a review of BellSouth's *Local Exchange Ordering Implementation Guide, Volume 1, Issue 7R.*

KCL Re-test Results:

As a result of the documentation review, KCL observed that BellSouth has revised its *Local Exchange Ordering Implementation Guide, Volume 1, Issue 7R, Section 12*, to include adequate data definitions for its responses (Clarifications, Reject, Status[1], and Jeopardy) and the data elements for each response type.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 75.

Attachments: None.

[1] Missed Appointment notifications (MAs) are included in the Status Returned Response Type.

Date: September 22, 2000

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

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

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

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

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

Summary of BellSouth's Response:

"The revised LMU and ADSL/HDSL Information Packages will resolve this concern. However, as has been the case since the ADSL/HDSL compatible loops have been developed, an ADSL or HDSL loop may be ordered without pre-order Loop Make-up by submission of a ADSL/HDSL SI and LSR. This is the current ordering procedure for ADSL and HDSL loops. The ADSL/HDSL SI and LSR are documented in the current Information Package."

Summary of KCL Re-test Activities:

KCL's re-test activities for this exception consisted of a documentation review of the *BellSouth Loop Makeup (LMU) CLEC Information Package, Version 1, dated July 28th, 2000* and *BellSouth Unbundled Asymmetrical Digital Subscriber Line Compatible Loop*

and Unbundled High-Bit-Rate Digital Subscriber Line Compatible Loop (ADSL/HDSL), Version 2, dated July 25, 2000, which are available on BellSouth's Interconnection Services Web site (www.interconnection.bellsouth), to ensure guidelines for submitting an order Service Inquiry (SI) and Loop Service Requests (LSR) provide complete, consistent information.

KCL Re-test Results:

As a result of the documentation review, KCL determined that BellSouth has developed and posted to its Web site adequate guidelines for submitting Service Inquiry (SI) and Loop Service Requests (LSR) for xDSL.

The business rules documentation reviewed by KCL contains the following components:

- Formal business rules for required information for the order SI;
- References between the LSR and pre-order SI (Loop Make-up) forms;
- Details regarding the submission method for SI and LSR forms (e.g., fax and/or e-mail).

The *BellSouth Loop Makeup (LMU) CLEC Information Package, Version 1, dated July 28th, 2000* and *BellSouth Unbundled Asymmetrical Digital Subscriber Line Compatible Loop and Unbundled High-Bit-Rate Digital Subscriber Line Compatible Loop (ADSL/HDSL), Version 2, dated July 25, 2000* can be found on Bellsouth's Web site (See http://www.interconnection.bellsouth.com/products/unes.html.)

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 80.

Attachments: None.

Date: September 22, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth incorrectly billed KPMG Consulting LLC (KCL) Test CLEC for usage charges for messages processed in the Augusta central office.

Summary of Exception:

The KCL Test CLEC generated local, toll, long distance and operator-assisted usage in executing the ADUF/ODUF[1] 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 KCL Test CLEC received EMI[2] records, which reflected usage that was captured by BellSouth during the test period and the corresponding invoices. KCL received the following invoices from the Augusta central office (AGSTGAMT72C):

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

KCL 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 KCL by BellSouth in lieu of an Interconnection Agreement; and 3) the additions and extensions on the invoices were mathematically correct.

KCL determined that invoice rates were correct but that the billed amount was incorrect because of discrepancies in usage quantities appearing on the invoice. KCL observed variances between billed usage and usage reported by EMI in every category tested, except switching and transport-related rate elements. KCL applied the BellSouth

[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.

algorithm to calculate the invoice accuracy metric[3]. 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.

Summary of BellSouth's 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, BellSouth is unable 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 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

[3] ((Total Billed Revenue – Total Adjustments[Variance])/Total Billed Revenues) X 100 – This is the invoicing accuracy metric as defined in the BellSouth *Service Quality Measurements Georgia Performance Reports, 10/22/99.*

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 mechanization enhancement: 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 modification 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): These two rate elements have a rate structure that calls for billing on a per minute basis, for operator work time (OWT). BellSouth was able to track the call records through the system and discovered that the OWT was not being passed down to the rating process. The duration field is being defaulted to one second and therefore during the rating process, these calls were being summarized, rounded up to a minute, and then rated. For a customer who is billed on a per minute basis for Verification and Interrupt, BellSouth also recognizes that OWT is not populated on the ODUF records that represent these calls, as that is an optional field and is populated at the provider's discretion. BellSouth recognizes the shortfall of the EMI standards in this area and have submitted a work request to our IT department to begin both passing the OWT down through the system and populating this field on the appropriate EMI records on the ODUF feed to the customer. The target date for implementation is 9/19/00."

Summary of KCL Re-test Activities:

KCL re-test activities consisted of a review of the BellSouth response and execution of a UNE DUF re-test from April 25 – 27, 2000.

KCL Re-test Results:

KCL analyzed the DUF records received from the test calling period noted above along with the May 5, 2000 UNE invoices from BellSouth. This analysis revealed that the billing elements for 800 Access Ten Digit Screening and DACC (directory assistance call completion) were billing correctly.

Additionally, KCL concluded that the billing for Operator Call Handling and Automated Call Handling is accurate.[4]

In revalidating the billing for Verification and Interrupt charges, KCL found that no duration values were being passed on these particular DUF records[5]. BellSouth supplied the actual switch records for these calls to aid validation. Upon examination of the switch recordings, KCL concluded that BellSouth continues to under-bill Verification and Interruption charges.

According to its response, BellSouth expects to implement a fix for the billing of Verification and Interrupt charges on September 19, 2000. KCL's professional experience indicates that, if properly implemented, BellSouth's proposed fix is likely to adequately address the issue identified in Exception 91.

BellSouth's proposed implementation date for this fix is outside the expected timeframe of the billing tests associated with the BellSouth-Georgia OSS Evaluation. As a result, KCL does not expect to conduct additional re-testing activities after implementation of the fix.

Based on re-testing activities BellSouth, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 91.

[4] The minutes of use for Operator Call Handling and Automated Call Handling are billed based on operator work time. EMI standards do not currently support passing operator work time on DUF records. KCL examined all operator-handled calls. Based on the total duration of these calls, KCL concluded that BellSouth is billing these rate elements accurately.

[5] Verification charges appear on the DUF as EMI record type 100135; Interrupt charges appear on the DUF as EMI record type 100137. The duration field is optional on these records per EMI standards; however, it situations where the CLEC is being billed based on minutes (as opposed to the number of call events), KCL believes it appropriate that the representative minutes be passed to the CLEC on the DUF records.

Attachments: None.

CLOSURE REPORT FOR EXCEPTION 99

BellSouth Georgia OSS Testing Evaluation

Date: September 22, 2000

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

On bills issued by BellSouth to the KCL Test CLEC, KCL 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).*

Summary of 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."

Summary of KCL Consulting Re-test Activities:

KCL's re-test activities consisted of a review of BellSouth's response to Exception 99.

KCL Re-test Results:

In KPMG's professional judgement, non-recurring charges are those that appear on a single invoice. Further, recurring charges will or have the potential to appear on successive invoices.

According to BellSouth's response, PICC charges will recur each month until such time as a customer initiates the action of selecting a Pre-subscribed InterExchange Carrier.

However, though these charges may appear on successive monthly invoice for an indefinite period, BellSouth elects to identify PICC charges as non-recurring charges.

BellSouth has indicated to KCL that it has no plans for changes to the existing billing charge identification process in this particular case. As a result, KCL cannot continue re-testing activities.

KCL disagrees with BellSouth's classification of this charge given the language in BellSouth's tariff and will assign a "Not Satisfied" to the relevant evaluation criteria in its final report. In the absence of any other activity or information, KCL closes this exception for testing purposes.

Based on BellSouth's response, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 99.

Attachments: None.

CERTIFICATE OF SERVICE
Docket No. 8354-U

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

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This 22nd day of September, 2000.

David Frey

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EXECUTIVE SECRETARY
G.P.S.C.

September 22nd, 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 (20) copies, as well as an electronic copy, of KPMG Consulting LLC's Exception 88 (Amended) as well as BellSouth's response to Exception 104, amended responses to Exceptions 103, 108 and 110, second amended response to Exception 107, third amended responses to Exceptions 88 and 100, fourth amended response to Exception 86, fifth amended responses to Exceptions 62 and 86, sixth amended response to Exception 92, seventh amended response to Exception 52, and ninth amended response to Exception 89 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 Consulting, LLC. KPMG Consulting, LLC is a subsidiary of KPMG LLP, the U.S. member firm of KPMG International, a Swiss association.

Date: September 11, 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:

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

Amended Exception: Additionally, BellSouth does not consistently update the "Version Changes" section of the *PMAP Raw Data User Manual.*

Initial Exception: 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 reports[1].

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 Consulting LLC (KCL) 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 KCL 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 KCL that BellSouth ensures that the *PMAP Raw Data User Manual* is synchronized with

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

the validation scripts[2]. However, BellSouth did not provide documentation of the procedures followed to ensure that this synchronization is accomplished.

Amended Exception: The "Version Changes" section summarizes the changes that occur between subsequent version of the *PMAP Raw Data User Manual*. BellSouth has not consistently updated this section for each new version of the *PMAP Raw Data User Manual*.

The following examples illustrates the inconsistency of BellSouth's updates to the "Version Changes" section of *PMAP Raw Data User Manuals:*

1. BellSouth published multiple versions of the *PMAP Raw Data User Manual, Version 2.04* without changing the version number.

2. In the *PMAP Raw Data User Manual, Version 2.07, dated July 26, 2000,* BellSouth listed changes implemented in the first iteration of Version 2.04. However, BellSouth did not include changes that occurred in versions subsequent to the first iteration of Version 2.04. That is, changes made subsequent to the first iteration of Version 2.04 up to and including Version 2.07 do not appear in the "Version Changes" section.

3. In the "Version Changes" section of the *PMAP Raw Data User Manual, dated August 31, 2000, Version 2.08,* BellSouth included all changes implemented in Versions 2.07 and 2.08. However, the "Version Changes" section does not list any other changes implemented in manuals published after the first iteration of Version 2.04.

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, including a "Version Changes" sections that summarizes all changes made to that particular version, 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.

[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 RESPONSE TO EXCEPTION 104

BELLSOUTH

September 18, 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:

BellSouth-reported raw data values for the KPMG Test CLEC do not match the KPMG-collected values for certain billing accounts involved in the calculation of *Mean Time To Deliver Invoices*, for both CRIS and CABS.

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) 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 comparing the data that BellSouth uses to produce SQM reports for the KPMG Test CLEC with the corresponding data that KPMG collects using its own test management tools. For *Mean Time to Deliver Invoices*, KPMG compared the raw data BellSouth used to calculate the SQM values for each month from November 1999 – May 2000 with the data KPMG maintains as part of functional testing. In the raw data for each month, BellSouth provides a list of the billing account numbers for which bills were sent.

KPMG could not match the BellSouth-reported values of the "number of business days" for certain CRIS accounts and the "number of calendar days" for certain CABS accounts with the KPMG-calculated values (which were calculated using BellSouth provided instructions). The two tables below (Table 1, and Table 2) show the specific discrepancies for CRIS and CABS bills, respectively.

Additionally KPMG found that certain KPMG Test CLEC CABS account numbers are not listed in the BellSouth raw data files used in the calculation of the metrics – *Mean Time to Deliver Invoices* – for the months February, March, April, and May.

Please see Table 3 below for a list of the missing account numbers.

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

BELLSOUTH'S RESPONSE TO EXCEPTION 104

TABLE 1: CRIS Accounts

BILLING ACCOUNT	BILL MONTH	BELLSOUTH-REPORTED VALUE	KPMG-CALCULATED VALUE
706Q591769	January	3	5
706Q594492	January	3	5
706Q594610	January	3	5
706Q594897	January	3	5
706Q596362	January	3	5
706Q599537	January	3	5

TABLE 2: CABS Accounts

BILLING ACCOUNT	BILL MONTH	BELLSOUTH-REPORTED VALUE	KPMG-CALCULATED VALUE
404N070032	May	5	3

TABLE 3: Missing CABS Accounts in BellSouth Raw Data Files

BILLLING ACCOUNT	BILL MONTH
404N280022	February
706N010017	February
706N250034	February
706N250047	February
404N190120	March
706N160066	March, April, May

BellSouth Response

Corrections for the test CLEC have been made to the data files for Jan, Feb, March, and May 2000 for *Mean Time To Deliver Invoices*. The PMAP SQMs were re-run for these months and KPMG should be able to verify that the values for the KPMG test CLEC have been corrected with the re-runs. For Tables 1 and 2, corrected CRIS and CABS account values are now shown in the data files and in the PMAP results. For Table 3, all but one of the indicated CABS accounts have been added to the data files and appear in the PMAP re-run results. However, account 706 N16-0066 was correctly excluded beginning Mar. 2000 since all circuits on the account were removed in Feb. 2000 and there were no current charges on the account beginning Mar. 2000 that could identify the account as local. Updated data files and re-run results were provided to KPMG on 9/18/00.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 103

BELLSOUTH

September 13, 2000

EXCEPTION REPORT

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

Exception:

The KPMG Consulting Test CLEC received invoices from BellSouth containing inaccurate information.

As part of the CRIS Resale Invoicing Functional Evaluation, KPMG Consulting compared DUF records for each telephone number (where test usage was generated) and the corresponding bills received from BellSouth for these numbers.

KPMG Consulting found that, in some cases, usage records were not billed when usage was generated. Additionally, some usage charges appeared on Test CLEC bills when usage was not generated.

The following are representative occurrences of missing or additional usage charges from KPMG Consulting Test CLEC bills.

