BELLSOUTH

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December 21, 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)**
9/29/00	KPMG Exception 111 and BST Statement of Investigation; BST Amended Response to Exception 106, 2nd Amended Response to Exceptions 32 and 103, 3rd Amended Response to Exception 46, 4th Amended Response to Exception 90; 6th Amended Response to Exception 62; and 10th Amended Response to Exception 89
10/05/00	KPMG Closure Report for Exceptions 18, 55 and 63
10/05/00	KMPG Amended Exception 24, Exception 112; BST Response to Exception 112; 2nd Amended Responses to Exceptions 9, 108 and 110; 3rd Amended Response to Exception 107; 4th Amended Response to Exception 88
10/11/00	KPMG 2nd Amended Exception 28; BST response to Exceptions 104 and 111, 2nd Amended Response to Exception 31; 4th Amended Response to Exception 46; 5th Amended Response to Exception 90; 6th Amended Response to Exception 86; 7th Amended Response to Exception 62; 8th Amended Response to Exception 52
10/30/00	KPMG Amended Exceptions 38, 60, 68, 78, and 98 and Statement of Re-

POSTED 12-21-00

Date Filed	Description of Document(s)
	opening for Exception 21; BST Amended Response to Exception 79, 3rd Amended Responses to Exceptions 74, 108, and 110; and 5th Amended Responses to Exceptions 28 and 88
10/30/00	KPMG Closure reports for Exceptions 100, 102 and 109
11/01/00	Letter from Leon Bowles, Director of Telecommunications, Georgia Public Service Commission, request for continued testing and audit of test results
11/02/00	KPMG Interim Status Report
11/14/00	KPMG Closure Report for Exceptions 32, 33, 35, 42, 43, 62 and 65
11/14/00	KPMG 2nd Amended Exception 38, Amended Exception 71, Exceptions 113, 114 and 115 and Amended Exception 114; BST Response to Exception 21 Statement of Re-opening, Responses to Exceptions 114 and 115, Amended Response to Exception 114; 3rd Amended Responses to Exceptions 38, 71, 74, and 78; 6th and 7th Amended Responses to Exception 88; and a Statement of Investigation for Exception 113
12/05/00	KPMG Amended Exceptions 77 and 113, 2nd Amended Exceptions 71 and 114, 3rd Amended Exception 38, Exception 47 Statement of Re-opening; BST response to Exception 113; Amended Responses to Exceptions 24, 68, 98, 111 and 113; 2nd Amended Response to Exception 60, 4th Amended Responses to Exceptions 71, 78 and 108, 7th Amended Responses to Exception 86 and 92, 11th and 12th Amended Responses 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 December 21, 2000, a copy of the foregoing document was served on counsel for the petitioner and the entities seeking intervention, via the method indicated, addressed as follows:

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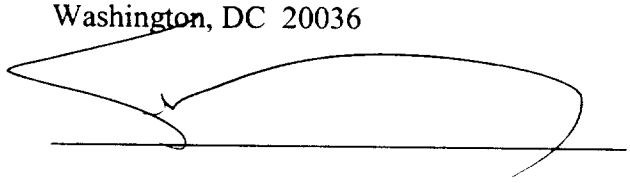
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RECEIVED
OCT 02 2000
EXECUTIVE SECRETARY
G.P.S.C.

September 29th, 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

Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of KPMG Consulting LLC's Exception 111 and BellSouth's Statement of Investigation for Exception 111 along with BellSouth's Amended Response to Exception 106, Second Amended Responses to Exceptions 32 and 103, Third Amended Response to Exception 46, Fourth Amended Response to Exception 90, Sixth Amended Response to Exception 62, and Tenth 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

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 the Performance Measurement testing associated with the validation of service quality measurement (SQM) calculations.

Exception:

KPMG Consulting LLC (KCL) cannot replicate one of BellSouth's reported Service Quality Measurements (SQMs) for the month of July 2000.

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.

KCL has been unable to replicate the following SQM values:

1. ***Total Service Order Cycle Time*** **in the Provisioning category for the KCL Test CLEC (July 2000).** The discrepancies found by KCL are listed in the table below:

Category	KCL Calculations	BellSouth's Reports
Non-Dispatch OCN 9994 UNE Non-Design < 10 Circuits > 30 Days	1	0
Non-Dispatch OCN 9994 UNE Non-Design < 10 Circuits Average Interval (Days)	109	0

[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.

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 applicable SQM 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 STATEMENT OF INVESTIGATION TO EXCEPTION 111

BELLSOUTH

September 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 Consulting LLC (KCL) cannot replicate one of BellSouth's reported Service Quality Measurements (SQMs) for the month of July 2000.

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.

KCL has been unable to replicate the following SQM values:

1. ***Total Service Order Cycle Time*** **in the Provisioning category for the KCL Test CLEC (July 2000).** The discrepancies found by KCL are listed in the table below:

Category	KCL Calculations	BellSouth Reported
Non-Dispatch OCN 9994 UNE Non-Design < 10 Circuits > 30 Days	1	0
Non-Dispatch OCN 9994 UNE Non-Design < 10 Circuits	109	0

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

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

BELLSOUTH'S STATEMENT OF INVESTIGATION TO EXCEPTION 111

Category	KCL Calculation	BellSouth's Report
Average Interval (Days)		

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 applicable SQM 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

BellSouth is currently investigating this exception and will provide a response when the investigation is complete.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 106

BELLSOUTH

September 14, 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 Response

Observation Date	Order Number	Number of Lines	Response	Action
5/15 Agree Central Office Error	60630	3	FDT 5PM The cut was made prematurely. Cut was completed and ported prior to 5 PM	Individual Central Office Technician covered on proper procedure by supervisor on 5/16

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 106

5/16 Disagree Order had been PF'd	59643	7	Original Due Date 5/16 FDT 10:45am Order was PF'd on due date, was never assigned to a technician for conversion due to PF condition, therefore no opportunity to make hot cut at designated time. Order status is made available to the CLEC through various web reports. Note: This order was subsequently rescheduled for 10:45 on 6/20. The technician was on site and ready to cut at 10:43, however, the order was canceled by CLEC.	No action required. There was no error in the processing of a hot cut on observation date.
5/25 Agree Central Office Issue	61832	8	FDT 8AM Central Office Technician reported tie pair conflict prior to cut time, however, the problem was not resolved until start time of 10:34am. Cut complete at 11:08am. Customer had a subsequent problem relative to incorrect service order. CLEC ordered service as Loop Start, should have been Ground Start.	Individual Central Office Technician covered on proper procedure by supervisor on 5/25

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 106

6/07 This should be counted as a failure to follow M&Ps rather than this category for hot cuts .	63715	5	FDT 12:49pm Order was in error status on 6/6. Call was made to LCSC by UNEC to verify error. Duplicate circuit IDs had been incorrectly entered on order by LCSC. Order was corrected on 06-06 and due date was updated for 06-08. There was no attempt to make cut on 06-07 since the due date had been updated to 06-08. The technician was dispatched and order conversion occurred at designated time on time on 06-08. CLEC was advised on 6/6 and 6/7 of delay and new date. LCSC changed date due to service order error, and CLEC was notified of new date.	LCSC error Due date updated to 6/8. No attempt on 6/7 observation date based on new due date.

6/13 Somewhat Disagree	63232	2 (1 conversion 1 new line)	The Field Technician was on site prior to FDT. In provisioning the new loop, line had be re-run to customer location. Rats had chewed wire leading into the suite. CLEC was advised of delay in provisioning new loop. CLEC advised BellSouth UNE technician to cut service when new line was ready. Actual Conversion on existing line began at 5:26pm and was complete at 5:33pm after new line problem was resolved.	Cut was delayed due to problem at end-user location, however, the technician could have made the conversion at the appointed time and he could have continued to work on the new line. In this instance, the CLEC was notified of new line delay, and said work the conversion along with the new line installation. Updates to the process have been written to give further instructions when working conversions and new lines on the same LSR/Order.
6/14 Agree	65202	3	FDT 2pm IDLC Conversion Outside technician delay. Conversion began at 6:00pm and was completed at 6:08pm.	No training or follow-up required. WMC/Field issue in securing a timely dispatch due to work load.

BellSouth provides a Firm Order Confirmation (FOC) after a valid, error free order has been submitted by the CLEC. This order confirmation does not guarantee the date/time requested, but in most cases BellSouth is able to meet the requested time. In instances where a facility problem exists, resulting in an order being PF'd , the CLEC is provided with web reports for tracking, i.e. PF report, PON Status reports, CSOTS. The CLEC must use these reports to determine status to keep their end-user updated of potential due date jeopardies. In one of the instances above, the date was not met due to a PF condition. This was not a failure in the hot cut process, but rather normal PF processes and procedures.

Based on the findings detailed above, only 3 of the six Order numbers listed above should be scored as "Not Satisfied" due to the inability to meet the requested FDT. One of the

six involving an LCSC error should be counted as a failure to follow Methods and Procedures since the updated order was not re-FOC'd to the customer when the due date was updated.

There were no installation attempts made on the order that was PF'd prior to due date (Order 59643). Additionally, Order 63715 had a service order error and was subsequently updated to 6/8.

Finally, in one instance (Order 63232), involving a new line installation along with a conversion, the CLEC and UNEC had the option of converting 1 line at scheduled time, but CLEC advised to wait until new line was installed before beginning the conversion on the existing line.

With the PF and clarification issue considered, along with the M&P adherence, BellSouth performed at a success rate of 94% for observed hot cut observations with a 95% target.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 32

BELLSOUTH

September 22, 2000

EXCEPTION REPORT

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

Exception:

BellSouth delivered Firm Order Confirmations (FOCs) on transactions after issuing Clarifications (CLR).

According to BellSouth ordering documentation, a CLR is delivered to a CLEC when BellSouth receives a service order containing an error[1].

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

As of February 16, KPMG identified eight transactions that received an FOC after receiving a CLR for the same transaction

Firm Order Confirmations delivered after receipt of Clarifications

PON	VER	LCC	CLR Received	FOC Received	Action / BellSouth Response
329A212PTI100003	00	9992	12/17/99	12/20/99	Agree, PON clarified for invalid ACTL. The individual Service Rep was covered when the incident occurred.
415A213PTM000001	00	9991	12/09/99	12/09/99	Agree, PON clarified in error. LCSC service reps covered on 2/01/00 on proper procedures for processing suspend/restore requests.
625A214PTJ100001	05	9991	12/10/99	12/22/99	Agree, PON clarified in error. LCSC service reps covered 1/3/00 on proper procedures on hunting sequences.
403A223PTM100003	00	9994	02/10/00	02/10/00	Disagree, PON clarified for Bill Information being different from Q account. Through conversations, the correct process for changing billing info was furnished. The LCSC agreed not to continue to clarify if this was the only error on the LSR and agreed to process the clarified PON.

[1] *Local Exchange Ordering (LEO) Guide Volume 1, Issue 7N*, January 2000, Section 2.4.

[2] According to the *LEO Guide, Section 2.4*: "Requests for service cannot be processed until a complete and accurate LSR has been received."

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 32

626A224PTJ100002	04	9991	12/13/99	12/13/99	Disagree, PON clarified 12/13/99 for incorrect USOCs and on 12/29/99 automatically cancelled by the system. An FOC was never sent by BellSouth.
402E223PTM000002	03	9994	01/18/00	01/18/00	Agree, PON clarified in error and was subsequently cancelled by the system. An FOC was never sent by BellSouth.
441C214PEM000001	00	9991	01/14/00	01/18/00	Agree, PON clarified in error. LCSC service rep covered on 2/01/00 on proper procedures for processing suspend/restore requests.
417X223PTM000002	01	9991	01/14/00	01/14/00	Disagree, PON clarified for incorrect cable and pair.

Impact

By generating a second response on a transaction, BellSouth could cause significant disruption to the CLEC ordering process. For example, a CLEC is likely to submit a Supplement following receipt of a CLR on an initial transaction. Receipt of an FOC on the initial transaction subsequent to submission of a Supplement would introduce confusion into the order management process. The effort required to investigate the reason for the FOC on a transaction that already received a prior response would add additional time and cost to the CLEC's.

Additional BellSouth Response

See above table for responses to specific PONs. BellSouth agrees that 5 of the 8 transactions were clarified in error which resulted in FOCs being sent after clarifications. BellSouth Service Representatives were retrained on the specific issues on the indicated dates. BellSouth disagrees with 3 of the identified instances. BellSouth has implemented an on-going performance and development process to improve service representative's proficiency in handing issues described in this exception.

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 recommended a future enhancement, 19708, to the LNP electronic systems to notify a CLEC when an incorrect/inappropriate clarification has been generated; and to have the electronic capability to re-FOC LSRs. This enhancement is going through the change control process to establish a target implementation date. Non-LNP electronic systems currently have the capability to allow transmission of a FOC after a Clarification has been sent.

An interim process for LNP LSRs to send a FAX FOC after a Clarification will be implemented by 5/15 and CLEC notification will be posted on the WEB by 5/15 to explain both processes.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 32

BellSouth has also opened feature 9874 to provide the ability to re-send an FOC with modified data for non-LNP orders. Feature 9874 has been submitted for internal review and prioritization in a future release.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 103

BELLSOUTH

September 20, 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 SECOND 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 SECOND 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 (Copy of the record follows)

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 103

010131	000405	10	4046334121	000	10	4047999478	00022000	0000000	143

BellSouth agrees this call was not included on the invoice sent to KPMG. However, due to the age of the call at the time the exception was reported to BellSouth, the final destination of the call within the billing system can not be determined. BellSouth's billing system incorporates dozens of error routines to rate, guide, aggregate and pull for billing individual call records. It is thought that one of these edits caused the usage to error out and, due to the limited volumes of calls for the customer, was subsequently written off. The edits and investigation processes used for CLEC resale calls are identical to those used for BellSouth's retail customers. Therefore, the treatment of CLEC calls is at parity with BellSouth's retail operations. Additionally, since the call was included on ODUF, the observed treatment of this particular call does not impede or hinder, in any way, the CLEC's ability to bill its end user.

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 (Copies of the records follow)

010131	000405	10	4046334121	000	10	4046330247	00033000	0000000	142
010131	000405	10	4046334121	000	10	4046330247	00033000	0000000	145

BellSouth agrees these calls were not included on the invoice sent to KPMG. However, due to the age of the calls at the time the exception was reported to BellSouth, the final destination of the calls within the billing system can not be determined. BellSouth's billing system incorporates dozens of error routines to rate, guide, aggregate and pull for billing individual call records. It is thought that one of these edits caused the usage to error out and, due to the limited volumes of calls for the customer, was subsequently written off. The edits and investigation processes used for CLEC resale calls are identical to those used for BellSouth's retail customers. Therefore, the treatment of CLEC calls is at parity with BellSouth's retail operations. Additionally, since these calls were included on the ODUF, the observed treatment of these particular calls does not impede or hinder, in any way, the CLEC's ability to bill its end user.

Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Local operator completed collect

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 103

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 (Copies of the records follow)

010131	000405	10	4046334121	000	10	4046330247	00033000	0000000	142
010131	000405	10	4046334121	000	10	4046330247	00033000	0000000	145

BellSouth agrees these calls were not included on the invoice sent to KPMG. However, due to the age of the calls at the time the exception was reported to BellSouth, the final destination of the calls within the billing system can not be determined. BellSouth's billing system incorporates dozens of error routines to rate, guide, aggregate and pull for billing individual call records. It is thought that one of these edits caused the usage to error out and, due to the limited volumes of calls for the customer, was subsequently written off. The edits and investigation processes used for CLEC resale calls are identical to those used for BellSouth's retail customers. Therefore, the treatment of CLEC calls is at parity with BellSouth's retail operations. Additionally, since these calls were included on the ODUF, the observed treatment of these particular calls does not impede or hinder, in any way, the CLEC's ability to bill its end user.

BELLSOUTH'S SECOND 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

BellSouth Reply: BellSouth disagrees that this is a valid issue. The two call records cancel each other out and, therefore, would not appear on the invoice. However, both records were sent on ODUF (Copies of the records follow):

010101	000406	10	4046330247	000	10	7067826488	00004800	0000000	091
030101	000406	10	4046330247	000	10	7067826488	00000000	0000000	091

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 agrees that this call was not sent to KPMG on ODUF although the invoice correctly reflects the charges for this call. In processing this call through the billing system one of the system edits identified an error to be investigated. As the error was resolved, the call was released back into the billing system to be billed. An indicator that is used to tell the system whether or not a copy of the call record had already been sent to DUF was incorrectly set. This kept the record from going to KPMG. A system trouble ticket has been issued to correct this problem and was completed on 9/16/00.

The bill number is 706-Q59-4492-492 not 770. The call billed correctly (see item number 65).

65. APR 5 324P ROME GA 706 235-6343 ROME GA 706 235-5762 DS 2.73

BELLSOUTH'S SECOND 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	

Local Call Detail is available for the local calls listed above however, the service must be ordered on a per account basis. Please refer to Section A3.22 of the Georgia GSST for more information on LUD.

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

BellSouth agrees that one of the 8 calls was not sent to KPMG on ODUF although the invoice correctly reflects the charges for all 8 calls. In processing this call through the billing system one of the system edits identified an error to be investigated. As the error was resolved, the call was released back into the billing system to be billed. An indicator that is used to tell the system whether or not a copy of the call record had already been sent to DUF was incorrectly set. This kept the record from going to KPMG. A system trouble ticket has been issued to correct this problem and was completed on 9/16/00.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 46

BELLSOUTH

September 22, 2000

EXCEPTION REPORT

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

Exception:

KPMG cannot replicate seven 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 perform its calculations, KPMG has relied on BellSouth's *PMAP Raw Data User Manual*[2], where applicable, and the corresponding raw data. Technical assistance has been provided by BellSouth, when necessary.

KPMG has been unable to replicate the following SQM values:

1. ***Percent Rejected Service Requests* in the Ordering category for the KPMG test CLEC (November 1999 and January 2000).** For each report *(Fully Mechanized, Partially Mechanized, Total Mechanized, and Non-Mechanized)*, KPMG was unable to replicate the values for the UNE and OTHER products using BellSouth's instructions.

2. ***Reject Interval* in the Ordering category for the KPMG test CLEC (November 1999 and January 2000).** For each report *(Fully Mechanized, Partially Mechanized, Total Mechanized, and Non-Mechanized)*, KPMG was unable to replicate the values for the UNE and OTHER products using BellSouth's instructions.

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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. ***Firm Order Confirmation Timeliness (Non-Trunks)* in the Ordering category for the KPMG test CLEC (November 1999 and January 2000).** For each report *(Fully Mechanized, Partially Mechanized, Total Mechanized, and Non-Mechanized)*, KPMG was unable to replicate the values for the UNE and OTHER products using BellSouth's instructions.

4. ***Order Completion Interval* in the Provisioning category for the KPMG test CLEC (November 1999, December 1999 and January 2000).** For November 1999, KPMG was unable to replicate the UNE Non-Design products for OCNs 9990 and 9991 using BellSouth's instructions. For December 1999, KPMG was unable to replicate the Residence and UNE Design products for OCN 9991 using BellSouth's instructions. For January 2000, KPMG was unable to replicate the UNE Non-Design product for OCN 9991 and 9994 using BellSouth's instructions.

5. ***Total Service Order Cycle Time*[3] in the Provisioning category for the KPMG test CLEC (November 1999, December 1999 and January 2000).** For the November 1999 *Fully Mechanized* report, KPMG was unable to replicate the UNE Design product for OCN 9990 using BellSouth's instructions. For December 1999, KPMG was unable to replicate each of the reports *(Fully Mechanized, Partially Mechanized, and Non-Mechanized)* using BellSouth instructions. For the January 1999 *Fully Mechanized* report, KPMG was unable to replicate the UNE Non-Design product for OCN 9994 using BellSouth's instructions.

6. ***OSS Interface Availability*[3] in the Pre-Ordering and Maintenance and Repair Categories for the CLEC Aggregate (December 1999).** KPMG was unable to replicate two values from the BellSouth report, as shown in this table:

Category	KPMG Calculations	BellSouth's Report
LEO Mainframe	Data not available[4]	100.0000%
CLEC TAG System	99.9837%	99.9667%

Additionally, there were records in the data file for the CRLNOP1D and CRLNOP2D system that BellSouth did not include in its report.

7. ***Mean Time to Deliver Usage*[3] in the Billing category for the KPMG test CLEC (November 1999).** BellSouth weighted the record volume by adding 1.5 to the "Days Delayed," rather than the 0.5 indicated in their written instructions. Thus, the BellSouth calculated value is greater than the KPMG-calculated value by 1. The resulting disparity is shown in this table:

Category	KPMG Calculations	BellSouth's Report
Mean Time	4.55	5.55

[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.

[4] When BellSouth provided the raw data for this SQM, KPMG was unable to identify any data relating to the LEO Mainframe.

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 seven applicable SQMs may be in question. Without accurate SQMs, CLECs are unable to assess.

BellSouth Response

Percent Rejected Service Requests in the Ordering category for the KPMG test CLEC (November 1999 and January 2000).

For Percent Rejected Service Requests in the Ordering Category, "Combos" are included in the "Other" category rather than "UNE" or "UNE Other". However, a change request is pending that would move the product "Combos" from the "Other" category to a separate category called "Combos". Business requirements are being developed and this change request will be prioritized with other pending changes.

Reject Interval in the Ordering category for the KPMG test CLEC (November 1999 and January 2000).

For Reject Interval in the Ordering category, "Combos" are included in the "Other" category rather than "UNE" or "UNE Other". However, a Change Request is pending that would move the product "Combos" from the "Other" category to a separate category called "Combos".

Although KPMG replicated June reports for the test CLEC, KPMG was unable to replicate the May report for the Test CLEC. This was due to the fact that BellSouth reran May's data 2 times. The 1st rerun was on June 14th because the PMAP production team did not originally migrate the ORNDDfLsrFatalRejects job into batch 60 which used the new table to identify fatal rejects. The 2nd rerun was on July 20th. The reason for the second rerun was to exclude the weekends and addition of the 36hr bucket.

Firm Order Confirmation Timeliness (Non-Trunks) in the Ordering category for the KPMG test CLEC (November 1999 and January 2000).

"Combos" are included in the "Other" category rather than "UNE" or "UNE Other". However, a change request is pending that would move the product "Combos" from the "Other" category to a separate category called "Combos". Business requirements are being developed and this change request will be prioritized with other pending changes.

Order Completion Interval in the Provisioning category for the KPMG test CLEC (November 1999, December 1999 and January 2000).

BellSouth agrees that using the Version 2.0 of the Raw Data Users Manual, KPMG was unable to replicate for the test CLEC the following data: for November 1999, the UNE Non-Design products for OCNs 9990 and 9991, for December 1999, the Residence and UNE Design products for OCN 9991, and for January 2000, the UNE Non-Design product for OCN 9991 and 9994.

The instructions to create a report using the exclusion "so_cmtt_cd = 'L'" would 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 issued a system change request # 5330 that addresses the issue of exclusion of "so_cmtt_cd = 'L'" that was effective for March data, published in April. This change enabled the monthly reports to match results created using the Raw Data Users Manual.

BellSouth provided KPMG with the April OCI data and reports. The discrepancies identified by KPMG in the April Average Completion Interval and Order Completion Interval reports are explained by differences in the functionality of KPMG and BellSouth's tools used to replicate the reports from Raw Data.

Step 2 Bullet 2 of the Raw Data User's Guide (RDUG) currently instructs the user to "Exclude records where SO_CMTT_CD = 'L'." This statement will be changed to read "Exclude records where SO_CMTT_CD = 'L' or SO_CMTT_CD is null" in the September 2000 release of the RDUG. The reason that BellSouth and KPMG were calculating different values from the raw data is because the aforementioned exclusions are handled identically using SQL to query the Oracle database. If one excludes records with a certain value in a field, then records with null values in that field are also excluded.

However, using KPMG's tool, the above statements are not identical. If records are excluded with a certain value in a field, then all other values are considered valid, including null values.

Records with null values are not valid for the Order Completion Interval metric is because these are "listing" records, where no work has been performed. Change request 5923 was implemented to filter these records in the PMAP system beginning with June Data.

Total Service Order Cycle Time[5] in the Provisioning category for the KPMG test CLEC (November 1999, December 1999 and January 2000).

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

BellSouth agrees that using Version 2.0 of the Raw Data Users Manual KPMG was unable to replicate for the KPMG test CLEC the following reports: for November 1999 *Fully Mechanized* report, the UNE Design products for OCNs 9990, for December 1999, each of the reports (*Fully Mechanized, Partially Mechanized, and Non-Mechanized)*, and for January 2000 *Fully Mechanized* report, the UNE Non-Design products for OCN 9994.

BellSouth, using the Version 2.04 of the Raw Data Users manual, was able to replicate the data in question for November 1999, December 1999, and January 2000 using additional steps. The instructions to perform the data replication, specifically the exclusion of records where "so_cmtt_cd = null", the grouping by fields to eliminate duplicate records needs some additional clarification. In November, only data that was for Mechanized orders (MECHZTN = 'Mechanized') was used to calculate the Average Total Service Order Cycle Time.

In December, again grouping by fields to eliminate duplicates results in the MECHZTN field return results for each of the data categories. For the January 2000 *Fully Mechanized* report, the only Fully Mechanized record returned belongs to OCN 4361. The raw data matched the end report because no fully mechanized UNE Non-Design products were reported for OCN 9994.

KPMG reported on 6/8/00 that they could now replicate the data in question for November 1999, December 1999, and January 2000. The Raw Data Users Manual was updated in May reflecting these changes and additional process steps. The Raw Data Users was posted to the web site on June 9th, 2000 and a copy was delivered to KPMG representatives.

OSS Interface Availability[3] in the Pre-Ordering and Maintenance and Repair Categories for the CLEC Aggregate (December 1999).

KPMG has been able to replicate OSS Interface Availability in the Pre-Ordering and Maintenance & Repair Categories.

- BellSouth informed KPMG where to locate the data for LEO Mainframe (KPMG stated data was not available). KPMG was able to match BellSouth's reported number.
- KPMG issued a corrected Exception No. 55. KPMG inadvertently transposed BellSouth's reported number with KPMG's calculated number for CLEC TAG system. However, after further clarification from BellSouth, KPMG was able to match BellSouth's reported number for CLEC TAG system.

OSS Applications consist of various servers. Some servers have a single function while others have multiple functions. Both servers in questions, CRLNOP1D and CRLNOP2D, provide LNP Gateway data only. One is the primary service while the second is used as a backup in case there is a failure in the first server. When users log onto the system, they are authenticated and allowed access to the LNP Gateway.

Separate servers report LNP data for the Maintenance and Repair OSS Interface Availability Report, but no data is currently reported from the LNP Gateway Servers.

Mean Time to Delivery Usage Records in the Billing category for the KPMG test CLEC (November 1999).

The weighting applied to this measure is in a spreadsheet which is used by an Ardent job as a lookup table. The table has been changed to provide the correct lookup for each interval by adding .5 rather than 1.5 to each interval. This change was implemented 1/17/00 and would have been apparent with February reports.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 90

BELLSOUTH

September 22, 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 FOURTH 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 FOURTH AMENDED RESPONSE TO EXCEPTION 90

BellSouth agrees that using Version 2.0 of the Raw Data Users Manual, KPMG was unable to replicate for the test CLEC the following data: for March 2000, the UNE Non-Design product for OCN 9994.

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 issued a system change request # 5330 that addresses the issue of exclusion of "so_cmtt_cd = 'L'" and was effective for March data. This change will enable the monthly reports to match results created using the Raw Data Users Manual.

BellSouth provided KPMG with the April OCI data and reports. The discrepancies identified by KPMG in the April Average Completion Interval and Order Completion Interval reports are explained by differences in the functionality of KPMG and BellSouth's tools used to replicate the reports from Raw Data.

Step 2 Bullet 2 of the Raw Data User's Guide (RDUG) currently instructs the user to "Exclude records where SO_CMTT_CD = 'L'." This statement will be changed to read "Exclude records where SO_CMTT_CD = 'L' or SO_CMTT_CD is null" in the September 2000 release of the RDUG.

The reason that BellSouth and KPMG were calculating different values from the raw data is because the aforementioned exclusions are handled identically using SQL to query the Oracle database. If one excludes records with a certain value in a field, then records with null values in that field are also excluded. However, using KPMG's tool, the above statements are not identical. If records are excluded with a certain value in a field, then all other values are considered valid, including null values. Records with null values are not valid for the Order Completion Interval metric is because these are "listing" records, where no work has been performed. Change request 5923 was implemented to filter these records in the PMAP system beginning with June Data.

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.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 90

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

September 22, 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 Reported
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 Version 2.0 of the Raw Data Users Manual, KPMG was unable to replicate for the test CLEC the data in the table.
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 effective for March data, published in April. This change enables the monthly reports to match results created using the Raw Data Users Manual.

BellSouth provided KPMG with the April OCI data and reports. The discrepancies identified by KPMG in the April Average Completion Interval and Order Completion Interval reports are explained by differences in the functionality of KPMG and BellSouth's tools used to replicate the reports from Raw Data.

Step 2 Bullet 2 of the Raw Data User's Guide (RDUG) currently instructs the user to "Exclude records where SO_CMTT_CD = 'L'." This statement will be changed to read "Exclude records where SO_CMTT_CD = 'L' or SO_CMTT_CD is null" in the September 2000 release of the RDUG.

The reason that BellSouth and KPMG were calculating different values from the raw data is because the aforementioned exclusions are handled identically using SQL to query the Oracle database. If one excludes records with a certain value in a field, then records with null values in that field are also excluded.

However, using KPMG's tool, the above statements are not identical. If records are excluded with a certain value in a field, then all other values are considered valid, including null values.

Records with null values are not valid for the Order Completion Interval metric is because these are "listing" records, where no work has been performed. Change request 5923 was implemented to filter these records in the PMAP system beginning with June Data.

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 SIXTH AMENDED RESPONSE TO EXCEPTION 62

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 TENTH AMENDED RESPONSE TO EXCEPTION 89

BELLSOUTH

September 22, 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.

BELLSOUTH'S TENTH AMENDED RESPONSE TO EXCEPTION 89

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

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

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

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

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

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

A sample 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 TENTH 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.

BELLSOUTH'S TENTH 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 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 (Rls. 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.

BELLSOUTH'S TENTH AMENDED RESPONSE TO EXCEPTION 89

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)

BELLSOUTH'S TENTH AMENDED RESPONSE TO EXCEPTION 89

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

BELLSOUTH'S TENTH AMENDED RESPONSE TO EXCEPTION 89

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.

BELLSOUTH'S TENTH AMENDED RESPONSE TO EXCEPTION 89

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.

BELLSOUTH'S TENTH AMENDED RESPONSE TO EXCEPTION 89

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

BellSouth agrees that 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, provided in December 1999, to agree with raw data values.

In order to provide an answer to this data discrepancy, the Audit Support Team will provide KPMG with June 2000 raw data due to the fact that the queries used to extract the original data are not available. BellSouth provided June 2000 raw data to KPMG on 9/22/00.

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.

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 TENTH 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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This 29th day of September, 2000.

David Frey

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OCT 0 5 2000

EXECUTIVE SECRETARY
G.P.S.C.

October 5, 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 Closure Reports for Exceptions 18, 55, and 63 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: October 5, 2000

EXCEPTION CLOSURE REPORT

Exception:

Bellsouth requirements for values entered in the Line Class of Service data elements for EDI and TAG are not consistent, and the documentation is incomplete.

Summary of Exception:

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

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

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

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

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

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

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

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

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

Summary of BellSouth's Response:

"In the next scheduled update of the LEO IG scheduled for March 17, 2000, Volume 1 Port Form 11.3.30 LNECLS SVC – Line Class Service Valid entries will be added as follows:

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

The incorrect or invalid line class of service LSRs, as referenced in Category 2, automatically clarify back to the CLEC, which was the case with the last 2 requests listed above. The first two requests were clarified due to the service either being final or suspended, so further editing was not necessary. As mentioned in this exception there was inconsistency in how the LSRs were processed. Investigation revealed that in some instances, if the LCOS was the only error, some service reps in the LCSC processed the request and did not clarify back to KPMG. In an effort to minimize impacts to customer due dates, the LCSC personnel can use their judgement and not clarify for minor errors, as long as they are not placed in the position of making a decision for the CLEC. For example, if the LCOS was populated with UEPRX instead of UEPRC and a feature for Caller ID was present, the service rep could decide not to clarify for the Line Class of Service. The line class of service edit 8240 should help to minimize service rep inconsistencies.

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 implemented a system enhancement Feature 8745 in issue 9. The Line Class of Service for REQTYPE "M" (Port Loop Combo), is now an optional field. Therefore, in the absence of the Line Class of Service, BellSouth will derive the correct Class of Service based on the Type of Service (Residence or Business) requested. If an LSR is received with an incorrect Line Class of Service, provided there are no other editing prior to the Line Class of Service field, BellSouth will generate an auto clarification "INVALID LINE CLASS OF SVC FOR REQUESTED SERVICE".

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

BellSouth is implementing a system enhancement on April 29, 2000 in which the Line Class of Service for REQTYPE "F" (Port) will become an optional field. Therefore, in the absence of the Line Class of Service, BellSouth will derive the correct Class of Service based on the Type of Service (Residence or Business) requested.

BellSouth has a system enhancement Feature 9522 pending for REQTYP "F" (Port). It will generate the message "INVALID LINE CLASS OF SVC FOR REQUESTED SERVICE" if the line class of service on the LSR is incorrect. This feature is currently going through the change control process to be prioritized and scheduled in a future release."

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 Implementation Guide, Volume 1(LEO Guide), dated August 28th,*[5] *2000* to ensure valid entries for the Line Class of Service data element are present; and 2) a review of Bellsouth's internal change control process document, dated July 19th, 2000. KCL examined the Targeted Release Date and analyzed specific features that Bellsouth indicated it will implement to address this exception.

KCL Re-test Results:

As a result of reviewing BellSouth's *Local Exchange Ordering Implementation Guide, Volume 1(LEO Guide),* KCL believes that BellSouth's revised documentation adequately addresses the documentation issues raised in this exception.

BellSouth's Targeted Release Date for BellSouth's functional feature enhancement, during the first quarter of 2001, is outside the expected timeframe of the BellSouth-Georgia OSS Evaluation. As a result, KCL does not expect to issue orders to re-test system functionality following implementation of the feature.

However, based on its professional judgement, KCL concludes that, if properly implemented, Feature 6885 (Modify current functionality of Port orders), Feature 8745 (Modify functionality of Non-Complex Port Loop Combo (Remand 319)) and Feature 9522 (System to clarify when Line Class Service is incorrect REQTYPE F) are likely to adequately address the issues identified in this exception.

In the absence of any other planned test activity related to this exception, KCL closes this exception.

[5] BellSouth's response to Exception 18 indicated that the proposed documentation changes to LNE CLS SVC valid entries was scheduled for the March 17th release of the *LEO Guide, Volume 1*. The actual documentation changes were not made until the August 28th release.

The Georgia Public Service Commission may elect to monitor this issue in the future.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, closes Exception 18.

Attachments: None.

Date: October 5, 2000

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

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

The following table provides details regarding these omissions and errors.

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

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

BellSouth Documentation Omissions and Errors	
Documents are logically organized with clear page numbering and section labeling.	The *Pending Service Order Job Aid* does not contain page numbers.
	The *CLEC Service Order Tracking System (SOTS) User Guide* contains several blank pages and the Revision Table does not indicate content changes or location of changes within the document.

Summary of BellSouth Response:

"Contact information for help desk, subject matter experts or escalations

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

The CLEC Service Order Tracking System User Guide will be updated as shown below:

In the newly created "ABOUT THE SYSTEM" section to the user guide the following information will be included:

For user assistance consult this user guide and the computer based tutorial, which may be accessed via "HELP" button in the application.
For additional user assistance beyond that provided via "HELP" contact your BellSouth Account Team.

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

Purpose & Scope

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

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

Reference to other relevant BellSouth

- LEO Guide Volume 2

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

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

- LEO Guide Volume 1
According to the LEO-IG, Volume 1, Issue 7O, page 22, the web address for the Error Message Log is correct in that version of the document. BellSouth does not agree with this item in the exception.

- LEO Guide Volume 1, page 25
BellSouth agreed with this omission. It was corrected in the 4/28 update of the LEO-IG, Volume 1.

- LEO Guide Volume 2, page 273
BellSouth agrees there is mention of a CLEC Handbook which is not currently on the Interconnection website. The reference will be changed to "Operational Understanding" which does appear on the customer Guides pages.

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

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

- Products & Services Interval Guide
The web address was added in the two locations identified in the May 31, 2000 update to this guide.

Contact information for reporting documentation errors or omissions

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

The Error Message Log for TCIF 7 and TCIF 9 appears on the customer guides page and provides a complete list of error codes, severity type, and an error message type. This log provides the CLEC the most complete, yet, concise of understanding the error that was made and what needs to be corrected. The steps to take in correcting a specific error is directly related to the error code and the error message type (e.g. D4030-LACT Required means that the this service request should have been presented with a listing activity type, but it did not appear.)

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

Content consistent with intended use

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

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

Documents contain table of contents

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

Documents are logically organized with clear page numbering and section labeling

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

Summary of KCL Re-test Activities:

KPMG Consulting's re-test activities for this exception consisted of: 1) a review of BellSouth's responses to Exception 55; and 2) a review of BellSouth's *Local Exchange Ordering Implementation Guide, Volumes 1, 2 and 3 Versions, (LEO Guide), Pre-Order Business Rules Issues 2.0 through 7.0, Pre-Order Business Rules Data Dictionary Versions 2.0 and 3.0, Pending Service Job Aid, Pending Order Status Job Aid Version 1B, Products and Services Interval Guide Issues 2B and 3, CLEC Service Order Tracking System User Guide Issues 2, 3 and 5, Local Number Portability Guide Issues 1A, 1B, 2, 2B, and 2C, and the Local Service Request Error Messages (TCIF 7) Releases 6.1 and 6.4.* The *Facilities Activation Requirements* and *Facilities Based Advisory Guide* are no longer available or applicable.

KCL Re-test Results:

As a result of the documentation review, KCL observed the following modifications:

1. BellSouth does not maintain a "Help Desk," per se. However, the documents listed in this exception now contain a statement that directs CLECs to refer all questions or issues to the Customer Support Manager (CSM) or the Account Team. According to BellSouth's response, the CSM or Account Team will contact the document owner with the specific question/issue and the response will be forwarded back to the CLEC. Additionally, according to BellSouth's response, CLECs can report a suspected system or documentation problem via the Change Control Process. The form that CLECs can use for initiating the Change Control Process can be found on the *BellSouth Interconnection Services – Customer Guides Web* page, which contains all documents and guides identified by this exception.

2. The *Pending Service Order Job Aid* and the *Pre-Order Business Rules Data Dictionary* now include a purpose and a scope statement.

3. The *LEO IG Volumes 1, 2 and 3,* the *Pre-Order Business Rules*, the *Pre-Order Business Rules Data Dictionary,* the *Local Number Portability Ordering Guide,* and the *Products and Services Interval Guide now* contain references to other BellSouth documentation. Additionally, the *Local Number Portability Ordering Guide* no longer references itself.

4. The *LEO IG Volumes 1, 2 and 3,* the *Pre-Order Business Rules*, the *Pre-Order Business Rules Data Dictionary,* the *Pending Service Job Aid,* the *CLEC Service Order Tracking System Guide,* the *Local Number Portability Ordering Guide,* and the *Products and Services Interval Guide now* contain contact information for reporting documentation errors or omissions. The *Local Service Request Error Messages (TCIF 7)* provides a complete list of error messages, and KCL concurs with BellSouth's statement that: "the steps to take in correcting a specific error is [sic] directly related to the error code and the error message type."

5. The *Pre-Order Business Rules* documentation now identifies business rules by interface.

6. The *Pending Service Order Job Aid* now contains a table of contents. KCL does not believe that the omission of all fourth level sections from the *CLEC SOTS User Guide* would impede the CLEC's use of documentation.

7. The *Pending Service Order Job Aid* now contains page numbers. The *CLEC Service Order Tracking System User Guide* now contains proper references in the revision table.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 55.

Attachments: None.

Date: October 5, 2000

EXCEPTION CLOSURE REPORT

Exception:

KPMG Consulting LLC (KCL) discovered numerous inconsistencies between BellSouth's *TAG API Guide, Version 2.2.0.5* and *Pre-Order Business Rules, Version 3.0* documentation.

Summary of Exception:

Initial Exception: BellSouth currently supports multiple versions of the TAG pre-order interface. When a new version of TAG is released, BellSouth continues to support the previous version(s) of TAG for a certain period of time to allow CLECs the opportunity to upgrade their systems[1]. For new versions of TAG BellSouth publishes a *TAG API Guide*, when necessary, which provides the technical specifications for TAG interface development or update by CLECs.

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

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

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

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

Amended Exception: Following BellSouth's initial response to this Exception, KCL performed a re-test of BellSouth documentation to evaluate consistency between TAG pre-order technical specifications and business rules. KCL reviewed the TAG API Guide

[1] The number of versions of TAG and the time period of support for previous versions vary based on the size of the release and other factors.
[2] KCL used TAG, Version 2.2.0.5 through March 8, 2000.

Version 2.2.0.8 against the Pre-Order Business Rules Version 6.0. A number of field layout discrepancies between the two documents remain.

Summary of BellSouth's Responses:

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

The HOUSENUMPREFIX data element is not valid and will be removed from the API Reference Guides 2.2.0.9 (Issue 7) and 7.1.1 (Issue 9). The guides will be posted on the Interconnection website on 8/5/00. Older versions of the API reference guide will not be updated since they are scheduled to be removed from the website in the near future."

In addition, BellSouth provided responses to each individual data element discrepancy identified by KPMG. BellSouth indicated the following explanations for discrepancies:

- Fields were erroneously present in the Business Rules and will be removed. Data elements falling into this category include: TRX-PURPOSE (AVR form); QTY REQUESTED (TNAR-TN form); QTY REQUESTED (TNAR-DID form); LSO-NPA-TTA (AAR form).

- Fields were erroneously present in the API Guide and will be removed. Data elements falling into this category include: HOUSENUMPREFIX (AVR form).

- Fields were missing from the Business Rules and will be added. Data elements falling into this category include: ADDRESSPATTERN (AVR form); ELEVATIONPATTERN (AVR form); UNITPATTERN (AVR form).

- Fields were incompletely defined in the Business Rules and documentation will be updated appropriately. Data elements falling into this category include: QTY PROVIDED (TNAR-TN form); QTY-IN-TER (TNAR-MLH form); QTY-OUT-TER (TNAR-MLH form)."

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

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

The TAG-API Reference Guide consists of several fields that are defined in multiple structures because the TAG API uses the same structure for input and output due to design issues. This would, in effect, cause the API Reference Guide and the Pre-Order Business Rules document to appear to have conflicts, when in fact due to design consideration each individual field does match. This is common when transitioning from logical modeling of an application system to the physical design used to implement a system.

BellSouth will document the correlation between the API Reference Guide and Pre-Order Business Rules by matching the TAG fields with the business rules and the usage along with the with the inputs and outputs."

An example of this API Guide-to-Business Rule mapping can be found in BellSouth's second amended response.

Summary of KCL Re-test Activities:

KCL re-test activities consisted of: 1) a review of BellSouth's responses to this exception; 2) a review of updated versions of BellSouth documentation to verify proposed changes had been made; and 3) discussions with BellSouth documentation owners to assess additional perceived discrepancies identified during KCL's review of updated documentation.

KCL Re-test Results:

KCL verified that documentation changes proposed in BellSouth's exception response were accurately reflected in the *TAG API Guide, Version 2.2.0.8* and *the Pre-Order Business Rules, Version 7.0.*

In addition, KCL understands that the TAG API Guide layout is designed to assist CLEC programmers with development of data structures (i.e., groupings of data elements) to be used in transaction inputs and outputs, whereas the Business Rule layout is designed to identify only those data elements which should be on a specific pre-order query or a specified pre-order response. As a result, a number of fields listed in the *API Guide* for a particular structure used in both the pre-order query and response may only appear in the *Business Rules* as applicable to either the outbound query *or* response (but not both). CLECs should utilize the Business Rules as the basis for determining the data elements to be populated on an outbound pre-order query and the data elements to be expected on an inbound response.

In KCL's professional judgement, the documentation enhancements proposed by BellSouth to provide correlation between data element names and usage requirements

listed in the *API Guide* and *Business Rules* will improve usability and compatibility of the documents, if properly implemented.

However, based on KCL's improved understanding of the relationship between the *API Guide* and *Business Rules*, there are no significant discrepancies between the two documents relating to existence or use of data elements.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 63.

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 5th day of October, 2000.

David Frey

David Frey

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October 5, 2000

RECEIVED

OCT 0 5 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 Exception 24 (Amended) and Exception 112 along with BellSouth's Response to Exception 112, Second Amended Responses to Exceptions 9, 108, and 110, Third Amended Response to Exception 107, and Fourth Amended Response to Exception 88 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: October 3, 2000

EXCEPTION REPORT

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

Exception:

BellSouth's TAG interface does not deliver timely responses to pre-order transactions.