Telephone Number	Account Number	Date Of Call	Bill Date	Missing Usage Records	Incorrect Usage Records
404-633-0247	770-Q59-4492-492	4/5/00	4/29/00	3	0
404-633-0247	770-Q59-4492-492	4/6/00	4/29/00	1	0
706-235-6343	706-Q59-4492-492	4/5/00	4/29/00	0	3

The call details corresponding to the table above are as follows.

Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Local automated operator serviced 3rd party
Date of Call	4/5/00
To Place	Atlanta
To Number	404-799-9478
From Number	404-633-4121

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 103

KPMG Consulting Expected Results	$1.91
BellSouth Bill	Not located on bill
Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Local operator completed collect
Date of Call	4/5/00
To Place	Atlanta
To Number	404-633-0247
From Number	404-633-4121
KPMG Consulting Expected Results	$2.82
BellSouth Bill	Not located on bill
Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Local operator completed collect
Date of Call	4/5/00
To Place	Atlanta
To Number	404-633-0247
From Number	404-633-4121
KPMG Consulting Expected Results	$2.82
BellSouth Bill	Not located on bill
Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Toll record with corresponding credit record
Date of Call	4/6/00
To Place	Clayton
To Number	706-782-6488
From Number	404-633-0247
KPMG Consulting Expected Results	$0.19
BellSouth Bill	Not located on bill
Telephone Number	706-235-6343
Account Number	770-Q59-4492-492
Call Type	Toll
Date of Call	4/5/00
To Place	Rome
To Number	706-235-6343
From Number	706-235-5762
KPMG Consulting Expected Results	No usage charges expected
BellSouth Bill	$2.73

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 103

Telephone Number	706-235-6343
Account Number	770-Q59-4492-492
Call Type	Band 4, 2 Expanded Local Area calls
KPMG Consulting Expected Results	No usage charges expected
BellSouth Bill	$0.26

Telephone Number	706-235-6343
Account Number	770-Q59-4492-492
Call Type	Local Call
KPMG Consulting Expected Results	7 Local calls
BellSouth Bill	8 Local calls

Impact

Issuing invoices containing inaccurate usage information will impact CLECs in the following ways:

- **Decrease in Revenue**. Missing usage charges on CLEC invoices may lead to underbilling of end users, which will result in reduced revenue for CLECs.

- **Decreased Customer Satisfaction.** Incorrect charges for usage that was not generated may result in CLECs inappropriately billing end users. Inappropriately billing end users will result in a decrease in CLEC customer satisfaction.

- **Increase in operating costs.** Regardless of the net monetary effect of incorrect charges upon CLEC bills, a CLEC may be forced to regularly reconcile these bills – identifying and correcting the incorrect charges and rectifying the inconvenience caused to its customers. The necessity of an extensive validation of each bill and facility will increase CLEC resource utilization, thereby increasing operating costs.

BellSouth Response

Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Local automated operator serviced 3rd party
Date of Call	4/5/00
To Place	Atlanta
To Number	404-799-9478
From Number	404-633-4121
KPMG Consulting Expected Results	$1.91
BellSouth Bill	Not located on bill

BellSouth Reply Call was sent on ODUF to KPMG

010131 000405 10 4046334121 000 10 4047999478 00022000 0000000 1

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 103

Due to age of the message, data files necessary to determine message final destination is not available.

Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Local operator completed collect
Date of Call	4/5/00
To Place	Atlanta
To Number	404-633-0247
From Number	404-633-4121
KPMG Consulting Expected Results	$2.82
BellSouth Bill	Not located on bill

Two Calls matching criteria was sent on ODUF to KPMG

010131	000405	10	4046334121	000	10	4046330247	00033000	0000000	14
010131	000405	10	4046334121	000	10	4046330247	00033000	0000000	14

Due to age of the message, data files necessary to determine message final destination is not available.

Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Local operator completed collect
Date of Call	4/5/00
To Place	Atlanta
To Number	404-633-0247
From Number	404-633-4121
KPMG Consulting Expected Results	$2.82
BellSouth Bill	Not located on bill

Two Calls matching criteria was sent on ODUF to KPMG

010131	000405	10	4046334121	000	10	4046330247	00033000	0000000	14
010131	000405	10	4046334121	000	10	4046330247	00033000	0000000	14

Due to age of the message, data files necessary to determine message final destination is not available.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 103

Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Toll record with corresponding credit record
Date of Call	4/6/00
To Place	Clayton
To Number	706-782-6488
From Number	404-633-0247
KPMG Consulting Expected Results	$0.19
BellSouth Bill	Not located on bill

Two Calls matching criteria was sent on ODUF. To KPMG **Note: Calls should have canceled each other out but both dropped.**

010101	000406	10	4046330247	000	10	7067826488	00004800	0000000	0
030101	000406	10	4046330247	000	10	7067826488	00000000	0000000	0

Telephone Number	706-235-6343
Account Number	770-Q59-4492-492
Call Type	Toll
Date of Call	4/5/00
To Place	Rome
To Number	706-235-6343
From Number	706-235-5762
KPMG Consulting Expected Results	No usage charges expected
BellSouth Bill	$2.73

This call was not sent to KPMG on ODUF. A trouble ticket has been issued to determine why call was not sent to KPMG and to correct any problems uncovered.

The bill number is 706-Q59-4492-492 not 770. This is a Macon account and is found on the 706 account. The call billed correctly and can be found on the bill as item number 65.

65. APR 5 324P ROME GA 706 235-6343 ROME GA 706 235-5762 DS 2.73

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 103

Telephone Number	706-235-6343
Account Number	770-Q59-4492-492 (706-Q59-4492-492)
Call Type	Band 4, 2 Expanded Local Area calls
KPMG Consulting Expected Results	No usage charges expected
BellSouth Bill	$0.26

Customer subscribes to GA Community Caller Plus. Per the GA Tariff the customer is charged for all calls outside the Basic Local Calling Area. Billed charges for these calls are correct. Billed as follows.

-DAY-		-NIGHT/WKND-			
		Total		Total	
Band		Calls	Mins	Calls	Mins	Charges
4		2	3	0	0	.32
						.32

67. Local Usage Summary .....
68. Resale Discount at 17.30% for Business .....

TOTAL REGULATED LOCAL USAGE		.26
TOTAL NONREGULATED LOCAL USAGE		.00
TOTAL LOCAL USAGE	.26	

Telephone Number	706-235-6343
Account Number	770-Q59-4492-492 (706-Q59-4492-492)
Call Type	Local Call
KPMG Consulting Expected Results	7 Local calls
BellSouth Bill	8 Local calls

One call was not sent to KPMG on ODUF. A trouble ticket has been issued to determine why call was not sent to KPMG and to correct any problems uncovered.

BELLSOUTH

September 14, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Pre-Order, Order & Provisioning xDSL Process Parity Evaluation (PO&P16).

Exception:

Parity does not exist between BellSouth's CLEC xDSL ordering process and its retail xDSL ordering process (BellSouth Internet Services).

CLECs are required to follow a manual process to order ADSL qualified loops (e.g., email to CRSG, printed out and faxed to LCSC for entry). By comparison, the BellSouth retail process for ordering ADSL service is mechanized, with a flow-through (i.e., do not require manual order entry by the Digital Subscriber Group (DSG)) rate of over 60%.

CLEC ADSL Ordering Process Overview: To order ADSL service a CLEC must first qualify the particular loop by emailing a Service Inquiry (SI) and a Local Service Request (LSR) form to the Complex Resale Support Group (CRSG). Once the CLEC receives confirmation that a given loop is qualified to support ADSL service, the CRSG faxes the LSR to the Local Carrier Service Center (LCSC) for review and entry into BellSouth's Local Order Number (LON) system for tracking.

If additional information is required from the CLEC, BellSouth will fax a Clarification to the CLEC. Once BellSouth deems that the LSR is error-free, address and customer record information is then validated using the ORION/RSAG and BOCRIS systems, respectively. The LSR information is subsequently entered into the EXACT system, assigned a service order number, and submitted to the SOCS system for processing. Firm Order Confirmations (FOCs) or Clarifications are faxed to CLECs within a targeted interval of 48 hours.

BellSouth ADSL Ordering Process Overview: BellSouth retail operations do not directly provide xDSL services. BellSouth Corporation has chosen to have BellSouth Internet Services (BellSouth.net) provide ADSL services to retail customers; BellSouth.net has, in turn, out-sourced pre-order and order processing to Client Logic, a third-party provider of call center services.

A BellSouth retail customer's order for end-to-end ADSL service is entered into one of three Web front-end systems (Consumer, Small Business and FASS [used by Client Logic]) and flows through to the SOEG system and then into SOCS. Orders that fall out in the DSG for manual processing are entered into the BASS system within 24 hours of

receipt. Once cleared of errors, these orders flow from SOCS to the LFACS system and then to the NMS system.

Impact

The lack of parity in the ADSL ordering processes impacts CLECs in the following ways:

- **Inability to Compete Effectively.** Because BellSouth wholesale customer orders are processed manually, CLECs a) lack the opportunity to reduce order management costs through mechanized ordering; b) are more likely to experience order errors and corresponding delays; and c) encounter slower commitment times for orders submitted.

- **Decrease in customer satisfaction.** The lengthy ordering process increases the time needed for the CLEC to provide service. This may result in a decrease in CLEC customer satisfaction.

BellSouth's Response

As a note of clarification: In discussing the CLEC ordering process, KPMG includes the function of submitting a Service Inquiry as part of the *ordering* process. This function is pre-ordering in nature; the point when the CRSG faxes the LSR to the LCSC commences the ordering portion of the provisioning process. BellSouth has addressed pre-ordering functions in the response to KPMG's exception 107.

This exception finding report pertaining to the ordering of BellSouth's xDSL compatible facilities has been remedied with full production and availability to CLECs of mechanized xDSL ordering as of September, 2000. This functionality provides the capability of ordering HDSL/ADSL/UCL electronically through service order generation, treating loop qualification as a function outside this feature. These UNE services are identified by a REQTYP "A" or "B" on the LSR. This ordering functionality has already been loaded onto BellSouth's systems and is currently undergoing beta testing with CLECs. Any CLEC that desires to participate in the beta test for mechanized xDSL ordering should contact its account team representative. Mechanized xDSL ordering will roll out into a full production mode upon the successful completion of beta testing.

For specific details, please refer to the:
ENCORE USER REQUIREMENTS FOR EIO SUPPORT OF THE PROCESSING OF UNE ADSL, HDSL AND UCL
ENC7694.D0C
DOCUMENT VERSION 5.0
APRIL 14, 2000

This document was shared on Wednesday, May 17 through the Change Control Committee.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 108

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 110

BELLSOUTH

September 11, 2000

EXCEPTION REPORT

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

Exception:

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

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports[1].

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

KPMG has been unable to replicate the following SQM values for the KPMG CLEC for the months of March and June:

1. ***Average Completion Notice Interval*** **in the Provisioning category for the KPMG Test CLEC (June 2000).** KPMG was unable to replicate the BellSouth-reported SQM values, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
OCN 9990; ACNI Distribution 0-1 Hour; Business; Dispatch; <10 circuits	0	1
OCN 9990; Average	0	.02

[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.

Category	KPMG Calculation	BellSouth Report
Completion Notice Interval; Business; Dispatch; <10 circuits		
OCN 9992; ACNI Distribution 0-1 Hour; UNE Non-Design; Dispatch; <10 circuits	0	1
OCN 9992; Average Completion Notice Interval; UNE Non-Design; Dispatch; <10 circuits	0	.02
OCN 9992; ACNI Distribution 0-1 Hour; UNE Non-Design; Non-Dispatch; <10 circuits	0	1
OCN 9992; Average Completion Notice Interval; UNE Non-Design; Non-Dispatch; <10 circuits	0	.02
OCN 9993; ACNI Distribution 0-1 Hour; Residence; Non-Dispatch; <10 circuits	0	1
OCN 9993; Average Completion Notice Interval; Residence; Non-Dispatch; <10 circuits	0	.95
OCN 9994; ACNI Distribution 0-1 Hour; UNE Non-Design; Non-Dispatch; <10 circuits	0	1

2. ***Firm Order Confirmation*** **in the Ordering category for the KPMG Test CLEC (June 2000).** KPMG was unable to replicate the BellSouth reported SQM values for the *Fully Mechanized* and *Total Mechanized* reports, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
Mechanized; OCN 9991; Residence; LSR Count (0-<15)	110	185
Mechanized; OCN 9991;	59	90

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 110

Category	KPMG Calculation	BellSouth Report
Business; LSR Count (0-<15)		
Mechanized; OCN 9991; UNE; LSR Count (0-<15)	206	356
Mechanized; OCN 9991; Other; LSR Count (0-<15)	112	222
Mechanized; OCN 9991; Residence; 0-<15 Min	0.092282	0.155201
Mechanized; OCN 9991; Business; 0-<15 Min	0.082633	0.126050
Mechanized; OCN 9991; UNE; 0-<15 Min	0.110160	0.190374
Mechanized; OCN 9991; Other; 0-<15 Min	0.078707	0.156008
Mechanized; OCN 9991; Residence; LSR Count (15-<30)	1035	960
Mechanized; OCN 9991; Business; LSR Count (15-<30)	623	592
Mechanized; OCN 9991; UNE; LSR Count (15-<30)	1624	1474
Mechanized; OCN 9991; Other; LSR Count (15-<30)	1288	1178
Mechanized; OCN 9991; Residence; 15-<30 Min	0.868289	0.805369
Mechanized; OCN 9991; Business; 15-<30 Min	0.872549	0.829132
Mechanized; OCN 9991; UNE; 15-<30 Min	0.868449	0.788235
Mechanized; OCN 9991; Other; 15-<30 Min	0.905130	0.827829
Total Mechanized; OCN 9991; Residence; LSR Count (0-<15)	110	185
Total Mechanized; OCN 9991; Business; LSR Count (0-<15)	59	90
Total Mechanized; OCN 9991; UNE; LSR Count (0-<15)	206	356
Total Mechanized; OCN 9991; Other; LSR Count (0-<15)	112	222
Total Mechanized; OCN	0.092282	0.155201

Category	KPMG Calculation	BellSouth Report
9991; Residence; 0-<15 Min		
Total Mechanized; OCN 9991; Business; 0-<15 Min	0.082633	0.12605
Total Mechanized; OCN 9991; UNE; 0-<15 Min	0.11016	0.190374
Total Mechanized; OCN 9991; Other; 0-<15 Min	0.078652	0.155899
Total Mechanized; OCN 9991; Residence; LSR Count (15-<30)	1035	960
Total Mechanized; OCN 9991; Business; LSR Count (15-<30)	623	592
Total Mechanized; OCN 9991; UNE; LSR Count (15-<30)	1624	1474
Total Mechanized; OCN 9991; Other; LSR Count (15-<30)	1288	1178
Total Mechanized; OCN 9991; Residence; 15-<30 Min	0.868289	0.805369
Total Mechanized; OCN 9991; Business; 15-<30 Min	0.872549	0.829132
Total Mechanized; OCN 9991; UNE; 15-<30 Min	0.868449	0.788235
Total Mechanized; OCN 9991; Other; 15-<30 Min	0.904494	0.827247

3. ***Jeopardy Interval and Percent Jeopardy* in the Provisioning category for the KPMG Test CLEC (June 2000).** KPMG was unable to replicate the BellSouth reported SQM values, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
OCN 9993; Business; # of Jpdy	0	1
OCN 9993; Business; Total Intvl (Hrs)	0	72
OCN 9993; Business; Avg Intvl (Hrs)	0	72
OCN 9993; Business; Total Orders	0	3

Category	KPMG Calculation	BellSouth Report
OCN 9993; Business; % Jpdy	0	0.3333
OCN 9991; Residence; Total Orders	0	3
OCN 9991; Business; Total Orders	0	1
OCN 9991; Design; Total Orders	0	1
OCN 9991; UNE Non-Design; Total Orders	0	1
OCN 9992; Residence; Total Orders	0	1
OCN 9992; UNE Non-Design; Total Orders	0	3
OCN 9993; Residence; Total Orders	0	1
OCN 9994; UNE Non-Design; Total Orders	0	2

4. ***Jeopardy Interval and Percent Jeopardy* in the Provisioning category for the KPMG Test CLEC (March 2000).** KPMG was unable to replicate the BellSouth reported SQM values, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
OCN 9991; Residence; # of Jpdy	3	4
OCN 9991; Residence; Total Intvl (Hrs)	504	600
OCN 9991; Residence; Avg Intvl (Hrs)	168.00	150.00
OCN 9991; Residence; Total Orders	46	47
OCN 9991; Residence; % Jpdy	6.52%	8.51%
OCN 9991; GA; # of Jpdy	9	10
OCN 9991; GA; Total Intvl (Hrs)	2328	2424
OCN 9991; GA; Avg Intvl (Hrs)	258.67	242.40
OCN 9991; GA; Total Orders	139	140
OCN 9991; GA; % Jpdy	6.47%	7.14%
OCN 9991; 9991; # of Jpdy	9	10
OCN 9991; 9991; Total	2328	2424

Category	KPMG Calculation	BellSouth Report
Intvl (Hrs)		
OCN 9991; 9991; Avg Intvl (Hrs)	258.67	242.40
OCN 9991; 9991; Total Orders	139	140
OCN 9991; 9991; % Jpdy	6.47%	7.14%
OCN 9994; UNE Non-Design; Total Orders	52	53
OCN 9994; UNE Non-Design; % Jpdy	13.46%	13.21%
OCN 9994; GA; Total Orders	75	76
OCN 9994; GA; % Jpdy	13.33%	13.16%
OCN 9994; 9994; Total Orders	75	76
OCN 9994; 9994; % Jpdy	13.33%	13.16%
CKS; # of Jpdy	20	21
CKS; Total Intvl (Hrs)	4680	4776
CKS; Avg Intvl (Hrs)	515.47	227.43
CKS; Total Orders	426	428
CKS; % Jpdy	4.69%	4.91%

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 four 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

Average Completion Notice Interval in the Provisioning category for the KPMG Test CLEC (June 2000).

BellSouth agrees that KPMG was unable to replicate the BellSouth-reported SQM values, *Average Completion Notice Interval* in the Provisioning category for the KPMG Test CLEC (June 2000), using BellSouth instructions.

Shortly after the reports were posted and viewed by KPMG, a data rerun for June was necessary due to code changes, specifically, Change Request #5922.
This code changed required that TSOCT_MTHD_ACQSTN_ID = '6'.
However, it also erroneously allowed TSOCT_MTHD_ACQSTN_ID = '3' in the report.

This was discovered immediately after the reports were posted. The reports were

subsequently removed from the web and rerun with the correct logic. BellSouth will provide KPMG with a new report for June 2000 for *Average Completion Notice Interval* for the KPMG Test CLEC.

Firm Order Confirmation in the Ordering category for the KPMG Test CLEC (June 2000).

BellSouth agrees that KPMG was unable to replicate *Firm Order Confirmation* for the KPMG Test CLEC (June 2000) data for Fully Mechanized, Partial Mechanized, and Total Mechanized reports using BellSouth instructions. The reason for this problem is that records are being placed into the incorrect time "buckets". Records are placed into buckets based on the value in the foc_duration field (* 60 to get minutes). Currently the code is placing records into the buckets based on different interval values than the ones defined in the SQM and displayed on the reports. The code is using the buckets of 0<=foc_duration<16 and 16<=foc_duration<30 while the SQM and reports use buckets of 0<=foc_duration<15 and 15<=foc_duration<30.

To resolve this problem the table DD_INTVL_MIN needs to be changed so that the value in the field INTVL_FOC_MIN_BLK_ID = 15 where INTVL_MIN_ID = 15. This change should also be made in the text file that loads the table DD_INTVL_MIN so that this change will be carried forward in future months. This change request has been entered in the Issue Tracker as # 5848.

Change Request 5848 corrected the "Mechanized" FOC interval buckets as shown:

0 - <15 min	4 - <8 hrs
15 - <30 min	8 - <12 hrs
30 - <45 min	12 - <16 hrs
30 - <45 min	16 - <20 hrs
45 - <60 min	20 - <24 hrs
45 - <60 min	24 - <48 hrs
60 - <90 min	>= 48 hrs
90 - <120 min	
120 - <240 min	

Jeopardy Interval and Percent Jeopardy in the Provisioning category for the KPMG Test CLEC (June 2000)

KPMG was unable to replicate numbers from the BellSouth reports for *Jeopardy Interval and Percent Jeopardy* for June 2000. BellSouth was able to replicate all of the BellSouth reported values for this month using the most recent version of the Raw Data Users Guide. The instructions for *Jeopardy Interval & Percent Jeopardy* were updated in the July 26, 2000 version of the Raw Data Users Guide. Using the July 26, 2000 version of the Raw Data Users Guide, KPMG should be able to replicate the BellSouth reported values for *Jeopardy Interval and Percent Jeopardy* for June 2000.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 110

Jeopardy Interval and Percent Jeopardy in the Provisioning category for the KPMG Test CLEC (March 2000).

KPMG was unable to replicate numbers from the BellSouth reports for *Jeopardy Interval and Percent Jeopardy* for March 2000. BellSouth was able to replicate all of the BellSouth reported values for this month using the most recent version of the Raw Data Users Guide. The instructions for *Jeopardy Interval & Percent Jeopardy* were updated in the July 26, 2000 version of the Raw Data Users Guide. Using the July 26, 2000 version of the Raw Data Users Guide, KPMG should be able to replicate the BellSouth reported values for *Jeopardy Interval and Percent Jeopardy* for March 2000.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 107

BELLSOUTH

September18, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Pre-Order, Order, & Provisioning xDSL Process Parity Evaluation (PO&P16).

Exception:

KPMG observes that parity does not appear to exist between the processes through which BellSouth retail (BellSouth Internet Services) and wholesale (CLEC-UNE) customers may determine the availability of ADSL capable loops.

CLEC xDSL Pre-Ordering Process Overview: BellSouth's CLEC (UNE) pre-order xDSL loop qualification process requires CLECs to submit Service Inquiries (SI) by email to the Complex Resale Services Group (CRSG) in Birmingham, Alabama. The SIs are screened and forwarded to the geographically appropriate BellSouth Service Advocacy Center (SAC). A SAC specialist uses LFACS, SOCS, RELOG, and MapViewer systems to process the SI and determine the availability of the specific xDSL loop (e.g., UDL-2W/ADSL, UDL-2W/HDSL) requested by the CLEC. If the loop is available[1], the Specialist reserves the cable pair and completes the SI. If the loop is unavailable, the SI is marked "Cannot Provide" or "Not Available but can be provided with a job." Completed SI forms are emailed back to the CRSG and the CLEC is notified of the result. The SI process takes between five to eight days to return a response to the CLEC.

BellSouth xDSL Pre-Ordering Process Overview: BellSouth retail operations do not directly provide xDSL services to end user (retail) customers. Rather, BellSouth Corporation has chosen to have BellSouth Internet Services (BellSouth.net) provide ADSL services to retail customers. BellSouth.net has, in turn, out-sourced pre-order and order processing to Client Logic, a third-party provider of call center services.

Loop qualification information is provided to BellSouth Internet Services retail and resale (e.g., ISP) customers in real-time using the BellSouth Loop Qualification System (LQS or Loopy). LQS contains loop information only on those Telephone Numbers served by Wire Centers in which BellSouth ADSL equipment has been installed and for Carrier Serving Areas (CSAs) in those Wire Centers in which a BellSouth ADSL Remote Solution has been implemented (for loops working from a Digital Loop Carrier remote site). In addition, LQS contains information for BellSouth retail POTS lines only.

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[1] Per the technical requirements section of the *BellSouth Unbundled Asymmetrical Digital Subscriber Line (ADSL) Compatible Loop – CLEC Information Package*, if an ADSL compatible loop is available, "it will be provided with no Digital Loop Carrier (DLC), load coils or repeaters. These loops will conform to the Revised Resistance Design (RRD) guidelines for non-loaded facilities as described in *Committee T1 Technical Report No. 28*. The loop facility will consist of a loop 18kft or less which may include 6kft of bridge tap with a resistance of 1300 ohms or less if the loop is available... ADSL loops will meet the parameters specified in *BellSouth Technical Reference 73600 (TR73600)*."

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 107

Customers enter their telephone number into LQS via the BellSouth.net (www.fastaccess.com) Web site and receive a response immediately. Client Logic has access to LQS through the FASS system and can immediately determine the availability of ADSL capable loops. LQS also holds details of why a subscriber loop is not qualified.

Impact

The lack of parity in the xDSL pre-ordering processes impacts CLECs in the following ways:

- **Decrease in customer satisfaction and Inability to Compete Effectively.** Although BellSouth has provided several "Data Only" CLECs (DLECs) with access to LQS to facilitate line sharing, the remainder of BellSouth's CLEC-UNE customers lack access to LQS. Because parity does not appear to exist between the CLECs' manual pre-ordering process and BellSouth retail customers' pre-ordering process, CLECs are unable to compete effectively with BellSouth in offering ADSL service. The lengthy pre-ordering process increases the time needed for CLECs to determine the availability of ADSL capable loops for providing (non-BellSouth) ADSL service to their respective customers. These delays may result in a decrease in CLEC customer satisfaction.

BellSouth's Response

BellSouth.net provides xDSL service over the high frequency portion of an end user (retail) customer's existing facility. The end user submits its request for BellSouth's ADSL service through BellSouth Internet Service (or through other Network Service Providers/ Internet Service Providers (NSPs/ISPs) such as Telocity.com and Earthlink.com). As stated above, a loop qualification Yes/No response to BellSouth's ADSL Service is provided to the NSP through BellSouth's LQS.

Since LQS became available to NSPs, BellSouth has made it available likewise to DLECs/CLECs ("D/CLEC"). Additionally, D/CLECs have direct access to reason codes in LQS that inform the D/CLEC why a BellSouth facility will not support BellSouth's defined ADSL service. In short, LQS is offered to all D/CLECs and as such puts the NSP and the D/CLEC that will provide xDSL services over the high frequency spectrum of the loop at parity.

The "CLEC xDSL Pre-Ordering Process Overview" pertains only to the purchase of an entire unbundled loop or sub-loop facility rather than applying to the use of the high frequency portion of an existing service facility (meaning, D/CLEC line sharing). D/CLECs who wish to utilize LQS with direct access to the reason codes should contact its account team to initiate the process of amending their interconnection agreement and gaining access to LQS.

As further clarification, prior to ordering an entire unbundled loop or sub-loop facility, the D/CLEC may utilize the features of the LQS to gain a sense of whether BellSouth has determined if whether BellSouth's ADSL service could be provided over the loop that is

in service to that address. The D/CLEC may utilize the more limited information with reason codes from LQS as a filter for determining whether its xDSL defined service may be provisioned to that location.