Through February 4, 2000, KPMG Consulting LLC (KCL) has submitted 366 pre-order transactions that have received a response from the BellSouth OSS[1]. On aggregate, twenty-nine percent (29%) of responses from TAG API took longer than 15 seconds to arrive[2].
For pre-order test transactions, KCL's experience indicates that pre-order responses from BellSouth's TAG API are not timely (i.e., took longer than 15 seconds) for the following query types[3]:

- **Customer Service Record Query (CSRQ):** 7% of API responses (1 of 14) were received in greater than 15 seconds.
- **Telephone Number Selection Query (TNSQ):** 8% of API responses (3 of 40) were received in greater than 15 seconds.
- **Telephone Number Assignment Query (TNAQ):** 10% of API responses (6 of 60) were received in greater than 15 seconds.
- **Address Validation Query by Telephone Number (AVQ_TN):** 28% of API responses (11 of 39) were received in greater than 15 seconds.
- **Appointment Availability Query (AAQ):** 24% of API responses (31 of 129) were received in greater than 15 seconds.
- **Address Validation Query (AVQ):** 61% of API responses (28 of 46) were received in greater than 15 seconds.
- **Telephone Number Assignment Query for Multi-Line Hunting Numbers (TNAQ_MLH):** 67% of API responses (2 of 3) were received in greater than 15 seconds.

[1] An additional 158 "Invalid Data Exception" responses were also received. Since this response type is delivered from the TAG Client residing on the CLEC's premises, timeliness data for these responses is not included in this report.
[2] Because pre-ordering information is often accessed while the customer is on the line, 15 seconds is used as a benchmark timeframe to allow for reasonably efficient customer interaction, for purposes of this exception.
[3] Transaction sample sizes are based on interim results and do not represent significant sample sizes in some cases.

- **Service Availability Query (SAQ):** 74% of API responses (25 of 34) were received in greater than 15 seconds.

The following tables provide a detailed breakdown of pre-order response timeliness data, broken down by pre-order query type, for BellSouth TAG pre-order responses.

CSRQ

INQNUM	Submit Time	Time Rcvd	Duration
6350b88b00000005	01/10/00 16:48:25	01/10/00 16:48:43	18

TNSQ

INQNUM	Submit Time	Time Rcvd	Duration
476cc81700000001	01/27/00 12:06:06	01/27/00 12:06:23	17
1eb7fb6000000001	01/21/00 11:38:24	01/21/00 11:38:48	24
5adc57a400000001	01/27/00 09:58:09	01/27/00 09:58:35	26

TNAQ

INQNUM	Submit Time	Time Rcvd	Duration
266d261300000001	01/14/00 12:48:13	01/14/00 12:48:34	21
33df943300000001	01/10/00 13:48:26	01/10/00 13:48:47	21
3ebd981800000001	01/19/00 15:22:36	01/19/00 15:23:01	25
360e45b200000001	01/17/00 09:20:31	01/17/00 09:20:58	27
489415ab00000001	02/02/00 14:53:01	02/02/00 14:53:28	27
226b34e900000001	01/25/00 10:11:53	01/25/00 10:12:22	29

AVQ_TN

INQNUM	Submit Time	Time Rcvd	Duration
6bd2892200000001	01/19/00 15:52:00	01/19/00 15:52:16	16
42b4f92600000001	01/24/00 11:44:27	01/24/00 11:44:43	16
59c89a7d00000001	01/27/00 16:28:48	01/27/00 16:29:05	17
0970bb8b00000005	01/10/00 15:16:43	01/10/00 15:17:00	17
5e12451a0000000I	12/22/99 13:26:18	12/22/99 13:26:36	18
127e824b00000001	01/18/00 11:30:32	01/18/00 11:30:51	19
3eccc43e00000001	01/20/00 14:12:36	01/20/00 14:12:55	19
0970bb8b00000006	01/10/00 15:17:00	01/10/00 15:17:19	19
0511a32700000002	01/14/00 11:16:42	01/14/00 11:17:02	20
2e637dc400000001	01/19/00 13:46:26	01/19/00 13:46:48	22
0511a32700000001	01/14/00 11:11:54	01/14/00 11:12:44	50

AAQ

INQNUM	Submit Time	Time Rcvd	Duration
6b6f6cd300000001	01/19/00 12:01:23	01/19/00 12:01:40	17
1681716800000001	01/20/00 13:47:48	01/20/00 13:48:05	17
1681716800000007	01/20/00 17:40:13	01/20/00 17:40:30	17
0a23f0b800000005	01/14/00 19:25:09	01/14/00 19:25:26	17
1681716800000005	01/20/00 17:39:07	01/20/00 17:39:24	17
1681716800000008	01/20/00 17:40:34	01/20/00 17:40:51	17
6b6f6cd300000002	01/19/00 13:41:30	01/19/00 13:41:48	18
6b6f6cd300000005	01/19/00 13:43:02	01/19/00 13:43:21	19
375f0cb500000003	01/11/00 14:29:12	01/11/00 14:29:31	19

375f0cb500000004	01/11/00 14:29:31	01/11/00 14:29:50	19
375f0cb500000005	01/11/00 14:29:50	01/11/00 14:30:10	20
6b6f6cd300000007	01/19/00 13:43:53	01/19/00 13:44:13	20
6b6f6cd300000003	01/19/00 13:41:48	01/19/00 13:42:08	20
328b9f7c00000002	01/18/00 11:30:51	01/18/00 11:31:11	20
7b36a40c0000000A	01/19/00 16:16:09	01/19/00 16:16:29	20
674a9f2c00000001	12/16/99 17:35:41	12/16/99 17:36:01	20
489d9f6500000001	01/12/00 08:48:25	01/12/00 08:48:46	21
6b6f6cd300000004	01/19/00 13:42:23	01/19/00 13:42:44	21
375f0cb500000008	01/11/00 14:37:26	01/11/00 14:37:47	21
293f1fec00000004	01/19/00 15:25:12	01/19/00 15:25:36	24
5b21d97b00000001	12/21/99 14:05:26	12/21/99 14:05:50	24
0a23f0b800000004	01/14/00 18:41:09	01/14/00 18:41:35	26
375f0cb500000006	01/11/00 14:30:11	01/11/00 14:30:38	27
0a23f0b800000002	01/14/00 18:19:50	01/14/00 18:20:19	29
504bb3f700000001	01/14/00 10:57:16	01/14/00 10:57:45	29
6b6f6cd300000006	01/19/00 13:43:21	01/19/00 13:43:53	32
375f0cb500000001	01/11/00 14:28:02	01/11/00 14:28:34	32
375f0cb500000002	01/11/00 14:28:34	01/11/00 14:29:12	38
0a23f0b800000003	01/14/00 18:21:55	01/14/00 18:22:33	38
1681716800000002	01/20/00 13:48:05	01/20/00 13:48:44	39
375f0cb500000007	01/11/00 14:30:38	01/11/00 14:31:18	40

AVQ

INQNUM	Submit Time	Time Rcvd	Duration
0283274200000001	01/20/00 11:54:48	01/20/00 11:55:04	16
09f2a6d600000001	01/27/00 13:38:09	01/27/00 13:38:26	17
29729afa00000001	02/01/00 15:38:34	02/01/00 15:38:51	17
08cd1b0f00000003	12/17/99 14:00:31	12/17/99 14:00:48	17
6c5721be00000001	01/14/00 09:59:01	01/14/00 09:59:19	18
7e7e99f500000001	01/25/00 12:01:30	01/25/00 12:01:49	19
48cf235d00000001	01/19/00 09:40:47	01/19/00 09:41:07	20
6c5721be00000003	01/14/00 10:25:22	01/14/00 10:25:43	21
08cd1b0f00000001	12/17/99 12:32:36	12/17/99 12:33:00	24
719f344800000002	01/12/00 13:35:22	01/12/00 13:35:48	26
719f344800000001	01/12/00 11:22:00	01/12/00 11:22:26	26
0627219300000001	01/03/00 16:27:28	01/03/00 16:27:54	26
29729afa00000002	02/01/00 17:07:38	02/01/00 17:08:05	27
29729afa00000002	02/01/00 16:08:19	02/01/00 16:08:47	28
2349fe3a00000001	02/02/00 14:26:25	02/02/00 14:26:53	28
4aef970400000001	01/19/00 13:41:01	01/19/00 13:41:29	28
6c5721be00000007	01/14/00 10:51:36	01/14/00 10:52:05	29
3b1ec9e700000001	02/03/00 16:53:19	02/03/00 16:53:49	30
29729afa00000002	02/01/00 16:47:29	02/01/00 16:48:01	32
465e924100000002	01/13/00 12:58:43	01/13/00 12:59:15	32
465e924100000001	01/13/00 12:28:12	01/13/00 12:28:44	32
3b1ec9e700000002	02/03/00 17:03:22	02/03/00 17:03:55	33
2349fe3a00000001	02/02/00 14:11:44	02/02/00 14:12:18	34
6c5721be00000009	01/14/00 11:00:16	01/14/00 11:00:50	34
026eb23300000001	12/17/99 17:51:42	12/17/99 17:52:16	34

6c5721be00000008	01/14/00 10:56:41	01/14/00 10:57:16	35
08cd1b0f00000002	12/17/99 12:47:18	12/17/99 12:47:55	37
6c5721be00000006	01/14/00 10:41:44	01/14/00 10:42:39	55

TNAQ MLH

INQNUM	Submit Time	Time Rcvd	Duration
1c6f810300000001	12/17/99 09:55:02	12/17/99 09:55:21	19
747015d000000001	01/11/00 13:29:21	01/11/00 13:29:48	27

SAQ

INQNUM	Submit Time	Time Rcvd	Duration
5de5320e00000001	01/10/00 13:09:27	01/10/00 13:09:51	24
544d062100000001	01/11/00 14:43:30	01/11/00 14:43:55	25
5de5320e00000009	01/10/00 13:45:33	01/10/00 13:46:29	56
5de5320e0000000M	01/10/00 14:11:14	01/10/00 14:12:10	56
03ad03af00000002	01/25/00 11:55:41	01/25/00 11:56:38	57
777c560b00000003	01/19/00 17:12:36	01/19/00 17:13:33	57
23c06a5e00000003	01/19/00 09:39:27	01/19/00 09:40:24	57
777c560b00000002	01/19/00 16:17:17	01/19/00 16:18:14	57
26c3f1a500000002	01/27/00 14:07:54	01/27/00 14:08:51	57
3666980400000002	01/18/00 14:02:25	01/18/00 14:03:23	58
061bc28f00000001	01/24/00 11:44:46	01/24/00 11:45:44	58
3275334f00000001	01/25/00 12:06:20	01/25/00 12:07:18	58
0646afbd00000001	01/20/00 12:12:37	01/20/00 12:13:36	59
26c3f1a500000001	01/27/00 13:59:52	01/27/00 14:00:51	59
0646afbd00000002	01/20/00 13:48:44	01/20/00 13:49:44	60
3666980400000001	01/18/00 13:50:02	01/18/00 13:51:02	60
23cbda9100000001	01/14/00 17:17:10	01/14/00 17:18:10	60
03ad03af00000001	01/25/00 11:53:37	01/25/00 11:54:38	61
5b21ce5800000001	01/19/00 13:34:32	01/19/00 13:35:33	61
0646afbd00000003	01/20/00 14:12:55	01/20/00 14:13:58	63
5de8bdab00000002	01/14/00 10:25:55	01/14/00 10:26:59	64
23c06a5e00000002	01/19/00 09:38:20	01/19/00 09:39:25	65
7b35ddf800000001	01/17/00 13:48:37	01/17/00 13:49:44	67
2ff15c3600000001	01/12/00 08:46:36	01/12/00 08:47:43	67
23c06a5e00000001	01/19/00 09:37:07	01/19/00 09:38:18	71

Impact

The inability of a CLEC to receive timely pre-order responses from BellSouth will have the following impact on CLECs:

Decreased Customer Satisfaction: Delays in receiving pre-order responses will prevent a CLEC from obtaining information necessary to efficiently process a customer's service request. As a result, customer satisfaction with the CLEC will likely decrease.

AMENDED EXCEPTION

Based on BellSouth improvements to pre-order transaction response times implemented with TAG Version 2.2.0.7, KCL initiated a re-test on April 19, 2000.

The Georgia Public Service Commission (GPSC) voted on June 6, 2000 to approve a set of Service Quality Measurement- (SQM-) related measures and standards to be used for the purpose of this evaluation. In accordance with the GPSC's ruling, KCL reviewed pre-order re-test timeliness results relative to BellSouth Retail pre-order timeliness. The GPSC's Order requests pre-order timeliness results disaggregated by the following back-end systems:

- RSAG – TN
- RSAG – ADDR
- DSAP
- ATLAS
- CSRACCTS
- CSROCSR

KCL analyzed BellSouth's published Retail performance data for the month of June 2000. Since BellSouth data is separated into business and residential pre-order categories, KCL compared re-test results to a weighted average of BellSouth residential and business results[4]. KCL conducted statistical analysis to determine whether the KCL result was statistically different from the BellSouth combined average.

For those pre-order types for which there is no BellSouth Retail data available, KCL reviewed results based on a standard of 8 seconds[5].

The table below provides details on the results of the pre-order timeliness re-test. Of the nine pre-order categories evaluated:

- Seven contain "Satisfied" results.
- Two contain "Not Satisfied" results.

[4] For those query types where BellSouth Retail data was available, KCL performed three "t-tests". The first test compared the average of BellSouth business and residence averages to the KCL data. The other two tests separately compared the KCL data to: 1) the average of BellSouth business data; and 2) the average of BellSouth residence data. The results of the three tests were consistent for each query.
[5] The GPSC requested KCL use its professional judgment to apply a performance standard in those instances where none is defined.

Pre-Order Re-Test Results

Pre-Order Query	BLS Back-End System	BLS Combined Average (seconds)	KCL Re-Test Average (seconds)	Evaluation Result
AVQ_TN	RSAG-TN	1.1	1.2[7]	Satisfied
AVQ	RSAG – ADDR	1.8	1.9[7]	Satisfied
TNAQ TNSQ TNCAN_TN	ATLAS	1.2	1.2	Satisfied
TNAQ_DID TNCAN_DID	ATLAS-DID	N/A	2.0	Satisfied
TNAQ_MLH TNCAN_MLH	ATLAS-MLH	N/A	1.0	Satisfied
AAQ	DSAP	0.5	1.0	Not Satisfied
CSRQ	CSRACCTS(res) CSROCSR (bus)	3.1	1.8	Satisfied
SAQ	OASIS	1.30	11.6[8]	Not Satisfied
CDD	N/A	N/A	0.1	Satisfied

[6] BLS Combined Average represents a weighted average of BLS business and residential Retail response averages.

[7] The KCL average does not differ from the BLS combined average by a statistically significant amount.

[8] Service Availability Queries (SAQs) may be performed by requesting a) information on a specific service/feature or group of related features; or b) information on all features available from a particular BLS switch. The average response time for "full" SAQs performed during the re-test was 31 seconds. For SAQs requesting partial information, the average re-test response time was 2 seconds.

EXCEPTION 112

BellSouth Georgia OSS Testing Evaluation

Date: October 3, 2000

EXCEPTION REPORT

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

Exception:

BellSouth does not have a process for returning acknowledgments or tracking manually-submitted (via e-mail and facsimile) Loop Make-Up Service Inquiry (LMU/SI) pre-order queries or Local Service Request Service Inquiries (LSR/SI).

KPMG Consulting LLC (KCL) did not receive an acknowledgement from BellSouth in response to 99% of 84 manually-submitted (via fax or e-mail) LMU Service Inquiries or LSR/SIs[1].

KCL has been unable to verify BellSouth's receipt of LMU/SIs and LSR/SIs submitted through the manual process due to the absence of an acknowledgement process.

Additionally, KCL found no formal process to track the status of LMU/SIs or LSR/SIs after submission to either the BellSouth Complex Resale Support Group (CSRG) or Local Carrier Service Center (LCSC).

Impact

The absence of an acknowledgement or tracking process for LMU/SIs and LSR/SIs will impact CLECs in the following ways:

- **Decrease in customer satisfaction.** The inability to confirm receipt of or track LMU/SIs and LSR/SIs after submission may create confusion regarding the status of a submission, which, in turn, may delay the ordering and provisioning of xDSL services. This will negatively impact CLEC customer satisfaction.

- **Increase in operating costs.** CLECs will also likely incur additional costs associated with researching the status of particular LMU/SIs.

[1] On August 9, 2000 KPMG Consulting LLC received an LSR Receipt Acknowledgement for PON X0R02A from the CRSG via facsimile.

BELLSOUTH'S RESPONSE TO EXCEPTION 112

BELLSOUTH

September 27, 2000

EXCEPTION REPORT

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

Exception:

BellSouth does not have a process for returning acknowledgments or tracking manually-submitted (via e-mail and facsimile) Loop Make-Up Service Inquiry (LMU/SI) pre-order queries or Local Service Request Service Inquiries (LSR/SI).

KPMG Consulting LLC (KCL) did not receive an acknowledgement from BellSouth in response to 99% of 84 manually-submitted (via fax or e-mail) LMU Service Inquiries or LSR/SIs[1].

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- **Increase in operating costs.** CLECs will also likely incur additional costs associated with researching the status of particular LMU/SIs.

[1] On August 9, 2000 KPMG Consulting LLC received an LSR Receipt Acknowledgement for PON X0R02A from the CRSG via facsimile.

BELLSOUTH'S RESPONSE TO EXCEPTION 112

BellSouth Response

Effective September 11, 2000 the CRSG will acknowledge all Service Inquiries/LSR received via e-mail or fax.

The CRSG currently sends daily, a manual "OPEN PON STATUS REPORT" to CLECs to give them a status on their PONs. This report provides the date the SI was received in the CRSG, the date the SI was sent to the SAC, and the date the SI was forwarded to the LCSC. It also gives the CLEC the date the SI was placed in and out of clarification and any applicable notes, pertaining to the clarification. CLECs can gain access to this report by following the instructions provided in the BellSouth Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guides for Loop Makeup found at www.interconnection.bellsouth.com/guides/bpobr. The CLEC should send an email to crsg.une@bridge.bellsouth.com and request to be included on the daily Open PON Status Report.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 9

BELLSOUTH

September 26, 2000

EXCEPTION REPORT

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

Exception:

BellSouth failed to deliver electronic Firm Order Confirmations (FOCs) and Completion Notices (CNs) in response to electronic service order requests.

When a CLEC submits an error-free service request via an electronic interface, BellSouth commits to deliver an electronic FOC response. An FOC response notifies the CLEC that BellSouth has generated an internal service order within its Service Order Communication System (SOCS) and provides the CLEC with a due date on which service will be provided. The CLEC can use this information to confirm that a valid service request has been received and to notify their end-user customer of the service establishment date. Once BellSouth has completed the service order, an electronic Completion Notification (CN) is delivered.

In several instances, KPMG did not receive an electronically-delivered FOC or CN[1] for service orders that BellSouth has generated and completed. The following table provides specific data on these instances. The 5th column (BLS FOC Date) lists the date and time the service order entered SOCS.

PON	CC	Date/Time LSR Submitted	Date FA Rcvd	BLS Service Order Entry Date	KPMG Comments
627A214PEJ100001	9991	12/8/99 12:32pm	12/8/99 12:40pm	12/08/99 1:50pm	FOC delivered manually (via FAX) on 12/27/99. No electronic FOC or CN received as of 1/20/00.
443A224PEM000002	9991	12/13/99 4:51pm	12/13/99 4:55pm	12/17/99 8:00am	FOC delivered manually (via FAX) on 12/27/99. No electronic FOC or CN received as of 1/20/00.
454A126PTF100003	9991	12/22/99 1:26pm	12/22/99 1:26pm	12/22/99 3:02pm	No FOC or CN received as of 1/20/00.
204A211PTN100003	9994	12/29/99	12/29/99	1/3/00	FOC was received 1/3/00

[1] CNs are only expected on orders for which FOCs are received.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 9

PON	CC	Date/Time LSR Submitted	Date FA Rcvd	BLS Service Order Entry Date	KPMG Comments
		1:15pm	1:15pm	10:39am	12:47pm on version 00. Supplemental LSR (version 01) was submitted and acknowledged on 1/10/00. No FOC or CN has been delivered as of 1/20/00.
440A124PEM100003	9991	1/12/00 9:02am	1/12/00 10:01am	1/12/00 12:52pm	No FOC or CN received as of 1/20/00.
454A126PEF000004	9991	1/12/00 2:02pm	1/12/00 2:17pm	1/18/00 5:20pm	KPMG received 2 Clarifications (CLRs) on 1/12 and 1/18. No FOC or CN received as of 1/20/00.
387A225PEG100001	9992	1/12/00 9:03am	1/12/00 10:01am	1/12/00	No FOC or CN received as of 1/20/00.

Notes:
1. PON = Purchase Order Number
2. CC = Company Code
3. LSR = Local Service Request
4. FA = Functional Acknowledgement, an electronic notification to CLECs that BellSouth has received the LSR file.

Impact

The absence of electronic delivery of FOC or CN responses to valid service requests submitted via an electronic interface will impact CLECs in the following ways:

- **Decrease in customer satisfaction.** Without an electronic FOC response, a CLEC cannot confirm, in a timely manner, that BellSouth has received a valid service request and that an internal BellSouth service order has been generated. A CLEC is unable to confirm a requested service delivery date and cannot communicate the date of expected service installation to its end user customer. The inability for a CLEC to commit to an expected service date will negatively affect a customer's perception of the CLEC's service capabilities.

- **Increase in operating costs.** If no electronic FOC or CN is received, CLEC personnel will be forced to pursue the status of these service orders. This will require additional time, effort and cost by the CLEC.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 9

BellSouth Response

Specific criteria must be present on an error-free service order for a Firm Order Confirmation (FOC) and Completion Notice (CN) to be sent electronically. The following fields must be present on the SOCS service order to trigger an FOC or CN:

AECN (UNE)
Sales Code with specific characters
PON
MAN (UNE)
RESH (RESALE)
RMKR

On the seven PONs listed above, six failed to meet the criteria for a FOC or CN. BellSouth has not received PON 387A225PEG100001 CC 9992.

Service representatives in the Local Carrier Centers have been retrained on how to properly handle requests that fall out for manual processing to comply with the policy to provide FOCs and CNs within specified timeframes.

On January 15, 2000 BellSouth implemented a system enhancement Feature 5183, to allow an FOC or CN to be generated when one or more of the above criteria has not been met. BellSouth also enhanced the system to trigger an FOC or CN when RMK, RMKR, IRMK, IRMKR, ORMK, or ORMKR is present on the service order, instead of just RMKR. This process will ensure BellSouth delivers electronic FOCs and CNs in response to electronic Local Service Requests.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 108

BELLSOUTH

October 3, 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. This conversion to a full production mode is expected to occur on 11/18/00.

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 SECOND AMENDED RESPONSE TO EXCEPTION 108

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 110

BELLSOUTH

September 29, 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

[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 9990; Average Completion Notice Interval; Business; Dispatch; <10 circuits	0	.02
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-	110	185

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 110

Category	KPMG Calculation	BellSouth Report
<15)		
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	KPMG 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 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;	0	72

Category	KPMG Calculation	BellSouth Report
Avg Intvl (Hrs)		
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 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	139	140

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 110

Category	KPMG Calculation	BellSouth Report
Orders		
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. 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. BellSouth provided KPMG with a new June report to address the changes that were effective in June.

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	

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 110

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.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 107

BELLSOUTH

October 3, 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 THIRD 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. Information on how CLECs can gain access to LQS will be posted on the Interconnection website on 10/15/00.

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 successful completion of beta testing. This conversion to a full production mode is expected to ccur on 11/18/00.

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 FOURTH 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.

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.

BellSouth Response

The PMAP Raw Data User Manual (RDUM) Version Change log has been updated to include all changes to the RDUM which could affect the CLEC's ability to replicate SQMs. These updates address those identified in the amended Exception 88. BellSouth published the current Raw Data User Manual, version 2.0.8, with an updated Version Change log on the PMAP website on 9/25/00.

[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.

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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David Frey

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OCT 13 2000

EXECUTIVE SECRETARY
G.P.S.C.

October 11, 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

Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of KPMG Consulting LLC's Exception 28 (Second Amended) along with BellSouth's Amended Responses to Exceptions 104 and 111, Second Amended Response to Exceptions 31, Fourth Amended Response to Exception 46, Fifth Amended Response to Exception 90, Sixth Amended Response to Exception 86, Seventh Amended Response to Exception 62, and Eighth Amended Response to Exception 52 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: October 4, 2000

EXCEPTION REPORT

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

Exception:

BellSouth failed to deliver DUF[1] records for six percent (6%) of the second retest calls for which records were expected.

First 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:

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

KPMG Consulting LLC (KCL) completed 1,017[2] test calls during the ODUF/ADUF Functional Usage Evaluation. BellSouth failed to deliver DUF records for forty-six percent of the test calls for which records were expected. Representative occurrences of calls with no corresponding DUF record are detailed in the tables shown below. The list include numerous call types including Calling Card Calls, Information Provider (900) Calls, Local Calls, Directory Assistance Calls, WATS Calls, Long Distance Calls, and Operator Services Calls.

Calling Card Calls

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

Missing Completed Calling Card DUF Records (Representative List)

Date	Connect Time	To Number	Duration (minutes)	From Number
Nov 20	13:53	603 382-9705	1	770 933-8170

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

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

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

Information Provider Calls

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

Missing Information Provider DUF Records (All Included)

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

Local Calls

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

Missing Local Call DUF Records (Representative List)

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

Date	Connect Time	To Number	Duration (minutes)	From Number
Nov 20	10:08	770 933-8526	1	770 933-8523

Directory Assistance

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

Missing Directory Assistance DUF Records (Representative List)

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

WATS Calls

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

Missing WATS DUF Records (Representative List)

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

Long Distance Calls

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

Missing Long Distance DUF Records (Representative List)

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

BellSouth's Investigation/Resolution Activities:

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

1) The process for identifying CLEC usage does not recognize service order activity that is completed, but still in a "pending" status.

2) The usage error correction status did not capture and recycle all erred usage through the billing system after a guide had been created.

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

KCL Initial Re-testing Results:

During the period of April 25-27, 2000, KCL completed 1821 test calls on test lines that had order activity on some lines and no order activity on others. DUF records were expected for 1348 of these test calls. **KCL determined that BellSouth failed to deliver**

DUF[3] records for twenty-seven percent (27%) of the test calls for which records were expected.

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

Intralata Toll

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

Local (Operator Assisted/Completed)

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

Busy Verify

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

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

Optional Calling Services

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

Credit Requests[4]

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

Toll Free

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

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

Directory Assistance

From Number	To Number	Bill To Number	Call Date	Connect Time	Duration
7067224181	7064110000	7067224181	4/26/2000	10:34:00	0:01:17
7067224181	7064110000	7067224181	4/26/2000	10:40:00	0:03:55
7062369443	7064110000	7062369443	4/26/2000	11:27:55	0:00:13
4046333616	4044110000	4046333616	4/26/2000	13:10:14	0:00:32
7067224955	7064110000	7067224955	4/26/2000	15:27:00	0:00:52
7067224955	7064110000	7067224955	4/26/2000	15:29:00	0:00:56
9127440749	9124110000	9127440749	4/27/2000	11:09:33	00:00:10

Information Provider

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

Long Distance

From Number	To Number	Bill To Number	Call Date	Connect Time	Duration
7067224955	9416861317	7067224955	4/26/2000	9:05:00	0:01:35
7702269019	7037230846	7702269019	4/25/2000	9:26:33	0:00:20
7702269019	7037253569	7702269019	4/25/2000	9:45:30	0:00:39
4046333616	7037230846	4046333616	4/26/2000	9:51:45	0:00:15
4046335809	7039673944	4046335809	4/25/2000	9:59:57	0:00:03
4046330247	3106527760	4046330247	4/26/2000	10:16:16	0:01:44
7067224181	7065549600	7067224181	4/27/2000	10:18:00	0:00:18
7067224983	7065544455	7067224983	4/25/2000	10:38:00	0:06:00
7705416524	9127414774	7705416524	4/25/2000	10:42:40	0:00:58
4046334121	4046994943	4046334121	4/26/2000	11:00:21	0:05:46
7062369443	2197639364	7062369443	4/27/2000	11:05:25	0:05:21
7067224181	9735652426	7067224181	4/27/2000	11:21:10	0:00:34
7067224181	9735652426	7067224181	4/27/2000	11:21:10	0:34:00
7067226207	7067389173	7067226207	4/26/2000	11:35:20	0:03:28
7063689160	3045295211	7063689160	4/26/2000	11:47:45	0:01:20
7067224953	7037230846	7067224953	4/26/2000	13:24:00	0:00:25

From Number	To Number	Bill To Number	Call Date	[illegible]	[illegible]
7067224953	7709339530	7067224953	4/26/2000	14:40:30	0:01:01
7067224953	9545876362	7067224953	4/26/2000	14:43:00	0:02:53
7062950681	3105538900	7062950681	4/25/2000	14:48:02	0:00:25
4046335809	5136624811	4046335809	4/26/2000	15:09:53	0:00:50
7708599604	5136845133	7708599604	4/25/2000	15:14:59	0:12:51
7067226207	7067369889	7067226207	4/26/2000	15:17:55	0:00:01
7067226207	7067903860	7067226207	4/26/2000	15:18:00	0:04:49
4043206215	4049673944	4043206215	4/27/2000	15:33:14	0:01:33
7067224953	7062369443	7067224953	4/26/2000	15:43:15	0:00:31
7063689160	2158256112	7063689160	4/26/2000	17:11:08	0:06:26
9127415953	4046333616	9127415953	4/25/2000	09:24:45	00:02:00
9127415953	7709339074	9127415953	4/25/2000	10:44:54	00:00:21
9127450679	7039053549	9127450679	4/25/2000	11:02:33	00:02:33
9127550766	4043258391	9127550766	4/25/2000	11:03:00	00:00:30
9127415953	9124642426	9127415953	4/27/2000	11:15:45	00:00:08
9127550766	8502659336	9127550766	4/26/2000	12:58:30	00:09:27
9127450679	7706565691	9127450679	4/26/2000	13:29:00	00:01:10
9127450679	7063689160	9127450679	4/26/2000	15:11:00	00:00:20
4046330247	5135551212	4046330247	4/26/2000	9:30:58	0:00:47
4046330247	5135551212	4046330247	4/26/2000	9:37:18	0:00:16
7067226207	9735551212	7067226207	4/26/2000	11:03:25	0:00:34
4046335981	7065551212	4046335981	4/25/2000	13:42:03	0:02:00
7062950681	3045551212	7062950681	4/25/2000	15:22:45	0:00:12
7063689160	5185551212	7063689160	4/26/2000	15:42:07	0:00:15
7063689160	5185551212	7063689160	4/26/2000	15:47:30	0:00:19
7708599604	5135551212	7708599604	4/25/2000	15:50:00	0:00:45
9127440984	6365551212	9127440984	4/27/2000	09:03:42	00:00:47
9127440749	2125551212	9127440749	4/25/2000	11:25:29	00:01:25
9127550766	8505551212	9127550766	4/26/2000	14:16:49	00:01:49
9127550766	9045551212	9127550766	4/26/2000	14:22:55	00:00:18
9127450679	7275551212	9127450679	4/26/2000	14:32:00	00:00:30

KCL's Second Re-testing Results:

During the period of August 1 - 4, 2000, KCL completed 1642 test calls on test lines that had order activity on some lines and no order activity on others. DUF records were expected for 1270 of these test calls. **KCL determined that BellSouth failed to deliver DUF[5] records for six percent (6%) of the test calls for which records were expected.**

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

KCL discovered that no ADUF records were received for calls placed on August 3, 2000 for the following telephone numbers (TNs):

770-916-1298
770-541-0959
912-743-6221

Each of these three TNs had migrated from resale to UNE status effective August 2, 2000.

Impact

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

- **Decrease in revenue.** A CLEC not receiving accurate DUF records will not be able to appropriately bill the end-users or inter-exchange carriers, which will decrease revenue.

- **Inaccurate forecasting.** A CLEC will not be able to make accurate usage and revenue projections for its customer base.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 104

BELLSOUTH

October 5, 2000

EXCEPTION REPORT

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

Exception:

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 AMENDED 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 Table 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.

The Billing data files were originally provided to the PMAP group (to be included with the monthly reports) with incomplete data for the KPMG CLEC test accounts. The files have been updated to reflect the corrected information. The process for gathering data has been reviewed and the Birmingham Bill Distribution Center has been advised to "include all media types" for all KPMG test accounts going forward.

However, account 706N160066 was correctly excluded beginning March, 2000 since all circuits on the account were removed in February, 2000 and there were no current

charges on the account beginning March, 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 RESPONSE TO EXCEPTION 111

BELLSOUTH

October 5, 2000

EXCEPTION REPORT

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

Exception:

KPMG Consulting LLC (KCL) cannot replicate one of BellSouth's reported Service Quality Measurements (SQMs) for the month of July 2000.

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.

KCL has been unable to replicate the following SQM values:

1. ***Total Service Order Cycle Time*** **in the Provisioning category for the KCL Test CLEC (July 2000).** The discrepancies found by KCL are listed in the table below:

Category	KCL Calculations	BellSouth's Report
Non-Dispatch OCN 9994 UNE Non-Design < 10 Circuits > 30 Days	1	0
Non-Dispatch OCN 9994 UNE Non-Design < 10 Circuits	109	0

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

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

BELLSOUTH'S RESPONSE TO EXCEPTION 111

Category	KCL Calculations	BellSouth's Report
Average Interval (Days)		

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 applicable SQM 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

KPMG was unable to replicate the July 2000 test CLEC report for *Total Service Order Cycle Time* (TSOCT). BellSouth was able to replicate the July 2000 test CLEC TSOCT report with the following changes, from CR # 478, to the Raw Data Users Manual.

Change #1

For the July 2000 version of the RDUM for the Total Service Order Cycle Time measure the following bullet point should be added to Step #3: 'Include records that have an so_cmtt_type_cd = 1 which indicates an original commitment.'

This change in the RDUM will enable the selection of only records that indicate an original commitment.

Change #2

For the May 2000 version of the RDUM for the Total Service Order Cycle Time measure Step # 4 should read 'Filter records on so_nbr/issu_dt and identify where the same so_nbr/issu_dt combination appears more than once. Keeping the first record, exclude all duplicate references to that so_nbr/issu_dt combination.'

This change to the RDUM is necessary because unique orders are defined by the combination of the so_nbr and issu_dt fields.

Both changes will be incorporated in the October 4, 2000 Version 2.0.10 release of the RDUM.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 31

BELLSOUTH

October 2, 2000

EXCEPTION REPORT

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

Exception:

BellSouth's electronic ordering systems (TAG and EDI) do not adequately support CLEC requests for Directory Listings associated with UNE loop customers.

Background: BellSouth's ordering documentation indicates that all data elements associated with the Directory Listing (DL) form on Loop Service (LS) requests (REQ TYPE A) are "Not Applicable".[1] While DL requests associated with other service delivery types (e.g., UNE Port, UNE Loop-Port Combination) can be accommodated on the original service request, DL requests in association with UNE Loop orders are not accepted on the actual Loop transaction.

KPMG's BellSouth Customer Support Manager (CSM) informed the ordering team that two separate service requests are required for related LS and DL orders. These two service requests are:

1. Loop Service Request - REQ TYPE A
2. Directory Listing Request - REQ TYPE J

KPMG's CSM further indicated that in order to coordinate the service establishment dates, these two transactions should be linked utilizing the Related Purchase Order Number (RPON) data element on the service request. According to KPMG's CSM, all transactions submitted using the RPON functionality automatically fall out for manual handling.

Directory Listing for UNE Loop Customers: The existing BellSouth requirements for ordering LS and DL present a number of deficiencies:

- The LS with DL ordering process is not documented.
- Two separate transactions are required.
- The related transactions result in a more complicated error resolution process. When one transaction within the RPON'd order set (the LS or DL request) is clarified back to the CLEC, the related transaction is subsequently sent back as well, requiring the CLEC to submit 2 supplements.

[1] BellSouth's *Local Exchange Ordering (LEO) Guide, Volume 1, Issue 7N, January 2000, Section 7.*

- Use of the RPON field means the LS request will not flow through[2].

Impact

BellSouth's ordering process for Loop Service with Directory Listing service requests may impact a CLEC in the following ways:

Increase in operating costs. The amount of CLEC coordination required to generate multiple transactions for one customer, monitor responses on both transactions, and send supplements on both transactions adds a significant amount of time and cost to the CLEC ordering process.

Decrease in customer satisfaction. Delays associated with handling multiple purchase orders for one customer, coupled with potential delays caused by the orders' non-flow through status, will result in overall slower service delivery for a CLEC's end users. Slow service will decrease CLEC customer satisfaction.

BellSouth Response

Loop service is identified by a circuit number not a telephone number. Therefore, circuit numbers are used to provision and identify customer service records (CSRs) for Loop service. UNE Port (REQTYP F) and UNE Port-Loop Combination (REQTYP M) services are telephone number identified. BellSouth lists only dialable telephone numbers in the directory, not circuit numbers.

Section 2.6 of the LEO-IG, Volume 1, Issue 7O, which was posted March 20, 2000, provides a table that illustrates the ordering requirements for provisioning different types of service requests. The table clearly indicates only fields associated with LSR, EU and Loop forms are applicable for REQTYP A – Loop Service Requests.

If a CLEC wants to associate the loop and directory listing LSRs, they may do so by populating the RPON field. CLECs are not encouraged to use the RPON field to relate Loop and Directory Listing requests. CLECs may simply request the same due date on the Loop and Directory Listing LSRs submitted to BellSouth.

If a CLEC chooses to relate these orders they will fall out to the center for manual handling. In an effort to ensure that RPON'd orders are processed in a timely and efficient manner the process was evaluated, documented and recovered by the center manager. The coverage was completed 04/01/00.

BellSouth assessed the feasibility of allowing changes to a Directory Listing and Loop via a single LSR on 5/5/00 and determined this was not feasible from an operations perspective. Loop requests are identified via a circuit ID, which is not listed in a

[2] BellSouth represented to KPMG that UNE Loops with DL are flow-through transactions. However, during testing, KPMG discovered that UNE Loop with DL orders are not flow-through.

directory. CLECs should continue to send separate LSRs to request listing changes on Loop service.

BellSouth modified usage rules for the RPON field in LEO IG, Volume 1, dated August 2000 as follows:

> Note 10: When this field is indicated on REQTYP J request, the related PON must also be a REQTYP J.

CLECs may continue to request the same due date for Loop Service (REQTYP = A) and Directory Listings (REQTYP = J) LSRs submitted to BellSouth.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 46

BELLSOUTH

October 5, 2000

EXCEPTION REPORT

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

Exception:

KPMG cannot replicate seven 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 perform its calculations, KPMG has relied on BellSouth's *PMAP Raw Data User Manual*[2], where applicable, and the corresponding raw data. Technical assistance has been provided by BellSouth, when necessary.

KPMG has been unable to replicate the following SQM values:

1. ***Percent Rejected Service Requests* in the Ordering category for the KPMG test CLEC (November 1999 and January 2000).** For each report *(Fully Mechanized, Partially Mechanized, Total Mechanized, and Non-Mechanized)*, KPMG was unable to replicate the values for the UNE and OTHER products using BellSouth's instructions.

2. ***Reject Interval* in the Ordering category for the KPMG test CLEC (November 1999 and January 2000).** For each report *(Fully Mechanized, Partially Mechanized, Total Mechanized, and Non-Mechanized)*, KPMG was unable to replicate the values for the UNE and OTHER products using BellSouth's instructions.

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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. ***Firm Order Confirmation Timeliness (Non-Trunks)* in the Ordering category for the KPMG test CLEC (November 1999 and January 2000).** For each report *(Fully Mechanized, Partially Mechanized, Total Mechanized, and Non-Mechanized)*, KPMG was unable to replicate the values for the UNE and OTHER products using BellSouth's instructions.

4. ***Order Completion Interval* in the Provisioning category for the KPMG test CLEC (November 1999, December 1999 and January 2000).** For November 1999, KPMG was unable to replicate the UNE Non-Design products for OCNs 9990 and 9991 using BellSouth's instructions. For December 1999, KPMG was unable to replicate the Residence and UNE Design products for OCN 9991 using BellSouth's instructions. For January 2000, KPMG was unable to replicate the UNE Non-Design product for OCN 9991 and 9994 using BellSouth's instructions.

5. ***Total Service Order Cycle Time*[3] in the Provisioning category for the KPMG test CLEC (November 1999, December 1999 and January 2000).** For the November 1999 *Fully Mechanized* report, KPMG was unable to replicate the UNE Design product for OCN 9990 using BellSouth's instructions. For December 1999, KPMG was unable to replicate each of the reports *(Fully Mechanized, Partially Mechanized, and Non-Mechanized)* using BellSouth instructions. For the January 1999 *Fully Mechanized* report, KPMG was unable to replicate the UNE Non-Design product for OCN 9994 using BellSouth's instructions.

6. ***OSS Interface Availability*[3] in the Pre-Ordering and Maintenance and Repair Categories for the CLEC Aggregate (December 1999).** KPMG was unable to replicate two values from the BellSouth report, as shown in this table:

Category	KPMG Calculations	BellSouth's Report
LEO Mainframe	Data not available[4]	100.0000%
CLEC TAG System	99.9837%	99.9667%

Additionally, there were records in the data file for the CRLNOP1D and CRLNOP2D system that BellSouth did not include in its report.

7. ***Mean Time to Deliver Usage*[3] in the Billing category for the KPMG test CLEC (November 1999).** BellSouth weighted the record volume by adding 1.5 to the "Days Delayed," rather than the 0.5 indicated in their written instructions. Thus, the BellSouth calculated value is greater than the KPMG-calculated value by 1. The resulting disparity is shown in this table:

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[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.

[4] When BellSouth provided the raw data for this SQM, KPMG was unable to identify any data relating to the LEO Mainframe.

Category	KPMG Calculations	BellSouth's Report
Mean Time	4.55	5.55

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 seven applicable SQMs may be in question. Without accurate SQMs, CLECs are unable to assess.

BellSouth Response

Percent Rejected Service Requests in the Ordering category for the KPMG test CLEC (November 1999 and January 2000).

For Percent Rejected Service Requests in the Ordering Category, "Combos" are included in the "Other" category rather than "UNE" or "UNE Other". However, a change request is pending that would move the product "Combos" from the "Other" category to a separate category called "Combos". Business requirements are being developed and this change request will be prioritized with other pending changes.

Reject Interval in the Ordering category for the KPMG test CLEC (November 1999 and January 2000).

For Reject Interval in the Ordering category, "Combos" are included in the "Other" category rather than "UNE" or "UNE Other". However, a Change Request is pending that would move the product "Combos" from the "Other" category to a separate category called "Combos".

Although KPMG replicated June reports for the test CLEC, KPMG was unable to replicate the May report for the Test CLEC. This was due to the fact that BellSouth reran May's data 2 times. The 1st rerun was on June 14th because the PMAP production team did not originally migrate the ORNDDfLsrFatalRejects job into batch 60 which used the new table to identify fatal rejects. The 2nd rerun was on July 20th. The reason for the second rerun was to exclude the weekends and addition of the 36hr bucket.

Firm Order Confirmation Timeliness (Non-Trunks) in the Ordering category for the KPMG test CLEC (November 1999 and January 2000).

"Combos" are included in the "Other" category rather than "UNE" or "UNE Other". However, a change request is pending that would move the product "Combos" from the

"Other" category to a separate category called "Combos". Business requirements are being developed and this change request will be prioritized with other pending changes.

Order Completion Interval in the Provisioning category for the KPMG test CLEC (November 1999, December 1999 and January 2000).

BellSouth agrees that using the Version 2.0 of the Raw Data Users Manual, KPMG was unable to replicate for the test CLEC the following data: for November 1999, the UNE Non-Design products for OCNs 9990 and 9991, for December 1999, the Residence and UNE Design products for OCN 9991, and for January 2000, the UNE Non-Design product for OCN 9991 and 9994.

The instructions to create a report using the exclusion "so_cmtt_cd = 'L'" would 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 issued a system change request # 5330 that addresses the issue of exclusion of "so_cmtt_cd = 'L'" that was effective for March data, published in April. This change enabled the monthly reports to match results created using the Raw Data Users Manual.

BellSouth provided KPMG with the April OCI data and reports. The discrepancies identified by KPMG in the April Average Completion Interval and Order Completion Interval reports are explained by differences in the functionality of KPMG and BellSouth's tools used to replicate the reports from Raw Data.

Step 2 Bullet 2 of the Raw Data User's Guide (RDUG) currently instructs the user to "Exclude records where SO_CMTT_CD = 'L'." This statement was changed to read "Exclude records where SO_CMTT_CD = 'L' or SO_CMTT_CD is null" in the September 2000 release of the RDUG. The reason that BellSouth and KPMG were calculating different values from the raw data is because the aforementioned exclusions are handled identically using SQL to query the Oracle database. If one excludes records with a certain value in a field, then records with null values in that field are also excluded.

However, using KPMG's tool, the above statements are not identical. If records are excluded with a certain value in a field, then all other values are considered valid, including null values. Records with null values are not valid for the Order Completion Interval metric is because these are "listing" records, where no work has been performed. Change request 5923 was implemented to filter these records in the PMAP system beginning with June Data.

In the Raw Data User's Guide (RDUG), the Order Completion Interval and Order Completion Interval Trunks instructions were changed to ensure that a null value in

the SO_CMTT_CD field would cause that record to be excluded from the selection process.

Change request 5923 prescribed a code change which prevents these listing orders from entering the PMAP Normalized Operational Data Store (NODS). Since there was no work performed on them, these are not valid provisioning orders. Beginning with June Data, posted in July, these orders are absent from NODS and raw data. If a CLEC attempts to replicate raw data before June, the additional exclusion of records where "SO_CMTT_CD is null" will allow this. For data later than May, this exclusion will no longer exclude any orders since they will have already been removed due to the code fix resulting from Change Request 5923.

Total Service Order Cycle Time[5] in the Provisioning category for the KPMG test CLEC (November 1999, December 1999 and January 2000).

BellSouth agrees that using Version 2.0 of the Raw Data Users Manual KPMG was unable to replicate for the KPMG test CLEC the following reports: for November 1999 *Fully Mechanized* report, the UNE Design products for OCNs 9990, for December 1999, each of the reports (*Fully Mechanized, Partially Mechanized, and Non-Mechanized)*, and for January 2000 *Fully Mechanized* report, the UNE Non-Design products for OCN 9994.

BellSouth, using the Version 2.04 of the Raw Data Users manual, was able to replicate the data in question for November 1999, December 1999, and January 2000 using additional steps. The instructions to perform the data replication, specifically the exclusion of records where "so_cmtt_cd = null", the grouping by fields to eliminate duplicate records needs some additional clarification. In November, only data that was for Mechanized orders (MECHZTN = 'Mechanized') was used to calculate the Average Total Service Order Cycle Time.

In December, again grouping by fields to eliminate duplicates results in the MECHZTN field return results for each of the data categories. For the January 2000 *Fully Mechanized* report, the only Fully Mechanized record returned belongs to OCN 4361. The raw data matched the end report because no fully mechanized UNE Non-Design products were reported for OCN 9994.

KPMG reported on 6/8/00 that they could now replicate the data in question for November 1999, December 1999, and January 2000. The Raw Data Users Manual was updated in May reflecting these changes and additional process steps. The Raw Data Users was posted to the web site on June 9th, 2000 and a copy was delivered to KPMG representatives.

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[5] 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.

OSS Interface Availability[3] in the Pre-Ordering and Maintenance and Repair Categories for the CLEC Aggregate (December 1999).

KPMG has been able to replicate OSS Interface Availability in the Pre-Ordering and Maintenance & Repair Categories.

- BellSouth informed KPMG where to locate the data for LEO Mainframe (KPMG stated data was not available). KPMG was able to match BellSouth's reported number.
- KPMG issued a corrected Exception No. 55. KPMG inadvertently transposed BellSouth's reported number with KPMG's calculated number for CLEC TAG system. However, after further clarification from BellSouth, KPMG was able to match BellSouth's reported number for CLEC TAG system.

OSS Applications consist of various servers. Some servers have a single function while others have multiple functions. Both servers in questions, CRLNOP1D and CRLNOP2D, provide LNP Gateway data only. One is the primary service while the second is used as a backup in case there is a failure in the first server. When users log onto the system, they are authenticated and allowed access to the LNP Gateway. Separate servers report LNP data for the Maintenance and Repair OSS Interface Availability Report, but no data is currently reported from the LNP Gateway Servers.

Mean Time to Delivery Usage Records in the Billing category for the KPMG test CLEC (November 1999).

The weighting applied to this measure is in a spreadsheet which is used by an Ardent job as a lookup table. The table has been changed to provide the correct lookup for each interval by adding .5 rather than 1.5 to each interval. This change was implemented 1/17/00 and would have been apparent with February reports.

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 90

BELLSOUTH

October 5, 2000

EXCEPTION REPORT

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

Exception:

KPMG 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

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 agrees that using Version 2.0 of the Raw Data Users Manual, KPMG was unable to replicate for the test CLEC the following data: for March 2000, the UNE Non-Design product for OCN 9994.

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 issued a system change request # 5330 that addresses the issue of exclusion of "so_cmtt_cd = 'L'" and was effective for March data. This change will enable the monthly reports to match results created using the Raw Data Users Manual.

BellSouth provided KPMG with the April OCI data and reports. The discrepancies identified by KPMG in the April Average Completion Interval and Order Completion Interval reports were explained by differences in the functionality of KPMG and BellSouth's tools used to replicate the reports from Raw Data.

Step 2 Bullet 2 of the Raw Data User's Guide (RDUG) currently instructs the user to "Exclude records where SO_CMTT_CD = 'L'." This statement was changed to read "Exclude records where SO_CMTT_CD = 'L' or SO_CMTT_CD is null" in the September 2000 release of the RDUG.

The reason that BellSouth and KPMG were calculating different values from the raw data is because the aforementioned exclusions are handled identically using SQL to query the Oracle database. If one excludes records with a certain value in a field, then records with null values in that field are also excluded.

However, using KPMG's tool, the above statements are not identical. If records are excluded with a certain value in a field, then all other values are considered valid, including null values. Records with null values are not valid for the Order Completion Interval metric is because these are "listing" records, where no work has been performed. Change request 5923 was implemented to filter these records in the PMAP system beginning with June Data.

In the Raw Data User's Guide (RDUG), the Order Completion Interval and Order Completion Interval Trunks instructions were changed to ensure that a null value in the SO_CMTT_CD field would cause that record to be excluded from the selection process.

Change request 5923 prescribed a code change which prevents these listing orders from entering the PMAP Normalized Operational Data Store (NODS). Since there was no work performed on them, these are not valid provisioning orders. Beginning with June Data, posted in July, these orders are absent from NODS and raw data.

If a CLEC attempts to replicate raw data before June, the additional exclusion of records where "SO_CMTT_CD is null" will allow this. For data later than May, this

exclusion will no longer exclude any orders since they will have already been removed due to the code fix resulting from Change Request 5923.

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 SIXTH AMENDED RESPONSE TO EXCEPTION 86

BELLSOUTH

October 3, 2000

EXCEPTION REPORT

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

Exception:

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

[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

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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%

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%

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< 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 SIXTH 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 SIXTH 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 SIXTH 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 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%

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%

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.

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%

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 rogramming and is extremely labor intensive, therefore, BST asks that reports for March 2000 forward be used for validation.

CR#6139- In order to replicate this measure, two fields must be added to the raw data table. The first addition should be the NODS_WO.CMPLTN_DT field. This field will contain the CMPLTN_DT from the NODS_WO table. The NODS_WO.CMPLTN_DT field will allow us to include an instruction in the Raw Data User's Guide (RDUG) to perform an important check on the data. This check, using the CMPLTN_DT for the trouble from WFA, will be used in the "TRBL_DT (NODS_TICKET)-NODS_WO.CMPLTN_DT <= 30" calculation. This check will replace the current statement which is "TRBL_DT (NODS_TICKET)-NODS_SO.CMPLTN_DT <= 30".

The second addition to raw data must be the NODS_TICKET.SOURCE field. This field will identify which source system the trbl_dt field originates (WFA or LMOS). Records from LMOS and WFA are affected differently, and require different logic to reproduce the correct results. Therefore, another set of instructions will be added to the RDUG to handle records whose TRBL_DT is being pulled from LMOS independently from those being pulled from WFA.

The addition of these two fields will give KPMG the capability to replicate June 2000 Percent Provisioning Troubles within 30 days for all regions using the raw data.

BELLSOUTH'S SIXTH AMENDED RESPONSE TO EXCEPTION 86

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).

BELLSOUTH'S SIXTH AMENDED RESPONSE TO EXCEPTION 86

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 will allow 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.

BellSouth has updated the Raw Data Users Manual to include these instructions. The RDUM is scheduled to be released in early October.

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 SIXTH 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 SEVENTH AMENDED RESPONSE TO EXCEPTION 62

BELLSOUTH

October 5, 2000

EXCEPTION REPORT

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

Exception:

KPMG 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

[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
Fully Mechanized; OCN = 9994; Product = Other; % 0-15 minutes	9.09%	18.18%
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 SEVENTH 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 Version 2.0 of the Raw Data Users Manual, KPMG was unable to replicate for the test CLEC the data in the table. 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 addresses the issue of exclusion of "so_cmtt_cd = 'L'" and was effective for March data, published in April. This change will enable the monthly reports to match results created using the Raw Data Users Manual.

BellSouth provided KPMG with the April OCI data and reports. The discrepancies identified by KPMG in the April Average Completion Interval and Order Completion Interval reports are explained by differences in the functionality of KPMG and BellSouth's tools used to replicate the reports from Raw Data.

Step 2 Bullet 2 of the Raw Data User's Guide (RDUG) currently instructs the user to "Exclude records where SO_CMTT_CD = 'L'." This statement was changed to read "Exclude records where SO_CMTT_CD = 'L' or SO_CMTT_CD is null" in the September 2000 release of the RDUG.

The reason that BellSouth and KPMG were calculating different values from the raw data is because the aforementioned exclusions are handled identically using SQL to query the Oracle database. If one excludes records with a certain value in a field, then records with null values in that field are also excluded. However, using KPMG's tool, the above statements are not identical. If records are excluded with a certain value in a field, then all other values are considered valid, including null values. Records with null values are not valid for the Order Completion Interval metric is because these are "listing" records, where no work has been performed. Change request 5923 was implemented to filter these records in the PMAP system beginning with June Data.

In the Raw Data User's Guide (RDUG), the Order Completion Interval and Order Completion Interval Trunks instructions were changed to ensure that a null value in the SO_CMTT_CD field would cause that record to be excluded from the selection process. Change request 5923 prescribed a code change which prevents these listing orders from entering the PMAP Normalized Operational Data Store (NODS). Since there was no work performed on them, these are not valid provisioning orders. Beginning with June Data, posted in July, these orders are absent from NODS and raw data. If a CLEC attempts to replicate raw data before June, the additional exclusion of records where "SO_CMTT_CD is null" will allow this. For data later than May, this exclusion will no longer exclude any orders since they will have already been removed due to the code fix resulting from Change Request 5923.

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.

BELLSOUTH'S SEVENTH AMENDED RESPONSE TO EXCEPTION 62

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 SEVENTH AMENDED RESPONSE TO EXCEPTION 62

Category	KPMG Calculation	BellSouth Reporting (PMAP Calculated values)	Calculated using Billing data in Feb 2000 E&Y file and with no changes for negative revenues	Recalculation 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 EIGHTH AMENDED RESPONSE TO EXCEPTION 52

BELLSOUTH

October 3, 2000

EXCEPTION REPORT

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

Exception:

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.

BELLSOUTH'S EIGHTH AMENDED RESPONSE TO EXCEPTION 52

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.

BELLSOUTH'S EIGHTH AMENDED RESPONSE TO EXCEPTION 52

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

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* for non-trunks. BellSouth provided KPMG with July data for trunks and non-trunks. There have been no held orders for trunk orders from December 1999 through September 2000.

BellSouth was able to replicate the July Held Order Interval and Mean report using the following changes to the Raw Data Users Guide:

BELLSOUTH'S EIGHTH AMENDED RESPONSE TO EXCEPTION 52

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.

BELLSOUTH'S EIGHTH AMENDED RESPONSE TO EXCEPTION 52

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 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.

BELLSOUTH'S EIGHTH AMENDED RESPONSE TO EXCEPTION 52

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.

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.

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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 11th day of October, 2000.

David Frey

David Frey

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October 30, 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 38 (Amended), Exception 60 (Amended), Exception 68 (Amended), Exception 78 (Amended), Exception 98 (Amended), and Statement of Re-Opening for Exception 21 along with BellSouth's Amended Response to Exception 79, Third Amended Responses to Exceptions 74, 108, and 110, and Fifth Amended Responses to Exceptions 28 and 88 for filing in the above referenced matter.

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

Thank you for your assistance in this regard.

Very truly yours,

David Frey
Manager

Enclosures

cc: Parties of Record

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

Date: October 20, 2000

EXCEPTION REPORT

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

Exception:

BellSouth does not consistently provide CLECs with a service Due Date (DD) matching their Desired Due Date (DDD).

When issuing Local Service Requests (LSRs), CLECs are required to input a DDD for service completion. BellSouth's *Product & Service Interval Guide Network & Carrier Services, Issue 2b, December 1999* provides CLECs with standard completion intervals for different service types. In response to an error-free LSR, BellSouth delivers a Firm Order Confirmation (FOC). This FOC contains the DD by which BellSouth commits to completing the CLEC's service request. According to the *Interval Guide*, if a CLEC has requested a DDD no shorter than the standard interval, BellSouth will attempt to commit to the same DD[1].

Approximately 20% of KPMG Consulting LLC's (KCL's) transactions had a DD that was not compliant with the interval specified in the *Interval Guide*. In these instances, BellSouth's FOC DDs can be broken down as follows:

1) **BellSouth provided KCL with an FOC DD later than the LSR DDD for 15% of service requests receiving an FOC.** A table of these transactions appears below.

FOC DD Later than LSR DDD

PON	VER	CC	LSR DDD	FOC DD	DD – DDD (Business Days)	REQTYP ACT
307A122PEK100001	04	9994	12/20/99	12/21/99	1	AB/V
395A213PEM100001	00	9994	1/21/00	1/24/00	1	FB/A
406A213PTM100001	00	9991	12/14/99	12/15/99	1	FB/V
406A213PTM100004	00	9991	1/21/00	1/24/00	1	FB/V
419A223PTM100002	00	9991	12/20/99	12/21/99	1	FB/D
428A124PTJ100006	01	9994	12/24/99	12/27/99	1	MB/V
428X224PEJ101001	00	9994	2/15/00	2/16/00	1	MB/V

[1] "BellSouth will make every effort to accommodate service requests utilizing these intervals." From BellSouth's *Product & Service Interval Guide Network & Carrier Services, Issue 2b, December 1999, Page V*.

PON	VER	CC	LSR DDD	FOC DD	DD – DDD (Business Days)	REQTYP ACT
603A224PTJ100002	00	9991	11/16/99	11/20/99	1	MB/D
326C222PEI100002	00	9992	1/26/00	1/28/00	2	BB/V
404A223PTM100001	03	9991	12/09/99	12/13/99	2	FB/V
444A214PEJ000002	00	9991	1/21/00	1/25/00	2	MB/D
445A124PEJ100003	00	9991	1/14/00	1/18/00	2	MB/D
603A224PTJ100004	00	9991	2/16/00	2/18/00	2	MB/D
604A224PEJ000003	00	9994	2/7/00	2/09/00	2	MB/V
605A214PTJ000004	00	9994	2/15/00	2/17/00	2	MB/V
309A222PTH100001	04	9994	12/23/99	12/28/99	3	AB/V
626A224PTJ101002	00	9991	1/06/00	1/11/00	3	MB/C
445D124PEJ100001	00	9991	12/14/99	12/20/99	4	MB/D
329A212PTI100003	00	9992	12/21/99	12/28/99	5	BB/V
433A124PEH100002	00	9991	12/22/99	12/29/99	5	MB/M
603A224PEJ100003	00	9991	1/19/00	1/26/00	5	MB/D
440A124PTJ000002	00	9991	11/30/99	12/21/99	15	MB/SS

2) **BellSouth provided KCL with an FOC DD earlier than the LSR DDD for 5% of service requests receiving an FOC.** A table of these transactions appears below.

FOC DD Earlier than LSR DDD

PON	VER	CC	LSR DDD	FOC DD	DD – DDD (Business Days)	REQTYP ACT
395A213PEM100001	01	9994	1/21/00	1/18/00	-3	FB/A
415A213PTM000001	00	9991	12/14/99	12/09/99	-3	FB/RS
452A216PTF100003	00	9991	12/22/99	12/17/99	-3	JB/R
626A224PTJ100002	04	9991	12/16/99	12/13/99	-3	MB/C
407A213PTM100003	03	9991	12/09/99	12/07/99	-2	FB/C
456A216PEF100002	00	9991	12/22/99	12/20/99	-2	JB/R
606A123PEM100004	00	9991	2/17/00	2/15/00	-2	FB/C
438A214PTJ000002	00	9991	2/15/00	2/14/00	-1	MB/SS

Impact

CLECs should be reasonably assured of receiving confirmed due dates (FOC DD) matching their requested due dates (LSR DDD) when the requests are interval-compliant. CLECs are likely to provide their customers with an anticipated service delivery date in line with BellSouth's standard intervals. The receipt of an FOC DD different than an LSR DDD will force a CLEC to notify their customers of this change. Late DDs may result in decreased customer satisfaction. (e.g. a new account is not established on time, directory assistance information is not available on time).

The occurrence of an FOC DD earlier than the LSR DDD places an additional burden on a CLEC. Early completion of the CLEC's order may result in a disruption to the end user's service, (e.g. service is suspended prior to the customer's requested date, a new account is established and billing initiated prior to the customer's requested date) which will result in decreased CLEC customer satisfaction. To move the DD back to the requested DDD, the CLEC would be forced to issue a supplemental service request.

AMENDED EXCEPTION

KCL reviewed the accuracy of FOC DDs provided for service requests submitted during a UNE functional re-test initiated on August 25, 2000.

Of the 197 FOCs[2] received during functional re-testing between August 28 and October 9, 2000, 17 (9%) contained DDs later than the DDD requested on the service request. Three of these orders were submitted using pre-order obtained DDDs, while the remaining 14 orders were submitted using service intervals obtained from BellSouth documentation.

The following table provides additional detail on the service orders receiving different Due Dates.

PON VER	CC	Order Type[3]	Flow Through	LSR DDD	FOC DD	DDD obtained via pre-orders	DDD obtained via Documentation
615R122PTH100005*00	9994	AB	Y	10/11/00	10/16/00		X
423R114PTJ100003*00	9994	MB	Y	9/26/00	9/27/00		X
428R124PEJ100001*00	9994	MB	Y	9/4/00	9/5/00		X
423R114PTJ100001*00	9994	MB	Y *	9/4/00	9/5/00		X
444R214PTJ100001*00	9990	MB	Y *	9/4/00	9/5/00		X
398R213PTM000001*00	9994	FB	N	8/30/00	9/5/00		X
398R213PTM000003*00	9994	FB	N	9/8/00	9/13/00		X
399R213PTM100002*00	9994	FB	N	9/8/00	9/13/00		X
404R223PTM101001*01	9994	FB	N	9/11/00	9/14/00		X

[2] This total excludes those FOCs received for KCL LSRs submitted with Desired Due Dates less than the standard interval (i.e., KCL errors).
[3] AB = UNE Loop; MB = UNE Loop-Port Combination; FB = UNE Port.

PON VER	CC	Order Type[3]	Flow Through	LSR DDD	FOC DD	DDD obtained via pre-orders	DDD obtained via Documentation
404R223PTM100002*00	9994	FB	N	9/19/00	9/25/00		X
399R213PEM100001*01	9994	FB	N	9/1/00	9/6/00		X
398R213PEM000002*00	9994	FB	N	9/8/00	9/13/00		X
409R223PEM100001*00	9994	FB	N	9/19/00	9/21/00		X
409R223PEM100001*01	9994	FB	N	9/19/00	9/21/00		X
428R124PTJ100003*00	9994	MB	Y	9/20/00	9/21/00	X	
395R213PEM100002*00	9994	FB	N	9/8/00	9/13/00	X	
399R213PEM100003*00	9994	FB	N	9/26/00	9/28/00	X	

Note: All Flow Through/Non-Flow Through classifications are based on *actual* designations from BellSouth-obtained flow through reports, with the exception of those marked by an *. For these orders, KCL was unable to obtain a flow through classification based on BellSouth reports and utilized *expected* flow-through designations derived from BellSouth documentation.

Date: October 15, 2000

EXCEPTION REPORT

An exception has been identified as a result of the EDI Order Functional Tests (O&P-1 and PO&P-11).

Initial Exception:

BellSouth does not deliver timely Functional Acknowledgements (FAs) via Electronic Data Interchange (EDI).

FAs are standard in the EDI ordering process to provide confirmation that a trading partner (in this case BellSouth or a CLEC) has received an EDI transaction sent by the other party. In response to a CLEC's Local Service Request (LSR), BellSouth is expected to deliver an FA notifying the CLEC that its order has been received.

For purposes of this evaluation, KPMG Consulting LLC (KCL) has proposed a benchmark of 30 minutes[1] for FA response timeliness[2]. BellSouth did not return 38% of the expected FAs within 30 minutes for LSRs submitted via EDI through March 10, 2000.

The following table provides a summary of FA response timeliness for orders submitted via EDI[3].

FA Timeliness - EDI (Initial Test)

<1 MIN	1-10 MINS	10-30 MINS	30-60 MINS	>1 HOUR	TOTAL
7	108	298	130	116	**659**
1%	16%	45%	20%	18%	**100%**

[1] A BellSouth-proposed or Georgia Public Service Commission-accepted standard for FA timeliness does not currently exist. In the absence of a published standard, KPMG has identified a benchmark to be used for the purposes of this evaluation.

[2] KPMG calculates response timeliness as the interval between the 'date/time sent' stamp on an LSR and the 'date/time received' stamp on an FA. An LSR receives a 'date/time sent stamp' when HP's EDI server initiates an NDM session with BellSouth's EDI server. An FA receives a 'date/time received' stamp when the first byte of BellSouth's response is received by HP's NDM server.

[3] The results included in this exception represents data obtained for LSRs submitted through 3/10/00.

Amended Exception

UNE Re-test Results

In response to this exception, BellSouth implemented a short-term process improvement to develop a separate environment within its EDI translator to handle processing of EDI files transmitted by CLECs, and to segregate CLEC transactions from those received by other trading partners. These changes were completed on June 30, 2000. BellSouth is also engaged in a long-term activity to replace EDI hardware and software to improve processing and transmission[4].

KCL initiated a re-test of EDI FA timeliness on August 25, 2000. For FAs received between August 25 and October 9, 2000, KCL noted an improvement in FA timeliness. However, BellSouth's performance still falls below the standards (95% of FA responses within 30 minutes) established by KCL for the purposes of this evaluation.

The following table provides a summary of FA response timeliness for orders submitted during the UNE functional re-test[5].

FA Timeliness - EDI (UNE Re-test)

< 30 min	30-60 min	60-90 min	> 90 min	TOTAL
238	17	6	0	**261**
91%	7%	2%	0%	**100%**

BellSouth's performance during the functional re-test differs from FA timeliness on transactions submitted during the production volume tests. During the volume transaction tests conducted in the production ordering environment, BellSouth returned 100% of EDI FAs within 30 minutes

Resale Functional Test Results

KCL also amended this exception to include results of FA timeliness for those orders submitted through EDI during the Resale Functional Evaluation (PO&P-11). During the Resale evaluation, KCL experienced deficiencies in the timely return of EDI FAs similar to those noted during the UNE evaluation (O&P-1). BellSouth processes Resale and UNE transactions through the same EDI environment. KCL did not perform a re-test of FA timeliness for Resale service requests.

The following table provides a summary of FA response timeliness for orders submitted during the Resale Functional Evaluation.

[4] This effort is expected to complete in 1Q01.

[5] Data represents results for FAs received through October 9, 2000. As of this date, KCL has additional EDI transactions to submit during re-testing.

FA Timeliness - EDI (Resale Test)

< 30 min	30-60 min	60-90 min	> 90 min	TOTAL
208	90	32	29	359
58%	25%	9%	8%	100%

KCL is including the PON detail associated with those UNE re-test and Resale service requests receiving late FAs as an attachment to this amended exception.

Impact

The lack of timely delivered FAs will impact CLECs in the following way:

- **Increase in operating costs.** Receiving a timely Functional Acknowledgement is an essential step in the ordering process. If a CLEC does not receive an FA within a reasonable timeframe, the CLEC will be unable to effectively monitor and respond to an LSR's order status. Investigation into an LSR's status will require additional resources which will increase a CLEC's operating costs.

Date: October 18, 2000

EXCEPTION REPORT

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

Exception:

BellSouth does not provide complete Firm Order Confirmation (FOC) and Completion Notice (CN) responses.

In response to a valid Local Service Request (LSR), BellSouth generates a FOC, notifying the CLEC of order confirmation and a committed due date. BellSouth transmits a CN to notify the CLEC upon completion of provisioning activities.

BellSouth's *Local Exchange Ordering Implementation Guide*[1] *(LEO Guide)* provides information on the data content and format that will be returned within the FOC and CN responses via EDI. The *LEO Guide* also contains a list of data elements, or fields, that should be present on the response. The *LEO Guide* also contains information on fields that must be populated with data values - based on the specific LSR's Requisition (REQ) and Activity (ACT) type - and on the format characteristics (e.g., nine alpha characters) of those data values.

BellSouth's *TAG API Reference Guide*[2] *(API Guide)* provides information on the data elements that will be returned within the FOC and CN responses via TAG. The *API Guide* does not contain information on data value usage and format requirements. BellSouth provides this data value information in the *LEO Guide*, which provides ordering business rules for both the TAG and EDI interfaces.

Based on a detailed comparison of a sample of FOCs and CNs received from both the TAG and EDI interfaces to the data value information specified in the *LEO Guide*, KPMG Consulting LLC (KCL) noted deficiencies in response completeness. These deficiencies fall into five categories:

1. ***Missing Data Elements***
   The FOC or CN does not contain fields listed in the BellSouth documentation.

2. ***Extraneous Data Elements***
   The FOC or CN contains fields not listed in the BellSouth documentation.

[1] For purposes of this evaluation, KPMG utilized *LEO Guide, Version 7N.*
[2] For purposes of this evaluation, KPMG utilized *API Guide, Version 2.2.0.7.*

3. ***Missing Data Values***
   The FOC or CN does not contain data values in one or more fields. According to the BellSouth documentation, these fields are required to be populated based on the order's REQ/ACT type.

4. ***Extraneous Data Values***
   The FOC or CN contain data values in one or more fields that are prohibited or not applicable according to the BellSouth documentation.

5. ***Incorrect Data Values***
   The data values populated on a FOC or CN are inaccurate with respect to field format or content, based on rules identified in the BellSouth documentation.

The following tables present the response completeness deficiencies identified by KCL. Results are broken down by response type (FOC or CN) and by ordering interface (TAG or EDI).[3] For each category defined above, the table presents a list of those data elements and data value identified with problems, and a percentage of responses affected. For missing, extraneous, or incorrect data values, KCL also provides a reference to the relevant REQ/ACT type data requirements.

[3] For the purpose of this response completeness evaluation, KPMG reviewed a sample of 30 responses for each category (FOCs via EDI, FOCs via TAG, CNs via EDI, CNs via TAG).

FOC Responses

	Data Elements	% of Responses Affected	Data Values	% of Responses Affected	Interface
Missing	N/A	N/A	• Billing Indicator 1 (BI1) • Billing Account Number 1 (BAN1) • Version (VER) • Frame Due Time (FDT)	• 17%[4] • 100%[5] • 39%[6] • 100%[7]	EDI
Extraneous	• REMARKS-TYPE	• 100%	• Channel Pair (CHAN-PAIR)	• 23%	EDI
Incorrect	N/A	N/A	• Representative Telephone Number (REP-TEL)	• 100%[8]	EDI
Missing	N/A	N/A	• Frame Due Time (FDT)	• 100%	TAG
Extraneous	• ACSTATIONRANGE • STATUS CODE • STATUSMSG	• 100% • 100% • 100%	• Exchange Company Circuit ID (ECCKT) • Local Service Request Number (LSR NO)	• 13%[9] • 10%	TAG
Incorrect	N/A	N/A	• Representative Telephone Number (REP-TEL)	• 100%	TAG

[4] REQ/ACT Type of BV
[5] Required for all valid REQ/ACT Types
[6] Required for all valid REQ/ACT Types
[7] Required for all valid REQ/ACT Types
[8] According to BellSouth documentation, the REP-TEL phone number should be 10 numeric characters. However, this field was found to contain hyphens and an incomplete phone number.
[9] Required for REQ/ACT types AC,AD,AM,AT,AR,AV, and BV

CN Responses

	Data Elements	% of Responses Affected	Data Values	% of Responses Affected	Interface
Missing	• Frame Due Time (FDT) • Telephone Number (Ported) (TNPORTED)	• 100% • 33%	• Billing Account Number 1 (BAN1) • Frame Due Time (FDT)	• 100% • 100%	EDI
Extraneous	• REMARKS-TYPE	• 100%	• Exchange Company Circuit ID (ECCKT) • Local Service Request Number (LSR NO) • Channel Pair (CHAN-PAIR)	• 13% • 50% • 27%	EDI
Incorrect	N/A	N/A	• Representative Telephone Number (REP-TEL)	• 100%	EDI
Missing	N/A	N/A	• Frame Due Time(FDT)	• 80%	TAG
Extraneous	• ACTSTATION RANGE • TRANSETPURPOSECD STATUS CD - • STATUS MSG	• 100% • 100% • 100%	N/A	N/A	TAG
Incorrect	N/A	•	• Representative Telephone Number (REP-TEL)	• 77%	TAG

Impact

Incomplete FOCs and CNs delivered in response to valid LSRs will impact CLECs in the following ways:

- **Increase in operating costs.** Extraneous information may cause confusion for CLEC ordering representatives. More seriously, missing or incorrect data elements and data values may not provide the necessary account information to the CLEC. If a CLEC does not receive necessary account information, contacting BellSouth to obtain the information will require additional CLEC resources. Utilizing additional resources will result in an increase in CLEC operating costs.

- **Decrease in customer satisfaction.** If a CLEC does not receive necessary account information, such as frame due time, provisioning activities may be affected. Any provisioning delays that result from this lack of information will decrease CLEC customer satisfaction.

Amended Exception:

To address some of the issues presented in this exception, as well as the issues presented in Exception 75 (BellSouth documentation did not contain Business Rules for Error, Clarification, Jeopardy, and Status response types), BellSouth issued an updated version of its *LEO Guide, Volume 1* on August 28, 2000.

In the modified documentation, BellSouth includes Business Rules for all response types (errors, confirmations, completions, status messages, and jeopardizes) in a single section. BellSouth includes a table that identifies the data elements (fields) that are applicable to each response type. While the current Business Rules for BellSouth responses accurately reflect the data elements returned on each response type, the documentation does not provide adequate definitions of *usage requirements*, by order type, for the population of all elements. For a number of fields, the documentation describes the location within BellSouth service order detail from where the response data will come. The documentation fails to consistently note the conditions (i.e., order types) driving population of data elements on response files. A description of the BellSouth service order *location* providing response data is insufficient to determine *when* data will be provided.

The following table provides a sample of the data elements containing incomplete usage requirements.

Data Element	Description	KCI Comments
ORD (Order Number)	This information is obtained from the service order field in the fielded IDENT section and provided in the ORD field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only under certain circumstances.
RORD (Related Order Number)	This information is obtained from the service order FID CRO in the unfielded IDENT section and provided in the RORD field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only under certain circumstances.
FDT (Frame Cutover Time)	This information is obtained from the service order, behind the LH FID FDT in the unfielded IDENT	It is unclear whether this field will be returned on all 855/865 responses, or only

Data Element	Description	KCL Comment
	section. This information will be converted to military time and provided in the FDT field on the 855/865.	under certain circumstances.
EBD (Effective Bill Date)	This information is obtained from behind the IEBD LH FID in the bill section on the service order and returned to the EBD field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only under certain circumstances.
LOCBAN (Local Billing Account Number)	This information is obtained from the TN in the fielded IDENT section on the service order and is populated on the IDENT field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only under certain circumstances.
BAN1 (Billing Account Number 1)	The BTN information is provided from behind the BTN field in the Bill Section on the service order. On REQ TYPE B, this will be the BTN from the Interim Number Portability Order and not the Loop Order. This information will be populated on the BAN1 field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only for REQ TYPE B.
BAN2 (Billing Account Number 2)	On a non-designed loop, this information is obtained from the BTN field in the Bill Section of the service order. This field will be used only for REQ TYPE B. It will always come from the Loop order. This information is populated in the BAN 2 field on the 855/865. On a designed loop, this information is obtained from behind the TN field in the fielded IDENT section of the service order and populated in the BAN 2 field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only for REQ TYPE B.

Date: October 16, 2000

EXCEPTION REPORT

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

Initial Exception:

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

Background:

In response to a valid Local Service Request[1] (LSR), BellSouth returns a FOC. This FOC provides notification to the CLEC that its order is confirmed and provides a committed due date for completion of service provisioning. FOCs are generated for two types of service requests:

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

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

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

BellSouth Performance[3]: In response to LSRs submitted via TAG and EDI, BellSouth failed to deliver timely flow through FOCs.

- 83% of flow through FOCs were returned via the TAG interface within the specified timeframe[4].

[1] According to the *BellSouth-Georgia Service Quality Measurements (SQMs), Draft Version 1.4, p.14*, a service request is not considered valid until it passes system edits to ensure all required fields are populated. An "Invalid" LSR will be returned to a CLEC as a Fatal Reject.
[2] These timeliness standards, proposed by BellSouth, have not yet been approved by the Georgia Public Services Commission.
[3] This exception includes data for LSRs submitted through April 21, 2000. All Local Number Portability (LNP) service requests are *excluded* from this data set. Information on fully versus partially mechanized FOCs for LNP orders was not provided to KPMG.

- 87% of flow through FOCs were returned via the EDI interface within the specified timeframe[5].

The following tables provide a detailed breakdown of response time for flow through FOCs[6].

Flow Through FOC Timeliness Summary

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

Flow Through FOC Detail – Untimely TAG FOCs

PON	VER	CC	4-24 hrs	24-36 hrs	36-48 hrs	48-72 hrs
602A214PTJ100002	00	9991	X			
409A223PTM100001	05	9991		X		
603A224PTJ100004	00	9991			X	
409A223PTM100002	00	9991			X	
382A225PTH102002	00	9991			X	
403A223PTM000001	01	9994				X
309A222PTH100001	04	9994				X
407A213PTM100003	03	9991				X

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

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

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

Flow Through FOC Detail – Untimely EDI FOCs

PON	VER	CC	4-24 hrs	24-36 hrs	36-48 hrs	48-72 hrs
301A112PEH100008	03	9994	X			
428A124PEJ100010	00	9994	X			
453C126PEF100001	00	9991	X			
606A123PEM100002	00	9991		X		
409A223PEM100003	00	9991		X		
326C222PEI100002	00	9992				X
409X223PEM100004	00	9991				X

Amendment

KCL amended this exception to include the results of the Resale Functional Evaluation (PO&P-11). KCL experienced similar response timeliness problems with the delivery of Flow-Through Firm Order Confirmations (FT FOCs) on Resale service requests as those uncovered during the initial UNE evaluations (O&P-1 and O&P-2).

Of the service requests submitted via the EDI interface, 76% of FT FOCs were received within three hours7. The remaining 24% were received within 10 hours.

< 3 hrs	3-4 hrs	4-6 hrs	6-10 hrs	TOTAL
62	9	3	8	82
75.6%	11.0%	3.7%	9.8%	100%
	Total Late = 24.4%			

The following table provides detail on the late FT FOCs received.

PON	VER	CC	LSR Sent	FOC Rcvd	3-4 hrs	4-6 hrs	6-10 hrs
R013H12PEN100001	00	9992	5/1/2000 5:02:54 PM	5/1/2000 8:20:55 PM	X		
R027B11PEN000003	00	9990	3/29/2000 4:32:18 PM	3/29/2000 8:12:34 PM	X		
R001A12PEN100003	00	9990	2/28/2000 4:17:47 PM	2/28/2000 7:19:24 PM	X		
R005E22PEN100003	00	9990	2/28/2000 4:18:57 PM	2/28/2000 7:19:24 PM	X		

[7] The Georgia Public Service Commission (GPSC) standard for purposes of this evaluation, adopted on June 6, 2000, is 95% of FT FOCs received within 3 hours.

PON	VER	CC	LSR Sent	FOC Rcvd	3-4 hrs	4-6 hrs	6-10 hrs
R005A12PEN100003	00	9992	3/17/2000 4:47:48 PM	3/17/2000 8:18:15 PM	X		
R005A12PEN100004	00	9992	3/17/2000 4:50:23 PM	3/17/2000 8:18:15 PM	X		
R011C22PEN100012	01	9992	5/18/2000 5:11:15 PM	5/18/2000 9:00:50 PM	X		
R017A11PEN000005	00	9991	3/29/2000 4:30:35 PM	3/29/2000 8:05:15 PM	X		
R013A12PEN100001	00	9990	3/30/2000 11:09:15am	3/30/2000 2:53:10 PM	X		
R001X12PEN100001	00	9990	2/24/2000 2:16:12 PM	2/24/2000 6:33:51 PM		X	
R013A22PEN100001	01	9991	2/25/2000 8:57:11 AM	2/25/2000 2:57:31 PM		X	
R005A12PEN100007	00	9992	3/17/2000 4:56:46 PM	3/17/2000 9:56:10 PM		X	
R001A21PEN100001	00	9990	2/18/2000 1:22:58 PM	2/18/2000 9:56:36 PM			X
R005E22PEN100001	00	9991	2/18/2000 1:26:55 PM	2/18/2000 10:34:55 PM			X
R010A12PEN100003	00	9991	2/18/2000 1:30:32 PM	2/18/2000 9:56:36 PM			X
R027A11PEN100005	00	9991	2/18/2000 1:37:40 PM	2/18/2000 9:56:36 PM			X
R001A12PEN100001	00	9991	2/18/2000 3:53:05 PM	2/18/2000 9:56:36 PM			X
R017D11PEN100003	00	9991	2/25/2000 8:38:30 AM	2/25/2000 2:57:31 PM			X
R005A12PEN100010	00	9992	3/17/2000 5:00:34 PM	3/18/2000 4:17:57 AM			X
R005A22PEN100002	02	9993	3/27/2000 2:59:10 PM	3/28/2000 12:00:44 AM			X

Impact

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

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

Date: October 24, 2000

EXCEPTION REPORT

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

Exception:

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

Background: In response to a valid Local Service Request[1] (LSR) that contains an error, BellSouth returns a CLR to the CLEC. A CLR is generated in one of two ways:

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

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

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

BellSouth Performance[2]: In response to LSRs submitted via TAG and EDI, BellSouth failed to deliver timely partially mechanized CLR responses.

- 58% of partially mechanized CLRs were returned via the TAG interface within the specified timeframe[3].

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

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

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

- 63% of partially mechanized CLRs were returned via the EDI interface within the specified timeframe[4].

The following tables provide a detailed breakdown of response time for partially mechanized CLRs[5].

Partially Mechanized CLR Timeliness Summary

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

Partially Mechanized CLR Detail – Untimely TAG CLRs

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

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

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

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours
615A122PTH101009	05	9991	X		
615A122PTH101009	04	9991	X		
620A212PTH101001	00	9992	X		
620A212PTH101001	07	9992	X		
301A212PTH100014	00	9994	X		
301A212PTF100015	00	9994	X		
608A124PTJ100001	02	9991	X		
301A222PTH101001	00	9994	X		
301A222PTH101001	03	9994	X		
615A122PTF100012	00	9991	X		
301A112PTH100027	01	9994	X		
626A224PTJ100002	02	9991	X		
303A212PTH101001	01	9994	X		
626A224PTJ100007	00	9991	X		
301A222PTH101001	02	9994	X		
435A114PTJ001002	00	9991	X		
399D213PTM100001	00	9994	X		
305A212PTH100007	00	9994	X		
650A224PTJ000001	00	9994	X		
402E223PTM000002	03	9994	X		
403A223PTM100003	00	9994	X		
403A223PTM100005	00	9994	X		
600C212PTH100001	02	9994	X		
307A222PTF101015	00	9994	X		
409A223PTM100001	02	9991	X		
415D213PTM001002	00	9991	X		
417X223PTM000002	01	9991	X		
323A122PTF100003	00	9991	X		
418A313PTM100002	00	9994	X		
323A122PTH100001	00	9991	X		
398D213PTM000001	00	9994	X		
307X222PTH100001	02	9994	X		
330A222PTI100001	00	9994	X		
333A122PTI101001	00	9992	X		
374A225PTG100005	00	9992	X		
307A222PTH100014	00	9994	X		
307A222PTF102018	03	9994	X		
308F312PTH000003	05	9994	X		
398A213PTM100001	02	9994	X		

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours
398A213PTM100002	00	9994	X		
398D213PTM000001	01	9994	X		
419F223PTM101002	00	9991	X		
415D213PTM001002	01	9991	X		
423A114PTJ000001	01	9994	X		
307A122PTH101002	00	9994	X		
307A122PTH100006	00	9994	X		
307A122PTH100004	00	9994	X		
432A214PTJ100004	00	9991	X		
307A122PTF100015	05	9994	X		
433A124PTJ100001	00	9991	X		
317A122PTH000004	00	9991	X		
307A122PTF100015	00	9994	X		
435C114PTJ001019	00	9991	X		
307A122PTH101002	01	9994	X		
307A122PTH101002	02	9994	X		
428A224PTJ100009	00	9994	X		
424A314PTJ000001	00	9994	X		
307A122PTH103002	07	9994	X		
428A124PTJ100012	00	9994	X		
428A124PTJ100006	00	9994	X		
315A212PTH100023	00	9994	X		
307A222PTH101014	04	9994	X		
309A222PTH100001	03	9994		X	
604A224PTJ000001	03	9994		X	
625A214PTJ100001	05	9991		X	
305A212PTH101007	00	9994		X	
423F114PTJ100002	02	9994		X	
606A123PTM100003	00	9991		X	
403X223PTM100002	01	9994		X	
404A223PTM100001	00	9991		X	
428A224PTJ100002	00	9991		X	
407A213PTM100003	00	9991		X	
404A223PTM100001	01	9991		X	
328F312PTI000002	01	9992			X
301A112PTH100009	03	9994			X
309A222PTH100001	04	9994			X
406C213PTM100002	02	9994			X
329A212PTI100003	00	9992			X

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours
398A213PTM100001	00	9994			X
398A213PTM100001	03	9994			X
398D213PTM000001	02	9994			X
398D213PTM000001	03	9994			X
417A223PTM000002	00	9991			X
423A114PTJ000001	00	9994			X
305A112PTH100007	00	9994			X
626A224PTJ100002	03	9991			X
315A212PTH101002	05	9994			X

Partially Mechanized CLR Detail – Untimely EDI CLRs

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

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours
301A222PEF102008	00	9994	X		
309A122PEH100007	02	9994	X		
428X224PEJ102001	04	9994	X		
302A312PEH000003	00	9994	X		
329A222PEI100001	01	9992	X		
329A212PEI100004	00	9992	X		
307A222PEF100013	00	9994	X		
325C222PEI001001	02	9992	X		
325C222PEI001001	00	9992	X		
325C222PEI000001	00	9992	X		
627A214PEJ100004	00	9991	X		
307A122PEH101003	03	9994	X		
307A222PEF100021	02	9994	X		
307A222PEH101001	00	9994	X		
307A222PEH101001	01	9994	X		
324A112PEH100002	06	9991	X		
307A222PEH102001	04	9994	X		
319A122PEH000003	00	9991	X		
319A122PEF000003	00	9991	X		
309A122PEH100001	03	9991	X		
315X212PEH101001	02	9991	X		
307A222PEH100009	00	9994	X		
307A122PEH100005	01	9994	X		
378A315PEI001001	05	9992	X		
305A222PEH101009	00	9994	X		
428X224PEJ102001	00	9994	X		
428A224PEJ100005	01	9994	X		
428A224PEJ100005	00	9994	X		
428A224PEJ100003	00	9994	X		
427A314PEJ101001	00	9994	X		
307A122PEF100003	00	9994	X		
409X223PEM100001	00	9991	X		
405A312PEM001002	00	9994	X		
325A212PEI000003	01	9992	X		
400A313PEM000001	02	9994	X		
402A223PEM000001	00	9994	X		
607A214PEJ103001	03	9991		X	
456A216PEF100001	00	9991		X	
627A214PEJ100001	01	9991		X	

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours
399A213PEM100002	01	9994		X	
378A315PEI001001	04	9992		X	
309A122PEH100001	00	9991		X	
400A313PEM000001	00	9994		X	
607A214PEJ103001	00	9991		X	
420A124PEJ101001	00	9994		X	
303A222PEH101001	03	9994			X
309A122PEH100001	01	9991			X
422A114PEJ101001	03	9994			X
400A313PEM000001	03	9994			X
399A213PEM100002	00	9994			X
373A215PEG100002	01	9992			X

Impact

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

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

Amended Exception

KCL is amending this exception to include the results of the Resale Functional Evaluation (PO&P-11). KCL experienced similar response timeliness problems with the delivery of partially-mechanized clarification on Resale service requests as those uncovered during the initial UNE evaluations (O&P-1 and O&P-2). The following tables provide a summary of PM CLR Timeliness during the Resale Evaluation.

PM CLR Timeliness – Resale TAG

<24 hrs	24-36 hrs	36-48 hrs	48-72 hrs	> 72 hrs	TOTAL
72	11	11	2	6	**102**
70.6%	10.8%	10.8%	2.0%	5.9%	**100%**
	Total Late = 29.4%				

PM CLR Timeliness – Resale EDI

<24 hrs	24-36 hrs	36-48 hrs	48-72 hrs	>72 hrs	TOTAL
88	16	1	1	3	**109**
80.7%	14.7%	1.0%	1.0%	2.7%	**100%**
	Total Late = 19.3%				

The following table provides details about the late PM CLRs received.