However, because of the nature of the UNE offering and the flexibility that the D/CLEC has when purchasing the loop, the D/CLEC may need to know more about the characteristics of the facilities to the location than is available through LQS. When ordering a loop to a customer's service location, the D/CLEC may wish to change the nature of the service it intends to provide such that it would not comport to BellSouth's technical standards. Furthermore, the D/CLEC may place any type of equipment it wishes on that D/CLEC owned facility. BellSouth's Mechanized Loop Makeup (Mechanized LMU) Service addresses the needs of D/CLECs for greater information on the characteristics of UNE facilities purchased by D/CLECs. BellSouth previously offered LQS to D/CLECs as an interim solution until the long-term, mandated solution of Mechanized LMU was developed and implemented in the CLEC ordering systems. . Effective September 11th, CLECs gained access to BellSouth's Mechanized LMU wherein the return of LMU data provides the D/CLEC with the underlying loop qualification information in accordance with the FCC's UNE 319 Remand Order. This information enables the D/CLEC to make its own qualification determination based upon the service it wishes to provide.

Mechanized LMU provides a near real-time response, in like fashion to LQS, with much more detailed and current information than LQS. BellSouth's new Mechanized LMU Service is accessible via TAG (TCIF9 only) and LENS. See Carrier Notification SN91081854 for additional information. This offering is currently in beta testing with D/CLECs. Any D/CLEC that desires to participate in the beta test for Mechanized LMU should contact its account team representative. Mechanized LMU will roll out into a full production mode upon the successful completion of beta testing.

For specific details, please refer to the:
ENCORE USER REQUIREMENTS FOR EIO SUPPORT OF THE PROCESSING OF UNE ADSL, HDSL AND UCL
ENC7694.D0C
DOCUMENT VERSION 5.0
APRIL 14, 2000

This document was shared on Wednesday, May 17 through the Change Control Committee.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 88

BELLSOUTH

September 18, 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:

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

Amended Exception: Additionally, BellSouth does not consistently update the "Version Changes" section of the *PMAP Raw Data User Manual.*

Initial Exception: 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 reports[1].

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 Consulting LLC (KCL) 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 KCL 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 KCL that BellSouth ensures that the *PMAP Raw Data User Manual* is synchronized with

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

the validation scripts[2]. However, BellSouth did not provide documentation of the procedures followed to ensure that this synchronization is accomplished.

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.

Amended Exception: The "Version Changes" section summarizes the changes that occur between subsequent version of the *PMAP Raw Data User Manual.* BellSouth has not consistently updated this section for each new version of the *PMAP Raw Data User Manual.*

The following examples illustrates the inconsistency of BellSouth's updates to the "Version Changes" section of *PMAP Raw Data User Manuals:*

1. BellSouth published multiple versions of the *PMAP Raw Data User Manual, Version 2.04* without changing the version number.

2. In the *PMAP Raw Data User Manual, Version 2.07, dated July 26, 2000,* BellSouth listed changes implemented in the first iteration of Version 2.04. However, BellSouth did not include changes that occurred in versions subsequent to the first iteration of Version 2.04. That is, changes made subsequent to the first iteration of Version 2.04 up to and including Version 2.07 do not appear in the "Version Changes" section.

3. In the "Version Changes" section of the *PMAP Raw Data User Manual, dated August 31, 2000, Version 2.08,* BellSouth included all changes implemented in Versions 2.07 and 2.08. However, the "Version Changes" section does not list any other changes implemented in manuals published after the first iteration of Version 2.04.

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[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 THIRD AMENDED RESPONSE TO EXCEPTION 88

BellSouth Response To Amended Exception

The PMAP Raw Data User Manual (RDUM) Version Change log is being updated to include all changes to the RDUM which could affect the CLEC's ability to replicate SQMs. These updates will resolve omissions such as those identified in the amended Exception 88. BellSouth plans on publishing the current RDUM with an updated Version Change log on the PMAP website on 9/22/00.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 100

BELLSOUTH

September 14, 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 reports[1].

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.

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 is now reporting the "Average Interval" in minutes and seconds (4:45). Previously this was reported in minutes and hundredths of minutes (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.

A problem was discovered on the May CCC report resulting in incorrect data for the Total Minutes and Average Interval fields for ZXC. The correct data is 19:56 and 4:59 minutes respectively. This problem is due to a problem in the program to calculate this data. The seconds were not being included when calculating the Total Minutes. This problem is being corrected.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 100

The CCC program has been corrected to include the "seconds" in the computations and has been rerun. Since this is a May report it will not be re-posted on the WEB. A copy of the report for the ZXC test CLEC was sent to KPMG on 8/17/00.

Currently the CCC report is a manual report. Development work is in progress to mechanize this report in PMAP using a data feed from Barney. It is anticipated that the August report (report created in September using August data) will be mechanized. When this is completed, the report and the raw data will be available from the PMAP website.

Invoice Accuracy in the Billing category for the KPMG Test CLEC

The five values in the "ADJUSTMENT" column in the May raw data which originally contained commas has been corrected and now should be included in the adjustment amount totals. The original values appeared with a comma following the value, and should have been numeric and not text. 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.

If KPMG includes the corrected adjustment values shown below in their calculations, the results will be the same as the total adjustments that the Billing file reflected.

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

BELLSOUTH

September 11, 2000

EXCEPTION REPORT

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

Exception:

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

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports[1].

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

KPMG has been unable to replicate the following SQMs[3]:

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

2. ***Order Completion Interval*** **in the provisioning category for the CLEC Aggregate and BellSouth Retail (October 1999).** Using BellSouth's instructions, KPMG was

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

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

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

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

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

< 10 Circuits; Non-Dispatch; 15-20 Days		
UNE-Design CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; >= 30 Days	0.86%	0.92%
UNE-Design CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; Average Interval (Days)	6.03	6.06

3. ***Missed Installation Appointments*** **in the Provisioning category for the CLEC Aggregate and BellSouth Retail (October 1999).** KPMG could not replicate the BellSouth retail customer or the CLEC customer section for any of the product groupings.

	KPMG Calculation	BellSouth Report
BellSouth Retail; Business; Dispatch; < 10 Circuits; Total Missed Appointments	25.14%	25.25%
BellSouth Retail; Business; Dispatch; >= 10 Circuits; Total Missed Appointments	39.49%	40.22%
BellSouth Retail; Business; Dispatch; >= 10 Circuits; End User Missed Appointments	21.38%	21.74%
CLEC Aggregate; Residence; Dispatch; < 10 Circuits; Total Missed Appointments	25.93%	26.16%
CLEC Aggregate; Business;	3.78%	3.97%

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

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

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

BellSouth Retail; Design; >= 10 Circuits Dispatch; 5-10 Days		
Fully Mechanized BellSouth Retail; Design; >= 10 Circuits Dispatch; 10-15 Days	13.70%	18.18%
Fully Mechanized BellSouth Retail; Design; >= 10 Circuits Dispatch; 15-20 Days	19.18%	6.82%
Fully Mechanized BellSouth Retail; Design; >= 10 Circuits Dispatch; 20-25 Days	12.33%	20.45%
Fully Mechanized BellSouth Retail; Design; >= 10 Circuits Dispatch; 25-30 Days	1.37%	No Value[5]
Fully Mechanized BellSouth Retail; Design; >= 10 Circuits Dispatch; > 30 Days	27.40%	20.45%
Fully Mechanized BellSouth Retail; Design; >= 10 Circuits Dispatch; Average Interval (Days)	34.19	27.30
Fully Mechanized CLEC Aggregate;	7.086	7.091

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

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

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

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

CLEC Aggregate; Business; < 10 Circuits; Dispatch; Average Interval (Days)		
Non-Mechanized CLEC Aggregate; Business; >= 10 Circuits; Dispatch; Average Interval (Days)	55.00	35.00
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 0-5 Days	0.33%	No Value[5]
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 5-10 Days	13.75%	11.60%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 10-15 Days	31.42%	27.62%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 15-20 Days	27.00%	33.98%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 25-30 Days	4.42%	5.25%
Non-Mechanized CLEC Aggregate;	9.49%	8.01%

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

UNE Non-Design; < 10 Circuits; Dispatch; > 30 Days		
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; Average Interval (Days)	17.99	18.25
Non-Mechanized CLEC Aggregate; UNE Non-Design; >= 10 Circuits; Dispatch; 10-15 Days	62.50%	50.00%
Non-Mechanized CLEC Aggregate; UNE Non-Design; >= 10 Circuits; Dispatch; 15-20 Days	12.50%	16.67%
Non-Mechanized CLEC Aggregate; UNE Non-Design; >= 10 Circuits; Dispatch; 20-25 Days	12.50%	16.67%
Non-Mechanized CLEC Aggregate; UNE Non-Design; >= 10 Circuits; Dispatch; > 30 Days	12.50%	16.67%
Non-Mechanized CLEC Aggregate; UNE Non-Design; >= 10 Circuits; Dispatch; Average Interval (Days)	18.75	20.33
Non-Mechanized CLEC Aggregate; Residence; < 10 Circuits; Non-Dispatch;	86.94%	87.05%

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

UNE Non-Design; < 10 Circuits; Non-Dispatch; 10-15 Days		
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; 15-20 Days	19.90%	24.29%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; 20-25 Days	7.91%	9.46%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; 25-30 Days	2.22%	2.68%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; > 30 Days	2.60%	3.21%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; Average Interval (Days)	12.34	13.91
Non-Mechanized CLEC Aggregate; UNE Non-Design; >= 10 Circuits; Non-Dispatch; 10-15 Days	40.00%	50.00%
Non-Mechanized CLEC Aggregate; UNE Non-Design; >= 10 Circuits; Non-Dispatch;	40.00%	50.00%

15-20 Days		
Non-Mechanized CLEC Aggregate; UNE Non-Design; >= 10 Circuits; Non-Dispatch; 20-25 Days	20.00%	No Value[5]
Non-Mechanized CLEC Aggregate; UNE Non-Design; >= 10 Circuits; Non-Dispatch; Average Interval (Days)	15.60	13.50

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

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

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

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

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

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

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. KPMG's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the six

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

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

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

This is the same issue as 23.4 for November and December. The raw data for Provisioning Troubles in 30 days for months prior to March 2000 cannot be utilized to replicate the report because of an error in the program. The program assigned the trouble to the lowest numbered cust-id thus allowing the assignment of troubles to the wrong CLEC. The error resulted in a small number of mismatched troubles. At the aggregate level the small error was not evident. KPMG, without the help of the appropriate BST SMEs, will have difficulty replicating the reports for those months. Replicating the report would require the identification of those troubles that appear in the report but not in the raw data and appropriately assigning these troubles to the correct CLEC. The code for Percent Provisioning within 30 days has been repaired and future months (March 2000 forward) will not have this problem.

Re-running the previous reports with the new code would involve extensive programming and is extremely labor-intensive, therefore, BellSouth asks that reports for March 2000 forward be used for validation.

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

BellSouth agrees that using the current raw data users manual KPMG was unable to replicate the reports for the CLEC Aggregate and BellSouth Retail data for October for POTS, UNE-Design, and Non-UNE Design for the "Dispatch" and Non-Dispatch categories.

Currently, the instructions to create the Order Completion Interval report using the exclusion "so_cmtt_cd = 'L'" will not yield results identical to the SQM reports. The SQM report performs additional exclusions, permitting supplementary "L" orders into the final report. Specifically, "L" orders with commitment dates from prior months are not being excluded. The raw data users manual instructions are correct. BellSouth provided additional instructions in a raw data query that should enable KPMG to duplicate the data referenced in this exception.

BellSouth has issued a system change request # 5330 that addresses the issue of exclusion of "so_cmtt_cd = 'L'" and is effective for March data. This change will enable the monthly reports to match results created using the Raw Data Users Manual. The "L"

exclusion differences will no longer be an issue once the May reports are run with the fixed code.

BellSouth was unable to replicate two categories of reports. They were:

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

The reason 14,390 orders are not able to be replicated from Raw Data is because these records do not have an original commitment date. These orders are considered listing records. Since no provisioning work is required, an order is entered and marked complete at the same time, without a commitment date. Raw Data only selects orders where a valid commitment date exists. PMAP currently allows orders without a commitment to be passed through the system. A change request, # 5894, was opened in Issue Tracker on 5/25/00 to eliminate null appointment code records from the reports. Change request # 5894 was completed 7/15/00. Change request 5923 was opened on 6/12/00 to expand this exclusion to all provisioning measures. This change request was completed on 7/24/00.

For both OCI and OCI Trunks, an exclusion was added to the Raw Data User Guide, August 2000, in Step 2: **exclude records where cmpld_dur < 0.**

BellSouth provided June 2000 data to KPMG for ***Order Completion Interval*** for replication retesting.

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

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

1.) The last line in Step 8 should read:
Include records where the **cmpltn_dt >= issu_dt**
(The code reflects this statement because an order can be issued and completed on the same day)

2.) The following instruction should be added to steps 5 and 9:
If the **num_items_worked on** field is null or blank then replace it with a '1'
Filter on **num_items_worked_on** to include only the desired number of circuts (<10, >=10)

, The BellSouth retail customer and the CLEC customer sections of the PMI October 1999 report can be replicated with the above changes to the instructions for PMI in the Raw Data Users Manual. BellSouth Change Requests 5909, 5910, 5911 are addressing the above corrections.
The following change requests have been implemented as of 7/15/00 to correct the following problems in Provisioning reports:

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

CR# 5909 – Exclude orders with issue date later than completion date :
This was necessary to eliminate duplicate order numbers being matched to the incorrect order for processing. Some order numbers are duplicated within a month of completion of the previous order number. Without matching dates, incorrect fields were being populated in NODS from the original order number. The PRSNS01p2 daily was changed to exclude these records before they get into NODS. This issue was completed for the June reports and closed in issue tracker.