PON	VER	CC	LSR Sent	CLR Rcvd	24-36 hrs	36-48 hrs	48-72 hrs	>72 hrs
R006A21PTN000001	00	9993	3/17/2000 9:26:27am	3/20/2000 9:35:43am	X			
R042A12PTN100016	01	9990	5/18/2000 12:32:45pm	5/19/2000 12:46:27pm	X			
R029A21PTN000005	00	9993	4/3/2000 1:41:12 pm	4/4/2000 2:06:28 pm	X			
R042A12PTN100012	00	9990	4/10/2000 10:31:59am	4/11/2000 11:17:43am	X			
R010A21PTN100001	00	9993	3/15/2000 10:39:07am	3/16/2000 2:09:56 pm	X			
R010A21PTN100002	00	9993	3/15/2000 10:39:57am	3/16/2000 2:18:57 pm	X			
R010A11PTN100001	00	9992	3/15/2000 10:21:30am	3/16/2000 2:15:57 pm	X			
R013C21PTN000002	01	9991	4/12/2000	4/13/2000	X			

EXCEPTION 98 (Amended)

BellSouth Georgia OSS Testing Evaluation

PON	VER	CC	LSR Sent	CLR Rcvd	24-36 hrs	36-48 hrs	48-72 hrs	>= 72 hrs
			1:38:30 pm	6:18:45 pm				
R013B21PTN000001	01	9993	4/12/2000 1:10:15 pm	4/13/2000 6:18:44 pm	X			
R011C22PTN100001	02	9992	3/15/2000 11:02:45am	3/16/2000 4:30:58 pm	X			
R041A21PTN100006	00	9990	4/7/2000 9:48:07 am	4/10/2000 3:44:08 pm	X			
R047A12PTN000001	00	9991	4/12/2000 5:53:45 pm	4/14/2000 9:08:44 am		X		
R042A12PTN100012	02	9990	4/17/2000 2:24:25 pm	4/19/2000 8:11:03 am		X		
R010A21PTN100005	01	9993	4/25/2000 3:07:30 pm	4/27/2000 9:10:59 am		X		
R031H21PTN000001	00	9990	5/2/2000 3:52:56 pm	5/4/2000 11:17:48am		X		
R047A11PTN000017	00	9991	4/7/2000 2:55:08 pm	4/11/2000 10:48:42am		X		
R010A21PTN100005	00	9993	4/18/2000 1:43:09 pm	4/20/2000 11:26:47am		X		
R044A21PTN000001	00	9993	4/19/2000 12:44:34pm	4/21/2000 10:52:46am		X		
R039A21PTN000001	01	9991	5/5/2000 2:27:22 pm	5/9/2000 1:07:07 pm		X		
R025H11PTN100004	00	9991	4/28/2000 2:06:40 pm	5/2/2000 12:53:56pm		X		
R006A21PTN000001	03	9993	3/27/2000 2:08:12 pm	3/29/2000 1:04:46 pm		X		
R006C22PTN000001	00	9992	3/22/2000 4:20:04 pm	3/24/2000 3:16:42 pm		X		
R017D11PTN100005	02	9991	3/14/2000 4:32:15 pm	3/17/2000 3:07:34 pm			X	
R029A21PTN000032	00	9993	5/18/2000 11:34:45am	5/23/2000 10:25:29am			X	
R042A12PTN000020	00	9990	5/2/2000 2:10:06 pm	5/5/2000 4:11:53 pm				X
R011F12PTN100015	00	9992	3/22/2000 10:33:11am	3/28/2000 12:00:44am				X
R026D12PTN000001	00	9990	5/3/2000 4:06:28 pm	5/9/2000 3:20:07 pm				X
R047A11PTN000026	00	9991	4/19/2000	4/26/2000				X

PON	VER	CC	LSR Sent	CLR Rcvd	24-36 hrs	36-48 hrs	48-72 hrs	> 72 hrs
			10:49:54am	8:43:52 am				
R040A21PTN100021	00	9990	4/26/2000 10:20:26am	5/3/2000 2:17:41 pm				X
R011F12PTN100029	01	9992	5/18/2000 10:38:03am	6/1/2000 6:04:44 pm				X
R047A11PEN001004	00	9991	04/04/00 11:06 AM	04/05/00 12:22 PM	X			
R055H12PEN000001	03	9990	05/03/00 02:41 PM	05/04/00 04:32 PM	X			
R047A11PEN001016	00	9991	04/04/00 11:15 AM	04/05/00 12:22 PM	X			
R036A21PEN000012	00	9990	05/02/00 03:17 PM	05/03/00 04:11 PM	X			
R041B21PEN100001	00	9990	04/07/00 10:15 AM	04/10/00 04:42 PM	X			
R011C22PEN100007	02	9992	03/17/00 02:53 PM	03/20/00 05:18 PM	X			
R025X11PEN100001	00	9991	02/24/00 02:10 PM	02/25/00 02:57 PM	X			
R026A11PEN000002	00	9993	04/07/00 03:18 PM	04/10/00 04:42 PM	X			
R011C22PEN100006	03	9992	03/17/00 02:48 PM	03/20/00 05:18 PM	X			
R011C22PEN100005	02	9992	03/17/00 02:43 PM	03/20/00 05:18 PM	X			
R028D11PEN000001	02	9990	03/17/00 01:39 PM	03/20/00 03:49 PM	X			
R035A12PEN000001	00	9991	02/18/00 02:10 PM	02/21/00 06:09 PM	X			
R038A21PEN000001	01	9991	02/22/00 01:16 PM	02/23/00 08:38 PM	X			
R041A21PEN100007	00	9990	04/07/00 09:49 AM	04/10/00 04:42 PM	X			
R011C22PEN100003	03	9992	03/17/00 02:07 PM	03/20/00 05:18 PM	X			
R002A11PEN100001	00	9993	03/15/00 10:25 AM	03/16/00 03:47 PM	X			
R042A12PEN000004	04	9990	04/17/00 11:30 AM	04/19/00 08:45 AM		X		
R028D11PEN100008	00	9990	04/12/00	04/17/00			X	

PON	VER	CC	LSR Sent	CLR Rcvd	24-36 hrs	36-48 hrs	48-72 hrs	> 72 hrs
			03:31 PM	08:21 AM				
R047A12PEN001004	00	9991	05/16/00 04:10 PM	05/22/00 02:25 PM				X
R015C12PEN100001	00	9991	03/10/00 03:17 PM	03/17/00 04:15 PM				X
R015C12PEN000001	00	9991	03/13/00 11:37 AM	03/17/00 04:50 PM				X

RE-OPENING STATEMENT FOR EXCEPTION 21

BellSouth Georgia OSS Testing Evaluation

Date: October 12, 2000

KPMG declares Exception 21 re-opened.

Background: On July 21, 2000 KPMG Consulting (KCL) filed a closure report for Exception 21 with the Georgia Public Service Commission. The title of the exception was:

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

In its closure report for Exception 21, KCL noted the following:

"**'Z' Processing Status:** Replication of the February Flow Through calculation showed that LSRs with a 'Z' processing status were no longer treated as CLEC-caused fall-out, except where additional errors resulting from CLEC causes existed on the LSRs."

Re-Opening Exception 21: Continued testing activities related to the Flow Through evaluation have provided KCL with new information concerning "Z" Processing Status LSRs that indicates that "Z" Processing Status LSRs are still not properly classified for Flow Through purposes.

At the time the exception was closed, it was understood that LSRs received a "Z" processing status when a supplemental LSR was submitted by a CLEC prior to the original LSR being canceled. It was also understood that the original LSR received the "Z" status had reached its final disposition. This information did not indicate that the LSR's should be considered CLEC caused fall-out and lead to Exception 21 and the resulting resolution.

KCL has now determined that LSRs may receive a "Z" status for other reasons than a supplemental submission and that their final disposition is not made at the time the status is changed but at a later time. While changes in BellSouth's response to this issue were made as described according to KCL's re-test, KCL finds that LSRs receiving a "Z" processing status should not be considered either CLEC caused or BellSouth caused fall-out for the purposes of the Flow Through Report until a final disposition of the LSR is determined.

Based on subsequent testing activities, KCL determined that the change implemented by BellSouth does not properly classify "Z" processing status LSRs for the purposes of the Flow Through Report. Therefore, KCL declares Exception 21 re-opened.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 79

BELLSOUTH

October 13, 2000

EXCEPTION REPORT

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

Exception:

BellSouth does not adequately retain certain source data[1] 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).[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.

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

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

[1] Source data is the earliest instance of the data collected in the BellSouth OSS.
[2] These non-PMAP SQMs are also referred to as "manual SQMs."

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 79

Impact

Inadequate retention of source data limits the ability of BellSouth or other parties to validate or re-generate historical SQM reports that may need to be revised, corrected, or audited.

BellSouth Response

BellSouth maintains the 'raw data' received from the legacy systems and used to produce the monthly reports in its system or in archives for 3 years.

In the specific Source Data Systems noted in this exception, where the raw data cannot be captured, the data owners send the Performance Measurement Group summarized data as noted in this exception. For the reports listed in this exception, BellSouth will maintain the summarized data retained by these ACD systems. The data available from these systems is the numerator, or total seconds and denominator, or total calls. These numerators and denominators will be retained in order to compute the reports for three years from the date of the report. The summarized data used in the metrics listed in the matrix below were not available prior to June reports. For example, the total delay seconds that were missing from the monthly feed from the Meridian Max will be sent starting in June. The QMS data owners have agreed to go to archived information and send the appropriate data from January 2000 forward on a monthly basis. This will satisfy the requirements of data retention for the SQM Reports.

Source Data System	SQM Affected	Data Currently Available to PM
Meridian Max	*Speed of Answer in the Ordering Center (Ordering)*	Yes*
Renaissance Enterprise Management	*Interface Availability (OSS)*	Yes
Spectrum Automatic Call Distributor	*Average Speed of Answer in Ordering Centers – Residence (Ordering)*	Yes*
Meridian Symposium	*Average Answer Time in Repair Centers for Large Business (Maintenance & Repair)*	Yes
Meridian Max	*Average Answer Time in Repair Centers – Residence (Maintenance & Repair)*	Yes*
QMS	*Average Speed to Answer - Toll (Operator Services Toll & Directory Assistance)*	Yes

* The Meridian Max ACD data for the numerator (total delay seconds) will be sent with the file starting with June data. BellSouth was previously receiving the average delay and total calls.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 79

BellSouth Amended Response

To reiterate, BellSouth maintains the 'raw data' received from the legacy systems and used to produce the monthly reports in its system or in archives for 3 years. The SQM reports are also retained for 3 years. Where 'raw data' is not retained by the source system, as is the case with these ACD products, BellSouth will maintain the summarized data retained by these ACD systems. The data available from these systems is the numerator, or total seconds and denominator, or total calls. These numerators and denominators will be retained in order to compute the reports for three years from the date of the report. For the purposes of this audit, KPMG verified that the raw data from these systems was correct and did in fact produce the numbers that are contained in the SQM reports.

Since KPMG validated the integrity of the 'raw data', the cost of maintaining this data, and the computer programs to produce these reports, for the sole purpose of an audit, is not warranted. Future audits need to validate current data.

BellSouth's Third Amended Response to Exception 74

BELLSOUTH

October 26, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Performance Measures Evaluation test.

Exception:

BellSouth does not report certain Georgia Service Quality Measurements ("SQMs") at the levels of disaggregation specified in the *Service Quality Measurements Georgia Performance Reports.*

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

As part of the BellSouth-Georgia OSS Evaluation, KPMG is reviewing the adequacy and completeness of the process for reporting SQMs, as specified in the *SQM Georgia Performance Reports*.[2] KPMG is evaluating whether BellSouth reports performance measurement details at the levels of disaggregation specified in the *SQM Georgia Performance Reports*.

KPMG discovered that BellSouth does not report SQMs at the levels of disaggregation specified in the *SQM Georgia Performance Reports* for the SQMs in the table below.

Table 1: SQMs Reported by BellSouth with Missing Levels of Disaggregation

Service Domain	SQM Name	Levels of Disaggregation Missing from SQM Reports
Ordering	Reject Interval	Design, UNE Non-Design, UNE Loop without NP
Ordering	Firm Order Confirmation Timeliness	Design, UNE Non-Design, UNE Loop without NP
Provisioning	Service Order Accuracy	Dispatch/No Dispatch
Billing	Mean Time to Deliver Invoices	Interconnection
Maintenance & Repair	Missed Repair Appointments	PBX, CENTREX and ISDN, UNE 2 Wire Loop, UNE Loop Other, and UNE Other

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

[2] KPMG used BellSouth's *SQM Georgia Performance Reports, Version 10/22/99* as the basis for performing this test.

BellSouth's Third Amended Response to Exception 74

Service Domain	SQM Name	Levels of Disaggregation Missing from SQM Reports
Maintenance & Repair	Customer Trouble Report Rate	PBX, CENTREX and ISDN, UNE 2 Wire Loop, UNE Loop Other, and UNE Other
Maintenance & Repair	Maintenance Average Duration	PBX, CENTREX and ISDN, UNE 2 Wire Loop, UNE Loop Other, and UNE Other
Maintenance & Repair	Percent Repeat Troubles within 30 Days	PBX, CENTREX and ISDN, UNE 2 Wire Loop, UNE Loop Other, and UNE Other
Maintenance & Repair	Out of Service > 24 Hours	PBX, CENTREX and ISDN, UNE 2 Wire Loop, UNE Loop Other, and UNE Other

BellSouth Response

The SQM that KPMG received was the first attempt by BellSouth to produce a regional SQM document. The regional SQM reflected the measurements and disaggregations for all states. Each individual state report reflected only those levels of disaggregation ordered by that state's PSC. The regional SQM was updated on 5/15/00 to more clearly show the disaggregation levels for each state. BellSouth has furnished KPMG the October SQM that was Georgia specific reflecting the disaggregation ordered by the GA PSC.

BellSouth added an introduction on 5/19/00 to the SQM that explains that it is a regional document and that the state specific measures and disaggregations are noted in each section. These measures and disaggregations were based on GA and LA State orders for Performance Measurements and associated product disaggregations. BellSouth posted the introduction on the PMAP website at the end of May 2000.

KPMG will continue to attempt to replicate the test CLEC SQM reports for all months in which the KPMG test CLEC generated transactions. KPMG will replicate one month of the CLEC aggregate/ BellSouth Retail reports typically October 1999. If KPMG needs to re-test based upon an Exception, they will pick additional months of SQM reports to replicate, as appropriate.

To address the question of which levels of disaggregation BellSouth should have been reporting since October, for both the test CLEC and CLEC aggregate / BellSouth Retail reports, KPMG will use the SQM manuals BellSouth has been publishing, focusing on the May 15 SQM manual. Originally, the KPMG comparison of the reports with the October 22, 1999 SQM Manual resulted in Exception 74.

Except as noted above, BellSouth will not re-create any reports (in particular, the December 1999, January 2000, or February 2000 CLEC aggregate reports) according to the June 6 documented levels of disaggregation, nor is KPMG expanding replication activities to cover additional reports.

For statistical comparison, BellSouth will instruct KPMG on how to take the data they already have, and assign them to the levels of disaggregation in the June 6 document. This applies to both the test CLEC data, as well as the Retail data.
KPMG will meet with BellSouth programmers and other personnel as appropriate to discuss this mapping of data.

Since those results are usually zero, KPMG will not see the level of disaggregation reported in the *Average Jeopardy Notice Interval* for Jeopardy Notices for interconnection trunks. These trunks seldom experience facility delays. This statement will be added to the next version of the SQM, with the change noted in the version change log.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 108

BELLSOUTH

October 11, 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. This conversion to a full production mode is expected to occur on 11/18/00.

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 108

BellSouth would like to clarify one point regarding the ADSL ordering process. FASS, is the only web-based front end interface used by the retail units. SOEG and SOCS are downstream systems that are used to track the ADSL request and process and provision the service.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 110

BELLSOUTH

October 13, 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

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. BellSouth provided KPMG with a new June report to address the changes that were effective in June.

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	

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 110

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.

KPMG was unable to replicate the Jeopardy Interval and Percent Jeopardy report for June 2000. BellSouth was able to replicate this report. At the request of BellSouth, KPMG provided a copy of the raw data file they were using to replicate the report. BellSouth found that the raw data file KPMG was using had been truncated and only contained a subset of the entire raw data file. BellSouth sent a new copy of the raw data file by e-mail to KPMG which enabled KPMG to replicate the Jeopardy Interval and Percent Jeopardy report for June 2000.

BELLSOUTH'S THIRD 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 FIFTH AMENDED RESPONSE TO EXCEPTION 28

BELLSOUTH

October 11, 2000

EXCEPTION REPORT

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

Exception:

BellSouth failed to deliver DUF[1] records for six percent (6%) of the second retest calls for which records were expected.

First 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:

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

KPMG Consulting LLC (KCL) completed 1,017[2] test calls during the ODUF/ADUF Functional Usage Evaluation. BellSouth failed to deliver DUF records for forty-six percent of the test calls for which records were expected. Representative occurrences of calls with no corresponding DUF record are detailed in the tables shown below. The list include numerous call types including Calling Card Calls, Information Provider (900) Calls, Local Calls, Directory Assistance Calls, WATS Calls, Long Distance Calls, and Operator Services Calls.

Calling Card Calls

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

Missing Completed Calling Card DUF Records (Representative List)

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

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

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 28

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

Information Provider Calls

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

Missing Information Provider DUF Records (All Included)

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

Local Calls

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

Missing Local Call DUF Records (Representative List)

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

Date	Connect Time	To Number	Duration (minutes)	From Number
Nov 20	10:08	770 933-8526	1	770 933-8523

Directory Assistance

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

Missing Directory Assistance DUF Records (Representative List)

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

WATS Calls

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

Missing WATS DUF Records (Representative List)

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

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 28

Long Distance Calls

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

Missing Long Distance DUF Records (Representative List)

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

BellSouth's Investigation/Resolution Activities:

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

1) The process for identifying CLEC usage does not recognize service order activity that is completed, but still in a "pending" status.

2) The usage error correction status did not capture and recycle all erred usage through the billing system after a guide had been created.

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

KCL Initial Re-testing Results:

During the period of April 25-27, 2000, KCL completed 1821 test calls on test lines that had order activity on some lines and no order activity on others. DUF records were expected for 1348

of these test calls. **KCL determined that BellSouth failed to deliver DUF[3] records for twenty-seven percent (27%) of the test calls for which records were expected.**

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

Intralata Toll

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

Local (Operator Assisted/Completed)

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

Busy Verify

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

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

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 28

Optional Calling Services

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

Credit Requests[4]

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

Toll Free

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

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

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 28

Directory Assistance

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration
7067224181	7064110000	7067224181	4/26/2000	10:34:00	0:01:17
7067224181	7064110000	7067224181	4/26/2000	10:40:00	0:03:55
7062369443	7064110000	7062369443	4/26/2000	11:27:55	0:00:13
4046333616	4044110000	4046333616	4/26/2000	13:10:14	0:00:32
7067224955	7064110000	7067224955	4/26/2000	15:27:00	0:00:52
7067224955	7064110000	7067224955	4/26/2000	15:29:00	0:00:56
9127440749	9124110000	9127440749	4/27/2000	11:09:33	00:00:10

Information Provider

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

Long Distance

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration
7067224955	9416861317	7067224955	4/26/2000	9:05:00	0:01:35
7702269019	7037230846	7702269019	4/25/2000	9:26:33	0:00:20
7702269019	7037253569	7702269019	4/25/2000	9:45:30	0:00:39
4046333616	7037230846	4046333616	4/26/2000	9:51:45	0:00:15
4046335809	7039673944	4046335809	4/25/2000	9:59:57	0:00:03
4046330247	3106527760	4046330247	4/26/2000	10:16:16	0:01:44
7067224181	7065549600	7067224181	4/27/2000	10:18:00	0:00:18
7067224983	7065544455	7067224983	4/25/2000	10:38:00	0:06:00
7705416524	9127414774	7705416524	4/25/2000	10:42:40	0:00:58
4046334121	4046994943	4046334121	4/26/2000	11:00:21	0:05:46
7062369443	2197639364	7062369443	4/27/2000	11:05:25	0:05:21
7067224181	9735652426	7067224181	4/27/2000	11:21:10	0:00:34
7067224181	9735652426	7067224181	4/27/2000	11:21:10	0:34:00
7067226207	7067389173	7067226207	4/26/2000	11:35:20	0:03:28
7063689160	3045295211	7063689160	4/26/2000	11:47:45	0:01:20

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 28

[illegible]	Number	Bill-To Number	Call Date	Connect Time	[illegible]
7067224953	7037230846	7067224953	4/26/2000	13:24:00	0:00:25
7067224953	7709339530	7067224953	4/26/2000	14:40:30	0:01:01
7067224953	9545876362	7067224953	4/26/2000	14:43:00	0:02:53
7062950681	3105538900	7062950681	4/25/2000	14:48:02	0:00:25
4046335809	5136624811	4046335809	4/26/2000	15:09:53	0:00:50
7708599604	5136845133	7708599604	4/25/2000	15:14:59	0:12:51
7067226207	7067369889	7067226207	4/26/2000	15:17:55	0:00:01
7067226207	7067903860	7067226207	4/26/2000	15:18:00	0:04:49
4043206215	4049673944	4043206215	4/27/2000	15:33:14	0:01:33
7067224953	7062369443	7067224953	4/26/2000	15:43:15	0:00:31
7063689160	2158256112	7063689160	4/26/2000	17:11:08	0:06:26
9127415953	4046333616	9127415953	4/25/2000	09:24:45	00:02:00
9127415953	7709339074	9127415953	4/25/2000	10:44:54	00:00:21
9127450679	7039053549	9127450679	4/25/2000	11:02:33	00:02:33
9127550766	4043258391	9127550766	4/25/2000	11:03:00	00:00:30
9127415953	9124642426	9127415953	4/27/2000	11:15:45	00:00:08
9127550766	8502659336	9127550766	4/26/2000	12:58:30	00:09:27
9127450679	7706565691	9127450679	4/26/2000	13:29:00	00:01:10
9127450679	7063689160	9127450679	4/26/2000	15:11:00	00:00:20
4046330247	5135551212	4046330247	4/26/2000	9:30:58	0:00:47
4046330247	5135551212	4046330247	4/26/2000	9:37:18	0:00:16
7067226207	9735551212	7067226207	4/26/2000	11:03:25	0:00:34
4046335981	7065551212	4046335981	4/25/2000	13:42:03	0:02:00
7062950681	3045551212	7062950681	4/25/2000	15:22:45	0:00:12
7063689160	5185551212	7063689160	4/26/2000	15:42:07	0:00:15
7063689160	5185551212	7063689160	4/26/2000	15:47:30	0:00:19
7708599604	5135551212	7708599604	4/25/2000	15:50:00	0:00:45
9127440984	6365551212	9127440984	4/27/2000	09:03:42	00:00:47
9127440749	2125551212	9127440749	4/25/2000	11:25:29	00:01:25
9127550766	8505551212	9127550766	4/26/2000	14:16:49	00:01:49
9127550766	9045551212	9127550766	4/26/2000	14:22:55	00:00:18
9127450679	7275551212	9127450679	4/26/2000	14:32:00	00:00:30

KCL's Second Re-testing Results:

During the period of August 1 - 4, 2000, KCL completed 1642 test calls on test lines that had order activity on some lines and no order activity on others. DUF records were expected for 1270 of these test calls. **KCL determined that BellSouth failed to deliver DUF[5] records for six percent (6%) of the test calls for which records were expected.**

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

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 28

KCL discovered that no ADUF records were received for calls placed on August 3, 2000 for the following telephone numbers (TNs):

770-916-1298
770-541-0959
912-743-6221

Each of these three TNs had migrated from resale to UNE status effective August 2, 2000.

Impact

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

- **Decrease in revenue.** A CLEC not receiving accurate DUF records will not be able to appropriately bill the end-users or inter-exchange carriers, which will decrease revenue.

- **Inaccurate forecasting.** A CLEC will not be able to make accurate usage and revenue projections for its customer base.

BellSouth Response to the ODUF/ADUF re-test (week of 8/3/00)

BellSouth analyzed the usage records produced and sent to KPMG on the DUF files for the three reported telephone numbers and found the following:

770-916-1298 – Disconnect (D) and New Connect (N) service orders were issued to transition this number to a UNE port. The orders were issued and completed on 8/2/00, and then posted to CRIS on 8/4/00. Since the service orders had not yet posted to CRIS, the test calls made by KPMG on 8/3/00 were not identified as being placed from (or placed to) an unbundled switch port and therefore were not sent to the ADUF process. The "held" guide process that captures usage for pending order activity can only capture pending N order information where no working account or service currently exist. Another way of stating this is the N order will not be recognized by the "held" guide process as long as there is live account information. The "held" guide process did not apply to this account when the D and N orders attempted to work on this number. This is due to the fact that the account status remained as a "live" KPMG resale account when the D and N order processed. Had there been no "live" account existing (such as when a new UNE port is ordered), the held guide process would have applied and the usage would have been sent on ADUF.

770-541-0959 – Disconnect (D) and New Connect (N) service orders were issued to transition this number to a UNE port. The orders were issued and completed on 8/2/00, and then posted to CRIS on 8/3/00. The test calls made by KPMG on 8/3/00 would have been sent to the ADUF

process, however a processing delays with the job that updates the daily service order activity to a VSAM file on 8/3/00, caused these messages to continue to be routed to the CABS billing system, stripped of detail and bulk-billed to the carriers by BellSouth. The VSAM file contains the telephone numbers that are associated with unbundled switch ports, and is used by the ALPHA system to route calls to the wholesale billing system, where they are processed, sent to ADUF and billed to the UNE provider. Since the VSAM file was delayed on 8/3/00, the ALPHA process used the last available VSAM file (8/2/00) which did not contain the information showing the change to UNE for telephone number 770-541-0959.

912-743-6221 – Disconnect (D) and New Connect (N) service orders were issued to transition this number to a UNE port. The orders were issued and completed on 8/1/00, and then posted to CRIS on 8/4/00. Since the service orders had not yet posted to CRIS, the test calls made by KPMG on 8/3/00 were not identified as being placed from (or placed to) an unbundled switch port and therefore were not sent to the ADUF process. The "held" guide process that captures usage for pending order activity can only capture pending N order information where no working account or service currently exist. Another way of stating this is the N order will not be recognized by the "held" guide process as long as there is live account information. The "held" guide process did not apply to this account when the D and N orders attempted to work on this number. This is due to the fact that the account status remained as a "live" KPMG resale account when the D and N order processed. Had there been no "live" account existing (such as when a new UNE port is ordered), the held guide process would have applied and the usage would have been sent on ADUF.

Summary: There will be occasions where service order timing or other processing issues will cause delays in providing the billing system the information it needs to identify usage events as being associated with an unbundled switch port. This issue is isolated to the time period immediately following a conversion of a facility (retail facility or resale facility) to an unbundled switch port. When these situations occur BellSouth will not include these usage events on the DUF files nor will it bill the CLEC for UNE usage connected with these calls.

In BellSouth's CLEC Billing documentation Chapter 4, Sections 2 and 3 under the sections named "Service Order Usage Timeline" it states:

BellSouth processes usage on a daily basis based on the account information on that particular day. Service order errors may delay the updating of the account during the time that the errors are being corrected. Usage that has already been processed before the account information is updated with the CLEC account information may not be sent to the CLEC on ODUF/ADUF. BellSouth will attempt to send usage on ODUF/ADUF based on pending service order information depending on the status of the pending UNE order activity for that particular day.

In an attempt to clarify and fully explain these situations to CLECs, BellSouth will modify the above wording of the "Service Order Usage Timeline" to state:

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 28

BellSouth processes usage on a daily basis based on the account information on that particular day. Service order errors or other processing issues may delay the updating of the account during the time that the errors are being corrected. Usage that has already been processed before the account information is updated with the CLEC account information may not be sent to the CLEC on ODUF/ADUF. When these situations occur BellSouth will only bill the CLEC for calls that were sent via the DUF process. BellSouth will attempt to send usage on ODUF/ADUF based on pending service order information depending on the status of the pending UNE order activity for that particular day.

The above modification to the wording will be updated with our next issuance of the CLEC Billing documentation on the web.

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 88

BELLSOUTH

October 17, 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.

BellSouth Response

The Performance Measurement Group's Issue Management and Change Control Process Guide is being updated to correct the absence of an appropriate change register. 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 as well as 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 part of the response to this Exception.

Version 2.2 fixed responsibility for updating the Raw Data Users Manual and maintaining contact with the data owners. In the future, the Raw Data Users Manual will be updated each time the SQM is updated. SMEs and the programmers have been notified of these changes. The change requests must be properly annotated before they

[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.

are closed. Examples of correctly annotated Change Requests were sent to KPMG as part of the response to the initial exception.

BellSouth publishes an updated PMAP Raw Data User Manual (RDUM) in conjunction with each new release of system software, e.g. an updated manual was posted to the PMAP website in conjunction with the 10/1/00 release of PMAP 2.0.10. Each updated RDUM contains a version change log showing the changes reflected in that version of the manual, as well as a cumulative log of the changes included in previous versions of the manual.

Amended Exception 88 identified omissions to the Release 2.0.4 RDUM version change log. These omissions were corrected in the Version 2.0.8 manual posted to the PMAP website 9/25/00. These version change log omissions were:

Version 2.0.4 - Additional Changes/Corrections previously omitted from Log
(**Note**: S2 = Step 2, S7 = Step 7, etc.)

RDUM Section III – Instructions changed in the following reports:

- Ordering:
  - % Rejected Service Requests (S2)
  - FOC Timeliness – Non-Trunks (S2, S3)
  - FOC Timeliness Trunks (S3)
  - Reject Interval (S2, S3)
- Provisioning:
  - % Missed Installation Appointments (S2, S5, S7 grammar, S8, S9)
  - % Missed Installation Appointments – Trunks (S2, S6, S8, S9 typo, S10 typo)
  - Troubles Within 30 Days of Provisioning - Non Trunks (S2, S4, S7)
  - Troubles Within 30 Days of Provisioning - Trunks (S2, S4, S7, S10 typo)
  - Held Order Interval (S6, S7, S8 and S9)
  - Held Order Interval – Trunks (S6, S7, S8)
  - Order Completion Interval (S2, S6 typo)
  - Order Completion Interval – Trunks (S2, S6 typo on field name)
  - Average Completion Notice Interval (S2 format, S3, S5)
  - Jeopardy Interval & Percent Jeopardy (S7)
  - Total Service Order Cycle Time (S2, S4 typo, S5, Reference table after Steps)
- Maintenance and Repair:
  - Customer Trouble report Rate (S6)
  - Missed Repair Appointments (S5-S7)

RDUM Section IV

- Ordering – FOC Timeliness (cmpltn_dt – description changed)
- Ordering – FOC Timeliness – Trunks (cmpltn_dt – description changed)
- Ordering – Reject Interval and Percent Rejected by Interval (cmpltn_dt – description changed)
- Ordering – Service Orders (cmpltn_dt – description changed)

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 88

- Provisioning – Held Orders (cmpltn_dt – description changed)
- Provisioning – Order Completion Interval Distribution
    - so_missed_cmtt_cd - description changed
    - so_missed_cmtt_desc - description changed
    - cmpltn_dt – description changed
- Provisioning - Order Completion Interval Distribution – Trunks
    - so_missed_cmtt_cd - description changed
    - so_missed_cmtt_desc - description changed
    - cmpltn_dt – description changed
- Provisioning – Percent Missed Installation Appointments (cmpltn_dt – description changed)
- Provisioning – Percent Missed Installation Appointments – Trunks (cmpltn_dt – description changed)
- Provisioning – Troubles Within 30 Days of Provisioning – Trunks (cmpltn_dt – description changed)
- Provisioning – Troubles Within 30 Days of Provisioning (cmpltn_dt – description changed)
- Provisioning – Jeopardy Interval (cmpltn_dt – description changed)
- Provisioning – ACNI (cmpltn_dt – description changed)
- Provisioning – TSOCT (cmpltn_dt – description changed)

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 30th day of October, 2000.

David Frey

KPMG Consulting LLC
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16th Floor
Philadelphia, PA 19103-7279

KPMG

1600 Market Street
Philadelphia, PA 19103-7279

October 30, 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 Closure Reports for Exceptions 100, 102 and 109 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 LLP. KPMG LLP, a U.S. limited liability partnership, is a member of KPMG International, a Swiss association.

Date: October 30, 2000

EXCEPTION CLOSURE REPORT

Exception:

KPMG Consulting LLC (KCL) was unable to replicate two of BellSouth's Service Quality Measurements (SQMs) in the May 2000 report.

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. Additionally, BellSouth 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[3] from BellSouth when necessary.

KCL experienced replication problems for the following SQMs in the May 2000 report.

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

Category	KCL 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.
[3] "Technical Assistance" refers to any calculation instruction KCL may have received in the replication of CLEC aggregate or non-PMAP (manually calculated) metrics.

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

Category	KCL 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, KCL 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.

Summary of BellSouth's Response:

1. ***Coordinated Customer Conversions* in the Provisioning category for the KCL 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.

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 KCL 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."

2. ***Invoice Accuracy*** **in the Billing category for the KCL 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 KCL 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

Summary of KCL Re-Test Activities ***(by Issue Number)*****:**

1. ***Coordinated Customer Conversions*** **in the Provisioning category for the KCL Test CLEC.**

KCL received a revised raw data file from BellSouth, which included "Cut Start" and "Cut Complete" times listed in minutes and seconds. Based upon this revised raw data file, KCL recalculated the "Total Minutes" and "Average Interval" values, in minutes and seconds.

KCL also received a revised SQM report based upon the raw data. In this revised report, the "Total Minutes" and "Average Interval" values were listed in minutes and seconds.

KCL compared all the KCL-calculated values to the BellSouth SQM report's corresponding values, including the revised Average Interval and Total Minutes values.

2. *Invoice Accuracy* in the Billing category for the KCL Test CLEC.

KCL received the revised figures listed in BellSouth's response above. KCL also received a revised SQM report from BellSouth.

KCL replaced the incorrect "text" values with the corrected (numeric) values for the appropriate records. KCL then recalculated the SQM values based upon the revised raw data, and compared its recalculated values with the revised BellSouth SQM report.

Additionally, KCL has continued to review the KCL test CLEC *Invoice Accuracy* SQM reports and data for the months subsequent to May 2000.

KCL Re-Test Results *(by Issue Number)*:

1. *Coordinated Customer Conversions* in the Provisioning category for the KCL Test CLEC.

Based upon the revised data, KCL calculated 19 minutes and 56 seconds for the Total Minutes value. When divided by the total items (four) for the month, the resulting Average Interval was four minutes and 59 seconds.

These KCL-recalculated values matched the corresponding values BellSouth reported in its revised SQM report. Additionally, KCL-calculated values now matched all of the values listed in the revised BellSouth SQM report.

2. *Invoice Accuracy* in the Billing category for the KCL Test CLEC.

KCL compared its recalculated values to the corresponding values in the revised BellSouth SQM report. All of the values listed in the revised SQM report matched the KCL-recalculated values, exactly.

Additionally, the KCL-calculated values for *Invoice Accuracy* have matched the BellSouth-reported values for the months of June and July 2000.

As a result, KCL believes that BellSouth has adequately addressed the issues identified in Exception 100.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 100.

Attachments: None.

CLOSURE REPORT FOR EXCEPTION 102

BellSouth Georgia OSS Testing Evaluation

Date: October 30, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth is unable to mechanically process telephone number changes for lines with measured classes of service 1MBGE.

Summary of Exception:

KPMG Consulting LLC (KCL) submitted the following orders:

PON	DATE	Company Code
R011H21PTN100003*AE	5/2/00 4:28 PM	9990
R011H21PEN100006*AD	5/9/00 5:27 PM	9991

KCL received the error message "USOC =: 1MBGE IS MISSING" on both responses.

KCL forwarded this issue to BellSouth.. BellSouth responded that it is unable to change the telephone number (TN) in these instances due to BellSouth system defect 9818.

Summary of BellSouth's Response:

"KPMG is correct in their assessment; BellSouth is unable to mechanically process telephone number changes for lines with measured classes of service 1MBGE. BellSouth system functionality was corrected (D9818) July 29, 2000 release."

Summary of KCL Re-test Activities:

KCL's re-test activities for this exception consisted of submitting four new orders for telephone number changes for lines with measured class of service 1MBGE (two TAG and two EDI). (Since more than 30 days had elapsed between the initial finding and the re-test, KCL was unable to re-submit the initial order that resulted in the exception.)

PON	DATE	Company Code
R011H21PTN101003*AA	8/24/00 11:04AM	9990
R011H21PTN102003*AA	9/13/00 5:00PM	9990
R011H21PEN101006*AA	8/28/00 5:01 PM	9991
R011H21PEN102006*AA	9/13/00 5:18PM	9991

KCL Re-test Results:

KCL's service requests for telephone number changes for lines with measured classes of service submitted during re-testing activities received Firm Order Confirmations (FOCs) via both TAG and EDI.

Based on the successful confirmation of these four re-test transactions, KCL determined that TAG and EDI presently provide the functionality for CLECs to process telephone number changes for lines with measured classes of service.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 102.

Attachments: None.

Date: October 30, 2000

EXCEPTION CLOSURE REPORT

Exception:

Formal procedures for managing the capacity of the BellSouth work centers, which perform wholesale (UNE) xDSL pre-order and ordering activities, are not defined and documented.

Summary of Exception:

BellSouth supports CLEC wholesale (UNE) xDSL pre-order and order processing activity via three primary work centers: the Complex Resale Services Group (CRSG), the Service Advocate Center (SAC), and the Local Carrier Service Center (LCSC). The CRSG and SAC support pre-ordering; the LCSC supports ordering.

The aforementioned work centers do not have documented procedures in place to plan for and manage increased demands on existing manual processes for xDSL pre-order and order processing. Although several of these work centers track monthly order volumes, no evidence was found that transaction processing volume data (historical or forecasted) is used in the capacity management process. Transaction processing volumes are not currently used to calculate work center capacity/utilization, or to trigger the augmentation of center headcount and xDSL-related support processes.

Summary of BellSouth's Response

The CSRG has documented procedures for managing increased demands on existing manual processes for xDSL pre-order requests. The CRSG monitors on a monthly basis the order volume from the CLECs, as well as the forecasts received quarterly from BellSouth Account Teams, and adjusts headcount accordingly. Subsequent to the receipt of the Exception, BellSouth provided KPMG a copy of the process being used to manage work center resources.

KPMG has been provided the forecast issued in 4Q99 from which the LCSC and UNEC/BRMC force sizing plan estimates for 2000 and beyond have been driven. Please note that the ADSL/HDSL volumes represent a small proportion of the overall UNE volumes for 2000 & 2001 (2.4% & 4.8%, respectively). For force sizing purposes, xDSL loops are considered as any other UNE product, even though in the LCSC much of the pre-ordering and ordering activity is completed before the xDSL request reaches the LCSC.

By using this assumption BellSouth should have adequate staff to cover xDSL even if actual volumes are somewhat higher than the forecast. No particular or customized force modeling is done to differentiate xDSL products from other work that comes in to the centers. If, in the future, it is deemed appropriate to make such distinctions, the force model(s) will be revised accordingly.

The Service Advocate Center, SAC, has a documented procedure in place to plan for and manage increased demands for xDSL orders. All SACs have the option of documenting their increased work volume and providing such data to the local management team for additional headcount authorization. In certain locations, headcount modifications have been implemented.

The main reason for establishment of the SAC was to handle "held" orders. These type orders are orders for which we presently do not have either available or compatible facilities. Additionally, the SAC is also responsible for performing certain pre-ordering functions in the form of service inquiries of which xDSL is just one type.

The initial formula for sizing the SAC is documented in RL 96 12 026 BT, which has been provided to KPMG as a separate document, along with the formula used for staffing the SACS. RL 96 12 026 BT authorized the SACs on a regional basis and outlined their expected duties. After field visits to all of the SACs in 1998, the formula was revised December, 1998 to account for additional functions not originally incorporated.

Summary of KCL Re-test Activities:

KPMG Consulting LLC's (KCL) re-testing activities consisted of: 1) a review of BellSouth's response to Exception 109; and 2) a review and evaluation of BellSouth internal xDSL capacity management documentation for the Complex Resale Services Group (CRSG), the Service Advocate Center (SAC), and the Local Carrier Service Center (LCSC).

KCL Re-test Results:

KCL's evaluation of documentation received from BellSouth indicates that the CRSG, SAC, and LCSC have documented procedures in place to plan for and manage increased demands on existing manual processes for xDSL pre-order and order processing.

The documents entitled *Complex Resale Support Group Forecasting Process, Service Advocate Center (SAC) Staffing Process*, and *Capacity Management – Local Operations Centers* detail the capacity management processes used by the CRSG, SAC, and LCSC, respectively.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 109.

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 30th day of October, 2000.

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DOCKET# 8354 7892
DOCUMENT# 42535 42536

October 30, 2000

IN RE: Docket 8354-U ANALOGS AND BENCHMARKS FOR OSS TEST
Docket 7892-U PERFORMANCE MEASURES

Dear Interested Parties:

In Docket 8354-U, BellSouth has responded to the standards and benchmarks approved by the Commission in its Administrative Session on June 6, 2000 for use in the Georgia Operational Support System (OSS) Test by developing a series of graphical charts showing Georgia performance measurements against approved standards and benchmarks. While these new charts have been developed using the same reporting environment and processes as the measurements currently published for Georgia by BellSouth and under review in the third-party test, substantial new development was required to support new measurements, new levels of disaggregation for existing measurements and changes in the presentation of the measurements which have not heretofore been addressed by the Georgia OSS third-party test. Additionally, in Docket 7892-U, the Commission has adopted new measurements as well as additional disaggregation of performance data.

The Commission asked KPMG Consulting as part of this third-party test to review the charts produced for consistency with published measurements, appropriate calculation method and accuracy of calculation of the measurements for three recent reporting periods. In addition, KPMG will review the appropriateness of the calculation methods and accuracy for selected z scores in the charts.

The Commission also desires to have the measures approved in Docket 7892-U. as well as the additional disaggregation, tested by KPMG in the same manner as mentioned above. This will create an independent verification of the accuracy and validity of the performance data for the Commission. The audit should also conform to the FCC's directives in their 9/27/99 letter to US West, which defined the criteria for an independent review of certain qualitative aspects of performance measurements. This audit should include both the Service Quality Metrics and the Enforcement Plan metrics and payments ordered in Docket 7892-U, as well as BellSouth's publication of the subsequent results.

KPMG shall continue the audit of the June 6, 2000 measures within the confines of the Georgia OSS third-party test and under the schedule previously approved by the Commission in Docket 8354-U. Additionally and separately, KPMG shall perform the audit of the Measures approved by the Commission in Docket 7892-U once the data and information to do so becomes available.

Sincerely,

Leon Bowles

Leon Bowles
Director of Telecommunications

CERTIFICATE OF SERVICE

IN RE: Docket 8354-U ANALOGS AND BENCHMARK FOR OSS TEST
Docket 7892-U PERFORMANCE MEASURES

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November 2nd, 2000

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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

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 November 2, 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

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 (KCL) provides a summary interim 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. A detailed report on specific Supplemental Test Plan (STP) items is provided in the table in section 5.0. Each item presented in the tables in sections 4.0 and 5.0 includes a reference number that identifies the item from a previous status report, where applicable. A detailed report on Exceptions is provided in the table in section 6.0.

2.0 Key Developments

- Ordering:
  - KCL is concluding execution and analysis associated with the ordering functional re-test. KCL will use the results of this functional re-test to evaluate a number of open exceptions.
- 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 August and September 2000. KCL had previously completed the process of replicating the calculations for November 1999 through July 2000.
  - KCL has completed its review of SQM definitions, including the comparison of definitions to calculation descriptions, and calculation descriptions to computation instructions.
  - KCL has completed its review of BellSouth's metrics change management and data retention and storage procedures.
- Capacity Management:
  - STP: KCL has completed all testing activities associated with *PO&P15: Work Center Capacity Management Evaluation – xDSL.*

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[1]	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, 22, 26, 31, 32, 38, 39, 54, 60, 68, 77, 78, 95, 97 & 98. KCL submitted a draft exception to BLS that will be publicly issued if the information is substantiated by the BLS response. KCL is reviewing closure reports for Exceptions 22 & 54 internally. KCL is clarifying a closure report for Exception 32 based on the GPSC's comments. The GPSC is reviewing a closure report for Exception 39.	• 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
		• KCL has completed submission of all transactions associated with the functional re-test. KCL continues to receive and analyze responses to re-test transactions. Re-testing was conducted to evaluate current BLS performance with respect to the following issues: 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; 6) Inaccurate FOC responses (confirmations received on invalid service requests); 7) Fully-Mechanized (FM) Clarification (CLR) timeliness; 8) Partially Mechanized (PM) CLR timeliness; 9) Flow Through Firm Order Confirmation (FOC) timeliness; 10) Non-Flow Through FOC timeliness; and 11) "Final Account" errors received in response to UNE Loop migration service requests.	• Based on re-test results to-date, KCL observes that test performance is below the thresholds specified by the GPSC or, absent GPSC-approved standards, by KCL in the following areas: FA Timeliness (2); FOC DD accuracy (3); FM CLR timeliness (7); and FT FOC timeliness (9). Additional re-test responses in each of these categories are expected. KCL will evaluate re-test performance based on complete results.	• KCL will employ the results of this functional re-test to evaluate a number of open exceptions.
		• Based on re-test activities, KCL determined that BLS has adequately addressed LPIC validations on UNE-Port orders (5); inaccurate FOC responses (6); and Final Account errors on UNE Loop orders (11).	• None.	• N/A.

Ref	Item	Status	Issues	Next Step Resolution
I-7	TAG functional testing	• KCL issued the following exceptions, related to TAG functional testing, that remain open: Exceptions 9, 22, 26, 31, 32, 38, 39, 54, 60, 68, 77, 78, 95, 97 & 98. KCL submitted a draft exception to BLS that will be publicly issued if the information is substantiated by the BLS response. KCL is reviewing closure reports for Exceptions 22 & 54 internally. KCL is clarifying a closure report for Exception 32 based on the GPSC's comments. The GPSC is reviewing a closure report for Exception 39.	• 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
		• KCL has completed submission of all transactions associated with the functional re-test. KCL continues to receive and analyze responses to re-test transactions. Re-testing was conducted to evaluate current BLS performance with respect to the following issues: 1) Completion Notification (CN) timeliness; 2) FOC Due Date accuracy compared to LSR Desired Due Date requests; 3) Loop Service with Directory Listing ordering process; 4) Order validation process for invalid LPIC entries on UNE-Port service requests; 5) Inaccurate FOC responses (confirmations received on invalid service requests); 6) Fully-Mechanized (FM) Clarification (CLR) timeliness; 7) Partially Mechanized (PM) CLR timeliness; 8) Flow Through Firm Order Confirmation (FOC) timeliness; 9) Non-Flow Through FOC timeliness; and 10) "Final Account" errors received in response to UNE Loop migration service requests.	• Based on re-test results to-date, KCL observes that test performance is below the thresholds specified by the GPSC or, absent GPSC-approved standards, by KCL in the following areas: FOC DD accuracy (2); FM CLR timeliness (6); and FT FOC timeliness (8). Additional re-test responses in each of these categories are expected. KCL will determine re-test success based on complete results.	• KCL will employ the results of this functional re-test to evaluate a number of open exceptions.
		• Based on re-test activities, KCL determined that BLS has adequately addressed LPIC validations on UNE-Port orders (4); inaccurate FOC responses (5); and Final Account errors on UNE Loop orders (10).	• None.	• 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. KCL is preparing closure reports for Exceptions 65 & 66. KCL submitted a 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.
		• In response to a previously-identified issue regarding missing or extraneous data elements and values on pre-order responses, BLS clarified its *Pre-Order Business Rules* documentation. Based on a review of pre-order responses relative to this updated documentation, KCL did not observe additional problems with missing or extraneous response data.	• None.	• KCL is drafting a closure report for the related exception (Exception 66) Further details are contained in *Section 6.0 Exceptions Status.*
		• In response to a previously-identified issue regarding the inability to process certain Calculate Due Date (CDD) pre-order requests, BLS implemented functionality fixes in TAG Version 2.2.0.11. KCL successfully re-tested BLS's ability to process CDD queries for Loop with Number Portability migrations and Stand-Alone Number Portability migrations in Version 2.2.0.11.	• KCL encountered errors when processing CDD queries for Loop-Port Combination accounts in TAG Version 2.2.0.11. With the upgrade to version 2.2.0.11, CLECs are required to utilize an additional field (RSPRODUCT INDICTAOR) on CDD requests. BLS's *Pre-Order Business Rules* do not contain information on how to populate this field (e.g., when required/optional, data characteristics, etc). In addition, KCL is unable to process Loop-Port Combination CDD queries using any of the RSPRODUCT valid entries listed in the TAG technical documentation.	• KCL and BLS are investigating these issues.

Ref	Item	Status	Issues	Next Step Resolution
		• In response to a previously-identified issue regarding discrepancies identified between service intervals obtained from BLS documentation versus those obtained from CDD pre-order queries, BLS implemented updates to the TAG interval tables used to calculate responses. After implementation of these updates, KCL performed re-testing activities.	• KCL noted continued discrepancies between service intervals obtained through BLS documentation versus those returned on CDD inquiries. Most discrepancies were related to intervals for Loop-Port Combination accounts.	• Based on its findings during the re-test, KCL expects to file an amended exception (Exception 71) with the GPSC.
I-8	CRIS/CABS Invoicing Functional Test	• KPMG issued the following exception, related to CRIS/CABS invoicing functional testing, that remains open: Exception 16. KCL is drafting a closure report for Exception 16.	• 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.
II-1	Metrics	• KCL issued the following exceptions, related to Metrics (MTP – Performance Measures Evaluations) that remain open: Exceptions 23, 42, 43, 46, 62, 74, 90, 100, 101, 104, 110 & 111. KCL is drafting a closure report for Exception 74. KCL is reviewing closure reports for Exceptions 46, 90, 104 & 110 internally. KCL is awaiting comments on closure reports for Exceptions 23, 42, 43 and 62 from the GPSC. KCL is clarifying a closure report for Exception 101 based on comments from the GPSC.	• 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 September 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 is researching potential missing FOC responses from the 7/17/00 peak volume test.	• KCL identified specific PONs to BLS for which FOCs were not received. BLS believes that FOCs were returned to HP/KCL for the LSRs in question.	• KCL will continue its investigation to determine the cause of the missing FOCs.

Ref	Item	Status	Issues	Next Step Resolution
II-5	Change Management (CM-1)	• BLS initiated and conducted a joint BLS/CLEC Change Control Process (CCP) Improvement meeting on 10/17/00. During this meeting, CLEC concerns and recommendations regarding the CCP were discussed. A follow-up meeting was held on 11/1/00. KCL observed this session.	• None.	• BLS committed to investigate the feasibility of incorporating and implementing CLEC suggestions.
		• KCL identified to BLS a possible change control process deficiency related to its introduction of the *BellSouth Business Rules for Local Ordering, Issue 9G.*	• KCL determined that changes to this publication from a prior version were not appropriately channeled through the existing change control process.	• BLS's response to KCL described revised internal processes to prevent future occurrences of this type. KCL asked BLS for additional information regarding these revised processes.
III-1	Flow-Through Evaluation	• KPMG has re-opened the following exception, related to Flow Through: Exception 21.	• 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-2	ECTA functional testing	• KPMG issued the following exception related to ECTA functional testing which remains open: Exception 96. KCL is awaiting comments from the GPSC regarding the closure report for Exception 96.	• 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 exception related to ODUF/ADUF usage functional testing that remains open: Exception 28. KCL expects to submit a closure report for Exception 28 to the GPSC for review and comment shortly.	• 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-4	CRIS/CABS invoicing documentation evaluation	• KCL issued the following exception related to the CRIS/CABS documentation evaluation that remains open: Exception 73. KCL expects to submit a closure report for Exception 73 to the GPSC for review and comment shortly.	• 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
V-2	Provisioning Verification	• KCL issued the following exceptions related to Provisioning Verification that remain open: 76 & 106. KCL expects to submit a closure report for Exception 106 to the GPSC for review and comment shortly.	• 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 continues to conduct a provisioning re-test, including evaluations of switch translations, CSRs and DL records.	• None.	• KCL will employ the results of this functional re-test to evaluate a number of open exceptions.
V-3	Pre-ordering, Ordering and Provisioning Documentation Review	• KCL issued the following exception related to Pre-Ordering, Ordering and Provisioning Documentation Reviews that remains open: Exception 33. KCL is awaiting comments on a closure report for Exception 33 from the GPSC.	• 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 November 1, 2000, KCL's *Documentation Issues Log* contains eight active issues.	• None.	• KCL will work with BLS to identify and resolve outstanding documentation deficiencies.

5.0 Supplemental Test Plan Specific Item Status

Ref	Item	Status	Issues	Next Step Resolution
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 & 113. KCL continues to draft closure reports for Exceptions 61, 83, 84, 87 & 93. KCL is reviewing a closure report for Exception 52 internally. KCL is awaiting comments on a closure report for Exception 70 from the GPSC.	• 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) Comparison of early stage data to raw data; 3) Reviewing system data flows and Metrics change management issues.	• KCL has identified exceptions related to these activities.	• KCL will continue testing and exception re-testing activities.
		• KCL continues testing BLS metrics as defined by the June 6, 2000 GPSC order. The initial round of tests have been completed and testing on additional months is underway.	• None.	• KCL will publish any issues or discrepancies found in the *Birmingham Issues Log.*
IX-2	PO&P11 – EDI & TAG Resale Functional Evaluation	• KCL issued the following exceptions related to EDI & TAG resale functional testing, that remain open: Exceptions 26, 49, 60, 68, 71, 77, 78, 98, 102 & 114.	• 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
IX-3	PO&P12 – xDSL Functional Evaluation	• KCL issued the following exceptions, related to xDSL functional testing, that remain open: Exceptions 57, 112 & 115. KCL has submitted two draft exceptions to BLS that will be publicly issued if the information is substantiated by the BLS response. KCL expects to submit a closure report for Exception 57 to the GPSC for review and comment shortly.	• 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 submission of pre-order inquiries (LMU Service Inquiries) for both test bed and live CLEC customer accounts.	• KCL has identified the following potential issues: 1) An LMU/SI timeliness issue; and 2) the lack of documented acknowledgement and tracking processes for manually submitted LMU/SIs	• KCL has raised these issues with BLS. BLS is investigating.
		• KCL continued to submit order LSRs for xDSL capable loops.	• KCL has identified the following potential issues: 1) An LSR/SI timeliness issue; 2) the lack of documented acknowledgement 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 expects to review the new release of BLS's xDSL documentation for structure and format.	• Previously reviewed versions of BLS's xDSL documentation contain some minor structural and formatting inconsistencies.	• KCL will document its findings as part of test activities.
IX-5	PO&P15 – Work Center Capacity Management - xDSL	• Work Center Capacity Management – xDSL testing activities have been completed. KCL has no open exceptions related to this test.	• None.	• N/A.
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.
IX-9	BLG7 – CRIS Resale Invoicing Functional Evaluation	• KCL issued the following exceptions, related to the CRIS Resale Invoicing Functional Evaluation, that remain open: Exception 103. KCL continues to draft 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.

Ref	Item	Status	Issues	Next Step Resolution
IX-10	BLG8 – Resale Usage Functional Evaluation	• KCL issued the following exception, related to EDI functional testing, that remains open: Exception 94. KCL is clarifying its closure report for Exception 94 based on the GPSC's comments.	• The status of exceptions and draft exceptions is detailed in *Section 6.0 Exceptions Status*.	• All exceptions must be closed for purposes of the test before reports can be finalized.
IX-11	CM2 – OSS '99 Release Evaluation	• KCL received responses and documentation from BLS that address KCL-generated questions. KCL is in the process of analyzing this additional information.	• None.	• KCL expects to complete testing activities shortly.

6.0 Exceptions[2] Status

Ref[1]	Item	Status	Issues	Next Step Resolution
IV-5	Exceptions	• KCL is reviewing a closure report for Exception 9, regarding Ordering & Provisioning, internally.	• KCL indicated that BLS failed to deliver Firm Order Confirmations (FOCs) and Completion Notices (CNs) in response to electronic service order requests.	• After internal review, KCL expects to submit this closure report to the GPSC.
		• KCL filed a closure report for Exception 12, regarding Maintenance and Repair, with the GPSC on 09/22/00. KCL submitted three transactions with valid data and two transactions with erroneous data against ECTA's closeOutVerification object. 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.	• KCL indicated that the ECTA Gateway does not accurately notify CLECs when invalid information is entered into a trouble ticket.	• N/A.
		• KCL is drafting a closure report for Exception 16, regarding Billing.	• KCL indicated that BLS issued multiple bills containing erroneous information to KCL.	• After internal review, KCL expects to submit this closure report to the GPSC.
		• KCL filed a closure report for Exception 18, regarding Ordering and Provisioning, with the GPSC on 10/05/00. As a result of reviewing BLS's Local Exchange Ordering Implementation Guide, Volume 1(LEO Guide), KCL believes that BLS's revised documentation adequately addresses the documentation issues raised in this exception.	• 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.	• N/A.
		• KCL filed a Statement of Re-Opening for Exception 21, regarding Flow-Through, and BLS's response to the Statement with the GPSC.	• KCL indicated that, based on subsequent testing activities, the change implemented by BLS does not properly classify "Z" processing status LSRs for the purposes of the Flow Through Report.	• KCL's further activities will be based on the outcome of the analysis of BLS's response.
		• KCL is reviewing a closure report for Exception 22, regarding Ordering & Provisioning, internally.	• KCL indicated that BLS disconnected retail accounts on loop migration orders without re-connecting the UNE loop component.	• KCL expects to submit the closure report to the GPSC after the internal review is complete.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL is clarifying a closure report for Exception 23, regarding Metrics, based on comments from the GPSC.	• KCL indicated that it cannot replicate five of BLS's reported Service Quality Measurements.	• KCL expects to re-submit this closure report to the GPSC for review upon completion.
		• KCL expects to receive an amended response from BLS for Exception 24, regarding Ordering and Provisioning, shortly.	• KCL indicated that BLS's TAG API does not deliver timely responses to pre-order transactions.	• KCL's further activities will be based on its analysis of BLS's amended response.
		• KCL is analyzing the results of its re-test activities 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 its analysis of the re-test data.
		• KCL filed a closure report for Exception 27, regarding Billing, with the GPSC on 09/22/00. KCL believes that the updated ODUF documentation clarifies the BLS policy regarding the generation and receipt of local and toll records. KCL also believes that the updated ODUF documentation clarifies the BLS 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.	• KCL indicated that BLS provided incorrect DUF records to KCL.	• N/A.
		• KCL is reviewing a closure report for Exception 28, regarding Billing internally.	• Amended Exception: BLS 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 expects to submit the closure report to the GPSC after the internal review is complete.
		• KCL is reviewing BLS's amended response to 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 its analysis of BLS's amended response.
		• KCL is clarifying a closure report for Exception 32, regarding Ordering and Provisioning, based upon comments received by the GPSC.	• KCL indicated that BLS delivered FOCs on transactions after issuing Clarifications (CLRs).	• KCL expects to re-submit this closure report to the GPSC for review upon completion.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL expects to file a closure report for Exception 33, regarding Ordering and Provisioning, with the GPSC shortly. As a result of its documentation review, KCL found that BLS developed and posted to its Web site revisions of the LEO Guide, Volume 1, which addressed the concerns outlined in the exception.	• KCL indicated that BLS's *LEO Guide, Volume 1, Version N* does not define data element requirements and valid entries for loop service requests.	• N/A.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL expects to file a closure report for Exception 35, regarding Billing, with the GPSC shortly. Undocumented Charges: *USOC VE1R2:* KCL was unable to re-test the corrective action for the issue with USOC VE1R2 because BLS will not be adding the USOC to the standard agreement until the Fourth Quarter of 2000. Incorrectly Rated Charges: *USOC UEPLX:* KCL was unable to re-test the corrective action for the issue associated with USOC UEPLX because BLS will not be implementing a system enhancement to provide a two-tiered pricing structure of SL1 services until the Fourth Quarter of 2000. Missing Charges: *USOC UEAL2:* According to BLS, the cause of the incorrect billing of the USOC UEAL2 was that the USOC UEAL2 had not been included in the CRIS rate table. In an effort to prevent recurrences of this problem, BLS implemented an interim process. KCL reviewed the interim process and was satisfied that it addressed the errors similar to that encountered with the USOC UEAL2. Further, KCL also reviewed the bills after the 2/23/00 implementation date to ensure that the update to the rate table had in fact taken effect. BLS's inability to consistently bill for the two-tiered pricing structure of SL1 services will warrant the assignment of a "Not Satisfied" to the relevant evaluation criteria in KCL's final report.	• KCL indicated that BLS issued multiple bills containing erroneous information to the KCL CLEC.	• N/A.
		• KCL filed Exception 38 (Amended), regarding Ordering and Provisioning, with the GPSC.	• 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 upon BLS's response to this amended exception.

Ref	Item	Status	Issues	Next Step Resolution
		• 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.
		• KCL expects to file a closure report for Exception 42, regarding Metrics, with the GPSC shortly. The new data files for November through March provided by BLS and the corresponding data collected by KCL matched for each account number, exactly. Although there were some discrepancies between the BLS-provided data files and the corresponding KCL-collected data noted for the months since March 2000, these have all been resolved. KCL's calculations based upon the revised data matched exactly the revised BLS SQM reports for the months November 1999 through March 2000. Further, the KCL calculations of Mean Time to Deliver Invoices SQM values matched exactly the BLS-reported values for the months since March 2000.	• 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.	• N/A.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL expects to file a closure report for Exception 43, regarding Metrics, with the GPSC shortly. The new data files for November through March provided by BellSouth and the corresponding data collected by KCL matched for each account number, exactly. Although there were some discrepancies between the BLS-provided data files and the corresponding KCL-collected data noted for the months since March 2000, these have all been resolved. KCL's calculations based upon the revised data matched exactly the revised BLS SQM reports for the months November 1999 through March 2000. Further, the KCL calculations of Mean Time to Deliver Invoices SQM values match the BLS-reported values for the months since March 2000, exactly.	• 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.	• N/A.
		• KCL is reviewing a closure report for Exception 46, regarding Metrics, internally.	• KCL indicated that it cannot replicate seven of BLS's reported Service Quality Measurements.	• KCL expects to submit the closure report to the GPSC once its internal review is complete.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL filed a closure report for Exception 47, regarding Ordering and Provisioning, with the GPSC on 09/22/00. Following BLS's training of its ordering service representatives, KCL experienced three additional occurrences of inaccurate CLRs, representing less than 5% of partially-mechanized CLRs reviewed. BLS 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, BLS 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.	• KCL indicated that BLS delivered inconsistent and inaccurate responses to Local Service Requests.	• N/A.
		• KCL is reviewing a closure report for Exception 49, regarding Ordering and Provisioning, internally.	• 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 reviewing a closure report for Exception 52, regarding Metrics internally.	• KCL indicated that it cannot replicate twelve of BLS's reported Service Quality Measurements (SQMs).	• 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 53, regarding Ordering and Provisioning, with the GPSC on 09/22/00. As a result of the documentation review, KCL found that BLS developed and posted revisions of the LEO Guide, Versions J – Q to its Web site that adequately addressed the issues outlined in the exception.	• KCL indicated that BLS's *LEO Guide, Volume 1, Versions J-N* contains numerous revision-related errors.	• N/A.
		• KCL is drafting a closure report for Exception 54, regarding Ordering and Provisioning.	• KCL indicated that BLS's electronic ordering systems do not support UNE-to-UNE migration service requests.	• After internal review, KCL expects to submit this closure report to the GPSC.
		• KCL filed a closure report for Exception 55, regarding Ordering and Provisioning, with the GPSC on 10/05/00. KCL found that the revisions made to the pre-ordering and ordering documentation made by BLS adequately addressed all the issues raised in the exception.	• KCL indicated that BLS's pre-ordering and ordering documentation contain numerous errors and omissions in structure and format.	• N/A.
		• KCL is drafting a closure report 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.	• 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 59, regarding Ordering and Provisioning, with the GPSC on 09/22/00. As a result of the documentation review and BLS's response, KCL has concluded that BLS's request to KCL for ten-minute intervals between batched orders for volume testing was intended as a guideline only. As BLS'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; and 4) when batch orders may be submitted. Based on its professional experience, KCL believes that BLS's response adequately addresses the issues raised by this exception.	• KCL indicated that BLS's documentation does not define rules for submission of batched orders.	• N/A.
		• KCL filed Exception 60 (Amended), regarding Ordering and Provisioning, with the GPSC.	• KCL indicated that BLS does not deliver timely Functional Acknowledgements (FAs) via Electronic Data Interchange (EDI).	• KCL's further activities will be based on BLS's response to the amended exception.
		• 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 expects to file a closure report for Exception 62, regarding Metrics, with the GPSC shortly. Based on revisions made to the Raw Data Users Manual, KCL was able to match the BLS-reported values for the months of November 1999 through August 2000.	• KCL indicated that it cannot replicate four of BLS's Service Quality Measurements (SQMs) in the February 2000 report.	• N/A.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL filed a closure statement for Exception 63, regarding Ordering and Provisioning, with the GPSC on 10/05/00. KCL verified that documentation changes proposed in BLS's exception response were accurately reflected in the TAG API Guide, Version 2.2.0.8 and the Pre-Order Business Rules, Version 7.0. In KCL's professional judgment, the documentation enhancements proposed by BLS to provide correlation between data element names and usage requirements listed in the API Guide and Business Rules will improve usability and compatibility of the documents, if properly implemented.	• KCL indicated that it discovered numerous inconsistencies between BLS's *TAG API Guide, Version 2.2.0.5* and *Pre-Order Business Rules* documentation.	• N/A.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL filed a closure report for Exception 64, regarding Metrics, with the GPSC on 09/22/00. Based upon KCL's review of additional supporting material (Service Orders and Local Service Requests) supplied by BLS, KCL confirmed that BLS'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. However, KCL and BLS did agree that the KCL-calculated value of 58 for "Mechanized, less than 10 Circuits, Resale Residence – Orders Reviewed" was correct. BLS prepared a revised SQM report for October 1999 to reflect this revised value. All values in the revised October 1999 BLS SQM report matched the revised KCL calculations, exactly.	• KCL indicated that it cannot replicate BLS's reported values for the *"Provisioning – Service Order Accuracy"* Service Quality Measurement.	• N/A.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL expects to file a closure report for Exception 65, regarding Ordering and Provisioning, with the GPSC shortly. KCL was able to successfully execute the functionality associated with all CDD queries submitted during this re-test. The "invalid REQ/ACT TYPE combination" error messages encountered during initial testing were not replicated. Instead, BLS delivered valid CDD responses containing a due date for related service requests. In addition, KCL verified that appropriate guidelines for populating the UNEPROD data element on REQ TYPE M CDDs were included in Version 7 of the Pre-Order Business Rules.	• KCL indicated that BLS's Calculate Due Date (CDD) pre-order query does not support all order requisition (REQ) and activity (ACT) types.	• N/A.
		• KCL is drafting a closure report for Exception 66, regarding Pre-Ordering.	• KCL indicated that BLS does not provide complete pre-order responses via the TAG interface.	• KCL expects to submit this closure report to the GPSC for review upon completion of this internal review.
		• KCL filed a closure statement for Exception 67, regarding Ordering and Provisioning, with the GPSC on 09/22/00. Based on BLS's responses, KCL conducted a further investigation of the MA notifications cited in Exception 67. In all cases, the MAs were delivered in a timely manner relative to the modified Due Dates.	• KCL indicated that BLS does not deliver timely Missed Appointment (MA) notices via the EDI and TAG interfaces.	• N/A.
		• KCL filed Exception 68 (Amended), regarding Ordering and Provisioning, with the GPSC.	• 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 BLS's response to the amended exception.
		• KCL is clarifying a closure report for Exception 70, regarding Metrics, based on GPSC comments.	• 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 expects to re-submit this closure report to the GPSC for its review upon completion of these clarifications.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL expects to file an amendment to Exception 71, regarding Ordering and Provisioning, with the GPSC shortly.	• 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 BLS's response to the amended exception.
		• The GPSC is reviewing 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.	• KCL expects to file the closure statement upon completion of the review by the GPSC.
		• KCL continues to draft 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 filed a closure report for Exception 75, regarding Ordering and Provisioning, with the GPSC on 09/22/00. As a result of the documentation review, KCL observed that BLS has adequately revised its Local Exchange Ordering Implementation Guide, Volume 1, Issue 7R, Section 12, to include adequate data definitions for its responses (Clarifications, Reject, Status, and Jeopardy) and the data elements for each response type.	• KCL indicated that BLS's Local Exchange Ordering Guide, Volume 1, Version 7N (LEO Guide) omits definitions for certain BLS ordering responses.	• N/A.
		• 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 expects to file an amendment to Exception 77, regarding Ordering and Provisioning, with the GPSC shortly.	• KCL indicated that BLS does not deliver timely fully mechanized Clarification (CLR) responses.	• KCL's further activities will be based on BLS's response to the amendment.
		• KCL filed Exception 78 (Amended), regarding Ordering and Provisioning, with the GPSC.	• 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 BLS's response to the amendment.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL is discussing issues pertaining to Exception 79, regarding Metrics, with the GPSC.	• 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 the outcome of these discussions with the GPSC.
		• KCL filed a closure report for Exception 80, regarding Ordering and Provisioning, with the GPSC on 09/22/00. As a result of the documentation review, KCL determined that BLS has developed and posted to its Web site adequate guidelines for submitting Service Inquiry (SI) and Loop Service Requests (LSR) for xDSL.	• KCL indicated that BLS guidelines for submitting an order Service Inquiry (SI) and Loop Service Requests (LSR) do not provide complete, consistent information.	• 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 for review and comment.
		• 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 BLS for five SQMs.	• After internal review, KCL expects to submit this closure report to the GPSC for review and comment.
		• KCL is reviewing a response from BLS 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 the review of BLS's response.
		• 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 for review and comment.
		• KCL is reviewing an amended response from BLS to Exception 88 (Amended), regarding Metrics.	• 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 its analysis of BLS's response to this amended exception.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL is clarifying its re-test results 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 its clarifications, KCL expects to complete re-testing activities in the near future.
		• KCL is reviewing a closure report for Exception 90, regarding Metrics, internally.	• KCL indicated that it cannot replicate three of BLS's reported SQMs in the March 2000 performance measurement reports.	• After internal review, KCL expects to submit this closure report to the GPSC.
		• KCL filed a closure report for Exception 91, regarding Billing, with the GPSC on 09/22/00. KCL analyzed the DUF records received from the test calling period noted above along with the May 5, 2000 UNE invoices from BLS. 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. In revalidating the billing for Verification and Interrupt charges, KCL found that no duration values were being passed on these particular DUF records. BLS supplied the actual switch records for these calls to aid validation. Upon examination of the switch recordings, KCL concluded that BLS continues to under-bill Verification and Interruption charges. According to its response, BLS expected 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, BLS's proposed fix is likely to adequately address the issue identified in Exception 91.	• KCL indicated that BLS incorrectly billed the KCL Test CLEC for usage charges for messages processed in the Augusta Central Office.	• N/A.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL is reviewing the results from re-testing activities for Exception 92, regarding Metrics.	• 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.	• KCL's further activities will be based upon the results of the re-test.
		• 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 for review and comment.
		• KCL is clarifying a closure report for Exception 94, regarding Billing, based on GPSC comments.	• KCL indicated that BLS failed to deliver 20% of expected resale DUF records to KCL.	• After completion, KCL expects to re-submit this closure report to the GPSC.
		• KCL is concluding 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.
		• The GPSC is reviewing 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.	• KCL expects to file this closure report after the GPSC has completed its review.
		• KCL is reviewing the results of 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 review.
		• KCL filed Exception 98 (Amended), regarding Ordering and Provisioning, with the GPSC.	• KCL indicated that BLS does not deliver timely partially mechanized Clarification (CLR) responses.	• KCL's further activities will be based on BLS's response to the amended exception.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL filed a closure report for Exception 99, regarding Billing, on 09/22/00. In KCL's professional judgment, non-recurring charges are those that appear on a single invoice. Further, recurring charges will or have the potential to appear on successive invoices. BLS 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 BLS's classification of this charge given the language in BLS's tariff and will assign a "Not Satisfied" to the relevant evaluation criteria in its final report.	• KCL indicated that BLS issued multiple bills to the KCL Test CLEC incorrectly identifying recurring charges as non-recurring charges.	• N/A.
		• KCL filed a closure report for Exception 100, regarding Metrics, with the GPSC on 10/30/00. KCL received a revised raw data file from BLS, which included "Cut Start" and "Cut Complete" times listed in minutes and seconds. KCL also received a revised SQM report based upon the raw data. All of the values listed in the revised SQM report matched the KCL-recalculated values, exactly.	• KCL indicated that it was unable to replicate two of BLS's Service Quality Measurements (SQMs) in the May 2000 report.	• N/A.
		• KCL is clarifying a closure report for Exception 101, regarding Metrics, based on GPSC comments.	• 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.	• KCL expects to re-submit this closure report to the GPSC upon completion.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL filed a closure report for Exception 102, regarding Ordering and Provisioning, with the GPSC on 10/30/00. Based on the successful confirmation of re-test transactions, KCL determined that TAG and EDI presently provide the functionality for CLECs to process telephone number changes for lines with measured classes of service.	• KCL indicated that BLS does not allow telephone number changes with measured classes of service.	• N/A.
		• 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 for review and comment.
		• KCL expects to file a closure report for Exception 104, regarding Metrics, with the GPSC shortly. The new data files provided by BLS and the corresponding data collected by KCL matched for each account number, exactly. KCL reviewed and understands BLS's explanation about why there were discrepancies related to account number 706N160066. Based upon the revised data, KCL's calculations matched exactly the revised BLS SQM reports for all of the months in question. Further, the KCL calculations of Mean Time to Deliver Invoices SQM values match the BLS-reported values for the months since May 2000, exactly.	• 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.	• N/A.
		• 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 for review and comment.
		• KCL is internally reviewing a closure report for Exception 106, regarding Ordering and Provisioning.	• KCL indicated that BLS failed to meet the agreed upon Frame Due Time (FDT) for six loop migrations.	• After internal review, KCL expects to submit this closure report to the GPSC for review and comment.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL continues to investigate the issues identified in Exception 107, regarding xDSL.	• KCL indicated that parity does not exist between BLS's CLEC xDSL pre-ordering loop qualification process and its retail xDSL ordering process.	• KCL's further activities will be based upon the results of its investigation.
		• KCL received and is reviewing BLS's response Exception 108, regarding xDSL.	• KCL indicated that parity does not exist between BLS's CLEC xDSL ordering process and its retail xDSL ordering process.	• KCL's further activities will be based upon the results of this review.
		• KCL filed a closure report for Exception 109, regarding xDSL, with the GPSC on 10/30/00. KCL's evaluation of documentation received from BLS indicates that the CRSG, SAC, and LCSC have documented procedures in place to plan for and manage increased demands on existing manual processes for xDSL pre-order and order processing.	• KCL indicated that formal procedures for managing the capacity of the BLS work centers, which perform wholesale xDSL pre-order and ordering activities, are not defined and documented.	• N/A.
		• KCL is reviewing a closure report for Exception 110, regarding Metrics, internally.	• KCL indicated that it cannot replicate four of BLS's reported SQMs.	• KCL expects to submit the closure report to the GPSC upon the completion of its review.
		• KCL expects to receive an amended response to Exception 111, regarding Metrics, from BLS.	• KCL indicated that it cannot replicate one of BLS's reported SQMs for the month of July 2000.	• KCL's further activities will be based upon BLS's amended response.
		• KCL continues to review recent test results related to Exception 112, regarding xDSL.	• 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's further activities will be based upon this review.
		• KCL expects to file Exception 113, regarding Metrics, with the GPSC shortly.	• 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 assessing further activities based upon BLS's response to the exception.
		• KCL expects to file Exception 114, regarding Ordering and Provisioning, with the GPSC shortly.	• KCL indicated that it encountered BLS provisioning errors for Resale orders.	• KCL is assessing further activities based upon BLS's response to the exception.

Ref	Item	Status	Issues	Next Step Resolution
		• KCL expects to file Exception 115, regarding xDSL, with the GPSC shortly.	• KCL indicated that BLS does not respond to Loop Make-Up Service Inquiries within the specified seven-day interval.	• KCL is assessing further activities based upon BLS's response to the exception.
		• KCL received a response to a Draft Exception, regarding Ordering and Provisioning, from BLS.	• KCL indicated that it did not receive Completion Notices (CNs) within one business day of expected service completion.	• 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 did not provide a Clarification/Rejection response to a Loop Make-Up (LMU) Service Inquiry 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 Pre-ordering, to BLS for its response.	• KCL indicated that version 2.2.0.11 of BLS's TAG pre-order interface does not provide a Calculated Due Date (CDD) for UNE Loop-Port Combination service requests.	• 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 have been no new items on the past two reports (September 15, 2000 and November 1, 2000).

[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 2nd day of November, 2000.

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EXECUTIVE SECRETARY
G.P.S.C.

November 14, 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

Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of KPMG Consulting LLC's Closure Reports for Exceptions 32, 33, 35, 42, 43, 62 and 65. We request that these documents be filed 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

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EXECUTIVE SECRETARY
G.P.S.C.

Date: November 14, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth delivered Firm Order Confirmations (FOCs) on transactions after issuing Clarifications (CLRs).

Summary of Exception:

According to BellSouth ordering documentation, a CLR is delivered to a CLEC when BellSouth receives a service order containing an error[1].

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

As of February 16, KPMG Consulting LLC (KCL) identified eight transactions that received an FOC after receiving a CLR for the same transaction.

Summary of BellSouth's Response:

"BellSouth agrees that 5 of the 8 transactions were clarified in error which resulted in FOCs being sent after clarifications. BellSouth Service Representatives were retrained on the specific issues on the indicated dates. BellSouth disagrees with 3 of the identified instances. BellSouth has implemented an on-going performance and development process to improve service representative's proficiency in handing issues described in this exception.

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 recommended a future enhancement, 19708, to the LNP electronic systems to notify a CLEC when an incorrect/inappropriate clarification has been generated; and to have the electronic capability to re-FOC LSRs. This enhancement is going through the change control process to establish a target implementation date. Non-LNP electronic systems currently have the capability to allow transmission of a FOC after a Clarification has been sent.

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[1] *Local Exchange Ordering (LEO) Guide Volume 1, Issue 7N*, January 2000, Section 2.4.
[2] According to the *LEO Guide, Section 2.4*: "Requests for service cannot be processed until a complete and accurate LSR has been received."

An interim process for LNP LSRs to send a FAX FOC after a Clarification will be implemented by 5/15 and CLEC notification will be posted on the WEB by 5/15 to explain both processes."

Summary of KCL Re-test Activities:

KCL's re-test activities for this exception consisted of: 1) a review of responses received to service requests submitted after BellSouth training of service representatives completed; and 2) a review of BellSouth's internal change control process document dated July 19th, 2000. KCL examined the Targeted Release Date and analyzed the specific feature that BellSouth indicated they would implement to address this exception.

KCL Re-test Results:

Following BellSouth's training of its ordering service representatives, KCL experienced only one additional service request receiving both a CLR and FOC on the same version. As a result, KCL has determined that this training has adequately reduced the potential re-occurrence of the delivery of an FOC after the issuance of a CLR on the same version of an order.

Additionally, BellSouth's plan is to minimize manual intervention through a feature enhancement (#19708) to its electronic ordering systems seeks to further ensure that FOCs are not issued subsequent to the transmission of a CLR. BellSouth has expressed to KCL that implementing the enhancement is a high priority, and is scheduled to take place in the first quarter of 2000.

Since BellSouth's Targeted Release Date for this feature enhancement -- during the first quarter of 2001 -- is outside the expected timeframe of the BellSouth-Georgia OSS Evaluation, KCL does not expect to issue orders to re-test system functionality following implementation of the feature.

However, KCL's experience indicates that, if properly implemented, Feature 19708 (Modify and re-send FOCs & CLRs for LNP) would represent a further step to address the issue outlined in Exception 32.

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 32.

Attachments: None.

Date: November 14, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth's *Local Exchange Ordering Guide - Volume 1, Version N (LEO Guide)* does not define data element requirements and valid entries for loop service requests.

Summary of Exception:

KPMG Consulting LLC (KCL) has identified a documentation defect associated with BellSouth's *LEO Guide*. The documentation does not adequately define rules for correctly populating the Billing Account Number (BI1, BAN1, BI2, BAN2) fields for SL1 and SL2 loop orders. Additionally, the stated requirements for the LOCBAN data element for loop migrations are incorrect.

Specific issues include the following:

1. **The *LEO Guide* does not discuss circumstances under which more than one BAN is required for an order type.** Bills for a particular account cannot be accurately generated if all applicable BANs are not included in cases where more than one is required. In some cases, service orders may even fail if all applicable BANs are not included. BAN requirements vary by order requisition and activity type. The *LEO Guide* does not mention any circumstances requiring more than one BAN for a particular order type.

2. **The *LEO Guide* does not state the BAN sequence when more than one BAN is to be used.** BellSouth's order validation process depends on the BAN sequence in cases where more than one BAN is required. If the sequence is not correct, in some cases a service order may receive an error.

3. **The *LEO Guide* does not state that a Carrier Access Billing System (CABS) account number should be used with an SL2 loop order, or that a Miscellaneous Account Number (MAN) should be used with an SL1 loop order.** BellSouth LCSC informed KCL that an SL2 loop order should include a CABS account number, and that an SL1 loop order should include a MAN. If SL1 and SL2 loop orders are not submitted with the correct account numbers, a service order will receive an error. However, the *LEO Guide* does not state this fact.

4. **The *LEO Guide* does not clearly define requirements for all Activity Types for the LOCBAN data element.** The existing LOCBAN rules apply for new loop installations, but appear to create errors on loop migration orders[1].

Summary of BellSouth Response:

The LEO IG does not discuss circumstances under which more than one BAN is required for an order type.

BellSouth elaborated on the usage of the multiple BANs when requesting service. The expansion of the existing usage notes was captured in an update of the LEO-IG, Volume 1, Issue 7P effective on April 27, 2000.

The LEO Guide does not state the BAN sequence when more than one BAN is to be used.

BellSouth elaborated on the sequence of the multiple BANs when requesting service. This expansion of the existing usage notes was captured in an update of the LEO-IG, Volume 1, Issue 7P effective on April 27, 2000.

The LEO Guide does not state that a Carrier Access Billing System (CABS) account number should be used with an SL2 loop order; or that a Miscellaneous Account Number (MAN) should be used with an SL1 loop order.

Usage notes in the LOCBAN field were enhanced to communicate that the CABS account number must be populated in the LOCBAN field for SL2 loops and a CRIS miscellaneous account number must be populated in the LOCBAN field for SL1 loops. These enhancements were made in the LEO-IG, Volume 1, Issue 7O effective on 3/17/00.

The LEO Guide does not clearly define requirements for all Activity Types for the LOCBAN data element.

Pre-existing notes on the LOCBAN field were enhanced to specify ACT types relevant to "new install". Additionally, a note was added to reflect: REQTYP A, ACT V, the LOCBAN must be the 10 digit dialable telephone number being converted. These enhancements were made in the LEO-IG, Volume 1, Issue 7O effective on 3/17/00.

[1] BellSouth *Local Exchange Ordering Guide, Volume 1, Issue 7N, Section 5.5.3.1 (LOCBAN data element).* *Note 1: (REQ TYPE = A)* - For Designed Loops the LOCBAN must be the ACCESS miscellaneous account. *Note 2: (REQ TYPE = A)* - For Designed Loops the BAN1 must be the same as the ACCESS miscellaneous account LOCBAN. *Note 3: (REQ TYPE = A)* - For non-designed loops the LOCBAN must be a CRIS miscellaneous number.

Summary of KCL Re-test Activities:

KCL's re-test activities for this exception consisted of reviewing BellSouth's *Local Exchange Ordering (LEO) Implementation Guide, Volume 1, Version S (LEO Guide).*

KCL Re-test Results:

As a result of the documentation review, KCL found that Bellsouth developed and posted to its Web site revisions of the *LEO Guide, Volume 1.*

The *LEO Guide Version S* contains the following components:

1. The *LEO Guide* discusses circumstances under which more than one BAN is required for an order type.

2. The *LEO Guide* states the BAN sequence when more than one BAN are to be used.

3. The *LEO Guide* states that a Carrier Access Billing System (CABS) account number should be used with an SL2 loop order, or that a Q Account Number should be used with an SL1 loop order.

4. The *LEO Guide* clearly defines requirements for all Activity Types for the LOCBAN data element.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 33.

Attachments: None.

Date: November 14, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth issued multiple bills containing erroneous charges to KPMG Consulting LLC (KCL).

Summary of Exception:

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

Undocumented Charges

USOC VE1R2: BellSouth billed the KCL 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 KCL CLEC in lieu of an Interconnection Agreement.

Incorrectly Rated Charges

USOC UEPLX: BellSouth inappropriately billed the KCL 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 KCL 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 KCL CLEC the following:

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

Missing Charges

USOC UEAL2: BellSouth did not bill the KCL 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 KCL 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 KCL CLEC for these charges when applicable.

Unbilled Unbundled Loop: The KCL 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.

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

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

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.

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 Consulting 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."

Summary of KCL Re-test Activities:

KCL's re-test activities consisted of the following: a review of the interim process and associated documentation implemented by BellSouth in July 2000 and a review of invoices based on orders submitted.

KCL Re-test Results:

Undocumented Charges:

USOC VE1R2: KCL was unable to re-test the corrective action for the issue with USOC VE1R2 because BellSouth will not be adding the USOC to the standard agreement until the Fourth Quarter of 2000.

Incorrectly Rated Charges:

USOC UEPLX: KCL was unable to re-test the corrective action for the issue associated with USOC UEPLX because BellSouth will not be implementing a system enhancement to provide a two-tiered pricing structure of SL1 services until the Fourth Quarter of 2000.

Missing Charges:

USOC UEAL2: According to BellSouth, the cause of the incorrect billing of the USOC UEAL2 was that the USOC UEAL2 had not been included in the CRIS rate table. In an effort to prevent recurrences of this problem, BellSouth implemented an interim process. KCL reviewed the interim process and was satisfied that it addressed the errors similar to that encountered with the USOC UEAL2. Further, KCL also reviewed the bills after the 2/23/00 implementation date to ensure that the update to the rate table had in fact taken effect.

KCL found in most instances that non-recurring charges were billed following the addition of the non-recurring charge to the CRIS rate table on 2/23/00. However, for new installation orders of multiple SL1 Loops, the first and additional non-recurring charges for the USOC UEAL2 were billed using the same rate (i.e., additional non-recurring charge equaled the first non-recurring charge). BellSouth is taking steps to correct this problem by implementing a system enhancement to provide for a two-tiered pricing structure of SL1 services by the Fourth Quarter of 2000. Given the timeframe, KCL will be unable to re-test the corrective action.

Non-recurring charges were not billed for certain orders created by BellSouth to add CLEC facilities for the KCL Test CLEC (but which were to be billed to KCL Test CLEC bills). However, since BellSouth was the originator of these orders (e.g., PON XDSL6G, Service Order #: N0CVP2X6 for circuit 40.TYNU.546804..SB) and because these service orders contained the value of "WNR" (Waived Non-recurring) in the IBI FID of the service order, KCL should not have expected (nor did KCL see) non-recurring charges assessed in association with these orders.

Unbilled Unbundled Loop: In an effort to determine the cause of the unbilled circuit issue, KCL submitted additional orders to replicate the Unbundled Loop order activity which had not flowed through to billing. After reviewing the associated Customer

Service Records (CSRs) and corresponding bills, KCL did not witness a recurrence of the problem. KCL therefore was unable to draw a conclusion as to the cause of this problem.

BellSouth's inability to consistently bill for the two-tiered pricing structure of SL1 services will warrant the assignment of a "Not Satisfied" to the relevant evaluation criteria in KCL's final report. In the absence of any other activity or information, KCL closes this exception for testing purposes.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 35.

Attachments: None.

CLOSURE REPORT FOR EXCEPTION 42

BellSouth Georgia OSS Testing Evaluation

Date: November 14, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth published incomplete KPMG Consulting LLC (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*.

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, KCL is attempting to validating the consistency of the data that BellSouth uses to produce KCL Test CLEC SQM reports with the corresponding data that KCL collects using its own test management tools. For the billing metric *Mean Time to Deliver Invoices*, KCL compared the raw data[2] BellSouth used to calculate SQM values with the data KCL compiled using the bills[3] it received from BellSouth.

KCL found that for the three months in question, although it received its CABS bills from BellSouth, the raw data BellSouth used to produce the SQM reports did not contain any CABS bill information. As a result, the published SQM reports do not show any values for the *Mean Time to Deliver CABS Invoices*.

Summary of BellSouth Response:

"BellSouth provided the necessary data files to KCL, however the data provided did not include Interconnection accounts for the KCL CLEC. BellSouth's policy has been to exclude all test accounts from the data that is published with the final CLEC aggregate reported for the SQM Billing measures. (Note: Test accounts are routinely used to test and track new service offerings, system enhancements, etc.) The KCL CLEC accounts

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

[2] BellSouth provided KCL with the raw data, since the information was not available via the PMAP web site.

[3] BellSouth electronically sends KCL CRIS and CABS bills for the KCL Test CLEC.

reflected a single billing name and were excluded in the normal process as BellSouth test accounts.

Additionally, billing account numbers are not required by the PMAP system to produce the SQM results and were not provided with data files.

After further discussions and clarification of requests with KCL, data files will be updated to include KCL test accounts and this information will be provided to the internal PMAP group. The billing account numbers will be added to original data files and will be provided to KCL. Reports to reflect the new SQM values resulting from adding the KCL test accounts will be provided to KCL. The SQM reports will not be changed to reflect the addition of billing account numbers."

Summary of KCL Re-Test Activities:

BellSouth provided to KCL new data files that included all KCL test CLEC account data from November 1999 through March 2000. These files were annotated with the billing account numbers to facilitate data comparison activities. Upon receiving the revised and annotated data, KCL compared these data to the KCL-collected data.

BellSouth also provided to KCL new SQM reports for the Mean Time to Deliver Invoices metric for the months November 1999 through March 2000. These new reports were provided to reflect the additional data being included in the data files. KCL recalculated the SQM values for these months using the new data, and compared its recalculations to the revised SQM reports.