CR# 5910 – Exclude orders where commit date is null:
This was necessary because to create raw data the service orders from NODS SO and NODS SO CMTT HIST are joined. The service orders that are not in both tables (those that do not have an original due date) are not included in the raw data but are included in the end report. Orders without a commit date have not been released into the system for processing, however, if their order number was previously used, the data can be incorrectly matched. This issue was completed for the June reports and closed in issue tracker.

CR# 5911 – Include issue date of Service Order from Extract:
This was necessary to work with CR 5909 and provide issue date information from Extract for exclusion of issue dates after completion dates. This was implemented with the June reports and closed in issue tracker.

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

BellSouth was able to replicate the *Total Service Order Cycle Time* in the Provisioning category for the CLEC Aggregate and BellSouth Retail (November 1999) using **prod_id** rather than **prod_desc.**

The Raw Data User Guide will be updated in July to correct Step 5; bullet 6 to use **prod_id** rather than **prod_desc**.

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

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

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

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

Using the new instructions provided above, the November 1999 report could be recreated using the November 1999 raw data. KPMG reported on 6/5/00 that they could replicate

the *Average Completion Notice Interval* in the Provisioning category for BellSouth Retail (November 1999) using the February Raw Data Users Guide.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 86

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

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

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

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

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

Exclude records where ckt_stat = 'IP'

The instructions are incorrect because the ckt_stat can be null or blank. Using the new instructions the report can be replicated correctly.
KPMG received a new data file that included UNE Non-Design.

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 62

BELLSOUTH

September 18, 2000

EXCEPTION REPORT

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

Exception:

KPMG cannot replicate four of BellSouth's Service Quality Measurements (SQMs) in the February 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. BellSouth also publishes the monthly raw data used to create these reports[1].

As part of the BellSouth-Georgia OSS Evaluation, KPMG is attempting to 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 February 2000 report.

1. ***Firm Order Confirmation Timeliness* in the Ordering category for the KPMG Test CLEC.** KPMG was unable to replicate values from the Fully Mechanized and Non-Mechanized SQM reports, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
Fully Mechanized; OCN = 9994; Product = Other; LSR Count (0-15)	1	2
Fully Mechanized;	9.09%	18.18%

[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.

Category	KPMG Calculation	BellSouth Report
OCN = 9994; Product = Other; % 0-15 minutes		
Fully Mechanized OCN = 9994 Product = Other LSR Count (15-30)	7	6
Fully Mechanized OCN = 9994 Product = Other % 15-30 minutes	63.64%	54.55%
Total Mechanized OCN = 9994 Product = Other LSR Count (0-15)	1	2
Total Mechanized OCN = 9994 Product = Other % 0-15 minutes	4.17%	8.33%
Total Mechanized OCN = 9994 Product = Other LSR Count (15-30)	7	6
Total Mechanized OCN = 9994 Product = Other % 15-30 minutes	29.17%	25.00%

2. ***Order Completion Interval*** **in the Provisioning category for the KPMG Test CLEC.** KPMG was unable to replicate the following values in the BellSouth SQM report. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch Total Orders 20-25 Days	0	1
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 0-5 Days	50.0%	45.5%

Category	KPMG Calculation	BellSouth Report
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 5-10 Days	50.0%	45.5%
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 20-25 Days	0.0%	9.1%
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch Average Interval (Days)	4.13	5.76

3. ***Total Service Order Cycle Time*** **in the Provisioning category for the KPMG Test CLEC.** KPMG was unable to replicate the following values in the Non-Mechanized report, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 0-5 Days	12.5%	16.7%
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 5-10 Days	75.0%	83.3%
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 20-25 Days	12.5%	0.0%
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch Average Interval (Days)	9.13	7.17

4. ***Invoice Accuracy*** **in the Billing category for the KPMG Test CLEC.**

KPMG was unable to replicate any of the BellSouth reported SQM values. The discrepancies are shown in the following table.

Category	KPMG Calculation	BellSouth Report
UNE Total Billed Revenue	$20,691.58	$62,556.44
UNE Total Adjustments	$43,152.09	$64,084.52
UNE % Accuracy	-108.5%	-2.4%
Interconnection Total Billed Revenue	$5,952.58	$6,030.44
Interconnection Total Adjustments	0	$38.93
Interconnection % Accuracy	100.0%	99.4%
Total Total Billed Revenue	$113,427.39	$155,370.11
Total Total Adjustments	$208,405.753	$229,377.11
Total % Accuracy	-83.7%	-47.6%

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 four applicable SQMs may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

BellSouth Response

1. Firm Order Confirmation Timeliness in the Ordering category for the KPMG Test CLEC.

BellSouth agrees that KPMG was unable to replicate the BellSouth reported SQM for *FOC Timeliness* for the KPMG Test CLEC for February 2000.
Upon further investigation, BellSouth identified a problem in the interval "buckets". The difference between KPMG's numbers and PMAP's numbers can be attributed to the LSRs FOC'd (orders confirmed) in the 15th minute. KPMG was putting those LSRs in the 15-30 minute "bucket" while PMAP was including them in the 0-15 minute "bucket".

As a result of this KPMG draft exception, System Change Request 5848 was opened to clarify the bucket definitions and was effective for May data that was published in

June. An interval chart for CR 5848 is shown below. The Raw Data Users Manual was updated in May, reflecting these changes.

The *FOC Timeliness* for the May report had to be rerun because prior to May, two pieces of code were designed to exclude non-mechanized LSRs, which were received and/or processed on weekends. Although the first piece of code was correctly rewritten to exclude appropriate weekend hours, the second was overlooked and LSRs received and/or processed on weekends continued to be excluded. The code was corrected and the report was rerun on July 27. Notification that May Ordering Reports had been rerun was posted to the Web on August 1, 2000. The July SQM further clarified the bucketization issue.

BellSouth has provided KPMG with *FOC Timeliness* data for May and June 2000 for retesting.

Change Request 5848 corrected the "Mechanized" FOC interval buckets as shown:

0 - <15 min	4 - <8 hrs
15 - <30 min	8 - <12 hrs
30 - <45 min	12 - <16 hrs
30 - <45 min	16 - <20 hrs
45 - <60 min	20 - <24 hrs
45 - <60 min	24 - <48 hrs
60 - <90 min	>= 48 hrs
90 - <120 min	
120 - <240 min	

2. Order Completion Interval in the Provisioning category for the KPMG Test CLEC.

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

BellSouth has issued a system change request # 5330 that addresses the issue of exclusion of "so_cmtt_cd = 'L'" and was implemented for March data that was published in April. This change enabled the monthly reports to match results created using the Raw Data Users Manual.

3. Total Service Order Cycle Time in the Provisioning category for the KPMG Test CLEC

BellSouth agrees that using Version 2.0 of the Raw Data users manual, KPMG is unable to replicate the Total Service Order Cycle Time for the KPMG Test CLEC as indicated in the above data for OCN 9991.

The instructions in the Manual utilized to perform the data replication, specifically the exclusion of records where "so_cmtt_cd = null", by grouping fields to eliminate duplicate records needs some additional clarification. BellSouth provided additional instructions in a raw data query that enabled KPMG to duplicate the data referenced in this exception. The Raw Data Users Manual was updated in June, to reflect changes made to ensure that duplicate records were eliminated and additional process steps were added to ensure that the reports could be duplicated.

4. Invoice Accuracy in the Billing category for the KPMG Test CLEC.

On 6/22/00 KPMG requested a copy of the rerun results for February 2000 data for Invoice Accuracy. BellSouth provided KPMG with the NODS_RQ Company file for February 2000 and with the DSS Agent report for February 2000.

The differences between the values calculated using the Feb. 2000 file data and the values PMAP calculated were due to the way PMAP processes negative revenues. **Two key points about how PMAP functions should be kept in mind when replicating Invoice Accuracy SQMs and reports:**

- 1st - When a negative revenue value is encountered by PMAP, it is changed to an absolute or positive value for that CLEC before it is included in calculations with other positive revenue values.
- 2nd - The absolute value of a negative revenue amount is added to the adjustment amount for that CLEC before the adjustment amount is used in calculations.

The results of using this approach to handling negative revenue, based on the Feb 2000 file data, is shown in the table below:

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 62

Category	KPMG Calculation	BellSouth Reported (PMAP Calculated values)	Calculated values using Billing data on Feb 2000 E&Y File and with no changes for negative revenues	Explanation of PMAP calculations using Billing data in Feb 2000 E&Y file
UNE Total Billed Revenue	$20,691.58	$62,556.44	$20,691.58	-20,932,43 revenue changed to abs. value causing $41,864.86 diff. in total UNE revenue
UNE Total Adjustments	$43,152.09	$64,084.52	$43,152.09	-20,932,43 changed to abs. value and added to $43,152.09 = $64,084.52
UNE % Accuracy	-108.50%	-2.40%		
Interconnection Total Billed Revenue	$5,952.58	$6,030.44	$5,952.58	-38.93 changed to abs. value causing $77.86 diff. In total Inter. revenue
Interconnection Total Adjustments	0	$38.93	0	-38.93 changed to abs. value and added to Inter. Total adjustments
Interconnection % Accuracy	100.00%	99.40%		
Total Total Billed Revenue	$113,427.39	$155,370.11	$113,427.39	$113,427.39 plus 2x$20,932.43 plus 2x$38.93 = $155,370.11
Total Total Adjustments	$208,405.75	$229,377.11	$208,405.75	$208,405.75 plus $20,932.43 plus $38.93 = $229,377.11
Total % Accuracy	-83.70%	-47.60%		

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 86

BELLSOUTH

September 18, 2000

EXCEPTION REPORT

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

Exception:

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

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports[1].

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

KPMG has been unable to replicate the following SQMs[3]:

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

2. ***Order Completion Interval*** **in the provisioning category for the CLEC Aggregate and BellSouth Retail (October 1999).** Using BellSouth's instructions, KPMG was

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

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

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

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

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

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 86

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

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

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 86

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

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

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

< 10 Circuits; Non-Dispatch; 15-20 Days		
UNE-Design CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; >= 30 Days	0.86%	0.92%
UNE-Design CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; Average Interval (Days)	6.03	6.06

3. ***Missed Installation Appointments* in the Provisioning category for the CLEC Aggregate and BellSouth Retail (October 1999).** KPMG could not replicate the BellSouth retail customer or the CLEC customer section for any of the product groupings.

BellSouth Retail; Business; Dispatch; < 10 Circuits; Total Missed Appointments	25.14%	25.25%
BellSouth Retail; Business; Dispatch; >= 10 Circuits; Total Missed Appointments	39.49%	40.22%
BellSouth Retail; Business; Dispatch; >= 10 Circuits; End User Missed Appointments	21.38%	21.74%
CLEC Aggregate; Residence; Dispatch; < 10 Circuits; Total Missed Appointments	25.93%	26.16%
CLEC Aggregate; Business;	3.78%	3.97%

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

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

Fully Mechanized BellSouth Retail; Residence; < 10 Circuits Dispatch; 0-5 Days	22.98%	26.38%
Fully Mechanized BellSouth Retail; Residence;	38.10%	40.75%

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

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

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

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

BellSouth Retail; Design; >= 10 Circuits Dispatch; 5-10 Days		
Fully Mechanized BellSouth Retail; Design; >= 10 Circuits Dispatch; 10-15 Days	13.70%	18.18%
Fully Mechanized BellSouth Retail; Design; >= 10 Circuits Dispatch; 15-20 Days	19.18%	6.82%
Fully Mechanized BellSouth Retail; Design; >= 10 Circuits Dispatch; 20-25 Days	12.33%	20.45%
Fully Mechanized BellSouth Retail; Design; >= 10 Circuits Dispatch; 25-30 Days	1.37%	No Value[5]
Fully Mechanized BellSouth Retail; Design; >= 10 Circuits Dispatch; > 30 Days	27.40%	20.45%
Fully Mechanized BellSouth Retail; Design; >= 10 Circuits Dispatch; Average Interval (Days)	34.19	27.30
Fully Mechanized CLEC Aggregate;	7.086	7.091

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

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

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

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

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 86

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

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 86

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

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

CLEC Aggregate; Business; < 10 Circuits; Dispatch; Average Interval (Days)		
Non-Mechanized CLEC Aggregate; Business; >= 10 Circuits; Dispatch; Average Interval (Days)	55.00	35.00
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 0-5 Days	0.33%	No Value[5]
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 5-10 Days	13.75%	11.60%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 10-15 Days	31.42%	27.62%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 15-20 Days	27.00%	33.98%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; 25-30 Days	4.42%	5.25%
Non-Mechanized CLEC Aggregate;	9.49%	8.01%

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

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 86

UNE Non-Design; < 10 Circuits; Dispatch; > 30 Days		
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Dispatch; Average Interval (Days)	17.99	18.25
Non-Mechanized CLEC Aggregate; UNE Non-Design; >= 10 Circuits; Dispatch; 10-15 Days	62.50%	50.00%
Non-Mechanized CLEC Aggregate; UNE Non-Design; >= 10 Circuits; Dispatch; 15-20 Days	12.50%	16.67%
Non-Mechanized CLEC Aggregate; UNE Non-Design; >= 10 Circuits; Dispatch; 20-25 Days	12.50%	16.67%
Non-Mechanized CLEC Aggregate; UNE Non-Design; >= 10 Circuits; Dispatch; > 30 Days	12.50%	16.67%
Non-Mechanized CLEC Aggregate; UNE Non-Design; >= 10 Circuits; Dispatch; Average Interval (Days)	18.75	20.33
Non-Mechanized CLEC Aggregate; Residence; < 10 Circuits; Non-Dispatch;	86.94%	87.05%

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

UNE Non-Design; < 10 Circuits; Non-Dispatch; 10-15 Days		
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; 15-20 Days	19.90%	24.29%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; 20-25 Days	7.91%	9.46%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; 25-30 Days	2.22%	2.68%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; > 30 Days	2.60%	3.21%
Non-Mechanized CLEC Aggregate; UNE Non-Design; < 10 Circuits; Non-Dispatch; Average Interval (Days)	12.34	13.91
Non-Mechanized CLEC Aggregate; UNE Non-Design; >= 10 Circuits; Non-Dispatch; 10-15 Days	40.00%	50.00%
Non-Mechanized CLEC Aggregate; UNE Non-Design; >= 10 Circuits; Non-Dispatch;	40.00%	50.00%

[illegible]	[illegible]	[illegible]
15-20 Days		
Non-Mechanized CLEC Aggregate; UNE Non-Design; >= 10 Circuits; Non-Dispatch; 20-25 Days	20.00%	No Value[5]
Non-Mechanized CLEC Aggregate; UNE Non-Design; >= 10 Circuits; Non-Dispatch; Average Interval (Days)	15.60	13.50

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

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

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

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

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

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

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. KPMG's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the six

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

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

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

This is the same issue as 23.4 for November and December. The raw data for Provisioning Troubles in 30 days for months prior to March 2000 cannot be utilized to replicate the report because of an error in the program. The program assigned the trouble to the lowest numbered cust-id thus allowing the assignment of troubles to the wrong CLEC. The error resulted in a small number of mismatched troubles. At the aggregate level the small error was not evident. KPMG, without the help of the appropriate BST SMEs, will have difficulty replicating the reports for those months. Replicating the report would require the identification of those troubles that appear in the report but not in the raw data and appropriately assigning these troubles to the correct CLEC. The code for Percent Provisioning within 30 days has been repaired and future months (March 2000 forward) will not have this problem.