KCL has continued to compare the KCL-collected data to the BellSouth-provided data for the months since March 2000. Additionally, KCL has continued to compare the KCL-calculated SQM values to those reported by BellSouth for the months since March 2000.

KCL Re-Test Results:

The new data files for November through March provided by BellSouth and the corresponding data collected by KCL matched for each account number, exactly. Although there were some discrepancies between the BellSouth-provided data files and the corresponding KCL-collected data noted for the months since March 2000, these have all been resolved. (See Exception 104 for additional information.)

KCL's calculations based upon the revised data matched exactly the revised BellSouth SQM reports for the months November 1999 through March 2000. Further, the KCL calculations of Mean Time to Deliver Invoices SQM values matched exactly the BellSouth-reported values for the months since March 2000, (after the aforementioned

data issues were addressed in accordance with Exception 104). The SQM reports include values for the CABS bills and Interconnections level of disaggregation.

As a result, KCL believes that BellSouth has adequately addressed the issues identified in Exception 42.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 42.

Attachments: None.

Date: November 14, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth has not provided KPMG Consulting LLC (KCL) with the raw data necessary to calculate values for the Service Quality Measurement ("SQM"), *Mean Time to Deliver Invoices* (Billing), for the KCL Test CLEC.

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, KCL is reviewing the adequacy and completeness of the raw data for calculating SQMs, as specified in BellSouth's *Service Quality Measurements Georgia Performance Reports.*[2]

BellSouth did not provide KCL with the raw data necessary to calculate the SQM value for *Mean Time to Deliver Invoices* in the Billing category for November 1999, December 1999, and January 2000, at the level of disaggregation specified in the *SQM Georgia Performance Reports.*

Summary of BellSouth Response:

"BellSouth would like to note that this Exception, No. 43, is a repeat of Exception No. 42, therefore the same statement applies.

BellSouth provided the necessary data files to KCL, however the data provided did not include Interconnection accounts for the KCL CLEC. BellSouth's policy has been to exclude all test accounts from the data that is published with the final CLEC aggregate reported for the SQM Biling Measure. (Note: Test accounts are routinely used to test and track new service offerings, system enhancements, etc.) The KCL CLEC accounts

[1] These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) web site.
[2] KCL used BellSouth's *Service Quality Measurements Georgia Performance Reports, Version 10/22/99* as the basis for performing this test.

reflected a single billing name and were excluded in the normal process as BellSouth test accounts.

Additionally, billing account numbers are not required by the PMAP system to produce the SQM results and were not provided with data files.

After further discussions and clarification of requests with KCL, data files will be updated to include KCL test accounts and this information will be provided to the internal PMAP group. The billing account numbers will be added to original data files and will be provided to KCL. Reports to reflect the new SQM values resulting from adding the KCL test accounts will be provided to KCL. The SQM reports will not be changed to reflect the addition of billing account numbers."

Summary of KCL Re-Test Activities:

BellSouth provided to KCL new data files that included all KCL test CLEC account data from November 1999 through March 2000. These files were annotated with the billing account numbers to facilitate data comparison activities. Upon receiving the revised and annotated data, KCL compared these data to the KCL-collected data.

BellSouth also provided to KCL new SQM reports for the Mean Time to Deliver Invoices metric for the months November 1999 through March 2000. These new reports were provided to reflect the additional data being included in the data files. KCL recalculated the SQM values for these months using the new data, and compared its recalculations to the revised SQM reports.

KCL has continued to compare the KCL-collected data to the BellSouth-provided data for the months since March 2000. Additionally, KCL has continued to compare the KCL-calculated SQM values to those reported by BellSouth, for the months since March 2000.

KCL Re-Test Results:

The new data files for November through March provided by BellSouth and the corresponding data collected by KCL matched for each account number, exactly. Although there were some discrepancies between the BellSouth-provided data files and the corresponding KCL-collected data noted for the months since March 2000, these have all been resolved. (See Exception 104 for additional information.)

KCL's calculations based upon the revised data matched exactly the revised BellSouth SQM reports for the months November 1999 through March 2000. Further, the KCL calculations of Mean Time to Deliver Invoices SQM values match the BellSouth-reported

values for the months since March 2000, exactly (after the aforementioned data issues were addressed in accordance with Exception 104). The SQM reports include values for the CABS bills, Interconnections level of disaggregation.

As a result, KCL believes that BellSouth has adequately addressed the issues identified in Exception 43.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 43.

Attachments: None.

Date: November 14, 2000

EXCEPTION CLOSURE REPORT

Exception:

KPMG Consulting LLC (KCL) cannot replicate four of BellSouth's Service Quality Measurements (SQMs) in the February 2000 report.

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, 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[3] from BellSouth when necessary.

KCL experienced replication problems for the following SQMs in the February 2000 report.

[1] These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) Web site.
[2] The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding raw data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The manual is posted and updated on the PMAP site.
[3] "Technical Assistance" refers to any calculation instruction KCL may have received in the replication of CLEC aggregate or non-PMAP (manually calculated) metrics.

1. ***Firm Order Confirmation Timeliness* in the Ordering category for the KCL Test CLEC.** KCL 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	KCL Calculation	BellSouth Report
Fully Mechanized; OCN = 9994; Product = Other; LSR Count (0-15)	1	2
Fully Mechanized; OCN = 9994; Product = Other; % 0-15 minutes	9.09%	18.18%
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 KCL Test CLEC.** KCL was unable to replicate the following values in the BellSouth SQM report. The discrepancies are detailed in the following table.

Category	KCL 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%
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 KCL Test CLEC.** KCL was unable to replicate the following values in the Non-Mechanized report, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KCL 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 KCL Test CLEC.**
KCL was unable to replicate any of the BellSouth reported SQM values. The discrepancies are shown in the following table.

Category	KCL 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%

Summary of BellSouth's Response:

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

BellSouth agrees that KCL was unable to replicate the BellSouth reported SQM for *FOC Timeliness* for the KCL Test CLEC for February 2000.

Upon further investigation, BellSouth identified a problem in the interval "buckets". The difference between KCL's numbers and PMAP's numbers can be attributed to the LSRs FOC'd (orders confirmed) in the 15th minute. KCL 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 KCL 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 KCL 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 KCL Test CLEC.

BellSouth agrees that using the Version 2.0 of the Raw Data Users Manual, KCL was unable to replicate for the test CLEC the data in the table. 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 KCL to duplicate the data referenced in this exception.

BellSouth issued a system change request # 5330 that addresses the issue of exclusion of "so_cmtt_cd = 'L'" and was effective for March data, published in April. This change will enable the monthly reports to match results created using the Raw Data Users Manual.

BellSouth provided KCL with the April OCI data and reports. The discrepancies identified by KCL in the April Average Completion Interval and Order Completion Interval reports are explained by differences in the functionality of KCL and BellSouth's tools used to replicate the reports from Raw Data.

Step 2 Bullet 2 of the Raw Data User's Guide (RDUG) currently instructs the user to "Exclude records where SO_CMTT_CD = 'L'." This statement was changed to read "Exclude records where SO_CMTT_CD = 'L' or SO_CMTT_CD is null" in the September 2000 release of the RDUG.

The reason that BellSouth and KCL were calculating different values from the raw data is because the aforementioned exclusions are handled identically using SQL to query the Oracle database. If one excludes records with a certain value in a field, then records with null values in that field are also excluded. However, using KCL's tool, the above statements are not identical. If records are excluded with a certain value in a field, then all other values are considered valid, including null values. Records with null values are not valid for the Order Completion Interval metric is because these are "listing" records, where no work has been performed. Change request 5923 was implemented to filter these records in the PMAP system beginning with June Data.

In the Raw Data User's Guide (RDUG), the Order Completion Interval and Order Completion Interval Trunks instructions were changed to ensure that a null value in the SO_CMTT_CD field would cause that record to be excluded from the selection process. Change request 5923 prescribed a code change which prevents these listing orders from entering the PMAP Normalized Operational Data Store (NODS). Since there was no work performed on them, these are not valid provisioning orders. Beginning with June Data, posted in July, these orders are absent from NODS and raw data. If a CLEC attempts to replicate raw data before June, the additional exclusion of records where "SO_CMTT_CD is null" will allow this. For data later than May, this exclusion will no longer exclude any orders since they will have already been removed due to the code fix resulting from Change Request 5923."

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

BellSouth agrees that using Version 2.0 of the Raw Data users manual, KCL is unable to replicate the Total Service Order Cycle Time for the KCL 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 KCL 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 KCL Test CLEC.

On 6/22/00 KCL requested a copy of the rerun results for February 2000 data for Invoice Accuracy. BellSouth provided KCL 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 on the following page:"

Category	KCI Calculation	BellSouth Report (PMAP Calculated values)	Calculated Values using Billing data for Jan and Feb 2000 Data changes for negative revenues	Explanation of PMAP calculations using Billing data for Jan and Feb 2000 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%		

Summary of KCL Re-Test Activities *(by Issue Number)*:

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

   As indicated above, BellSouth requested that KCL perform its review beginning with the May 2000 raw data and SQM reports. KCL received the data and calculated SQM values. KCL then compared these values to the BellSouth-reported values. KCL has also reviewed the KCL Test CLEC reports for every month as a part of its regular testing activities.

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

   Based upon BellSouth's response that its SQM reports prior to that for March 2000 did not properly exclude records where the *so_cmtt_cd* field is equal to "L," KCL reviewed all of the reports beginning with March 2000, and compared the BellSouth-reported values with the KCL-calculated values. In addition, KCL also revised its computer programs to incorporate the revisions BellSouth made to the calculation instructions – that is, to exclude records where the *so_cmtt_cd* field is "null."

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

   Based upon BellSouth's response, KCL revised its computer programs to incorporate the instructions found in the May version of the *Raw Data User Manual.* KCL then compared the recalculated values with the BellSouth-reported values. KCL has used the new instruction consistently for all months for calculation verification purposes. (KCL reviews the KCL Test CLEC reports for every month as a part of its regular testing activities.)

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

   Based upon the revised instructions KCL received from BellSouth (see BellSouth response above), KCL re-calculated its SQM values, and compared them to the original BellSouth-reported values. KCL used the new instructions consistently for all months for calculation verification purposes. (KCL reviews the KCL Test CLEC reports for every month as a part of its regular testing activities.

KCL Re-Test Results *(by Issue Number)*:

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

   The KCL-calculated values did not match the initial BellSouth-reported values for May 2000. BellSouth then updated its code and revised its May 2000 report, such that FOCs received during the weekend were not automatically excluded from the calculations. Clarifications were also made to the *Raw Data User Manual.* KCL then compared its calculations to the revised BellSouth-reported values, and determined that the values matched exactly.

   The KCL-calculated values did not match the initial BellSouth-reported values for June 2000 for the same reasons that KCL could not match the BellSouth-reported values for May 2000. When BellSouth updated its code and revised its June 2000 report, KCL was able to match the revised BellSouth-reported values exactly. (See Exception 110 for additional information.)

   KCL has been able to match its calculated values to the BellSouth-reported values for all months since July 2000.

2. *Order Completion Interval* for the Provisioning category for the KCL Test CLEC

   As stated above, BellSouth asked KCL to review the reports beginning with that for March 2000. The KCL-calculated values did not match the values BellSouth initially reported for March 2000. However, BellSouth updated its code to exclude the records where the *so_cmtt_cd* field had a value of "L," and re-ran the March report. As a result, the KCL-calculated values matched the revised BellSouth-reported values.

   As noted in BellSouth's response above, the *Raw Data User Manual* did not indicate that all records with the *so_cmtt_cd* field having a null value should be removed from the calculation. Based upon this missing instruction, KCL was initially unable to replicate the April SQM report. However, the manual has now been updated, and these records are also eliminated prior to the creation of the raw data. KCL re-calculated its values for April 2000. These recalculated values matched the originally reported BellSouth values, exactly.

   Additionally, KCL has matched the BellSouth-reported values for all SQM reports since May 2000.

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

When KCL implemented the instructions found in the May version of the *Raw Data User Manual*, the resulting calculated values matched the BellSouth-reported values. Further, the values KCL calculated for this SQM subsequent to those posted in the January report match those reported by BellSouth. Note that BellSouth had removed the new instruction from the August *Raw Data User Manual*, resulting in KCL being unable to match its calculations to the BellSouth SQM report for July 2000. However BellSouth has updated the *Raw Data User Manual* (see the October 2000 version) with this instruction once again. (See Exception 111 for additional information.)

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

When KCL implemented the revised instructions listed above, the resulting recalculated KCL values matched the original BellSouth-reported values for February 2000, exactly.

While KCL matched the BellSouth-reported values for March and April 2000, KCL was initially unable to match the BellSouth-reported values for May 2000. However, this was due to unrelated data issues that have since been resolved. (See Exception 100 for additional information.)

KCL has now matched the BellSouth-reported values for the months of November 1999 through August 2000.

As a result, KCL believes that BellSouth has adequately addressed the issues identified in Exception 62.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 62.

Attachments: None.

Date: November 14, 2000

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

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 KCL'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", KCL 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", KCL received Error Message TAG1110VAL: "Invalid REQTYP – Account Activity Type Combination".

3. ***Loop Port Combinations (REQ TYPE M) – all valid Activity Types.***
   KCL 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

[1] KCL obtained a listing of inputs for the UNE Product Type data element from the BellSouth *TAG API Reference Guide, Version 2.2.0.5, 2.2.0.7, and 2.2.0.8.*

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.

Summary of BellSouth's Response:

In its response to Exception 65, BellSouth noted that a TAG defect had been uncovered regarding CDD requests for REQTYPs B and C with ACTTYP W. BellSouth indicated that the defect was scheduled to be corrected in the implementation of TAG 2.2.0.10, due to be released in July 2000.

BellSouth also noted that it was able to successfully process CDDs for REQTYP M in TAG version 2.2.0.8, keeping the UNEPROD indicator field blank. BellSouth provided the inputs and outputs of these pre-orders in the exception response.

Summary of KCL Re-test Activities:

To re-test CDD functionality, KCL submitted 15 CDD queries, covering the following REQ ACT TYPE combinations:

- REQTYP = B; ACTTYP = W
- REQTYP = C; ACTTYP = W
- REQTYP = M; ACTTYP = A
- REQTYP = M; ACTTYP = C
- REQTYP = M; ACTTYP = D
- REQTYP = M; ACTTYP = M
- REQTYP = M; ACTTYP = T
- REQTYP = M; ACTTYP = SS
- REQTYP = M; ACTTYP = RS

These pre-orders were submitted using TAG Version 2.2.0.11[2].

In addition, KCL reviewed updated BellSouth Pre-Order Business Rule documentation (Version 7, July 7, 2000) to verify that appropriate guidelines for populating the UNEPROD indicator on CDD queries for REQTYP M were included.

[2] While BellSouth initial response to this exception stated that the related CDD functionality deficiencies would be corrected in TAG Version 2.2.0.10, BellSouth actually implemented the functionality additions with the release of version 2.2.0.11.

KCL Re-test Results:
KCL was able to successfully execute the functionality associated with all CDD queries submitted during this re-test. The "invalid REQ/ACT TYPE combination" error messages encountered during initial testing were not replicated. Instead, BellSouth delivered valid CDD responses containing a due date for related service requests.

In addition, KCL verified that appropriate guidelines for populating the UNEPROD data element on REQ TYPE M CDDs were included in Version 7 of the Pre-Order Business Rules[3].

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 65.

Attachments: None.

[3] Page 258 of the Pre-Order Business Rules (Issue 7), state that for products not listed in the UNE Product identifier list provided, such as Loop Port Combos (REQTYP M), CLECs should utilize the "normal, or standard interval guide. These products would have a UNEPROD identifier of zero."

CERTIFICATE OF SERVICE
Docket No. 8354-U

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

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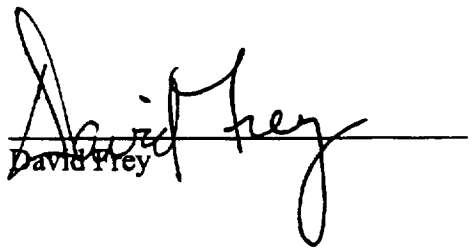
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EXECUTIVE SECRETARY
G.P.S.C.

November 14, 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

Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of KPMG Consulting LLC's Exception 38 (2nd Amended); Exception 71 (Amended); Exception 113; Exception 114; Exception 114 (Amended); and Exception 115. Please also find enclosed the following responses from BellSouth: Exception 21 Statement of Re-Opening, Exception 114, Exception 115; an Amended Response for Exception 114; 3rd Amended responses for Exception 38, Exception 71, Exception 74, Exception 78; 6th Amended Response for Exception 88; 7th Amended Response for Exception 88; and a Statement of Investigation for Exception 113. We request that these documents be filed 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.

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EXECUTIVE SECRETARY
G.P.S.C.

Date: October 28, 2000

EXCEPTION REPORT

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

Exception:

BellSouth does not consistently provide CLECs with a service Due Date (DD) matching their Desired Due Date (DDD).

When issuing Local Service Requests (LSRs), CLECs are required to input a DDD for service completion. BellSouth's *Product & Service Interval Guide Network & Carrier Services, Issue 2b, December 1999* provides CLECs with standard completion intervals for different service types. In response to an error-free LSR, BellSouth delivers a Firm Order Confirmation (FOC). This FOC contains the DD by which BellSouth commits to completing the CLEC's service request. According to the *Interval Guide*, if a CLEC has requested a DDD no shorter than the standard interval, BellSouth will attempt to commit to the same DD[1].

Approximately 20% of KPMG's transactions had a DD that was not compliant with the interval specified in the *Interval Guide*. In these instances, BellSouth's FOC DDs can be broken down as follows:

1) **BellSouth provided KPMG with an FOC DD later than the LSR DDD for 15% of service requests receiving an FOC.** A table of these transactions appears below.

FOC DD Later than LSR DDD

PON	VER	CC	LSR DDD	FOC DD	DD – DDD (Business Days)	REQTYP ACT
307A122PEK100001	04	9994	12/20/99	12/21/99	1	AB/V
395A213PEM100001	00	9994	1/21/00	1/24/00	1	FB/A
406A213PTM100001	00	9991	12/14/99	12/15/99	1	FB/V
406A213PTM100004	00	9991	1/21/00	1/24/00	1	FB/V
419A223PTM100002	00	9991	12/20/99	12/21/99	1	FB/D
428A124PTJ100006	01	9994	12/24/99	12/27/99	1	MB/V
428X224PEJ101001	00	9994	2/15/00	2/16/00	1	MB/V

[1] "BellSouth will make every effort to accommodate service requests utilizing these intervals." From BellSouth's *Product & Service Interval Guide Network & Carrier Services, Issue 2b, December 1999, Page V*

PON	VER	CC	LSR DDD	FOC DD	DD – DDD (Business Days)	REQTYP ACT
603A224PTJ100002	00	9991	11/16/99	11/20/99	1	MB/D
326C222PEI100002	00	9992	1/26/00	1/28/00	2	BB/V
404A223PTM100001	03	9991	12/09/99	12/13/99	2	FB/V
444A214PEJ000002	00	9991	1/21/00	1/25/00	2	MB/D
445A124PEJ100003	00	9991	1/14/00	1/18/00	2	MB/D
603A224PTJ100004	00	9991	2/16/00	2/18/00	2	MB/D
604A224PEJ000003	00	9994	2/7/00	2/09/00	2	MB/V
605A214PTJ000004	00	9994	2/15/00	2/17/00	2	MB/V
309A222PTH100001	04	9994	12/23/99	12/28/99	3	AB/V
626A224PTJ101002	00	9991	1/06/00	1/11/00	3	MB/C
445D124PEJ100001	00	9991	12/14/99	12/20/99	4	MB/D
329A212PTI100003	00	9992	12/21/99	12/28/99	5	BB/V
433A124PEH100002	00	9991	12/22/99	12/29/99	5	MB/M
603A224PEJ100003	00	9991	1/19/00	1/26/00	5	MB/D
440A124PTJ000002	00	9991	11/30/99	12/21/99	15	MB/SS

2) **BellSouth provided KPMG with an FOC DD earlier than the LSR DDD for 5% of service requests receiving an FOC.** A table of these transactions appears below.

FOC DD Earlier than LSR DDD

PON	VER	CC	LSR DDD	FOC DD	DD – DDD (Business Days)	REQTYP ACT
395A213PEM100001	01	9994	1/21/00	1/18/00	-3	FB/A
415A213PTM000001	00	9991	12/14/99	12/09/99	-3	FB/RS
452A216PTF100003	00	9991	12/22/99	12/17/99	-3	JB/R
626A224PTJ100002	04	9991	12/16/99	12/13/99	-3	MB/C
407A213PTM100003	03	9991	12/09/99	12/07/99	-2	FB/C
456A216PEF100002	00	9991	12/22/99	12/20/99	-2	JB/R
606A123PEM100004	00	9991	2/17/00	2/15/00	-2	FB/C
438A214PTJ000002	00	9991	2/15/00	2/14/00	-1	MB/SS

Impact

CLECs should be reasonably assured of receiving confirmed due dates (FOC DD) matching their requested due dates (LSR DDD) when the requests are interval-compliant. CLECs are likely to provide their customers with an anticipated service delivery date in line with BellSouth's standard intervals. The receipt of an FOC DD different than an LSR DDD will force a CLEC to notify their customers of this change. Late DDs may result in decreased customer satisfaction. (e.g. a new account is not established on time, directory assistance information is not available on time).

The occurrence of an FOC DD earlier than the LSR DDD places an additional burden on a CLEC. Early completion of the CLEC's order may result in a disruption to the end user's service, (e.g. service is suspended prior to the customer's requested date, a new account is established and billing initiated prior to the customer's requested date) which will result in decreased CLEC customer satisfaction. To move the DD back to the requested DDD, the CLEC would be forced to issue a supplemental service request.

AMENDED EXCEPTION

KCL reviewed the accuracy of FOC DDs provided on service requests submitted during a UNE functional re-test initiated on August 25, 2000.

Of the 197 FOCs[2] received during functional re-testing between August 28 and October 9, 2000, 17 (9%) contained DDs later than the DDD requested on the service request. One of these orders was submitted using pre-order obtained DDDs, while the remaining 16 orders were submitted using service intervals obtained from BellSouth documentation.

KCL performed an upgrade from TAG Version 2.2.0.8 to TAG Version 2.2.0.11 on October 5, 2000. The majority of pre-order and order transactions highlighted below were transmitted via Version 2.2.0.8.

The following table provides additional detail on the service orders receiving different Due Dates.

PON VER	CC	Order Type	Flow Through	LSR DDD	FOC DD	DDD obtained via pre-orders	DDD obtained via Documentation
615R122PTH100005*00	9994	AB/C	Y	10/11/00	10/16/00		X
423R114PTJ100003*00	9994	MB/V	Y	9/26/00	9/27/00		X
428R124PEJ100001*00	9994	MB/V	Y	9/4/00	9/5/00		X
423R114PTJ100001*00	9994	MB/V	Y *	9/4/00	9/5/00		X
444R214PTJ100001*00	9990	MB/D	Y *	9/4/00	9/5/00		X
398R213PTM000001*00	9994	FB/V	N	8/30/00	9/5/00		X
398R213PTM000003*00	9994	FB/V	N	9/8/00	9/13/00		X
399R213PTM100002*00	9994	FB/V	N	9/8/00	9/13/00		X
404R223PTM101001*01	9994	FB/V	N	9/11/00	9/14/00		X
404R223PTM100002*00	9994	FB/V	N	9/19/00	9/25/00		X
399R213PEM100001*01	9994	FB/V	N	9/1/00	9/6/00		X
398R213PEM000002*00	9994	FB/V	N	9/8/00	9/13/00		X

[2] This total excludes those FOCs received on KPMG LSRs submitted with Desired Due Dates less than the standard interval (i.e., KPMG errors).

PON VER	CC	Order Type	Flow Through	LSR DDD	FOC DD	DDD obtained via pre-orders	DDD obtained via Documentation
409R223PEM100001*00	9994	FB/C	N	9/19/00	9/21/00		X
409R223PEM100001*01	9994	FB/C	N	9/19/00	9/21/00		X
428R124PTJ100003*00	9994	MB/V	Y	9/20/00	9/21/00		X
395R213PEM100002*00	9994	FB/A	N	9/8/00	9/13/00		X
399R213PEM100003*00	9994	FB/V	N	9/26/00[3]	9/28/00	X	

Note: All Flow Through/Non-Flow Through classifications are based on *actual* designations from BellSouth-obtained flow through reports, with the exception of those marked by a *. For these orders, KPMG was unable to obtain a flow through classification based on BellSouth reports and utilized *expected* flow-through designations derived from BellSouth documentation.

[3] For this transaction, the LSR was submitted within 30 minutes following the receipt of the associated pre-order responses. The Appointment Availability pre-order used indicated an "unavailable date" of 9/26/00. The correct input for the corresponding LSR DDD should have been 9/27/00 (the next available due date). BLS returned a FOC DD of 9/28/00.

Date: October 31, 2000

EXCEPTION REPORT

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

Exception:

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

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

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

1. ***Documentation***

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

2. ***Pre-Order Inquiry***

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

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

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

REQ TYPE	ACT TYPE	UNE Product Type	ORDER TYPE	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
E	A	NOT UNE To Calculate	POTS	3	4/5/00	4/10/00	3	7
E	A	NOT UNE To Calculate	POTS	3	4/6/00	4/11/00	3	7
E	A	NOT UNE To Calculate	POTS	3	4/7/00	4/12/00	3	7
E	A	NOT UNE To Calculate	POTS	1	4/7/00	4/10/00	1	4
E	A	NOT UNE To Calculate	POTS	1	4/7/00	4/10/00	1	4
E	A	NOT UNE To Calculate	POTS	2	4/7/00	4/11/00	2	4
E	A	NOT UNE To Calculate	POTS	2	4/7/00	4/11/00	2	4
E	T	NOT UNE To Calculate	POTS	1	4/7/00	4/10/00	1	4
E	W	NOT UNE To Calculate	ISDN	1	4/7/00	4/7/00	0	3
E	V	NOT UNE To Calculate	ISDN	1	4/10/00	4/11/00	1	16
E	W	NOT UNE To Calculate	ISDN	1	4/7/00	4/7/00	0	3
E	A	NOT UNE To Calculate	ISDN	1	4/7/00	4/10/00	1	16
E	C	NOT UNE To Calculate	ISDN	1	4/7/00	4/8/00	1	16
E	C	NOT UNE To Calculate	ISDN	1	4/7/00	4/8/00	1	16
E	C	NOT UNE To Calculate	POTS	2	4/10/00	4/12/00	2	4
E	C	NOT UNE To Calculate	POTS	2	4/10/00	4/11/00	1	4
E	C	NOT UNE To Calculate	POTS	2	4/10/00	4/12/00	2	4
E	C	NOT UNE To Calculate	POTS	2	4/10/00	4/12/00	2	4
B	V	LocalNumberPortability_NotComplexServices	POTS	2	2/18/00	2/28/00	6	5
C	D	LocalNumberPortability_NotComplexServices	POTS	1	2/18/00	2/29/00	7	5
C	V	LocalNumberPortability_NotComplexServices	POTS	5	2/22/00	3/15/00	16	5
C	V	LocalNumberPortability_NotComplexServices	POTS	1	2/22/00	3/15/00	16	5
F	A	UnbundledLocalSwitching_2WireAnalogPort	POTS	8	2/22/00	3/15/00	16	3
F	C	UnbundledLocalSwitching_2WireAnalogPort	POTS	5	2/18/00	2/28/00	6	3
F	SS	UnbundledLocalSwitching_2WireAnalogPort	POTS	3	2/18/00	2/28/00	6	3
F	D	UnbundledLocalSwitching_2WireAnalogPort	POTS	1	2/22/00	2/28/00	4	3
F	V	UnbundledLocalSwitching_2WireAnalogPort	POTS	1	2/18/00	2/28/00	6	3
A	A	UnbundledLoops	POTS	1	2/28/00	3/8/00	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.

Amended Exception

KCL initiated an ordering functional re-test on August 25, 2000. During the re-test, KCL reviewed the service provisioning intervals returned in response to Calculate Due Date (CDD) requests against the intervals contained in BellSouth documentation.

KCL continued to observe discrepancies between the documented service intervals and those returned in response to CDD pre-orders. The majority of discrepancies occurred for UNE Loop-Port Combination accounts.

The following table presents the discrepancies encountered during re-testing.

REQ TYPE	ACT TYPE	UNE Product Type	ORDER TYPE	NO. of Lines	Submit Date	Due Date	CDD Interval (3)	Documentation Interval
AB	C	Unbundled Loops	POTS	1	09/21/00	10/2/00	7	6
B	V	Unbundled Loops	POTS	6	10/02/00	10/16/00	9	7
J	R	O/S and DA UNEs	POTS	2	10/02/00	10/10/00	6	3
J	R	O/S and DA UNEs	POTS	2	10/02/00	10/6/00	4	3
J	R	O/S and DA UNEs	POTS	2	10/02/00	10/10/00	6	3
J	R	O/S and DA UNEs	POTS	1	10/02/00	10/10/00	6	3
M	A	Not a UNE to Calculate	POTS	1	09/20/00	9/25/00	3	4
M	A	Not a UNE to Calculate	POTS	1	09/28/00	10/10/00	6	4
M	C	Not a UNE to Calculate	POTS	3	09/06/00	9/11/00	3	7
M	C	Not a UNE to Calculate	POTS	3	09/20/00	9/25/00	3	7
M	C	Not a UNE to Calculate	POTS	3	10/02/00	10/10/00	6	7
M	C	Not a UNE to Calculate	POTS	3	10/02/00	10/9/00	5	7
M	C	Not a UNE to Calculate	POTS	1	10/02/00	10/10/00	6	7
M	C	Not a UNE to Calculate	POTS	1	10/02/00	10/12/00	8	7
M	C	Not a UNE to Calculate	POTS	2	09/14/00	9/20/00	4	7
M	C	Not a UNE to Calculate	POTS	2	10/02/00	10/9/00	5	7
M	D	Not a UNE to Calculate	POTS	2	10/02/00	10/10/00	6	4
M	D	Not a UNE to Calculate	POTS	2	09/20/00	9/25/00	3	4
M	D	Not a UNE to Calculate	POTS	2	10/02/00	10/9/00	5	4
M	M	Not a UNE to Calculate	POTS	2	08/28/00	9/8/00	3	4
M	V	Not a UNE to Calculate	POTS	2	09/28/00	9/25/00	3	4
M	V	Not a UNE to Calculate	POTS	2	09/20/00	9/27/00	5	4

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

Date: September 22, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Data Comparison test for Ordering & Provisioning service quality measurements (SQMs).

Exception:

BellSouth-reported raw data values for Commitment Date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Service Order numbers and Purchase Order numbers for six Provisioning metrics.

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, 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 each of the Provisioning metrics – *Mean Held Order Interval and Distribution Intervals, Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices, Percent Missed Installation Appointments, Average Completion Interval / Order Completion Interval Distribution, Average Completion Notice Interval,* and *Total Service Order Cycle Time* – KCL compared the BellSouth-reported values for COMMITMENT DATE in the raw data files with the due date (commitment date)[2] that KCL received from Hewlett Packard for March, April, and May 2000.

KCL could not match the BellSouth-reported values in these fields with the corresponding KCL-collected values for certain service order numbers and purchase order numbers. The table below shows the specific discrepancies for Commitment Date.

COMMITMENT DATE

PON	SO_NBR	MONTH	BLS-REPORTED VALUE	KCL-REPORTED[3] VALUE
R010A11PTN100001	CO0VJ7L2	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R010A11PEN100003	CO24RH11	March	3/21/00 12:00 AM	03/24/00 12:00 AM

[1] These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.
[2] Commitment Date is the due date indicated in the FOC that is received by HP and provided to KCL.
[3] These values are contained in response files provided to KCL by HP.

PON	SO_NBR	MONTH	BLS-REPORTED VALUE	KCL-REPORTED[3] VALUE
R002A11PEN100003	CO270WV2	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R002A11PTN101002	COBV58F5	March	3/23/00 12:00 AM	03/27/00 12:00 AM
R002A11PEN100005	CP0X8M92	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R010A11PTN100004	CP4CF625	March	3/21/00 12:00 AM	03/23/00 12:00 AM
R002A11PEN100001	CP5QH432	March	3/21/00 12:00 AM	03/28/00 12:00 AM
R002A11PTN100004	CP86GNN9	March	3/23/00 12:00 AM	03/28/00 12:00 AM
424A314PTJ000001	NO26B2P9	March	2/16/00 12:00 AM	03/01/00 12:00 AM
422A114PEJ101001	NOBJDYR1	March	2/18/00 12:00 AM	03/03/00 12:00 AM
615A122PTH102014	CP7R0531	April	4/27/00 12:00 AM	04/25/00 12:00 AM
R047A11PTN000018	NO4Y4Y46	April	4/27/00 12:00 AM	04/18/00 12:00 AM
378A315PEI001001	NP0FNX10	April	3/29/00 12:00 AM	03/23/00 12:00 AM
R041A21PTN100006	NP9V5K27	April	4/12/00 12:00 AM	04/17/00 12:00 AM
R041A21PEN100007	NPF01H46	April	4/12/00 12:00 AM	04/21/00 12:00 AM
R041B21PEN100001	NPF1MLT2	April	4/11/00 12:00 AM	04/17/00 12:00 AM
311F212PEH102002	CO2MXTV7	May	5/11/00 12:00 AM	05/10/00 12:00 AM
R036A22PTN000003	COVQ5886	May	5/1/00 12:00 AM	04/27/00 12:00 AM
R041A12PEN100009	NO0VF3L7	May	5/17/00 12:00 AM	05/18/00 12:00 AM
301A212PEH101016	NO2WDK96	May	5/5/00 12:00 AM	04/14/00 12:00 AM
301A212PTH102014	NO831LW8	May	12/29/00 12:00 AM	04/18/00 12:00 AM
398A213PEM000003	NP02RM89	May	5/2/00 12:00 AM	04/28/00 12:00 AM
378A315PEI001001	NP0FNX10	May	12/29/00 12:00 AM	03/23/00 12:00 AM
R041A12PEN100012	NP8HRNF6	May	5/12/00 12:00 AM	05/19/00 12:00 AM
305A122PTH105001	NP9MJXD8	May	5/8/00 12:00 AM	04/25/00 12:00 AM

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. If SQM reports are based on incomplete or incorrect raw data, CLECs will not receive accurate SQM information for these purposes.

Date: October 2, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Resale Provisioning Verification Evaluation (PO&P11).

Exception:

KPMG Consulting encountered BellSouth provisioning errors for Resale orders.

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

Of the 84 Resale orders, which have been validated to date, 21 post-order CSRs (25.0%) contained different information than their corresponding LSRs. Of the 21 orders, 17 (80.9%) were flow-through and four (19.1%) were non-flow through[1].

Of the 102 Directory Listing for Resale orders, which were validated, 25 orders (24.5%) contained different information than their corresponding LSRs. Of the 25 orders, 22 (88.0%) were flow-through and three (12.0%) were non-flow through.

Of the 175 Switch Translations for Resale lines, which were validated, 16 lines (9.1%) contained different information than their corresponding LSRs. Of the 16 lines, five (31.3%) were flow-through and 11 (68.7%) were non-flow through.

Please see the following tables for details.

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

Date: October 2, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Resale Provisioning Verification Evaluation (PO&P11).

Exception:

KPMG Consulting encountered BellSouth provisioning errors for Resale orders.

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

Of the 84 Resale orders, which have been validated to date, 21 post-order CSRs (25.0%) contained different information than their corresponding LSRs. Of the 21 orders, 17 (80.9%) were flow-through and four (19.1%) were non-flow through[1].

Of the 102 Directory Listing for Resale orders, which were validated, 25 orders (24.5%) contained different information than their corresponding LSRs. Of the 25 orders, 22 (88.0%) were flow-through and three (12.0%) were non-flow through.

Of the 175 Switch Translations for Resale lines, which were validated, 16 lines (9.1%) contained different information than their corresponding LSRs. Of the 16 lines, five (31.3%) were flow-through and 11 (68.7%) were non-flow through.

Please see the following tables for details.

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

Date: October 31, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Resale Provisioning Verification Evaluation (PO&P11).

Exception:

KPMG Consulting LLC (KCL) encountered BellSouth provisioning errors for Resale orders.

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

Of the 84 Resale orders that have been validated to date, 19 post-order CSRs (22.6%) contained different information than their corresponding LSRs. Of the 19 orders, 15 (78.9%) were flow-through and four (21.1%) were non-flow through[1].

Of the 102 Directory Listing for Resale orders that were validated, 25 orders (24.5%) contained different information than their corresponding LSRs. Of the 25 orders, 22 (88.0%) were flow-through and three (12.0%) were non-flow through.

Of the 174 Switch Translations for Resale lines that were validated, 15 lines (8.6%) contained different information than their corresponding LSRs. Of the 15 lines, five (33.3%) were flow-through and10 (66.7%) were non-flow through.

The following tables provide details of the tests.

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

Date: September 6, 2000

EXCEPTION REPORT

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

Exception:

BellSouth does not respond to Loop Make-Up Service Inquiries (LMU/SI) within the specified seven-day interval.

According to *the BellSouth Loop Makeup (LMU) CLEC Information Package (Version 1)*[1], available on the BellSouth Interconnection Service Web site, a CLEC should receive a response to an LMU/SI within seven working days.

As of August 28, 2000, 28 LMU/SIs submitted by the KCL Test CLEC (25% of the total LMU/SIs submitted) had not received a response within the specified seven day interval.

The following table provides details on the 28 LMU/SIs cited in this exception. These LMU/SIs were sent between July 10th and August 8th, 2000. As of August 28th, 2000, no responses had been received.

PON	Date Sent	Submitted via facsimile/email
X046A12002	7/10/2000	email
X046A110002, X046A110001	7/17/2000	email
X001P11004, X001P11006, X001P11007, X039A210001, X046P12007, X001P12006	7/18/2000	email
X039A11004, X039A12004, X039B110001,	7/20/2000	email
X039P12006, X046BP11003, X046BP11004, X046BP11006, X046BP11007, X046BP11009, X046BP11010	7/21/2000	email
X0R03A, X0R04A, X0R05A, X0R06A, X0R08A, X0R09A, X0R011A, X0R012A, X0R014A	8/8/2000	facsimile

[1] *BellSouth Loop Makeup (LMU) CLEC Information Package (Version 1)*: http://www.interconnection.bellsouth.com/products/UNE/bstlmu.pdf.

Impact

The absence of timely responses to LMU/SIs Inquiry impact CLECs in the following ways:

- **Decrease in customer satisfaction.** A delay in the return of an LMU/SI will delay the ordering and provisioning of xDSL services. This will negatively impact CLEC customer satisfaction.

- **Increase in operating costs.** CLECs will also likely incur additional costs associated with researching the status of untimely LMU/SIs.

BELLSOUTH'S RESPONSE TO EXCEPTION 21 STATEMENT OF RE-OPENING

BELLSOUTH

October 24, 2000

KPMG declares Exception 21 re-opened.

Background: On July 21, 2000 KPMG Consulting (KCL) filed a closure report for Exception 21 with the Georgia Public Service Commission. The title of the exception was:

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

In its closure report for Exception 21, KCL noted the following:

"'Z' Processing Status: Replication of the February Flow Through calculation showed that LSRs with a 'Z' processing status were no longer treated as CLEC-caused fall-out, except where additional errors resulting from CLEC causes existed on the LSRs."

Re-Opening Exception 21: Continued testing activities related to the Flow Through evaluation have provided KCL with new information concerning "Z" Processing Status LSRs that indicates that "Z" Processing Status LSRs are still not properly classified for Flow Through purposes.

At the time the exception was closed, it was understood that LSRs received a "Z" processing status when a supplemental LSR was submitted by a CLEC prior to the original LSR being canceled. It was also understood that the original LSR received the "Z" status had reached its final disposition. This information did not indicate that the LSR's should be considered CLEC caused fall-out and lead to Exception 21 and the resulting resolution.

KCL has now determined that LSRs may receive a "Z" status for other reasons than a supplemental submission and that their final disposition is not made at the time the status is changed but at a later time. While changes in BellSouth's response to this issue were made as described according to KCL's re-test, KCL finds that LSRs receiving a "Z" processing status should not be considered either CLEC caused or BellSouth caused fall-out for the purposes of the Flow Through Report until a final disposition of the LSR is determined.

Based on subsequent testing activities, KCL determined that the change implemented by BellSouth does not properly classify "Z" processing status LSRs for the purposes of the Flow Through Report. Therefore, KCL declares Exception 21 re-opened.

BELLSOUTH'S RESPONSE TO EXCEPTION 21 STATEMENT OF RE-OPENING

BellSouth Response

Since KPMG has determined that LSRs receiving "Z" processing status (Pending Supplements) should not be considered either CLEC caused or BellSouth caused fallout for the purposes of the Flow Through Report until a final disposition of the LSR is determined, BellSouth has taken the necessary steps to exclude these LSRs from the Total System Fallout which contains both the BST and CLEC caused fallout. Additionally, since these LSRs are now ineligible to flow through, they are now excluded from the count of valid LSRs which is the number of LSRs eligible to flow through. Any LSRs in this Pending Supplements category will be counted in the following month's flow through reports when they have reached their final disposition.

BELLSOUTH'S RESPONSE TO EXCEPTION 114

BELLSOUTH

October 6, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Resale Provisioning Verification Evaluation (PO&P11).

Exception:

KPMG Consulting encountered BellSouth provisioning errors for Resale orders.

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

Of the 84 Resale orders, which have been validated to date, 21 post-order CSRs (25.0%) contained different information than their corresponding LSRs. Of the 21 orders, 17 (80.9%) were flow-through and four (19.1%) were non-flow through[1].

Of the 102 Directory Listing for Resale orders, which were validated, 25 orders (24.5%) contained different information than their corresponding LSRs. Of the 25 orders, 22 (88.0%) were flow-through and three (12.0%) were non-flow through.

Of the 175 Switch Translations for Resale lines, which were validated, 16 lines (9.1%) contained different information than their corresponding LSRs. Of the 16 lines, five (31.3%) were flow-through and 11 (68.7%) were non-flow through.

Please see the following table for details.

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

BELLSOUTH'S RESPONSE TO EXCEPTION 115

BELLSOUTH

October 3, 2000

EXCEPTION REPORT

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

Exception:

BellSouth does not respond to Loop Make-Up Service Inquiries (LMU/SI) within the specified seven-day interval.

According to the BellSouth Loop Makeup (LMU) CLEC Information Package (Version 1)[1], available on the BellSouth Interconnection Service Web site, a CLEC should receive a response to an LMU/SI within seven working days.

As of August 28, 2000, 28 LMU/SIs submitted by the KCL Test CLEC (25% of the total LMU/SIs submitted) had not received a response within the specified seven day interval.

The following table provides details on the 28 LMU/SIs cited in this exception. These LMU/SIs were sent between July 10th and August 8th, 2000. As of August 28th, 2000, no responses had been received.

PON	Date Sent	Submitted via facsimile/email
X046A12002	7/10/2000	email
X046A110002, X046A110001	7/17/2000	email
X001P11004, X001P11006, X001P11007, X039A210001, X046P12007, X001P12006	7/18/2000	email
X039A11004, X039A12004, X039B110001,	7/20/2000	email
X039P12006, X046BP11003, X046BP11004, X046BP11006, X046BP11007, X046BP11009, X046BP11010	7/21/2000	email
X0R03A, X0R04A, X0R05A, X0R06A, X0R08A, X0R09A, X0R011A, X0R012A, X0R014A	8/8/2000	facsimile

Impact

The absence of timely responses to LMU/SIs Inquiry impact CLECs in the following ways:

[1] *BellSouth Loop Makeup (LMU) CLEC Information Package (Version 1)*: http://www.interconnection.bellsouth.com/products/UNE/bstlmu.pdf.

BELLSOUTH'S RESPONSE TO EXCEPTION 115

- Decrease in customer satisfaction. A delay in the return of an LMU/SI will delay the ordering and provisioning of xDSL services. This will negatively impact CLEC customer satisfaction.

- Increase in operating costs. CLECs will also likely incur additional costs associated with researching the status of untimely LMU/SIs.