Re-running the previous reports with the new code would involve extensive programming and is extremely labor-intensive, therefore, BellSouth asks that reports for March 2000 forward be used for validation.

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

BellSouth agrees that using the current raw data users manual KPMG was unable to replicate the reports for the CLEC Aggregate and BellSouth Retail data for October for POTS, UNE-Design, and Non-UNE Design for the "Dispatch" and Non-Dispatch categories.

Currently, the instructions to create the Order Completion Interval report using the exclusion "so_cmtt_cd = 'L'" will not yield results identical to the SQM reports. The SQM report performs additional exclusions, permitting supplementary "L" orders into the final report. Specifically, "L" orders with commitment dates from prior months are not being excluded. The raw data users manual instructions are correct. BellSouth provided additional instructions in a raw data query that should enable KPMG to duplicate the data referenced in this exception.

BellSouth has issued a system change request # 5330 that addresses the issue of exclusion of "so_cmtt_cd = 'L'" and is effective for March data. This change will enable the monthly reports to match results created using the Raw Data Users Manual. The "L"

exclusion differences will no longer be an issue once the May reports are run with the fixed code.

BellSouth was unable to replicate two categories of reports. They were:

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

The reason 14,390 orders are not able to be replicated from Raw Data is because these records do not have an original commitment date. These orders are considered listing records. Since no provisioning work is required, an order is entered and marked complete at the same time, without a commitment date. Raw Data only selects orders where a valid commitment date exists. PMAP currently allows orders without a commitment to be passed through the system. A change request, # 5894, was opened in Issue Tracker on 5/25/00 to eliminate null appointment code records from the reports. Change request # 5894 was completed 7/15/00. Change request 5923 was opened on 6/12/00 to expand this exclusion to all provisioning measures. This change request was completed on 7/24/00.

For both OCI and OCI Trunks, an exclusion was added to the Raw Data User Guide, August 2000, in Step 2: **exclude records where cmpld_dur < 0.**

BellSouth provided June 2000 data to KPMG for ***Order Completion Interval*** for replication retesting.

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

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

1.) The last line in Step 8 should read:
Include records where the **cmpltn_dt >= issu_dt**
(The code reflects this statement because an order can be issued and completed on the same day)

2.) The following instruction should be added to steps 5 and 9:
If the **num_items_worked on** field is null or blank then replace it with a '1'
Filter on **num_items_worked_on** to include only the desired number of circuts (<10, >=10)

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

The following change requests have been implemented as of 7/15/00 to correct the following problems in Provisioning reports:

CR# 5909 – Exclude orders with issue date later than completion date :
This was necessary to eliminate duplicate order numbers being matched to the incorrect order for processing. Some order numbers are duplicated within a month of completion of the previous order number. Without matching dates, incorrect fields were being populated in NODS from the original order number. The PRSNS01p2 daily was changed to exclude these records before they get into NODS. This issue was completed for the June reports and closed in issue tracker.

CR# 5910 – Exclude orders where commit date is null:
This was necessary because to create raw data the service orders from NODS SO and NODS SO CMTT HIST are joined. The service orders that are not in both tables (those that do not have an original due date) are not included in the raw data but are included in the end report. Orders without a commit date have not been released into the system for processing, however, if their order number was previously used, the data can me matched incorrectly. This issue was completed for the June reports and closed in issue tracker.

CR# 5911 – Include issue date of Service Order from Extract:
This was necessary to work with CR 5909 and provide issue date information from Extract for exclusion of issue dates after completion dates. This was implemented with the June reports and closed in issue tracker.

CR#6140 – Include missed appointment with null so_missed_cmtt_cd.
This allows KPMG to replicate PMI & PMI Trunks for August, 2000 and Months following. The Raw Data User Guide will add in Step 8 to include records where "NL"is in the so_missed_cmtt_cd field in the September version.

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

BellSouth was able to replicate the *Total Service Order Cycle Time* in the Provisioning category for the CLEC Aggregate and BellSouth Retail (November 1999) using **prod_id** rather than **prod_desc.**

The Raw Data User Guide will be updated in July to correct Step 5; bullet 6 to use **prod_id** rather than **prod_desc**.

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

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

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

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

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

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 86

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

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

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

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

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

Exclude records where ckt_stat = 'IP'

The instructions are incorrect because the ckt_stat can be null or blank. Using the new instructions the report can be replicated correctly.
KPMG received a new data file that included UNE Non-Design.

BELLSOUTH

September 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 data[1] used in the calculation of the BellSouth Service Quality Measurement (SQM) reports are not accurately derived from or supported by their component early-stage data[2].

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.

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[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.

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 different[5].

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 data[5].

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 data[5].

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 data[5].

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-

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

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 calculations[5].

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.

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[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.

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 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 logicsince an 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 was worked with June data and posted to the Web in July.

Using early stage BARNEY snapshot data for June 2000, BellSouth is able to explain why each of the records identified by KPMG is not in Raw Data. The table included below lists each of the records and the reason it is excluded from Raw Data.

Reason for Exclusion: Not a local trunk – PMAP only captures ASRs that are local trunks. If the record does not have a 'J' as the leading character of the TRK_MOD field then that record is not a local trunk.

Reason for Exclusion: D_REC > D_CNF – PMAP does not capture records where the Received Date is greater than the Confirmed Date. An ASR can have a Received Date greater than the Confirmed Date when there are multiple actions on an ASR during the month. The BARNEY snapshot only captures the most recent value in a particular field from the EXACT system. An ASR would show a Confirmed Date less than the Received Date if that record had a subsequent Received Date during the month but was not Confirmed again between the subsequent received date and the end of the month.

ASR	PON	D_CNF	D_REC	TRK_MOD	Reason Excluded from Raw Data
16700269	A00276		06/15/2000		D_REC > D_CNF; Not a local trunk
16000275	A00258		06/19/2000		D_REC > D_CNF; Not a local trunk
7400327	N00000039-GA	06/27/2000	06/20/2000	KE	Not a local trunk
18000206	A00254B		06/28/2000		D_REC > D_CNF; Not a local trunk
16700202	A00282		06/28/2000		D_REC > D_CNF; Not a local trunk
10400277	00M0795	04/26/2000	06/22/2000	JKE	D_REC > D_CNF
16700306	A00278		06/15/2000		D_REC > D_CNF; Not a local trunk
15400175	00ATLB-00935		06/28/2000		D_REC > D_CNF; Not a local trunk
11700212	403-43AH	06/09/2000	06/15/2000	JKE	D_REC > D_CNF
16100072	A00252		06/09/2000		D_REC > D_CNF; Not a local trunk
16700269	A00276		06/15/2000		D_REC > D_CNF; Not a local trunk

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

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

Record #2

Record	**LON**	**OCN**	**PON**	**VER**
2	2816295	7268	W19299	

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.

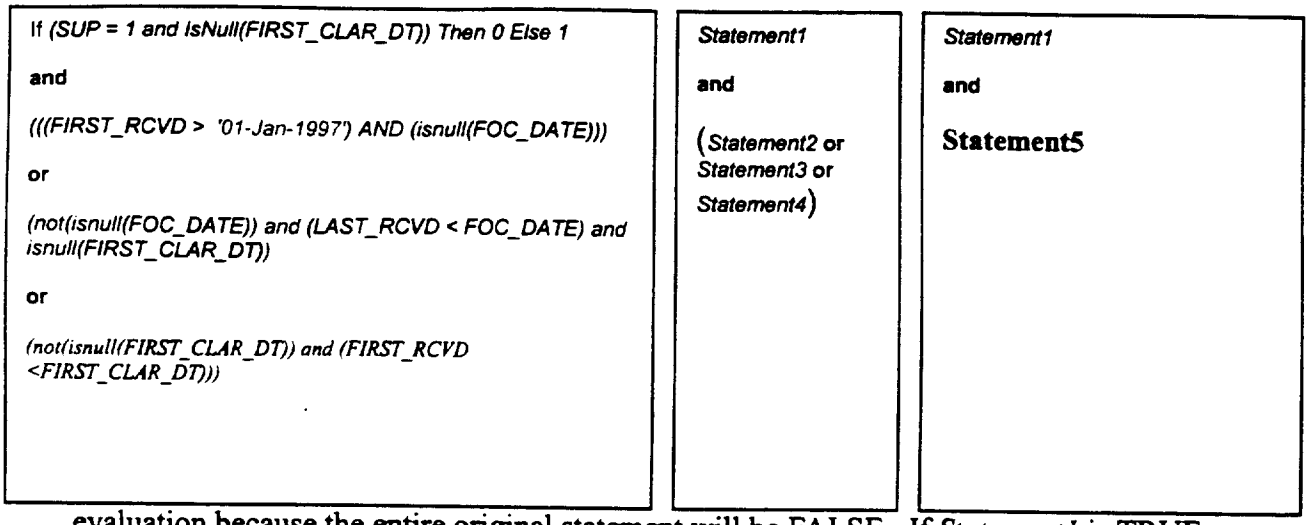
The boxes below represent a breakdown of the original logic statement into smaller more manageable parts.

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



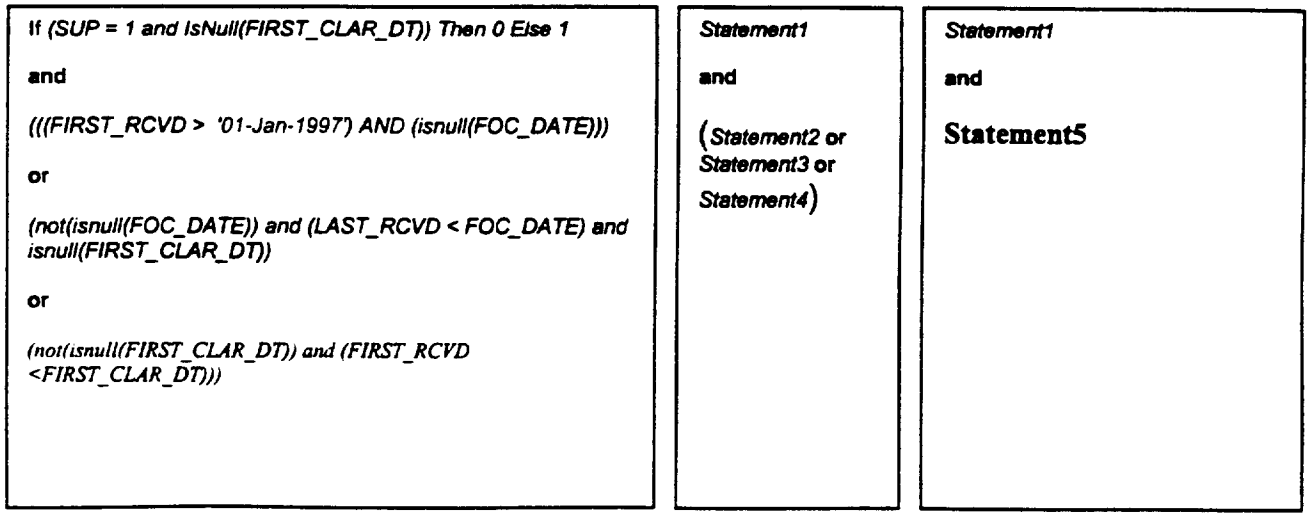
evaluation because the entire original statement will be FALSE. If *Statement1* is TRUE then *Statement5* must be evaluated as discussed below.

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.

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.



In Then 0 Else 1part 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 then January 1, 1997 and the FOC_DATE field is null then Statement2 will evaluate to TRUE. If the FIRST_RCVD date is less then 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 FLASE 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 then 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 then 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.

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

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				at 10:00 am., and therefore, cannot provide any more additional information on these records.	
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.

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.

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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.

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

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

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 SEVENTH AMENDED RESPONSE TO EXCEPTION 52

BELLSOUTH

September 12, 2000

EXCEPTION REPORT

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

Exception:

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

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports[1].