BellSouth Response

PON	Date Sent	Submitted via facsimile/email	BellSouth Response
X046A12002	7/10/2000	email	Disagree. PON not received in CRSG
X046A110002	7/17/2000	email	Agree. PON placed in clarification for the address on 8/2. Cleared 8/4, Response emailed to Marc Buckman on 8/7. Re-sent via fax on 8/31 to Marc
X046A110001	7/17/2000	email	Disagree. Response emailed to Marc Buckman on 7/20
X001P11004	7/18/2000	email	Agree. Response faxed to Marc Buckman on 7/31
X001P11006	7/18/2000	email	Disagree. Response faxed to Marc Buckman on 7/20
X001P11007	7/18/2000	email	Disagree. Response faxed 7/21 to Marc Buckman. Re-faxed 7/31 and 8/31 to Marc
X039A210001	7/18/2000	email	Disagree. PON placed in clarification for the address on 7/18. Cleared 7/18 Response faxed to Marc Buckman on 7/20. Re-sent via fax on 8/31 to Marc
X046P12007	7/18/2000	email	Agree. Response faxed to Marc on 7/31 and re-faxed 8/31.
X001P12006	7/18/2000	email	Disagree. Response faxed to Marc 7/20
X039A11004	7/20/2000	email	Disagree. PON not received in CRSG
X039A12004	7/20/2000	email	Disagree. PON not received in CRSG
X039B110001	7/20/2000	email	Disagree. PON received via email 7/17. Response sent via email on 7/20 to Marc Buckman
X039P12006	7/21/2000	email	Disagree. PON placed in clarification on 7/21 because PON on transmittal did not agree with PON on SI. Clarification cleared 7/24. Response faxed on 7/27 to Marc Buckman.
X046BP11003	7/21/2000	email	Disagree. Response faxed 8/1 to Marc Buckman and re-faxed on 8/31
X046BP11004	7/21/2000	email	Disagree. Response faxed 7/31 to Marc Buckman and re-faxed on 8/31.
X046BP11006	7/21/2000	email	Disagree. Response faxed 7/31 to Marc Buckman and re-faxed on 8/31.
X046BP11007	7/21/2000	email	Disagree. Response faxed 7/31 to Marc Buckman and re-faxed on 8/31.
X046BP11009	7/21/2000	email	Disagree. Response faxed 7/31 to Marc Buckman
X046BP11010	7/21/2000	email	Disagree. Response faxed 8/1 to Marc Buckman

BELLSOUTH'S RESPONSE TO EXCEPTION 115

X0R03A	8/8/2000	facsimile	Agree. Response faxed 8/23 to Marc Buckman and re-faxed on 8/29.
X0R04A	8/8/2000	facsimile	Agree. Response faxed 8/23 to Marc Buckman
X0R05A	8/8/2000	facsimile	Agree. Response faxed 8/23 to Marc Buckman
X0R06A	8/8/2000	facsimile	Agree. Response faxed 8/23 to Marc and re-faxed 8/29 and 8/31.
X0R08A	8/8/2000	facsimile	Agree. Response faxed 8/23 to Marc and re-faxed 8/29
X0R09A	8/8/2000	facsimile	Agree. Response faxed 8/23 to Marc and re-faxed 8/29
X0R011A	8/8/2000	facsimile	Agree. Response faxed 8/23 to Marc and re-faxed 8/29
X0R012A	8/8/2000	facsimile	Agree. Response faxed to Marc Buckman on
X0R014A	8/8/2000	facsimile	Agree .Response faxed 8/23 to Marc Buckman

BellSouth agrees that 12 of the 28 responses exceeded the 7-day timeframe, which translates to 89% of the responses within the 7-day interval. To improve SAC response timeframes the CRSG has implemented weekly conference calls with the SAC to address the responses that were not sent within the 7-day timeframe.

Additionally, the SAC has implemented the following center changes:

1. Assigned monitoring and control of the SI box to one person. This person is responsible for logging; distributing and sending completed SIs back to the CRSG.

2. An escalation process was put in place within the SAC to ensure there is management oversight in meeting the specified timeframe.

3. The objective is to process SIs on the same day they are received.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 114

BELLSOUTH

November 6, 2000

EXCEPTION REPORT (Amended)

An exception has been identified as a result of the Resale Provisioning Verification Evaluation (PO&P11).

Exception:

KPMG Consulting encountered BellSouth provisioning errors for Resale orders.

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

Of the 84 Resale orders, which have been validated to date, 21 post-order CSRs (25.0%) contained different information than their corresponding LSRs. Of the 21 orders, 17 (80.9%) were flow-through and four (19.1%) were non-flow through[1].

Of the 102 Directory Listing for Resale orders, which were validated, 25 orders (24.5%) contained different information than their corresponding LSRs. Of the 25 orders, 22 (88.0%) were flow-through and three (12.0%) were non-flow through.

Of the 175 Switch Translations for Resale lines, which were validated, 16 lines (9.1%) contained different information than their corresponding LSRs. Of the 16 lines, five (31.3%) were flow-through and 11 (68.7%) were non-flow through.

Please see the following table for details.

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 38

BELLSOUTH

November 6, 2000

EXCEPTION REPORT

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

Exception:

BellSouth does not consistently provide CLECs with a service Due Date (DD) matching their Desired Due Date (DDD).

When issuing Local Service Requests (LSRs), CLECs are required to input a DDD for service completion. BellSouth's *Product & Service Interval Guide Network & Carrier Services, Issue 2b, December 1999* provides CLECs with standard completion intervals for different service types. In response to an error-free LSR, BellSouth delivers a Firm Order Confirmation (FOC). This FOC contains the DD by which BellSouth commits to completing the CLEC's service request. According to the *Interval Guide*, if a CLEC has requested a DDD no shorter than the standard interval, BellSouth will attempt to commit to the same DD[1].

Approximately 20% of KPMG Consulting LLC's (KCL's) transactions had a DD that was not compliant with the interval specified in the *Interval Guide*. In these instances, BellSouth's FOC DDs can be broken down as follows:

1) **BellSouth provided KCL with an FOC DD later than the LSR DDD for 15% of service requests receiving an FOC.** A table of these transactions appears below.

FOC DD Later than LSR DDD

PON	VER	CC	LSR DDD	FOC DD	DD - DDD (Business Days)	REQTYP ACT
307A122PEK100001	04	9994	12/20/99	12/21/99	1	AB/V
395A213PEM100001	00	9994	1/21/00	1/24/00	1	FB/A
406A213PTM100001	00	9991	12/14/99	12/15/99	1	FB/V
406A213PTM100004	00	9991	1/21/00	1/24/00	1	FB/V
419A223PTM100002	00	9991	12/20/99	12/21/99	1	FB/D
428A124PTJ100006	01	9994	12/24/99	12/27/99	1	MB/V
428X224PEJ101001	00	9994	2/15/00	2/16/00	1	MB/V

[1] "BellSouth will make every effort to accommodate service requests utilizing these intervals." From BellSouth's *Product & Service Interval Guide Network & Carrier Services, Issue 2b, December 1999, Page V*.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 38

PON	VER	CC	LSR DDD	FOC DD	DD – DDD (Business Days)	REQTYP ACT
603A224PTJ100002	00	9991	11/16/99	11/20/99	1	MB/D
326C222PEI100002	00	9992	1/26/00	1/28/00	2	BB/V
404A223PTM100001	03	9991	12/09/99	12/13/99	2	FB/V
444A214PEJ000002	00	9991	1/21/00	1/25/00	2	MB/D
445A124PEJ100003	00	9991	1/14/00	1/18/00	2	MB/D
603A224PTJ100004	00	9991	2/16/00	2/18/00	2	MB/D
604A224PEJ000003	00	9994	2/7/00	2/09/00	2	MB/V
605A214PTJ000004	00	9994	2/15/00	2/17/00	2	MB/V
309A222PTH100001	04	9994	12/23/99	12/28/99	3	AB/V
626A224PTJ101002	00	9991	1/06/00	1/11/00	3	MB/C
445D124PEJ100001	00	9991	12/14/99	12/20/99	4	MB/D
329A212PTI100003	00	9992	12/21/99	12/28/99	5	BB/V
433A124PEH100002	00	9991	12/22/99	12/29/99	5	MB/M
603A224PEJ100003	00	9991	1/19/00	1/26/00	5	MB/D
440A124PTJ000002	00	9991	11/30/99	12/21/99	15	MB/SS

2) **BellSouth provided KCL with an FOC DD earlier than the LSR DDD for 5% of service requests receiving an FOC.** A table of these transactions appears below.

FOC DD Earlier than LSR DDD

PON	VER	CC	LSR DDD	FOC DD	DD – DDD (Business Days)	REQTYP ACT
395A213PEM100001	01	9994	1/21/00	1/18/00	-3	FB/A
415A213PTM000001	00	9991	12/14/99	12/09/99	-3	FB/RS
452A216PTF100003	00	9991	12/22/99	12/17/99	-3	JB/R
626A224PTJ100002	04	9991	12/16/99	12/13/99	-3	MB/C
407A213PTM100003	03	9991	12/09/99	12/07/99	-2	FB/C
456A216PEF100002	00	9991	12/22/99	12/20/99	-2	JB/R
606A123PEM100004	00	9991	2/17/00	2/15/00	-2	FB/C
438A214PTJ000002	00	9991	2/15/00	2/14/00	-1	MB/SS

Impact

CLECs should be reasonably assured of receiving confirmed due dates (FOC DD) matching their requested due dates (LSR DDD) when the requests are interval-compliant. CLECs are likely to provide their customers with an anticipated service delivery date in line with BellSouth's standard intervals. The receipt of an FOC DD different than an LSR DDD will force a CLEC to notify their customers of this change. Late DDs may result in decreased customer satisfaction. (e.g. a new account is not established on time, directory assistance information is not available on time).

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 38

The occurrence of an FOC DD earlier than the LSR DDD places an additional burden on a CLEC. Early completion of the CLEC's order may result in a disruption to the end user's service, (e.g. service is suspended prior to the customer's requested date, a new account is established and billing initiated prior to the customer's requested date) which will result in decreased CLEC customer satisfaction. To move the DD back to the requested DDD, the CLEC would be forced to issue a supplemental service request.

AMENDED EXCEPTION

KCL reviewed the accuracy of FOC DDs provided for service requests submitted during a UNE functional re-test initiated on August 25, 2000.

Of the 197 FOCs[2] received during functional re-testing between August 28 and October 9, 2000, 17 (9%) contained DDs later than the DDD requested on the service request. Three of these orders were submitted using pre-order obtained DDDs, while the remaining 14 orders were submitted using service intervals obtained from BellSouth documentation.

The following table provides additional detail on the service orders receiving different Due Dates.

PON VER	CC	Order Type[3]	F/T	LSR DDD	FOC DD	DDD obtained via pre-orders	DDD obtained via Doc.	BellSouth Response
615R122PTH100005*00	9994	AB	Y	10/11/00	10/16/00		X	Disagree, PON processed in a timely manner. First available DD was mechanically assigned.
423R114PTJ100003*00	9994	MB	Y	9/26/00	9/27/00		X	Disagree, PON processed in a timely manner. First available DD was mechanically assigned.
428R124PEJ100001*00	9994	MB	Y	9/4/00	9/5/00		X	Disagree, PON processed in a timely manner. First available DD was mechanically assigned. LSR DDD was a Holiday.

[2] This total excludes those FOCs received for KCL LSRs submitted with Desired Due Dates less than the standard interval (i.e., KCL errors).

[3] AB = UNE Loop; MB = UNE Loop-Port Combination; FB = UNE Port.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 38

PON VER	CC	Order Type[4]	F/T	LSR DDD	FOC DD	DDD obtained via pre-orders	DDD obtained via Doc.	BellSouth Response
423R114PTJ100001*00	9994	MB	Y *	9/4/00	9/5/00		X	Disagree, PON processed in a timely manner. First available DD was mechanically assigned. LSR DDD was a Holiday.
444R214PTJ100001*00	9990	MB	Y *	9/4/00	9/5/00		X	Disagree, PON processed in a timely manner. First available DD was mechanically assigned. LSR DDD was a Holiday.
398R213PTM000001*00	9994	FB	N	8/30/00	9/5/00		X	Agree, service rep error. Rep covered 10/09/00. Interval Guide to be updated 12/15/00 to clarify interval.
398R213PTM000003*00	9994	FB	N	9/8/00	9/13/00		X	Agree, service rep error. Rep covered 10/09/00. Interval Guide to be updated 12/15/00 to clarify interval.
399R213PTM100002*00	9994	FB	N	9/8/00	9/13/00		X	Agree, service rep error. Rep covered 10/09/00. Interval Guide to be updated 12/15/00 to clarify interval.
404R223PTM101001*01	9994	FB	N	9/11/00	9/14/00		X	Agree, service rep error. Rep covered 10/09/00. Interval Guide to be updated 12/15/00 to clarify interval.
404R223PTM100002*00	9994	FB	N	9/19/00	9/25/00		X	Agree, service rep error. Rep covered 10/09/00. Interval Guide to be updated 12/15/00 to clarify interval.

[4] AB = UNE Loop; MB = UNE Loop-Port Combination; FB = UNE Port.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 38

PON VER	CC	Order Type[5]	F/T	LSR DDD	FOC DD	DDD obtained via pre-orders	DDD obtained via Doc.	BellSouth Response
399R213PEM100001*01	9994	FB	N	9/1/00	9/6/00		X	Agree, service rep error. Rep covered 10/09/00. Interval Guide to be updated 12/15/00 to clarify interval.
398R213PEM000002*00	9994	FB	N	9/8/00	9/13/00		X	Agree, service rep error. Rep covered 10/09/00. Interval Guide to be updated 12/15/00 to clarify interval.
409R223PEM100001*00	9994	FB	N	9/19/00	9/21/00		X	Agree, service rep error. Rep covered 10/09/00. Interval Guide to be updated 12/15/00 to clarify interval.
409R223PEM100001*01	9994	FB	N	9/19/00	9/21/00		X	Agree, service rep error. Rep covered 10/09/00. Interval Guide to be updated 12/15/00 to clarify interval.
428R124PTJ100003*00	9994	MB	Y	9/20/00	9/21/00	X		Disagree, PON processed in a timely manner. First available DD mechanically assigned.
395R213PEM100002*00	9994	FB	N	9/8/00	9/13/00	X		Agree, service rep error. Rep covered 10/09/00. Interval Guide to be updated 12/15/00 to clarify interval.
399R213PEM100003*00	9994	FB	N	9/26/00	9/28/00	X		Agree, service rep error. Rep covered 10/09/00. Interval Guide to be updated 12/15/00 to clarify interval.

Note: All Flow Through/Non-Flow Through classifications are based on *actual* designations from BellSouth-obtained flow through reports, with the exception of those marked by an *. For these orders, KCL was unable to obtain a flow through

[5] AB = UNE Loop; MB = UNE Loop-Port Combination; FB = UNE Port.

classification based on BellSouth reports and utilized *expected* flow-through designations derived from BellSouth documentation.

BellSouth Response

BellSouth has completed a thorough review of the Products & Services Interval Guide. This Guide will be updated on the BellSouth web site on 12/15/00. Process documents used by BellSouth service reps are reviewed and modified as needed to ensure consistency with the Guide.

CMVC item 10511 has been issued to align system functionality with the Products and Services Interval guide. The change is currently targeted for February, 2001.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 71

BELLSOUTH

November 3, 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 THIRD AMENDED RESPONSE TO EXCEPTION 71

E	A	NOT UNE To Calculate	POTS	3	4/5/00	4/10/00	3	7
E	A	NOT UNE To Calculate	POTS	3	4/6/00	4/11/00	3	7
E	A	NOT UNE To Calculate	POTS	3	4/7/00	4/12/00	3	7
E	A	NOT UNE To Calculate	POTS	1	4/7/00	4/10/00	1	4
E	A	NOT UNE To Calculate	POTS	1	4/7/00	4/10/00	1	4
E	A	NOT UNE To Calculate	POTS	2	4/7/00	4/11/00	2	4
E	A	NOT UNE To Calculate	POTS	2	4/7/00	4/11/00	2	4
E	T	NOT UNE To Calculate	POTS	1	4/7/00	4/10/00	1	4
E	W	NOT UNE To Calculate	ISDN	1	4/7/00	4/7/00	0	3
E	V	NOT UNE To Calculate	ISDN	1	4/10/00	4/11/00	1	16
E	W	NOT UNE To Calculate	ISDN	1	4/7/00	4/7/00	0	3
E	A	NOT UNE To Calculate	ISDN	1	4/7/00	4/10/00	1	16
E	C	NOT UNE To Calculate	ISDN	1	4/7/00	4/8/00	1	16
E	C	NOT UNE To Calculate	ISDN	1	4/7/00	4/8/00	1	16
E	C	NOT UNE To Calculate	POTS	2	4/10/00	4/12/00	2	4
E	C	NOT UNE To Calculate	POTS	2	4/10/00	4/11/00	1	4
E	C	NOT UNE To Calculate	POTS	2	4/10/00	4/12/00	2	4
E	C	NOT UNE To Calculate	POTS	2	4/10/00	4/12/00	2	4
B	V	LocalNumberPortability_NotComplexServices	POTS	2	2/18/00	2/28/00	6	5
C	D	LocalNumberPortability_NotComplexServices	POTS	1	2/18/00	2/29/00	7	5
C	V	LocalNumberPortability_NotComplexServices	POTS	5	2/22/00	3/15/00	16	5
C	V	LocalNumberPortability_NotComplexServices	POTS	1	2/22/00	3/15/00	16	5
F	A	UnbundledLocalSwitching_2WireAnalogPort	POTS	8	2/22/00	3/15/00	16	3
F	C	UnbundledLocalSwitching_2WireAnalogPort	POTS	5	2/18/00	2/28/00	6	3
F	SS	UnbundledLocalSwitching_2WireAnalogPort	POTS	3	2/18/00	2/28/00	6	3
F	D	UnbundledLocalSwitching_2WireAnalogPort	POTS	1	2/22/00	2/28/00	4	3
F	V	UnbundledLocalSwitching_2WireAnalogPort	POTS	1	2/18/00	2/28/00	6	3
A	A	UnbundledLoops	POTS	1	2/28/00	3/8/00	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'S THIRD AMENDED RESPONSE TO EXCEPTION 71

Amended Exception

KCL initiated an ordering functional re-test on August 25, 2000. During the re-test, KCL reviewed the service provisioning intervals returned in response to Calculate Due Date (CDD) requests against the intervals contained in BellSouth documentation.

KCL continued to observe discrepancies between the documented service intervals and those returned in response to CDD pre-orders. The majority of discrepancies occurred for UNE Loop-Port Combination accounts.

The following table presents the discrepancies encountered during re-testing.

REQ TYPE	ACT TYPE	UNE Product Type	ORDER TYPE	Num Lines	CDD Interval			Documented Interval
					Submit Date	Due Date	Days	Days
AB	C	Unbundled Loops	POTS	1	09/21/00	10/2/00	7	6
B	V	Unbundled Loops	POTS	6	10/02/00	10/16/00	9	7
J	R	O/S and DA UNEs	POTS	2	10/02/00	10/10/00	6	3
J	R	O/S and DA UNEs	POTS	2	10/02/00	10/6/00	4	3
J	R	O/S and DA UNEs	POTS	2	10/02/00	10/10/00	6	3
J	R	O/S and DA UNEs	POTS	1	10/02/00	10/10/00	6	3
M	A	Not a UNE to Calculate	POTS	1	09/20/00	9/25/00	3	4
M	A	Not a UNE to Calculate	POTS	1	09/28/00	10/10/00	6	4
M	C	Not a UNE to Calculate	POTS	3	09/06/00	9/11/00	3	7
M	C	Not a UNE to Calculate	POTS	3	09/20/00	9/25/00	3	7
M	C	Not a UNE to Calculate	POTS	3	10/02/00	10/10/00	6	7
M	C	Not a UNE to Calculate	POTS	3	10/02/00	10/9/00	5	7
M	C	Not a UNE to Calculate	POTS	1	10/02/00	10/10/00	6	7
M	C	Not a UNE to Calculate	POTS	1	10/02/00	10/12/00	8	7
M	C	Not a UNE to Calculate	POTS	2	09/14/00	9/20/00	4	7
M	C	Not a UNE to Calculate	POTS	2	10/02/00	10/9/00	5	7
M	D	Not a UNE to Calculate	POTS	2	10/02/00	10/10/00	6	4
M	D	Not a UNE to Calculate	POTS	2	09/20/00	9/25/00	3	4
M	D	Not a UNE to Calculate	POTS	2	10/02/00	10/9/00	5	4
M	M	Not a UNE to Calculate	POTS	2	08/28/00	9/8/00	3	4
M	V	Not a UNE to Calculate	POTS	2	09/28/00	9/25/00	3	4
M	V	Not a UNE to Calculate	POTS	2	09/20/00	9/27/00	5	4

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 71

BellSouth Response

REQ TYPE	ACT TYPE	RESPONSE
AB	C	The documented interval in the Products and Services Interval guide is "7" days which matches the response on the CDD interval
B	V	The number of days between 10/2 and 10/16 is 10 days which matches the CDD Interval
J	R	Reqtype J does not require a DD calculation, the interval is equal to 0 days.
M	A,C,D M,V	Using TAG 2.2.0.8 this combination would generate an "ILEC Exception, Invalid Data Exception – Invalid Data element: RSPROD, Error Code: TAG8008VAL, Msg. Text: RSPROD REQUIRED." You must run this test against 2.2.0.11 and populate the RSPROD field with a value of 31 or 32.

BELLSOUTH's THIRD AMENDED RESPONSE TO EXCEPTION 74

BELLSOUTH

October 26, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Performance Measures Evaluation test.

Exception:

BellSouth does not report certain Georgia Service Quality Measurements ("SQMs") at the levels of disaggregation specified in the *Service Quality Measurements Georgia Performance Reports*.

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

As part of the BellSouth-Georgia OSS Evaluation, KPMG is reviewing the adequacy and completeness of the process for reporting SQMs, as specified in the *SQM Georgia Performance Reports*.[2] KPMG is evaluating whether BellSouth reports performance measurement details at the levels of disaggregation specified in the *SQM Georgia Performance Reports*.

KPMG discovered that BellSouth does not report SQMs at the levels of disaggregation specified in the *SQM Georgia Performance Reports* for the SQMs in the table below.

Table 1: SQMs Reported by BellSouth with Missing Levels of Disaggregation

Service Domain	SQM Name	Levels of Disaggregation Missing from SQM Reports
Ordering	Reject Interval	Design, UNE Non-Design, UNE Loop without NP
Ordering	Firm Order Confirmation Timeliness	Design, UNE Non-Design, UNE Loop without NP
Provisioning	Service Order Accuracy	Dispatch/No Dispatch
Billing	Mean Time to Deliver Invoices	Interconnection
Maintenance & Repair	Missed Repair Appointments	PBX, CENTREX and ISDN, UNE 2 Wire Loop, UNE Loop Other, and UNE Other

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

[2] KPMG used BellSouth's *SQM Georgia Performance Reports, Version 10/22/99* as the basis for performing this test.

BELLSOUTH's THIRD AMENDED RESPONSE TO EXCEPTION 74

Service Domain	SQM Name	Levels of Disaggregation Missing from SQM Reports
Maintenance & Repair	Customer Trouble Report Rate	PBX, CENTREX and ISDN, UNE 2 Wire Loop, UNE Loop Other, and UNE Other
Maintenance & Repair	Maintenance Average Duration	PBX, CENTREX and ISDN, UNE 2 Wire Loop, UNE Loop Other, and UNE Other
Maintenance & Repair	Percent Repeat Troubles within 30 Days	PBX, CENTREX and ISDN, UNE 2 Wire Loop, UNE Loop Other, and UNE Other
Maintenance & Repair	Out of Service > 24 Hours	PBX, CENTREX and ISDN, UNE 2 Wire Loop, UNE Loop Other, and UNE Other

BellSouth Response

The SQM that KPMG received was the first attempt by BellSouth to produce a regional SQM document. The regional SQM reflected the measurements and disaggregations for all states. Each individual state report reflected only those levels of disaggregation ordered by that state's PSC. The regional SQM was updated on 5/15/00 to more clearly show the disaggregation levels for each state. BellSouth has furnished KPMG the October SQM that was Georgia specific reflecting the disaggregation ordered by the GA PSC.

BellSouth added an introduction on 5/19/00 to the SQM that explains that it is a regional document and that the state specific measures and disaggregations are noted in each section. These measures and disaggregations were based on GA and LA State orders for Performance Measurements and associated product disaggregations. BellSouth posted the introduction on the PMAP website at the end of May 2000.

KPMG will continue to attempt to replicate the test CLEC SQM reports for all months in which the KPMG test CLEC generated transactions. KPMG will replicate one month of the CLEC aggregate/ BellSouth Retail reports typically October 1999. If KPMG needs to re-test based upon an Exception, they will pick additional months of SQM reports to replicate, as appropriate.

To address the question of which levels of disaggregation BellSouth should have been reporting since October, for both the test CLEC and CLEC aggregate / BellSouth Retail reports, KPMG will use the SQM manuals BellSouth has been publishing, focusing on the May 15 SQM manual. Originally, the KPMG comparison of the reports with the October 22, 1999 SQM Manual resulted in Exception 74.

Except as noted above, BellSouth will not re-create any reports (in particular, the December 1999, January 2000, or February 2000 CLEC aggregate reports) according to the June 6 documented levels of disaggregation, nor is KPMG expanding replication activities to cover additional reports.

BELLSOUTH's THIRD AMENDED RESPONSE TO EXCEPTION 74

For statistical comparison, BellSouth will instruct KPMG on how to take the data they already have, and assign them to the levels of disaggregation in the June 6 document. This applies to both the test CLEC data, as well as the Retail data.
KPMG will meet with BellSouth programmers and other personnel as appropriate to discuss this mapping of data.

Since those results are usually zero, KPMG will not see the level of disaggregation reported in the *Average Jeopardy Notice Interval* for Jeopardy Notices for interconnection trunks. These trunks seldom experience facility delays. This statement will be added to the next version of the SQM, with the change noted in the version change log.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 78

BELLSOUTH

November 2, 2000

EXCEPTION REPORT

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

Initial Exception:

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

Background:

In response to a valid Local Service Request[1] (LSR), BellSouth returns a FOC. This FOC provides notification to the CLEC that its order is confirmed and provides a committed due date for completion of service provisioning. FOCs are generated for two types of service requests:

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

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

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

BellSouth Performance[3]: In response to LSRs submitted via TAG and EDI, BellSouth failed to deliver timely flow through FOCs.

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

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

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 78

- 83% of flow through FOCs were returned via the TAG interface within the specified timeframe[4].

- 87% of flow through FOCs were returned via the EDI interface within the specified timeframe[5].

The following tables provide a detailed breakdown of response time for flow through FOCs[6].

Flow Through FOC Timeliness Summary

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

Flow Through FOC Detail – Untimely TAG FOCs

PON	VER	CC	4-24 hrs	24-36 hrs	36-48 hrs	48-72 hrs
602A214PTJ100002	00	9991	X			
409A223PTM100001	05	9991		X		
603A224PTJ100004	00	9991			X	
409A223PTM100002	00	9991			X	
382A225PTH102002	00	9991			X	
403A223PTM000001	01	9994				X
309A222PTH100001	04	9994				X
407A213PTM100003	03	9991				X

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

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

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

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 78

Flow Through FOC Detail – Untimely EDI FOCs

PON	VER	CC	4-24 hrs	24-36 hrs	36-48 hrs	48-72 hrs
301A112PEH100008	03	9994	X			
428A124PEJ100010	00	9994	X			
453C126PEF100001	00	9991	X			
606A123PEM100002	00	9991		X		
409A223PEM100003	00	9991		X		
326C222PEI100002	00	9992				X
409X223PEM100004	00	9991				X

Amendment

KCL amended this exception to include the results of the Resale Functional Evaluation (PO&P-11). KCL experienced similar response timeliness problems with the delivery of Flow-Through Firm Order Confirmations (FT FOCs) on Resale service requests as those uncovered during the initial UNE evaluations (O&P-1 and O&P-2).

Of the service requests submitted via the EDI interface, 76% of FT FOCs were received within three hours7. The remaining 24% were received within 10 hours.

<3 hrs	3-4 hrs	4-5 hrs	5-10 hrs	TOTAL
62	9	3	8	82
75.6%	11.0%	3.7%	9.8%	100%
	Total Late = 24.4%			

The following table provides detail on the late FT FOCs received.

PON	VER	CC	LSR Sent	FOC				
R013H12PEN100001	00	9992	5/1/2000 5:02:54 PM	5/1/2000 8:20:55 PM	X			Disagree, BellSouth sent the FOC at 19.13 which is 2hrs and 58 mins from the received time of 16.15
R027B11PEN000003	00	9990	3/29/2000 4:32:18 PM	3/29/2000 8:12:34 PM	X			Disagree, BellSouth sent the FOC at 18.45 which is 1hr and 39 mins from the received time of 17.06

[7] The Georgia Public Service Commission (GPSC) standard for purposes of this evaluation, adopted on June 6, 2000, is 95% of FT FOCs received within 3 hours.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 78

PON	V	C	[illegible]	[illegible]				
R001A12PEN100003	00	9990	2/28/2000 4:17:47 PM	2/28/2000 7:19:24 PM	X			Disagree, BellSouth sent the FOC at 16.48 which is 18 mins from the received time of 16.30
R005E22PEN100003	00	9990	2/28/2000 4:18:57 PM	2/28/2000 7:19:24 PM	X			Disagree, BellSouth sent the FOC at 16.48 which is 18 mins from the received time of 16.30
R005A12PEN100003	00	9992	3/17/2000 4:47:48 PM	3/17/2000 8:18:15 PM	X			Disagree, BellSouth sent the FOC at 16.26 which is 26 mins from the received time of 16.00
R005A12PEN100004	00	9992	3/17/2000 4:50:23 PM	3/17/2000 8:18:15 PM	X			Disagree, BellSouth sent the FOC at 16.17 which is 17 mins from the received time of 16.00
R011C22PEN100012	01	9992	5/18/2000 5:11:15 PM	5/18/2000 9:00:50 PM	X			Disagree, BellSouth sent the FOC at 19.33 which is 2 hrs and 47 mins form the received time of 16.46
R017A11PEN000005	00	9991	3/29/2000 4:30:35 PM	3/29/2000 8:05:15 PM	X			Disagree, BellSouth sent the FOC at 17.47 which is 41 mins from the received time of 17.06
R013A12PEN100001	00	9990	3/30/2000 11:09:15am	3/30/2000 2:53:10 PM	X			Disagree, BellSouth sent the FOC at 13.12 which is 41 mins from the received time of 12.00
R001X12PEN100001	00	9990	2/24/2000 2:16:12 PM	2/24/2000 6:33:51 PM		X		Disagree, BellSouth sent the FOC at 16.41. which is 2hrs and 41 mins from the received time of 14.00

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 78

PON	VER	FOC	LSR Sent	FOC Sent				
R013A22PEN100001	01	9991	2/25/2000 8:57:11 AM	2/25/2000 2:57:31 PM		X		Disagree, BellSouth sent the FOC at 11.26 which is 26 mins from the received time of 11.00
R005A12PEN100007	00	9992	3/17/2000 4:56:46 PM	3/17/2000 9:56:10 PM		X		Disagree, BellSouth sent the FOC at 19.47 which is 17 mins from the received time of 19.30
R001A21PEN100001	00	9990	2/18/2000 1:22:58 PM	2/18/2000 9:56:36 PM			X	Disagree, BellSouth sent the FOC at 20.01 which is 25 mins from the received time of 20.26
R005E22PEN100001	00	9991	2/18/2000 1:26:55 PM	2/18/2000 10:34:55 PM			X	Disagree, BellSouth sent the FOC at 20.32 which is 31 mins from the received time of 20.01
R010A12PEN100003	00	9991	2/18/2000 1:30:32 PM	2/18/2000 9:56:36 PM			X	Disagree, BellSouth sent the FOC at 20.26 which is 25 mins from the received time of 20.01
R027A11PEN100005	00	9991	2/18/2000 1:37:40 PM	2/18/2000 9:56:36 PM			X	Disagree, BellSouth sent the FOC at 20.26 which is 25 mins from the received time of 20.01
R001A12PEN100001	00	9991	2/18/2000 3:53:05 PM	2/18/2000 9:56:36 PM			X	Disagree, BellSouth sent the FOC at 20.26 which is 25 mins from the received time of 20.01
R017D11PEN100003	00	9991	2/25/2000 8:38:30 AM	2/25/2000 2:57:31 PM			X	Disagree, BellSouth sent the FOC at 11.26 which is 49 mins from the received time of 10.37

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 78

TEST RUN								
R005A12PEN100010	00	9992	3/17/2000 5:00:34 PM	3/18/2000 4:17:57 AM			X	Disagree, BellSouth sent the FOC at 20.56 which is 1 hr and 26 mins from the received time of 19.30
R005A22PEN100002	02	9993	3/27/2000 2:59:10 PM	3/28/2000 12:00:44 AM			X	Disagree, BellSouth sent the FOC at 15.32 which is 1 hr and 2 mins from the received time of 14.30

Impact

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

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

BellSouth Response

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

BELLSOUTH'S SIXTH AMENDED RESPONSE TO EXCEPTION 88

BELLSOUTH

October 27, 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.

BellSouth Response

BellSouth publishes an updated PMAP Raw Data User Manual (RDUM) in conjunction with each new release of system software, e.g. an updated manual was posted to the PMAP website in conjunction with the 10/1/00 release of PMAP 2.0.10. Each manual is identified with a version number that matches the PMAP release that it supports. In addition, updated manuals are published to the Internet by the 15th of the month when corrections are needed that impact the CLEC's ability to replicate SQMs. In these cases, the updated RDUMs are labeled with the PMAP version number and the issue date. Each manual contains a log showing the changes reflected in that version of the manual, as well as a cumulative log of the changes included in previous versions of the manual.

Amended Exception 88 identified omissions to the Release 2.0.4 RDUM version change log. These omissions were corrected in the Version 2.0.8 manual posted to the PMAP website 9/25/00. These version change log omissions were:

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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 SIXTH AMENDED RESPONSE TO EXCEPTION 88

Version 2.0.4 - Additional Changes/Corrections previously omitted from Log
(**Note**: S2 = Step 2, S7 = Step 7, etc.)

RDUM Section III – Instructions changed in the following reports:

- Ordering:
  - % Rejected Service Requests (S2)
  - FOC Timeliness – Non-Trunks (S2, S3)
  - FOC Timeliness Trunks (S3)
  - Reject Interval (S2, S3)
- Provisioning:
  - % Missed Installation Appointments (S2, S5, S7 grammar, S8, S9)
  - % Missed Installation Appointments – Trunks (S2, S6, S8, S9 typo, S10 typo)
  - Troubles Within 30 Days of Provisioning - Non Trunks (S2, S4, S7)
  - Troubles Within 30 Days of Provisioning - Trunks (S2, S4, S7, S10 typo)
  - Held Order Interval (S6, S7, S8 and S9)
  - Held Order Interval – Trunks (S6, S7, S8)
  - Order Completion Interval (S2, S6 typo)
  - Order Completion Interval – Trunks (S2, S6 typo on field name)
  - Average Completion Notice Interval (S2 format, S3, S5)
  - Jeopardy Interval & Percent Jeopardy (S7)
  - Total Service Order Cycle Time (S2, S4 typo, S5, Reference table after Steps)
- Maintenance and Repair:
  - Customer Trouble report Rate (S6)
  - Missed Repair Appointments (S5-S7)

RDUM Section IV

- Ordering – FOC Timeliness (cmpltn_dt – description changed)
- Ordering – FOC Timeliness – Trunks (cmpltn_dt – description changed)
- Ordering – Reject Interval and Percent Rejected by Interval (cmpltn_dt – description changed)
- Ordering – Service Orders (cmpltn_dt – description changed)
- Provisioning – Held Orders (cmpltn_dt – description changed)
- Provisioning – Order Completion Interval Distribution
  - so_missed_cmtt_cd - description changed
  - so_missed_cmtt_desc - description changed
  - cmpltn_dt – description changed
- Provisioning - Order Completion Interval Distribution – Trunks
  - so_missed_cmtt_cd - description changed
  - so_missed_cmtt_desc - description changed
  - cmpltn_dt – description changed
- Provisioning – Percent Missed Installation Appointments (cmpltn_dt – description changed)
- Provisioning – Percent Missed Installation Appointments – Trunks (cmpltn_dt – description changed)
- Provisioning – Troubles Within 30 Days of Provisioning – Trunks (cmpltn_dt – description changed)

BELLSOUTH'S SIXTH AMENDED RESPONSE TO EXCEPTION 88

- Provisioning – Troubles Within 30 Days of Provisioning (cmpltn_dt – description changed)
- Provisioning – Jeopardy Interval (cmpltn_dt – description changed)
- Provisioning – ACNI (cmpltn_dt – description changed)
- Provisioning – TSOCT (cmpltn_dt – description changed)

BELLSOUTH'S SEVENTH AMENDED RESPONSE TO EXCEPTION 88

BELLSOUTH

November 2, 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.

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 part of the response to this Exception.

This document fixed responsibility for updating the Raw Data Users Manual and maintaining contact with the data owners. In the future, the Raw Data Users Manual will be updated each time the SQM is updated. SMEs and the programmers have been notified of these changes. The change requests must be properly annotated before they

[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.

are closed. Examples of correctly annotated Change Requests were sent to KPMG as part of the response to the initial exception.

BellSouth publishes an updated PMAP Raw Data User Manual (RDUM) in conjunction with each new release of system software, e.g. an updated manual was posted to the PMAP website in conjunction with the 10/1/00 release of PMAP 2.0.10. Each manual is identified with a version number that matches the PMAP release that it supports. In addition, updated manuals are published to the Internet by the 15th of the month when corrections are needed that impact the CLEC's ability to replicate SQMs. In these cases, the updated RDUMs are labeled with the PMAP version number and the issue date. Each manual contains a log showing the changes reflected in that version of the manual, as well as a cumulative log of the changes included in previous versions of the manual.

Amended Exception 88 identified omissions to the Release 2.0.4 RDUM version change log. These omissions were corrected in the Version 2.0.8 manual posted to the PMAP website 9/25/00. These version change log omissions were:

Version 2.0.4 - Additional Changes/Corrections previously omitted from Log
(**Note**: S2 = Step 2, S7 = Step 7, etc.)

RDUM Section III – Instructions changed in the following reports:

- Ordering:
  - % Rejected Service Requests (S2)
  - FOC Timeliness – Non-Trunks (S2, S3)
  - FOC Timeliness Trunks (S3)
  - Reject Interval (S2, S3)
- Provisioning:
  - % Missed Installation Appointments (S2, S5, S7 grammar, S8, S9)
  - % Missed Installation Appointments – Trunks (S2, S6, S8, S9 typo, S10 typo)
  - Troubles Within 30 Days of Provisioning - Non Trunks (S2, S4, S7)
  - Troubles Within 30 Days of Provisioning - Trunks (S2, S4, S7, S10 typo)
  - Held Order Interval (S6, S7, S8 and S9)
  - Held Order Interval – Trunks (S6, S7, S8)
  - Order Completion Interval (S2, S6 typo)
  - Order Completion Interval – Trunks (S2, S6 typo on field name)
  - Average Completion Notice Interval (S2 format, S3, S5)
  - Jeopardy Interval & Percent Jeopardy (S7)
  - Total Service Order Cycle Time (S2, S4 typo, S5, Reference table after Steps)
- Maintenance and Repair:
  - Customer Trouble report Rate (S6)
  - Missed Repair Appointments (S5-S7)

RDUM Section IV

- Ordering – FOC Timeliness (cmpltn_dt – description changed)
- Ordering – FOC Timeliness – Trunks (cmpltn_dt – description changed)

BELLSOUTH'S SEVENTH AMENDED RESPONSE TO EXCEPTION 88

- Ordering – Reject Interval and Percent Rejected by Interval (cmpltn_dt – description changed)
- Ordering – Service Orders (cmpltn_dt – description changed)
- Provisioning – Held Orders (cmpltn_dt – description changed)
- Provisioning – Order Completion Interval Distribution
    - so_missed_cmtt_cd - description changed
    - so_missed_cmtt_desc - description changed
    - cmpltn_dt – description changed
- Provisioning - Order Completion Interval Distribution – Trunks
    - so_missed_cmtt_cd - description changed
    - so_missed_cmtt_desc - description changed
    - cmpltn_dt – description changed
- Provisioning – Percent Missed Installation Appointments (cmpltn_dt – description changed)
- Provisioning – Percent Missed Installation Appointments – Trunks (cmpltn_dt – description changed)
- Provisioning – Troubles Within 30 Days of Provisioning – Trunks (cmpltn_dt – description changed)
- Provisioning – Troubles Within 30 Days of Provisioning (cmpltn_dt – description changed)
- Provisioning – Jeopardy Interval (cmpltn_dt – description changed)
- Provisioning – ACNI (cmpltn_dt – description changed)
- Provisioning – TSOCT (cmpltn_dt – description changed)

BELLSOUTH'S STATEMENT OF INVESTIGATION FOR EXCEPTION 113

BELLSOUTH

October 3, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Data Comparison test for Ordering & Provisioning service quality measurements (SQMs).

Exception:

BellSouth-reported raw data values for Commitment Date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Service Order numbers and Purchase Order numbers for six Provisioning metrics.

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, 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 each of the Provisioning metrics – *Mean Held Order Interval and Distribution Intervals, Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices, Percent Missed Installation Appointments, Average Completion Interval / Order Completion Interval Distribution, Average Completion Notice Interval,* and *Total Service Order Cycle Time* – KCL compared the BellSouth-reported values for COMMITMENT DATE in the raw data files with the due date (commitment date)[2] that KCL received from Hewlett Packard for March, April, and May 2000.

KCL could not match the BellSouth-reported values in these fields with the corresponding KCL-collected values for certain service order numbers and purchase order numbers. The table below shows the specific discrepancies for Commitment Date.

COMMITMENT DATE

PON	SO_NBR	MONTH	BLS-REPORTED VALUE	KCL-REPORTED[3] VALUE

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

[2] Commitment Date is the due date indicated in the FOC that is received by HP and provided to KCL.

[3] These values are contained in response files provided to KCL by HP.

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 November, 2000.

David Frey

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EXECUTIVE SECRETARY
G.P.S.C.

December 5, 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

Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of KPMG Consulting LLC's Exception 38 (3rd Amended); Exception 47 Statement of Re-Opening; Exception 71 (2nd Amended); Exception 77 (Amended); Exception 113 (Amended); and Exception 114 (2nd Amended). Please also find enclosed the following responses from BellSouth: Exception 24 Amended Response; Exception 60 2nd Amended Response with accompanying Excel file; Exception 68 Amended Response; Exception 71 4th Amended Response; Exception 78 4th Amended Response with accompanying Excel file; Exception 86 7th Amended Response; Exception 89 11th Amended Response; Exception 89 12th Amended Response; Exception 92 7th Amended Response; Exception 98 Amended Response; Exception 108 4th Amended Response; Exception 111 Amended Response; Exception 113 Response; and Exception 113 Amended Response.

We request that these documents be filed 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: November 22, 2000

EXCEPTION REPORT

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

Exception:

BellSouth does not consistently provide CLECs with a service Due Date (DD) matching their Desired Due Date (DDD).

When issuing Local Service Requests (LSRs), CLECs are required to input a DDD for service completion. BellSouth's *Product & Service Interval Guide Network & Carrier Services, Issue 2b, December 1999* provides CLECs with standard completion intervals for different service types. In response to an error-free LSR, BellSouth delivers a Firm Order Confirmation (FOC). This FOC contains the DD by which BellSouth commits to completing the CLEC's service request. According to the *Interval Guide*, if a CLEC has requested a DDD no shorter than the standard interval, BellSouth will attempt to commit to the same DD[1].

Approximately 20% of KPMG's transactions had a DD that was not compliant with the interval specified in the *Interval Guide*. In these instances, BellSouth's FOC DDs can be broken down as follows:

1) **BellSouth provided KPMG with an FOC DD later than the LSR DDD for 15% of service requests receiving an FOC.** A table of these transactions appears below.

FOC DD Later than LSR DDD

PON	VER	CC	LSR DDD	FOC DD	DD – DDD (Business Days)	REQTYP ACT
307A122PEK100001	04	9994	12/20/99	12/21/99	1	AB/V
395A213PEM100001	00	9994	1/21/00	1/24/00	1	FB/A
406A213PTM100001	00	9991	12/14/99	12/15/99	1	FB/V
406A213PTM100004	00	9991	1/21/00	1/24/00	1	FB/V
419A223PTM100002	00	9991	12/20/99	12/21/99	1	FB/D
428A124PTJ100006	01	9994	12/24/99	12/27/99	1	MB/V
428X224PEJ101001	00	9994	2/15/00	2/16/00	1	MB/V

[1] "BellSouth will make every effort to accommodate service requests utilizing these intervals." From BellSouth's *Product & Service Interval Guide Network & Carrier Services, Issue 2b, December 1999, Page V*

PON	VER	CC	LSR DDD	FOC DD	DD – DDD (Business Days)	REQTYP ACT
603A224PTJ100002	00	9991	11/16/99	11/20/99	1	MB/D
326C222PEI100002	00	9992	1/26/00	1/28/00	2	BB/V
404A223PTM100001	03	9991	12/09/99	12/13/99	2	FB/V
444A214PEJ000002	00	9991	1/21/00	1/25/00	2	MB/D
445A124PEJ100003	00	9991	1/14/00	1/18/00	2	MB/D
603A224PTJ100004	00	9991	2/16/00	2/18/00	2	MB/D
604A224PEJ000003	00	9994	2/7/00	2/09/00	2	MB/V
605A214PTJ000004	00	9994	2/15/00	2/17/00	2	MB/V
309A222PTH100001	04	9994	12/23/99	12/28/99	3	AB/V
626A224PTJ101002	00	9991	1/06/00	1/11/00	3	MB/C
445D124PEJ100001	00	9991	12/14/99	12/20/99	4	MB/D
329A212PTI100003	00	9992	12/21/99	12/28/99	5	BB/V
433A124PEH100002	00	9991	12/22/99	12/29/99	5	MB/M
603A224PEJ100003	00	9991	1/19/00	1/26/00	5	MB/D
440A124PTJ000002	00	9991	11/30/99	12/21/99	15	MB/SS

2) **BellSouth provided KPMG with an FOC DD earlier than the LSR DDD for 5% of service requests receiving an FOC.** A table of these transactions appears below.