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). For this purpose, 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 report values for the following SQMs for the month of October 1999[3]:

1. ***Coordinated Customer Conversions* in the Provisioning category for the CLEC Aggregate.** KPMG was unable to replicate the following values in the BellSouth SQM report:

Category	KPMG Calculations	BellSouth's Report
Without Number Portability; Count <=5	1888	1880
Without Number Portability;	81.48 %	81.14 %

[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 *PMAP Raw Data User Manual* and the corresponding raw data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The *PMAP Raw Data User Manual* is posted and updated on the PMAP site.

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

% <=5		
Without Number Portability; Count >15	114	122
Without Number Portability; % >15	4.92 %	5.27 %
Without Number Portability; Total Minutes	9369	9969
Without Number Portability; Average Interval (Min)	4.0	4.3

2. ***Timeliness*** **in the E911 category for the combined CLEC Aggregate and BellSouth Retail.** KPMG was unable to replicate the following values in the BellSouth SQM report:

Category	KPMG Calculations	BellSouth's Report
Percent answered 0-4 hours	82.94%	82.45%
Percent answered 4-8 hours	1.41%	3.08%
Percent answered 8-12 hours	2.53%	4.10%
Percent answered 12-16 hours	3.13%	1.27%
Percent answered 16-20 hours	2.44%	4.28%
Percent answered 20-24 hours	2.87%	1.33%
Percent answered 24+ hours	4.69%	3.50%

3. ***Mean Interval*** **in the E911 category for the combined CLEC Aggregate and BellSouth Retail.** KPMG was unable to replicate the Mean Interval Duration in the BellSouth SQM report:

Category	KPMG Calculations	BellSouth's Report
Mean Interval Duration	0.03	3.81

4. ***Percent Rejected Service Requests*** **in the Ordering category for the CLEC Aggregate.** KPMG was unable to replicate the BellSouth-reported SQM values for the Non-Mechanized report, using BellSouth's instructions.

Category	KPMG Calculations	BellSouth's Report
Product = Special; Product Specific % Rejected	0.331	0.329
Product = Special; Product Specific % Rejected	0.144	0.142

5. ***Reject Interval*** **in the Ordering category for the CLEC Aggregate.** For several reports *(Partially Mechanized, Total Mechanized, and Non-Mechanized)*, KPMG was unable to replicate the BellSouth reported SQM values, using BellSouth's instructions.

6. ***FOC Timeliness*** **in the Ordering category for the CLEC Aggregate.**

For each report *(Fully Mechanized, Partially Mechanized, Total Mechanized, and Non-Mechanized)*, KPMG was unable to replicate the BellSouth reported SQM values, using BellSouth's instructions.

7. ***Mean Held Order Interval and Distributions Interval* in the Provisioning non-trunks category for the CLEC Aggregate and BellSouth Retail, and the Provisioning trunks category for the CLEC Aggregate.** KPMG was unable to replicate the BellSouth reported SQM values, using BellSouth's instructions.

8. ***Usage Data Delivery Completeness* in the Billing category for the CLEC Aggregate and BellSouth Retail.** KPMG was unable to replicate the BellSouth reported "Day >30 Cumulative % Completeness Benchmark" value. BellSouth reports a rounded value of 1, although there are usage data records delivered after 30 days.

Category	KPMG Calculations	BellSouth's Report
Day >30 Cumulative % Completeness Benchmark (CLEC Aggregate)	0.9974825	1
Day >30 Cumulative % Completeness Benchmark (BellSouth Retail)	0.9978706	1

9. ***Mean Time to Deliver Usage* in the Billing category for the CLEC Aggregate and BellSouth Retail.** 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 (CLEC Aggregate)	3.64	4.64
Mean Time (BellSouth Retail)	2.42	3.42

10. ***Usage Data Delivery Accuracy* in the Billing category for the CLEC Aggregate.** KPMG was unable to replicate the BellSouth reported 'Total Data Packs Sent" value.

Category	KPMG Calculations	BellSouth's Report
Total Data Packs Sent	5012	5024

11. ***Invoice Accuracy* in the Billing category for the CLEC Aggregate.** KPMG was unable to replicate any of the BellSouth reported SQM values.

12. ***Mean Time to Deliver Invoices* in the Billing category for the CLEC Aggregate.**

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KPMG was unable to replicate the BellSouth reported "Mean Time to Deliver CABS Bills" value for the Interconnection type of service.

Category	KPMG Calculations	BellSouth's Report
Mean Time to Deliver CABS Bills -cal day; Interconnection	5.74	5.66

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 twelve 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 CLEC Aggregate.

The reason for the difference between the BellSouth report values and the KPMG report values is because of different calculation methods.

BellSouth calculation for the "avg." cut minutes per item is derived using the following:

avg. (cut time per item) = (cut comp – cut start) / # items

KPMG derived this by using the following:

avg. (cut time per item) = cut min / # items

The file that was used for generating the PMAP report for October 1999 contained manually calculated cut minutes. There were some errors in these calculations but the errors were of no consequence because the cut minutes were not used by the formula to calculate the CCC report. (There is a BellSouth group that uses cut minutes data for other reports.) These miscalculations in the cut minutes were discovered and beginning in November 1999 the cut minutes were calculated mechanically. The formula for calculating the cut minutes was applied to the October file which was inadvertently sent to KPMG instead of the original raw data file that was sent to the PMAP databases used calculating the CCC report. Also, when the cut complete and cut start times are the same the cut minutes are defaulted to 1 (one) minute when preparing the raw data file. When the PMAP databases calculate the cut minutes, the actual value is used in these cases instead of a default value. Both files used by KPMG and the original raw data file for October is available for re-testing as required.

Timeliness in the E911 category for the combined CLEC Aggregate and BellSouth Retail.

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The values found in the October SQM are correct. The instructions provided to KPMG lacked the specificity to permit KPMG to replicate the data. BellSouth has revised the instructions to be more specific and corrected one calculation. As a result, KPMG was able to replicate the Timeliness values in the E911 category for the October 1999.

Mean Interval in the E911 category for the combined CLEC Aggregate and BellSouth Retail.

KPMG should follow the revised method included in Item No. 3 of BellSouth's instructions. By doing so, KPMG should be able to replicate the Mean Interval Duration found in BellSouth's October 1999 report.

Updated instructions were sent to KPMG for review in calculation of data. As of 5/02/00 KPMG advised BellSouth that they were unable to replicate the October 1999 E911 Mean Interval of 3.81. KPMG's derived number was 3.819. BellSouth's Application Developer revised the narrative of PMAP's E911 Duration Calculation Procedure and sent this to KPMG on 5/9/00. KPMG reported on 5/10/00 that they were able to replicate the BellSouth reported value for Mean Interval Duration for this SQM.

BellSouth has updated its instructions available to CLECs to reflect the information provided to KPMG. BellSouth does not provide Raw Data to the CLECs for *Mean Interval in the E911* categories and does not provide instructions to the CLECs.

Percent Rejected Service Requests in the Ordering category for the CLEC Aggregate.

BellSouth agrees with KPMG that they were unable to replicate the BellSouth reported SQM values for *Percent Rejected Service Request* for the Non-Mechanized report for the CLEC Aggregate for October 1999.

BellSouth discovered that there were reject count errors in the October raw data. PMAP coding changes implemented in November affecting LSRs received will not allow BellSouth to replicate the exclusions for October data. The February version of the Raw Data Users Manual will allow KPMG to replicate data from December 1999 through March 2000. The following changes are important if KPMG desires to review additional months for data validation for this metric. A PMAP coding change request (Issue Tracker # 5705) implemented in April 2000 modified the SQM report to exclude LSRs cancelled prior to being rejected. The Raw Data Users Manual is being updated to reflect this information. A PMAP coding change request (Issue Tracker # 5542) has been issued to modify PMAP reports to reflect the new LCSC hours of operation. This coding change was implemented for May data in June 2000. The Raw Data Users Manual was updated to reflect this information.

The Ordering Reports for May were rerun because, prior to May, two pieces of code were designed to exclude non-mechanized LSRs, which were received and/or processed on weekends. Although the first piece of code was correctly rewritten to exclude appropriate weekend hours, the second was overlooked and LSRs received and/or processed on

weekends continued to be excluded. The correction was made to include LSRs received and/or processed on weekends prior to posting the June reports. BellSouth did not rerun the May reports until July 27, however the June 2000 *Percent Rejected Service Request* Report was correct when it was posted and available for validation prior to the rerun of the May report.

Originally, BellSouth had offered KPMG the May 2000 Report but because June 2000 was already available, BellSouth requested that KPMG retest for replication with the June 2000 *Percent Rejected Service Request* Report. KPMG reported on 8/21/00 that they were able to replicate June 2000 for the CLEC Aggregate for the *Percent Rejected Service Request* Report.

Reject Interval in the Ordering category for the CLEC Aggregate.

The values found in the October 1999 SQM are correct. Using the February version of the Raw Data Users Manual, KPMG was able to replicate the reported SQM values. BellSouth provided KPMG with sample queries and as a result, KPMG was able to replicate the *Reject Interval* for the CLEC Aggregate data for October 1999.

FOC Timeliness in the Ordering category for the CLEC Aggregate.

BellSouth agrees that KPMG was unable to replicate the BellSouth reported SQM for *FOC Timeliness* for the CLEC Aggregate for October 1999. Upon further investigation, BellSouth identified a problem in the interval "buckets". The difference between KPMG's numbers and PMAP's numbers can be attributed to the LSRs FOC'd (orders confirmed) in the 15th minute. KPMG was putting those LSRs in the 15-30 minute "bucket" while PMAP was including them in the 0-15 minute "bucket".

As a result of this KPMG draft exception, System Change Request 5848 was opened to clarify the bucket definitions and was effective for May data that was published in June. An interval chart for CR 5848 is shown below. The Raw Data Users Manual was updated in May, reflecting these changes.

The *FOC Timeliness* for the May report had to be rerun because prior to May, two pieces of code were designed to exclude non-mechanized LSRs, which were received and/or processed on weekends. Although the first piece of code was correctly rewritten to exclude appropriate weekend hours, the second was overlooked and LSRs received and/or processed on weekends continued to be excluded. The code was corrected and the report was rerun on July 27. Notification that May Ordering Reports had been rerun was posted to the Web on August 1, 2000. The July SQM further clarified the bucketization issue. BellSouth has provided KPMG with *FOC Timeliness* data for May and June 2000 for retesting.

KPMG should be able to replicate the most recent June *FOC Timeliness* Report which was sent to them on 8/22/00. The raw data is correct and has not changed. However, on the report that KPMG attempted to replicate initially, records were placed into "buckets" based on different interval values than those defined in the SQM and displayed on the

reports. The changes, which were made in May, were inadvertently dropped in June but have now been corrected permanently.

As a result of this situation, BellSouth requested that KPMG review July data for *FOC Timeliness*. KPMG reported on 9/7/00 that they were able to replicate *FOC Timeliness* for the CLEC Aggregate.

Change Request 5848 corrected the "Mechanized" FOC interval buckets as shown:

0 - <15 min	12 - <16 hrs
15 - <30 min	16 - <20 hrs
30 - <45 min	20 - <24 hrs
45 - <60 min	24 - <48 hrs
60 - <90 min	>= 48 hrs
90 - <120 min	
120 - <240 min	
4 - <8 hrs	
8 - <12 hrs	

Mean Held Order Interval and Distributions Interval in the Provisioning non-trunks category for the CLEC Aggregate and BellSouth Retail, and the Provisioning trunks category for the CLEC Aggregate.

The instructions in the Raw Data User Manual were corrected in the 2.0.7 version dated 07/26/00, with multiple changes to further clarify the instructions for *Mean Held Order Interval*. This is an update to previous instructions provided to KPMG.
Also, prior to December 1999, a section of the Ardent DataStage code that is used to create Held Order and Held Order Trunking reports was incorrect. This was explained in the initial set of instructions. A correction was made to the code that changed the assignment of the synthetic key by ordering the loading of the table by CMTT_DATE ascending. This change made the minimum CMTT_DATE correspond to the minimum SO_CMTT HIST_ID and so forth so that the final and first commitments selected would be the final and first CMTT_DATE. Due to the nature of this error, the October 1999 Held Order and Held Order Trunking raw data cannot be used to replicate the end report.

A change request (CR 6070) was entered into issue tracker to make a correction to the Ardent code to exclude orders in 'CP', PC, CA status and to only include orders where CMPLTN_DT is null. This was effective with the July data for August 15th reports.
Ardent DataStage code was corrected as stated above in CR 6070.
KPMG should use July data to replicate *Mean Held Order Interval and Distributions Interval.*

BellSouth was able to replicate the July Held Order Interval and Mean report using the following changes to the Raw Data Users Guide:

The text **'Include records where so_cmtt_cd field contains W, X, F, L, M or blank.'** was removed from the Raw Data User's Guide (RDUG). A new step #8 was created between step #7 and old step #8 with the addition of the text **'Include records where**

so_cmtt_cd field contains W, X, F, L, or M'. The so_cmtt_cd field is only valid for the original commitment on an order, and not for subsequent commitments, and should therefore only be applied to the step in the RDUG that selects the minimum so_cmtt_hist_id.

Additionally, bullet points were added to step #7 and new step #8 that decrease the size of record sets that need to be compared to finish recreating the measure.

Usage Data Delivery Completeness in the Billing category for the CLEC Aggregate and BellSouth Retail.

The PMAP reports for BellSouth 'Day >30 Cumulative % Completeness Benchmark (CLEC Aggregate) & Day >30 Cumulative % Completeness Benchmark (BellSouth Retail)' show the same results for OCT 1999 as KPMG. There was a programming problem that was corrected in PMAP, Issue Tracker #5584 on Feb 18, 2000. This report has been re-run, verified to match, and resent to KPMG on 6/5/00. The file used by KPMG is available for retesting as required.

Mean Time to Deliver Usage in the Billing category for the CLEC Aggregate and BellSouth Retail.

There was a programming problem in PMAP that has been corrected.
The BellSouth team has researched these issues and they are now corrected as of 2/2/00. The weighting that is currently applied to this measure in an Excel spreadsheet 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 was change request 5419. This report has been re-run, verified to match, and resent to KPMG on 6/5/00.

Usage Data Delivery Accuracy in the Billing category for the CLEC Aggregate.

The OCN/ACNA files used by PMAP for mapping the CLEC is a manual process. There were OCNs provided in the Billing data that were not included in the OCN/ACNA mapping file for PMAP. The data associated with these OCNs represent the difference in the KPMG & BellSouth reports. The PMAP group must manually update the OCN/ACNA tables to coincide with the CLECs OCN/ACNA value reflected on the individual accounts. A process for automating this function has been addressed by the PMAP group.

BellSouth has provided KPMG with an electronic copy of the NODS_RQ Company file for October 1999 on 6/22/00. KPMG was able to replicate the BellSouth 'Total Data Packs Sent' value for October 1999.

Invoice Accuracy in the Billing category for the CLEC Aggregate.

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For Invoice Accuracy in the Billing Category for the CLEC Aggregate KPMG compared their calculations to the PMAP results. BellSouth used KPMG's comparisons to evaluate why the replication cannot be done on this measure. BellSouth evaluation of the data reveals that there are some OCNs and ACNAs on the BBI data that KPMG didn't include. Those OCNs / ACNAs that are not in KPMG's data are also the same ones that are not on the CLECID file in their comparison. If those OCNs / ACNAs were added into KPMG's data, the KPMG and PMAP Billing data figures would be the same. After review of the PMAP revenue amounts (and excluding the revenue amounts without OCN / ACNAs values in PMAP), the difference is that PMAP used the absolute value of the total billed revenue for UNE and Interconnection.

On 6/22/00 KPMG requested a copy of the rerun results for October 99 data for Invoice Accuracy. BellSouth has provided KPMG with an electronic copy of the NODS_RQ Company file for October 1999 on 6/22/00.

The differences in the data that Billing reported versus the figures that PMAP reported were due to PMAP handling of the negative revenues and the fact that the October 1999 NODS_RQ Company file did not include some of the test accounts or ICOs. If KPMG excludes the fall out of the test accounts and ICOs from the totals, the results would be the same as reported in PMAP. In summary, if 'fallout' from PMAP is determined to be 'BST test data' or BST accounts that have not been identified as a valid CLEC, PMAP will exclude it from the final reports.

A correction to NODS_RQ_Company was made to make OCN 2834 an active (unexpired) code. The May 2000 CLEC Resale Invoice Accuracy report was rerun and the corrected version posted to the web. With this correction, revenue of $60,554.54 and an adjustment of $132.91 are included in the CLEC Resale values. In addition, the combined revenue for ACNAs ZZR and ZZS ($2,892) continues to be correctly excluded from the CLEC Interconnection revenue total. With the inclusion of values for OCN 2834 and the exclusion of values for ZZR and ZZS, the report now matches the values shown in the calculations provided by KPMG on 8/28/00.

Mean Time to Deliver Invoices in the Billing category for the CLEC Aggregate.

The OCN/ACNA files used by PMAP for mapping the CLEC is a manual process. There were ACNAs provided in the Billing data that were not included in the OCN/ACNA mapping file for PMAP. The data associated with these ACNAs represent the difference in the KPMG & BellSouth PMAP reports. The PMAP group must manually update the OCN/ACNA tables to coincide with the CLECs OCN/ACNA value reflected on the individual accounts. A process for automating this function has been addressed by the PMAP group.

The *Mean Time to Deliver Invoices in the Billing category for the CLEC Aggregate* report was rerun for October 1999 after the 2 ACNAs/OCNs into the NODS_RQ Company file for October 1999. The report was provided to KPMG on 6/22/00. KPMG verified that

BELLSOUTH'S SEVENTH AMENDED RESPONSE TO EXCEPTION 52

the *Mean Time to Deliver CABS Bills"* value for the Interconnection type of service matched the BellSouth reported value.

A correction to NODS_RQ_Company was made to make OCN 2834 an active (unexpired) code. The May 2000 Mean Time To Deliver Invoice report was rerun and the corrected version posted to the web. The workdays for the two (2) invoices for OCN 2834 are now included in the PMAP-generated values for CLEC Region Resale for the CRIS bills, thereby agreeing with the KPMG calculated values. The BBS End User ACNAs of ZZR and ZZS were not involved in this exception.

BELLSOUTH'S NINTH AMENDED RESPONSE TO EXCEPTION 89

BELLSOUTH

September 18, 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 data[1] used in the calculation of BellSouth Service Quality Measurement (SQM) reports are not accurately derived from or supported by their component early-stage data[2].

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.

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[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.

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_BLKG (*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.

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 record[6] 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 order[7].

[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.

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

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.

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 Reports[8].

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.

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. The Time Consistent Busy Hour (TCBH) is determined based on half-hour increments of each 24-hour day during the study period. The data previously being provided to KPMG by BellSouth was in one-hour increments of each 24-hour day during the study period. BellSouth is now providing the data to KPMG in half-hour increments. 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.

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% (hour21)	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.

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. BellSouth is currently debugging the code to determine how the **TRAN TIME** 'value' is being calculated as a negative number. 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.

BellSouth has investigated the issue of the negative transaction times in the Navigator debug facility. Using a utility called 'navswim', BellSouth traced the **TRAN TIME** calculation back to a file in one of Navigator's libraries. The logic in this file is incorrect. The dequeue time was sometimes being computed incorrectly, affecting the SNA time, and ultimately affecting the calculation of the transaction time. The logic has been changed to correct the problem, has been checked into the CMVC, and will be included in the next Navigator release. The last Navigator release (RIs. 4.6.2) was made available on July 10, 2000. The next Navigator release is currently being scheduled for 4Q2000.

BellSouth has requested that KPMG consider any time field with a negative value to be an invalid data row. The fields to check for such negative numbers are as follows: queue_ms, proc_ms, network_ms, dequeue_ms, navigator_ms, tcpip_ms, and total_ms.

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

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

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.

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)

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)

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.

KPMG reported that 11 of 34 sample ASRs from June Exact screen printouts have an issue with the FOC_DATE and/or FOR_DURATION. The cells in red in the table sent to KPMG are where the BellSouth Raw Data value differed from the KPMG valued calculated using the EXACT screen printout.

To calculate the FOC Duration BellSouth uses the fields d_cnf (date confirmed = FOC date) and d_rec (date received). This data was taken from a snapshot of June early stage data. KPMG did not use these fields in its calculations and was unable to replicate the FOC Duration.

The first table sent to KPMG shows the early stage June snapshot data as found by BellSouth and BellSouth's calculation of the FOC Duration. The first table also lists the foc_date and foc_duration that was found by KPMG in the BellSouth Raw Data file. This table shows that the values reported by BellSouth in raw data are the same as the values found in the June early stage snapshot.

The second table sent to KPMG lists early stage data values found by using EXACT screen printouts. Data found in EXACT screen printout may vary from early stage snapshot data because fields in the EXACT system may have been modified since the time the data snapshot was taken.

NOTES: Sample EXACT screen print data as it was provided to KPMG can be found in Appendix A. From the screen print data the field 'D/TREC' corresponds to 'd_rec' and 't_rec' in the above table, and the field 'CD/TSENT' corresponds to 'd_cnf' and 't_cnf' in the table. Corresponding fields for 'd_sent' and 't_sent' from the table were not included in the screen prints because this data is not relevant for calculating the measure. The 'd_sent' and 't_sent' fields are a timestamp of when CLEC data is sent from Telis to EXACT. Due to batch processing restrictions EXACT receives this data at the time represented by the fields 'd_rec' and 't_rec' from the table.

Appendix A

/FOR: ICADM *ICSC: ASR ADMINISTRATION INFORMATION * 08/17/00 16:38
COMMAND TARGET

ASR 0013900229 OWNER CPOC ORD CO5GV6J2 JEP STATUS FKR T ACA
REQTYP MD ACT C CCNA DLT PON DLT00LOC00359C VER C RPON
ECCKT 1 /DF-4ESJ912 /ALBYGADZ1MD/M-/ALBYGAMA13T FMT LTERM ASI
********** BILLING INFORMATION **********
BILLNM ITC^DELTACOM SBILNM PAM COOPER ACNA DLT TE A
STREET 1791 O.G.SKINNER DR. FL NA RM NA
CITY WESTPOINT ST AL ZIP 31833
BILLCON TEL 706 645 3838
VTA EBP VCVTA IWBAN
********** CONTACT INFORMATION **********
INIT SHIRLEY ISBELL TEL 256 264 1222 FAX 256 264 1583
STREET P.O. DRAWER 1301 FL NA RM NA
CITY ARAB ST AL ZIP 35016
EMAIL
DSGCON SHIRLEY ISBELL TEL 256 264 1222 FAX DRC FDRC
STREET P.O. DRAWER 1301 FL NA RM NA
CITY ARAB ST AL ZIP 35016
EMAIL
IMPCON SERVICE INSTALL TEL 888 517 8925 MTCE TEL
D/TREC 072700 11:30

/FOR: ICCNF *ICSC CONFIRMATION* 08/17/00 16:39
COMMAND REQUEST REFNUM
ASR 0013900229 OWNER CPOC ORD CO5GV6J2 JEP STATUS FKR T
REQTYP MD ACT C CCNA DLT PON DLT00LOC00359C SPA RT F INIT SHIRLEY ISBELL
VER C
ECCKT 1 /DF-4ESJ912 /ALBYGADZ1MD/M-/ALBYGAMA13T FMT LTERM
********** ASR DETAILS AND SERVICE OPTIONS **********
ICSC SB01 CD/TSENT 061500 15:07 APREP T-HINTON TEL 800 666 0580 2169
EMAIL
ECVER 03 PIA PRVNT PROJ LTDLTALBYE911 CNO
APP 060900 DLRD CDLRD PTD 061400 DD 061600 EBD
BAN 912 S01-0005 LSO 912432 SC TSP
SECLOC ECSPC

FDLRD FCDLRD FPTD FDD
FNI CFNI RTI CIWBAN
********** SERVICE OPTIONS **********
MBA CAD SCD ASU CFW CWG CND HWL MWI HNTYP QUE SPC
TWC SMDI IEX RCF SSS CDND DID DIDQ
DIDR TNSC
RMKS

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".

On 8/28/00 BellSouth sent KPMG additional information (see below), that KPMG had requested, regarding raw data file rerun notification procedures, as a result of several CCC conference calls. On 8/30/00, KPMG reported that the document adequately provided for the definition of the CCC process.

Coordinated Customer Conversions Reports Raw Data File

Data used to generate the Coordinated Customer Conversions (CCC) report are obtained from CCSS and WFA-C. Each month data from these sources are combined to create a monthly file of the UNE loop conversions completed in the previous month. In addition to orders for UNE loop conversions (cuts) this file contains data on orders that are not UNE loop conversions (new service, disconnects, rearranges, relocations, etc.). The data concerning service orders relevant to the CCC report are then extracted from this file to create the raw data file. The CCC report is then generated using this raw data file.

When situations arise in either of these systems that impact the data in a previous month's raw data file a new monthly file must be provided so that a new raw data file can created. Notification should be provided that creation of a new monthly file is necessary, why the new file is necessary, and when the new monthly file is available. This notification should be provided to one of the PMAP Provisioning SMEs. Listed below is a current list of the Provisioning SMEs. The PMAP SME will then make an assessment to determine if the CCC report will need to be rerun. If necessary, the report will be rerun against the new raw data file and appropriate notification of the rerun of the report will be provided.

The CCC report is currently in the process of being mechanized which will replace the above process. In this mechanized process data will be transmitted from the Coordinated Cut Scheduling System (CCSS) twice daily to ICAIS (Barney). A "snapshot" will be taken from ICAIS on the third workday of the month for the previous month's data. This "snapshot" will be used to generate the CCC report, in addition to other reports concerning UNE loop conversions (currently the CCC - Hot Cut Timeliness is being developed and will be mechanized as well as other reports). In the event that a new "snapshot" is necessary notification as described above should be done. Also, the PMAP Project Manager and PMAP Run Team Lead must be notified. An assessment will then be made to determine if any report(s) will need to be rerun. If necessary, the report(s) will be rerun against the new "snapshot" and appropriate notification of the new raw data file and the rerun of the report(s) will be provided.

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 December, 1999 data for *Percent Provisioning Troubles within 30 Days of Service Order Activity* for KPMG to revalidate early stage data and raw data.

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

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

1.) The 'so_missed_cmtt_cd' field did not match for the following five service orders from ICAIS/BARNEY to raw data: ('NO1MTCP0', 'NO85N2Y9', 'NOB4GHY7', 'NO83B1R1', 'NO3WTR51')

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

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

BellSouth was unable to replicate the discrepancies identified by KPMG for the 'status' field for the 17 service orders listed above. Queries were run in the ICAIS/BARNEY and raw data databases. The results from these queries show that the 'status' field matches for 14 distinct service orders. There were three service orders that were exceptions. These service orders fell out of raw data because they possess a cmpltn_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',

'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
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.

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.

BELLSOUTH'S NINTH AMENDED RESPONSE TO EXCEPTION 89

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 validate 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 inclusion in the Billing SQM.

BELLSOUTH'S NINTH AMENDED RESPONSE TO EXCEPTION 89

CERTIFICATE OF SERVICE
Docket No. 8354-U

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

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