FOC DD Earlier than LSR DDD

PON	VER	CC	LSR DDD	FOC DD	DD – DDD (Business Days)	REQTYP ACT
395A213PEM100001	01	9994	1/21/00	1/18/00	-3	FB/A
415A213PTM000001	00	9991	12/14/99	12/09/99	-3	FB/RS
452A216PTF100003	00	9991	12/22/99	12/17/99	-3	JB/R
626A224PTJ100002	04	9991	12/16/99	12/13/99	-3	MB/C
407A213PTM100003	03	9991	12/09/99	12/07/99	-2	FB/C
456A216PEF100002	00	9991	12/22/99	12/20/99	-2	JB/R
606A123PEM100004	00	9991	2/17/00	2/15/00	-2	FB/C
438A214PTJ000002	00	9991	2/15/00	2/14/00	-1	MB/SS

Impact

CLECs should be reasonably assured of receiving confirmed due dates (FOC DD) matching their requested due dates (LSR DDD) when the requests are interval-compliant. CLECs are likely to provide their customers with an anticipated service delivery date in line with BellSouth's standard intervals. The receipt of an FOC DD different than an LSR DDD will force a CLEC to notify their customers of this change. Late DDs may result in

decreased customer satisfaction. (e.g. a new account is not established on time, directory assistance information is not available on time).

The occurrence of an FOC DD earlier than the LSR DDD places an additional burden on a CLEC. Early completion of the CLEC's order may result in a disruption to the end user's service, (e.g. service is suspended prior to the customer's requested date, a new account is established and billing initiated prior to the customer's requested date) which will result in decreased CLEC customer satisfaction. To move the DD back to the requested DDD, the CLEC would be forced to issue a supplemental service request.

AMENDED EXCEPTION (October 28, 2000)

KPMG reviewed the accuracy of FOC DDs provided on service requests submitted during a UNE functional re-test initiated on August 25, 2000.

Of the 197 FOCs[2] received during functional re-testing between August 28 and October 9, 2000, 17 (9%) contained DDs later than the DDD requested on the service request. One of these orders were submitted using pre-order obtained DDDs, while the remaining 16 orders were submitted using service intervals obtained from BellSouth documentation.

KCL performed an upgrade from TAG Version 2.2.0.8 to TAG Version 2.2.0.11 on October 5, 2000. The majority of pre-order and order transactions highlighted below were transmitted via Version 2.2.0.8.

The following table provides additional detail on the service orders receiving different Due Dates.

PON VER	CC	Order Type	Flow Through	LSR DDD	FOC DD	DDD obtained via pre-orders	DDD obtained via Documentation
615R122PTH100005*00	9994	AB/C	Y	10/11/00	10/16/00		X
423R114PTJ100003*00	9994	MB/V	Y	9/26/00	9/27/00		X
428R124PEJ100001*00	9994	MB/V	Y	9/4/00	9/5/00		X
423R114PTJ100001*00	9994	MB/V	Y *	9/4/00	9/5/00		X
444R214PTJ100001*00	9990	MB/D	Y *	9/4/00	9/5/00		X
398R213PTM000001*00	9994	FB/V	N	8/30/00	9/5/00		X
398R213PTM000003*00	9994	FB/V	N	9/8/00	9/13/00		X
399R213PTM100002*00	9994	FB/V	N	9/8/00	9/13/00		X
404R223PTM101001*01	9994	FB/V	N	9/11/00	9/14/00		X
404R223PTM100002*00	9994	FB/V	N	9/19/00	9/25/00		X
399R213PEM100001*01	9994	FB/V	N	9/1/00	9/6/00		X
398R213PEM000002*00	9994	FB/V	N	9/8/00	9/13/00		X

[2] This total excludes those FOCs received on KPMG LSRs submitted with Desired Due Dates less than the standard interval (i.e., KPMG errors).

PON VER	CC	Order Type	Flow Through	LSR DDD	FOC DD	DDD obtained via pre-orders	DDD obtained via Documentation
409R223PEM100001*00	9994	FB/C	N	9/19/00	9/21/00		X
409R223PEM100001*01	9994	FB/C	N	9/19/00	9/21/00		X
428R124PTJ100003*00	9994	MB/V	Y	9/20/00	9/21/00		X
395R213PEM100002*00	9994	FB/A	N	9/8/00	9/13/00		X
399R213PEM100003*00	9994	FB/V	N	9/26/00[3]	9/28/00	X	

Note: All Flow Through/Non-Flow Through classifications are based on *actual* designations from BellSouth-obtained flow through reports, with the exception of those marked by a *. For these orders, KPMG was unable to obtain a flow through classification based on BellSouth reports and utilized *expected* flow-through designations derived from BellSouth documentation.

[3] For this transaction, the LSR was submitted within 30 minutes following the receipt of the associated pre-order responses. The Appointment Availability pre-order used indicated an "unavailable date" of 9/26/00. The correct input for the corresponding LSR DDD should have been 9/27/00 (the next available due date). BLS returned a FOC DD of 9/28/00.

AMENDED EXCPETION (November 22,2000)

KCL is amending this exception to:

a) Include the final results of the UNE functional re-test initiated on August 25, 2000.
b) Include results from the Resale Functional Evaluation (PO&P-11).

UNE Re-Test[4]

Of the 287 FOCs[5] received during functional re-testing between August 28 and November 15, 2000:

- 23 (8%) contained DDs different than the DDD requested on the LSR.
  - 19 (7%) of DDs were later than the DDD
  - 4 (1%) of DDs were earlier than the DDD.

The following table provides additional detail on the UNE Re-Test service orders receiving different Due Dates.

UNE Re-Test

PON VER	CC	Order Type	Flow Through	LSR DDD	FOC DD	DDD obtained via pre-orders	DDD obtained via Documentation
PONs from previous exception							
615R122PTH100005*00	9994	AB/C	Y	10/11/00	10/16/00		X
423R114PTJ100003*00	9994	MB/V	Y	9/26/00	9/27/00		X
398R213PTM000001*00	9994	FB/V	N	8/30/00	9/5/00		X
398R213PTM000003*00	9994	FB/V	N	9/8/00	9/13/00		X
399R213PTM100002*00	9994	FB/V	N	9/8/00	9/13/00		X
404R223PTM101001*01	9994	FB/V	N	9/11/00	9/14/00		X
404R223PTM100002*00	9994	FB/V	N	9/19/00	9/25/00		X
399R213PEM100001*01	9994	FB/V	N	9/1/00	9/6/00		X

[4] KCL performed an upgrade from TAG Version 2.2.0.8 to TAG Version 2.2.0.11 on October 5, 2000. The majority of pre-order and order transactions highlighted in the UNE Re-test table were transmitted via Version 2.2.0.8.

[5] This total excludes those FOCs received on KPMG LSRs submitted with Desired Due Dates less than the standard interval (i.e., KPMG errors).

PON VER	CC	Order Type	Flow Through	LSR DDD	FOC DD	DDD obtained via pre-orders	DDD obtained via Documentation
398R213PEM000002*00	9994	FB/V	N	9/8/00	9/13/00		X
409R223PEM100001*00	9994	FB/C	N	9/19/00	9/21/00		X
409R223PEM100001*01	9994	FB/C	N	9/19/00	9/21/00		X
428R124PTJ100003*00	9994	MB/V	Y	9/20/00	9/21/00		X
395R213PEM100002*00	9994	FB/A	N	9/8/00	9/13/00		X
399R213PEM100003*00	9994	FB/V	N	9/26/00[6]	9/28/00	X	
PONs added to this amended exception							
320R212PEH100019*01	9994	AB/T	N	11/13/00	11/2/00		X
302R312PEH000003*00	9994	AB/A	N	10/23/00	10/30/00	X	
435R114PEJ001003*00	9990	MB/T	N	10/25/00	10/30/00	X	
615R122PTH001004*02	9994	AB/A	Y	10/31/00	10/24/00		X
511R212PTH000004*02	9994	AB/V	Y	10/6/00	10/5/00		X
301R112PTH001003*00	9994	AB/A	N*	11/20/00	11/22/00		X
404R223PTM102001*00	9994	FB/V	N	10/13/00	10/17/00		X
615R122PTH001004*00	9994	AB/A	Y	10/19/00	10/24/00	X	

Note: All Flow Through/Non-Flow Through classifications are based on *actual* designations from BellSouth-obtained flow through reports, with the exception of those marked by a *. For these orders, KPMG was unable to obtain a flow through classification based on BellSouth reports and utilized *expected* flow-through designations derived from BellSouth documentation.

Resale Test

Of the 259 FOCs[7] received during the Resale Evaluation,

[6] For this transaction, the LSR was submitted within 30 minutes following the receipt of the associated pre-order responses. The Appointment Availability pre-order used indicated an "unavailable date" of 9/26/00. The correct input for the corresponding LSR DDD should have been 9/27/00 (the next available due date). BLS returned a FOC DD of 9/28/00.

[7] This total excludes those FOCs received on KPMG LSRs submitted with Desired Due Dates less than the standard interval (i.e., KPMG errors).

- 38 (15%) contained DDs different than the DDD requested on the LSR.
  - 14 (5%) of DDs were later than the DDD
  - 24 (9%) were earlier than the DDD.

The following table provides additional detail on the Resale Evaluation service orders receiving different Due Dates.

Resale

PON VER	CC	Order Type	Flow Through	LSR DDD	FOC DD	DDD obtained via pre-orders	DDD obtained via Documentation
R041B21PEN100003*00	9990	EB/A	Y	4/28/00	5/1/00	X	
R005A12PEN100012*00	9992	EB/V	Y	5/4/00	5/8/00	X	
R001A11PEN100002*00	9993	EB/W	N	3/17/00	3/20/00		X
R005E22PEN100003*00	9990	EB/V	Y	3/3/00	3/6/00		X
R001A21PEN100003*00	9991	EB/W	Y	2/24/00	2/28/00		X
R001X12PEN100002*00	9993	EB/W	Y	4/24/00	4/25/00		X
R017A11PEN000005*00	9991	EB/D	Y	3/31/00	4/4/00		X
R015A12PEN100002*00	9991	EB/C	N	2/29/00	3/1/00		X
R035A12PTN000010*00	9990	EB/W	N	4/26/00	4/27/00	X	
R036A21PTN100004*00	9990	EB/W	N	5/5/00	5/8/00	X	
R010A11PTN100011*01	9991	EB/C	N	5/11/00	5/13/00	X	
R001A11PTN100001*00	9993	EB/W	N	3/17/00	3/20/00		X
R029A21PTN001032*02	9993	EB/A	Y	6/6/00	6/8/00		X
R011F12PTN100015*00	9992	EB/C	Y	3/24/00	3/27/00		X
R028D11PEN000002*02	9990	EB/RS	Y	3/28/00	3/21/00		X
R025A11PEN100009*00	9992	EB/M	N	3/21/00	3/20/00		X
R025A11PEN100005*00	9992	EB/M	N	3/23/00	3/22/00		X
R025A11PEN100003*00	9992	EB/M	N	3/21/00	3/17/00		X
R025A11PEN100001*02	9992	EB/M	N	3/21/00	3/17/00		X

PON VER	CC	Order Type	Flow Through	LSR DDD	FOC DD	DDD obtained via pre-orders	DDD obtained via Documentation
R010A21PEN100004*02	9993	EB/C	N	3/25/00	3/21/00		X
R010C11PEN100001*01	9991	EB/C	Y	5/16/00	5/15/00		X
R011A21PEN000002*01	9991	EB/C	N	6/3/00	5/26/00		X
R018A21PEN000008*00	9991	EB/C	N	3/17/00	3/11/00		X
R025X11PTN100002*01	9991	EB/M	Y	3/20/00	3/18/00		X
R010A11PTN100005*01	9992	EB/C	N	3/29/00	3/28/00		X
R010A21PTN100001*04	9993	EB/C	N	4/4/00	3/29/00		X
R011A21PTN000001*00	9991	EB/C	N	5/25/00	5/23/00		X
R006C22PTN001001*00	9992	EB/V	N	4/28/00	4/24/00		X
R002A21PTN100001*05	9992	EB/V	N	3/27/00	3/23/00		X
R017D11PTN100005*02	9991	EB/D	N	3/23/00	3/20/00		X
R018A21PTN000007*00	9991	EB/C	N	3/17/00	3/11/00		X
R018B21PTN000002*00	9990	EB/C	N	3/21/00	3/15/00		X
R025A11PTN100002*00	9992	EB/M	N	3/23/00	3/21/00		X
R025A11PTN100004*00	9992	EB/M	N	3/21/00	3/17/00		X
R025A11PTN100006*00	9992	EB/M	N	3/23/00	3/21/00		X
R025A11PTN100008*00	9992	EB/M	N	3/21/00	3/20/00		X
R025A11PTN100010*00	9992	EB/M	N	3/23/00	3/21/00		X
R025X11PTN100002*00	9991	EB/M	N	3/20/00	3/18/00		X

KPMG Consulting

EXCEPTION 47 STATEMENT OF RE-OPENING

BellSouth Georgia OSS Testing Evaluation

Date: November 13, 2000

KPMG re-opens Exception 47.

Background: On September 22, 2000 KPMG Consulting (KCL) filed a closure report for Exception 47 with the Georgia Public Service Commission. The title of the exception was:

BellSouth delivered inaccurate partially-mechanized CLRs.

In its closure report for Exception 47, KCL noted the following:

BLS Training: "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."
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. BellSouth subsequently generated confirmations for these transactions following a review requested by KPMG. This percentage of inaccurate CLRs did not significantly affect KCL's ability to proceed with its ordering processes."

Statement of Re-Opening for Exception 47:
KCL initiated a functional re-test on August 25, 2000. While the purpose of the re-test was not to measure CLR accuracy, KCL noted a growing number of inaccurate error messages received during testing. For partially-mechanized clarifications received between August 25 and November 9, 2000, KCL determined nearly 10% to be inaccurate. The following table provides detail on these responses.

PON VER CC	Date of Error	Error Description	KCL Comments
432R214PEJ000001*00 9990	8/28/00	"Invalid ACT Type for Outside Move....KMX1773 8-28-00"	Service request was submitted for an Inside Move. ACT TYPE was correct according to *LEO Guide Volume 1* Business Rules.
329R212PEI001001*03 7727	9/6/00	"You only address 3 of the 4 telephone #s on the CSR. Is 706 722-6533 remaining with Bell or being	Following the guidelines outlined in a BLS Carrier Notification SN91081619, KCL provided the new BTN in the REMARKS section of

EXCEPTION 47 STATEMENT OF RE-OPENING

BellSouth Georgia OSS Testing Evaluation

PON, VER, CC	Date of Error	Error Description	Resolution
		disconnected?"	the LSR.
349R212PEI000003*00 7050	9/21/00	"Process Manually: Not all numbers on CSR are being ported out."	KCL was issuing a service request for a partial migration; not all of the customer's TNs are required to be addressed on an LSR.
353R212PEI001001*01 7727	11/07/00	"Process Manually: Not all numbers on CSR are being ported out."	KCL was issuing a service request for a partial migration; not all of the customer's TNs are required to be addressed on an LSR. Electronic submission of these orders should be allowed.
353R212PEI001003*00 7727	11/10/00	"Process Manually: Not all numbers on CSR are being ported out."	KCL was issuing a service request for a partial migration; not all of the customer's TNs are required to be addressed on an LSR. Electronic submission of these orders should be allowed.
318R112PEH101007*00 9994	11/10/00	"CLARIFY-end user LOC not chg'd, CC Code on LSR doesn't match CC on BAN DC1774."	According to KCL logs, the CC and BAN did match. KCL subsequently received another CLR stating that previous response was clarified in error.
404R223PEM100003*00 9994	9/26/00	"Listed Address invalid on DL form"	LA was entered as LaVista Rd NE with no number which is valid for the LA field on a DL Form. A customer may request to list only the street name in the directory.
328R312PTI000001*01 7050	10/17/00	"Ref Num 1 duplicated and List Act V invalid on DLR Tab."	There are 2 TNs being ported. The LN provided on the DL Form is for the TN associated with LSNP Ref Num 1. Therefore, Ref Num 1 is shown on both the DL

EXCEPTION 47 STATEMENT OF RE-OPENING

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PON VER CC	Date of Error	Error Description	KCL Comments
			Form and on the referenced LSNP Form.
353R212PTI000002*01 7050	10/17/00	"Ref Num 2 duplicated and List Act V invalid."	There are 2 TNs being ported. The LN provided on the DL Form is for the TN associated with LSNP Ref Num 2. Therefore, Ref Num 2 is shown on both the DL Form and on the referenced LSNP Form.
801R222PTI000002*04 7125	10/17/00	"IMPCON must be a toll free number or local no to the end user address."	This is an Issue 9 requirement, not an Issue 7 requirement. This order was supped 2 additional times and received the same error message.
801R222PTI000002*05 7125	11/7/00	"IMPCON must be local or toll free number from the end user's location."	
801R222PTI000002*06 7125	11/10/00	"3rd request, IMPCON must be local or toll free number to end user's address."	
801R222PEI000004*01 7125	11/9/00	"IMPCON should be local or toll free to end user's address-Austin Ext 1821"	This is a requirement for Issue 9 of BLS electronic interfaces, not an Issue 7 requirement.
350R112PEI000004*02 7125	11/7/00	"IMPCON is required with local or toll free number to end user's address –Austin Ext 1821."	This is a requirement for Issue 9 of BLS electronic interfaces, not an Issue 7 requirement.

Based on subsequent testing activities, KCL has determined that BellSouth has not adequately addressed the issues initially raised in Exception 47. As a result, KCL re-opens Exception 47.

Date: November 16, 2000

EXCEPTION REPORT

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

Exception:

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

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

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

1. ***Documentation***

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

2. ***Pre-Order Inquiry***

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

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

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

RPO TYPE	ACT TYPE	UNE Product Type	CDD PON				
E	A	NOT UNE To Calculate	POTS	3	4/5/00	4/10/00	3	7
E	A	NOT UNE To Calculate	POTS	3	4/6/00	4/11/00	3	7
E	A	NOT UNE To Calculate	POTS	3	4/7/00	4/12/00	3	7
E	A	NOT UNE To Calculate	POTS	1	4/7/00	4/10/00	1	4
E	A	NOT UNE To Calculate	POTS	1	4/7/00	4/10/00	1	4
E	A	NOT UNE To Calculate	POTS	2	4/7/00	4/11/00	2	4
E	A	NOT UNE To Calculate	POTS	2	4/7/00	4/11/00	2	4
E	T	NOT UNE To Calculate	POTS	1	4/7/00	4/10/00	1	4
E	W	NOT UNE To Calculate	ISDN	1	4/7/00	4/7/00	0	3
E	V	NOT UNE To Calculate	ISDN	1	4/10/00	4/11/00	1	16
E	W	NOT UNE To Calculate	ISDN	1	4/7/00	4/7/00	0	3
E	A	NOT UNE To Calculate	ISDN	1	4/7/00	4/10/00	1	16
E	C	NOT UNE To Calculate	ISDN	1	4/7/00	4/8/00	1	16
E	C	NOT UNE To Calculate	ISDN	1	4/7/00	4/8/00	1	16
E	C	NOT UNE To Calculate	POTS	2	4/10/00	4/12/00	2	4
E	C	NOT UNE To Calculate	POTS	2	4/10/00	4/11/00	1	4
E	C	NOT UNE To Calculate	POTS	2	4/10/00	4/12/00	2	4
E	C	NOT UNE To Calculate	POTS	2	4/10/00	4/12/00	2	4
B	V	LocalNumberPortability_NotComplexServices	POTS	2	2/18/00	2/28/00	6	5
C	D	LocalNumberPortability_NotComplexServices	POTS	1	2/18/00	2/29/00	7	5
C	V	LocalNumberPortability_NotComplexServices	POTS	5	2/22/00	3/15/00	16	5
C	V	LocalNumberPortability_NotComplexServices	POTS	1	2/22/00	3/15/00	16	5
F	A	UnbundledLocalSwitching_2WireAnalogPort	POTS	8	2/22/00	3/15/00	16	3
F	C	UnbundledLocalSwitching_2WireAnalogPort	POTS	5	2/18/00	2/28/00	6	3
F	SS	UnbundledLocalSwitching_2WireAnalogPort	POTS	3	2/18/00	2/28/00	6	3
F	D	UnbundledLocalSwitching_2WireAnalogPort	POTS	1	2/22/00	2/28/00	4	3
F	V	UnbundledLocalSwitching_2WireAnalogPort	POTS	1	2/18/00	2/28/00	6	3
A	A	UnbundledLoops	POTS	1	2/28/00	3/8/00	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.

Amended Exception

KCL initiated an ordering functional re-test on August 25, 2000. During this re-test, KCL reviewed the service provisioning intervals returned in response to Calculate Due Date (CDD) requests against the intervals contained in BLS documentation.

KCL continued to observe discrepancies between the documented service intervals and those returned in response to CDD pre-orders.

The following table presents the discrepancies encountered during re-testing.

REQ TYPE	ACT TYPE	UNE Product Type [1]	ORDER TYPE	Nbr Lines	CDD Interval [2]			Documentation CDD Interval
					Submit Dt	Due Date	Days	Days [3]
AB	C	Unbundled Loops	POTS	1	09/21/00	10/2/00	7	6
B	V	Unbundled Loops	POTS	6	10/02/00	10/16/00	9	7
J	R	O/S and DA UNEs	POTS	2	10/02/00	10/10/00	6	3
J	R	O/S and DA UNEs	POTS	2	10/02/00	10/6/00	4	3
J	R	O/S and DA UNEs	POTS	2	10/02/00	10/10/00	6	3
J	R	O/S and DA UNEs	POTS	1	10/02/00	10/10/00	6	3
M	A	Not a UNE to Calculate	POTS	1	09/20/00	9/25/00	3	4
M	A	Not a UNE to Calculate	POTS	1	09/28/00	10/10/00	6	4
M	C	Not a UNE to Calculate	POTS	3	09/06/00	9/11/00	3	7
M	C	Not a UNE to Calculate	POTS	3	09/20/00	9/25/00	3	7
M	C	Not a UNE to Calculate	POTS	3	10/02/00	10/10/00	6	7
M	C	Not a UNE to Calculate	POTS	3	10/02/00	10/9/00	5	7
M	C	Not a UNE to Calculate	POTS	1	10/02/00	10/10/00	6	7
M	C	Not a UNE to Calculate	POTS	1	10/02/00	10/12/00	8	7
M	C	Not a UNE to Calculate	POTS	2	09/14/00	9/20/00	4	7
M	C	Not a UNE to Calculate	POTS	2	10/02/00	10/9/00	5	7
M	D	Not a UNE to Calculate	POTS	2	10/02/00	10/10/00	6	4
M	D	Not a UNE to Calculate	POTS	2	09/20/00	9/25/00	3	4
M	D	Not a UNE to Calculate	POTS	2	10/02/00	10/9/00	5	4
M	M	Not a UNE to Calculate	POTS	2	08/28/00	9/8/00	3	4
M	V	Not a UNE to Calculate	POTS	2	09/28/00	9/25/00	3	4
M	V	Not a UNE to Calculate	POTS	2	09/20/00	9/27/00	5	4

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

Second Amended Exception

KCL is amending this exception to include details of discrepancies identified during a re-test of intervals for Resale service requests (PO&P-11). The following table provides details on Resale-related interval discrepancies between CDD pre-order responses and documented intervals.

REQ TYPE	ACT TYPE	Resale Product Type (1)	Nbr Lines	CDD Interval (2)			Documentation Interval
				Submit Dt	Due Date	Days	Days
EB	C	LINEFEATURES	1	10/09/00	10/13/2000	4	2
EB	C	RINGMASTER	3	10/09/00	10/12/2000	3	7

Notes
(1) Resale Product Type is a data element on the CDD inquiry. The valid entries are provided by BellSouth.
(2) CDD Interval obtained by subtracting the CDD query submission date from the due date returned by the CDD.
(3) Business Days

Date: October 16, 2000

EXCEPTION REPORT

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

Exception:

BellSouth does not deliver timely fully mechanized Clarification (CLR) responses.

Background: In response to a valid Local Service Request[1] (LSR) that contains an error, BellSouth returns a CLR to the CLEC. A CLR is generated in one of two ways:

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

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

BellSouth commits to returning 95% of CLRs for fully mechanized service requests within one hour and to returning 85% of CLRs for partially mechanized service requests within 48 hours.[2]

BellSouth Performance[3]: In response to LSRs submitted via TAG and EDI, BellSouth failed to deliver timely fully mechanized CLR responses.

- 92% of fully mechanized CLRs were returned via the TAG interface within the specified timeframe[4].

- 17% of fully mechanized CLRs were returned via the EDI interface within the specified timeframe[5].

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

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

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

[4] Response timeliness did not significantly improve after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness of response issues. For fully mechanized CLRs received between 2/8/00 and 4/21/00, 93% were returned within one hour via TAG.

The following tables provide a detailed breakdown of response time for fully mechanized and partially mechanized CLRs[6].

Fully Mechanized CLR Timeliness Summary

CLRs Received via TAG						
<1 hr	1-2 hrs	2-4 hrs	4-12 hrs	12-24 hrs	24-48 hrs	>48 hrs
95	2	0	3	1	2	0
92.2%	1.9%	0%	2.9%	1.0%	1.9%	0.0%
CLRs Received via EDI						
<1 hr	1-2 hrs	2-4 hrs	4-12 hrs	12-24 hrs	24-48 hrs	>48 hrs
15	59	5	5	2	0	1
17.2%	67.8%	5.7%	5.7%	2.3%	0.0%	1.1%

Fully Mechanized CLR Detail – Untimely TAG CLRs

PON	VER	CC	1-2 hrs	2-4 hrs	4-12 hrs	12-24 hrs	24-48 hrs
382A225PTH101002	00	9992	X				
382A225PTH100002	00	9992	X				
305A122PTH101002	00	9994			X		
305A122PTH101001	05	9994			X		
305A112PTH100001	17	9994			X		
307X222PTH101001	05	9994				X	
305A122PTH100002	03	9994					X
395A213PTH100002	00	9994					X

Fully Mechanized CLR Detail – Untimely EDI CLRs

PON	VER	CC	1-2 hrs	2-4 hrs	4-12 hrs	12-24 hrs	>24 hrs
303A222PEH101001	0	9994	X				
378A315PEI001001	0	9992	X				
626A224PEJ100003	0	9991	X				

[5] Response timeliness did not improve after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness issues. For fully mechanized CLRs received between 2/8/00 and 4/21/00, 15% were received within one hour.

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

PON	VER	CC	1-2 hrs	2-4 hrs	4-12 hrs	12-24 hrs	>24 hrs
305A222PEH100001	2	9994	X				
607A214PEJ103002	0	9991	X				
607A214PEJ101001	0	9991	X				
301A212PEH100001	0	9994	X				
315A212PEH100024	0	9994	X				
420A124PEJ100008	0	9994	X				
307A122PEH100005	0	9994	X				
307A122PEH100003	1	9994	X				
324A112PEH100002	2	9991	X				
324A112PEH101005	0	9991	X				
433A127PEH000004	0	9994	X				
309A122PEH100007	0	9994	X				
308F312PEH102001	0	9994	X				
303A222PEH101001	1	9994	X				
324A112PEH100002	0	9991	X				
305A222PEH100001	1	9994	X				
308F312PEH100001	0	9994	X				
607C214PEJ100001	0	9991	X				
305A222PEH101001	0	9994	X				
315X212PEH100001	0	9991	X				
305A122PEH100010	1	9994	X				
309A122PEH101001	0	9994	X				
324A112PEH100003	0	9991	X				
324A112PEH100002	1	9991	X				
626A224PEJ100012	0	9991	X				
309A122PEH101001	6	9994	X				
305A212PEH100004	0	9994	X				
323A122PEH100006	1	9991	X				
323A122PEH100006	2	9991	X				
600A212PEH000002	0	9994	X				
326A212PEI100003	0	9992	X				
323A122PEH100006	0	9991	X				
324A112PEH100003	1	9991	X				
305A222PEH100009	0	9994	X				
607A214PEJ100001	0	9994	X				
620A212PEH101004	0	9991	X				
305A222PEH100001	0	9994	X				
420A124PEJ100001	0	9994	X				
606A123PEM101006	0	9991	X				

PON	VER	CC	1-2 hrs	2-4 hrs	4-12 hrs	12-24 hrs	> 24 hrs
604D224PEJ000001	0	9994	X				
600A212PEH001001	0	9994	X				
615A122PEF100013	0	9991	X				
625A214PEJ100005	2	9991	X				
422A114PEJ101001	2	9994	X				
625A214PEJ100005	0	9991	X				
378A315PEI001001	3	9992	X				
308F312PEH100001	1	9994	X				
308F312PEH101001	0	9994	X				
409X223PEM101001	0	9991	X				
608A124PEJ100004	1	9991	X				
303A222PEH100003	0	9994	X				
305A122PEH100010	0	9994	X				
608A124PEJ100004	0	9991	X				
626A224PEJ100011	0	9991	X				
422A114PEJ100001	0	9994	X				
301A212PEF101007	0	9994	X				
625A214PEJ100004	0	9991		X			
615A122PEH100010	0	9991		X			
382D225PEG100005	0	9991		X			
307A122PEH100003	0	9994		X			
607A214PEJ103002	4	9991		X			
311A212PEH101001	0	9994			X		
301A112PEF100007	4	9994			X		
315A212PEH100024	1	9994			X		
305A212PEH101004	0	9994			X		
606A123PEM100006	2	9991			X		
307A122PEH101003	0	9994				X	
305A122PEH101010	0	9994				X	
428X224PEJ100001	0	9994					X

Amended Exception

KCL initiated a UNE functional re-test on August 25, 2000. Based on results through November 8, KCL has received Fully-mechanized error (FM ERR/CLR) responses from BellSouth outside of the standard response time[7]. Of the 22 FM errors delivered via TAG, 68% were received on time (within 1 hour). Of the 108 FM errors delivered via EDI, 64% were received on time.

TAG FM Response Timeliness					
< 1 hr	1-2 hrs	2-4 hrs	12-24 hrs	48-72 hrs	TOTAL
15	2	1	2	2	22
68%	9%	5%	9%	9%	100%
EDI FM Response Timeliness					
< 1 hr	1-2 hrs	2-4 hrs	12-24 hrs	48-72 hrs	TOTAL
69	37	2	--	--	108
64%	34%	2%	--	--	100%

The following tables provide detail associated with those PONs receiving late FM error responses.

TAG				
PON*VER	CC	Date Sent	Response Rcvd	Response Category
305R112PTF101002*00	9991	9/15/2000 11:29:26 AM	9/15/2000 12:36:00 PM	1-2 hrs
305R112PTF101002*00	9991	9/15/2000 3:02:06 PM	9/15/2000 4:13:28 PM	1-2 hrs
350R112PTI000002*00	7727	10/12/2000 4:51:33 PM	10/12/2000 8:14:38 PM	2-4 hrs
333R122PTI000001*00	7727	8/30/2000 8:46:45 AM	8/31/2000 5:21:14 AM	12-24 hrs
354R212PTI000002*00	7727	10/2/2000 6:20:16 PM	10/3/2000 6:35:55 AM	12-24
440R124PTJ000001*00	9990	8/28/2000 12:06:46 PM	8/30/2000 5:08:29 PM	48-72 hrs
801R222PTI000001*00	7727	8/28/2000 6:50:40 PM	8/31/2000 5:49:15 AM	48-72 hrs

[7] The Georgia Public Service Commission (GPSC) standard for purposes of this evaluation, adopted on June 6, 2000, is 95% of FM errors within 1 hour.

PON/VER	LEC	EDI Date Sent	EDI Response Rcvd	Duration
305R112PEF101020*00	9991	10/16/2000 3:22:00 PM	10/16/2000 4:27:37 PM	1-2 hrs
305R112PEF100020*00	9991	10/6/2000 11:08:24 AM	10/6/2000 12:14:43 PM	1-2 hrs
305R112PEF100020*00	9991	10/4/2000 2:20:10 PM	10/4/2000 3:28:28 PM	1-2 hrs
320R212PEF100005*00	9991	10/3/2000 5:14:28 PM	10/3/2000 6:14:30 PM	1-2 hrs
320R212PEF100005*00	9991	10/2/2000 2:37:27 PM	10/2/2000 3:55:41 PM	1-2 hrs
309R122PEH000002*00	9994	9/28/2000 9:16:33 AM	9/28/2000 10:16:29 AM	1-2 hrs
307R222PEH000001*00	9994	9/22/2000 10:32:51 AM	9/22/2000 11:38:42 AM	1-2 hrs
323R122PEH001001*00	9991	9/19/2000 2:58:52 PM	9/19/2000 4:09:00 PM	1-2 hrs
323R122PEH001001*00	9991	9/15/2000 10:43:36 AM	9/15/2000 11:53:28 AM	1-2 hrs
315R212PEH000002*00	9991	9/15/2000 10:12:45 AM	9/15/2000 11:53:28 AM	1-2 hrs
323R122PEH000001*00	9991	9/14/2000 1:10:59 PM	9/14/2000 2:13:37 PM	1-2 hrs
305R112PEH000002*00	9991	9/6/2000 3:46:36 PM	9/6/2000 4:51:12 PM	1-2 hrs
305R112PEH000002*00	9991	9/6/2000 11:20:53 AM	9/6/2000 12:27:29 PM	1-2 hrs
319R122PEH000001*00	9990	10/5/2000 1:47:54 PM	10/5/2000 2:51:32 PM	1-2 hrs
318R112PEH000004*00	9994	9/28/2000 1:20:45 PM	9/28/2000 2:31:18 PM	1-2 hrs
432R214PEJ000001*00	9990	8/30/2000 12:13:30 PM	8/30/2000 1:24:27 PM	1-2 hrs
454R126PEF001001*00	9990	9/5/2000 1:18:09 PM	9/5/2000 2:18:43 PM	1-2 hrs
452R216PEF000001*00	9990	8/25/2000 12:20:33 PM	8/25/2000 1:27:51 PM	1-2 hrs
435R114PEJ000003*00	9990	10/4/2000 9:11:33 AM	10/4/2000 10:15:38 AM	1-2 hrs
307R122PEF000003*00	9991	9/19/2000	9/19/2000	1-2 hrs

[illegible]	[illegible]	EDI [illegible]	[illegible]	[illegible]
[illegible]	[illegible]	10:50:23 AM	11:50:18 AM	
307R122PEF000003*00	9991	9/14/2000 10:27:27 AM	9/14/2000 11:41:47 AM	1-2 hrs
303R222PEH000002*00	9994	9/25/2000 3:00:14 PM	9/25/2000 4:04:43 PM	1-2 hrs
307R122PEF000009*00	9994	10/5/2000 11:33:52 AM	10/5/2000 12:37:54 PM	1-2 hrs
307R122PEH000005*00	9994	9/28/2000 12:48:59 PM	9/28/2000 1:50:25 PM	1-2 hrs
307R122PEH000003*00	9991	9/20/2000 2:16:21 PM	9/20/2000 3:29:52 PM	1-2 hrs
305R222PEH000001*00	9994	8/25/2000 11:45:14 AM	8/25/2000 12:50:04 PM	1-2 hrs
318R112PEH000001*02	9994	9/19/2000 3:04:39 PM	9/19/2000 4:09:00 PM	1-2 hrs
319R122PEF000016*00	9990	10/18/2000 10:46:26 AM	10/18/2000 11:50:39 AM	1-2 hrs
329R212PEI000001*01	7727	8/28/2000 12:02:15 PM	8/28/2000 2:34:06 PM	2-4 hrs
329R212PEI001001*00	7727	8/28/2000 3:51:20 PM	8/28/2000 5:54:47 PM	2-4 hrs
329R212PEI002001*00	7727	9/15/2000 10:12:45 AM	9/15/2000 11:12:57 AM	1-2 hrs
330R222PEI000002*00	7050	9/14/2000 9:54:30 AM	9/14/2000 10:55:19 AM	1-2 hrs
330R222PEI000003*00	7050	10/16/2000 8:59:09 PM	10/16/2000 10:03:05 PM	1-2 hrs
349R212PEI000003*00	7050	9/26/2000 10:28:58 AM	9/26/2000 11:35:04 AM	1-2 hrs
409R223PEM100001*00	9994	9/14/2000 11:22:13 AM	9/14/2000 12:30:36 PM	1-2 hrs
428R124PEJ100001*00	9994	8/28/2000 3:52:37 PM	8/28/2000 5:11:05 PM	1-2 hrs
452R216PEF000001*02	9990	9/5/2000 1:14:28 PM	9/5/2000 2:18:43 PM	1-2 hrs
454R126PEF000001*00	9990	8/29/2000 11:14:36 AM	8/29/2000 12:18:08 PM	1-2 hrs
606R123PEM000003*00	9990	9/20/2000 9:25:32 AM	9/20/2000 10:28:55 AM	1-2 hrs

KCL has also amended this exception to include the results of the Resale Functional Evaluation (PO&P-11). KCL experienced similar response timeliness problems with the delivery of EDI Fully-Mechanized errors on Resale service requests as those uncovered during the UNE evaluations (O&P-1 and O&P-2).

Of the service requests submitted via the EDI interface, 9% of FM errors were received within 1 hour[8].

EDI FM Response Timeliness				
< 1 hr	1-2 hrs	2-4 hrs	4-12 hrs	TOTAL
4	27	10	3	44
9%	61%	23%	7%	100%

The following table provides detail on the late Resale FM errors received.

PON	VER	CC	LSR SENT	CLR RECEIVED	1-2 hrs	2-4 hrs	4-12 hrs
R019A11PEN100001	00	9991	03/10/00 02:08 PM	03/10/00 03:30 PM	X		
R025A11PEN100001	00	9992	03/10/00 02:22 PM	03/10/00 03:43 PM	X		
R027H12PEN100001	00	9991	04/28/00 01:20 PM	04/28/00 02:46 PM	X		
R018B21PEN000003	00	9990	03/15/00 10:41 AM	03/15/00 12:01 PM	X		
R018B21PEN000001	00	9990	03/15/00 10:38 AM	03/15/00 12:01 PM	X		
R019A11PEN100003	00	9991	03/10/00 02:10 PM	03/10/00 03:30 PM	X		
R028A11PEN100013	00	9991	03/10/00 03:03 PM	03/10/00 04:43 PM	X		
R028A11PEN100015	00	9991	03/10/00 03:05 PM	03/10/00 04:43 PM	X		
R028A11PEN100016	00	9991	03/10/00 03:05 PM	03/10/00 04:43 PM	X		
R028A11PEN100017	00	9991	03/10/00 03:06 PM	03/10/00 04:43 PM	X		
R028A11PEN100018	00	9991	03/10/00 03:07 PM	03/10/00 04:43 PM	X		
R042A12PEN000008	00	9990	04/18/00	04/18/00	X		

[8] The Georgia Public Service Commission (GPSC) standard for purposes of this evaluation, adopted on June 6, 2000, is 95% of FM errors within 1 hour.

PON	VER	CC	LSR SENT	CLR RECEIVED	[illegible]	[illegible]	[illegible]
			10:24 AM	11:43 AM			
R028A11PEN100014	00	9991	03/10/00 03:04 PM	03/10/00 04:43 PM	X		
R011H21PEN100006	02	9991	05/09/00 05:27 PM	05/09/00 06:30 PM	X		
R002A21PEN100002	00	9992	03/15/00 10:07 AM	03/15/00 12:01 PM	X		
R011H21PEN100006	00	9991	05/02/00 03:36 PM	05/02/00 04:41 PM	X		
R005A22PEN100002	00	9993	03/17/00 02:26 PM	03/17/00 03:38 PM	X		
R005A22PEN100002	01	9993	03/24/00 01:51 PM	03/24/00 03:25 PM	X		
R005G22PEN100002	00	9990	02/22/00 01:31 PM	02/22/00 02:59 PM	X		
R005G22PEN101002	00	9990	03/01/00 09:25 AM	03/01/00 10:36 AM	X		
R010A11PEN100002	00	9992	03/15/00 10:22 AM	03/15/00 12:01 PM	X		
R011C22PEN100003	00	9992	03/15/00 08:33 AM	03/15/00 09:43 AM	X		
R005G22PEN101002	02	9990	03/02/00 10:11 AM	03/02/00 11:11 AM	X		
R011C22PEN100005	00	9992	03/15/00 08:34 AM	03/15/00 09:43 AM	X		
R011C22PEN100006	00	9992	03/15/00 08:35 AM	03/15/00 09:43 AM	X		
R011C22PEN100007	00	9992	03/15/00 08:36 AM	03/15/00 09:43 AM	X		
R011C22PEN100003	01	9992	03/15/00 01:48 PM	03/15/00 03:42 PM	X		
R010A11PEN100002	01	9992	03/15/00 02:51 PM	03/15/00 05:08 PM		X	
R002A21PEN100002	01	9992	03/15/00 03:56 PM	03/15/00 07:40 PM		X	
R042A12PEN000004	00	9990	04/04/00 01:20 PM	04/04/00 04:41 PM		X	
R028D11PEN000003	00	9990	03/15/00 02:35 PM	03/15/00 05:08 PM		X	
R013A22PEN100001	00	9991	02/24/00 04:06 PM	02/24/00 06:33 PM		X	
R028D11PEN000001	00	9990	03/15/00 02:33 PM	03/15/00 05:08 PM		X	
R011C22PEN100006	01	9992	03/15/00 05:11 PM	03/15/00 07:40 PM		X	
R047A11PEN000004	00	9992	03/30/00 11:09 AM	03/30/00 02:53 PM		X	
R028D11PEN000002	00	9990	03/15/00	03/15/00		X	

PON	VER	CC	LSR SENT	FOC RECEIVED			
			02:34 PM	05:08 PM			
R047A11PEN000016	00	9990	03/30/00 11:08 AM	03/30/00 02:53 PM		X	
R005G22PEN100002	01	9990	02/23/00 01:02 PM	02/23/00 08:38 PM			X
R028A11PEN100011	00	9991	02/18/00 01:31 PM	02/18/00 09:56 PM			X
R005F12PEN100001	00	9992	02/18/00 04:00 PM	02/18/00 09:56 PM			X

Impact

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

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

Date: November 6, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Data Comparison test for Ordering & Provisioning Service Quality Measurements (SQMs).

Initial Exception:

BellSouth-reported raw data values for Commitment Date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Service Order numbers and Purchase Order numbers for six Provisioning metrics.

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, KCL compared 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 each of the Provisioning metrics – *Mean Held Order Interval and Distribution Intervals, Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices, Percent Missed Installation Appointments, Average Completion Interval / Order Completion Interval Distribution, Average Completion Notice Interval,* and *Total Service Order Cycle Time* – KCL compared the BellSouth-reported values for COMMITMENT DATE in the raw data files with the due date (commitment date)[2] that KCL received from Hewlett Packard for March, April, and May 2000.

KCL could not match the BellSouth-reported values in these fields with the corresponding KCL-collected values for certain service order numbers and purchase order numbers. Table 1 shows the specific discrepancies for Commitment Date.

[1] These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.
[2] Commitment Date is the due date indicated in the FOC that is received by HP and provided to KCL.

TABLE 1—COMMITMENT DATE

PON	SO_NBR	MONTH	BLS-REPORTED VALUE	KCL-REPORTED[3] VALUE
R010A11PTN100001	CO0VJ7L2	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R010A11PEN100003	CO24RH11	March	3/21/00 12:00 AM	03/24/00 12:00 AM
R002A11PEN100003	CO270WV2	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R002A11PTN101002	COBV58F5	March	3/23/00 12:00 AM	03/27/00 12:00 AM
R002A11PEN100005	CP0X8M92	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R010A11PTN100004	CP4CF625	March	3/21/00 12:00 AM	03/23/00 12:00 AM
R002A11PEN100001	CP5QH432	March	3/21/00 12:00 AM	03/28/00 12:00 AM
R002A11PTN100004	CP86GNN9	March	3/23/00 12:00 AM	03/28/00 12:00 AM
424A314PTJ000001	NO26B2P9	March	2/16/00 12:00 AM	03/01/00 12:00 AM
422A114PEJ101001	NOBJDYR1	March	2/18/00 12:00 AM	03/03/00 12:00 AM
615A122PTH102014	CP7R0531	April	4/27/00 12:00 AM	04/25/00 12:00 AM
R047A11PTN000018	NO4Y4Y46	April	4/27/00 12:00 AM	04/18/00 12:00 AM
378A315PEI001001	NP0FNX10	April	3/29/00 12:00 AM	03/23/00 12:00 AM
R041A21PTN100006	NP9V5K27	April	4/12/00 12:00 AM	04/17/00 12:00 AM
R041A21PEN100007	NPF01H46	April	4/12/00 12:00 AM	04/21/00 12:00 AM
R041B21PEN100001	NPF1MLT2	April	4/11/00 12:00 AM	04/17/00 12:00 AM
311F212PEH102002	CO2MXTV7	May	5/11/00 12:00 AM	05/10/00 12:00 AM
R036A22PTN000003	COVQ5886	May	5/1/00 12:00 AM	04/27/00 12:00 AM
R041A12PEN100009	NO0VF3L7	May	5/17/00 12:00 AM	05/18/00 12:00 AM
301A212PEH101016	NO2WDK96	May	5/5/00 12:00 AM	04/14/00 12:00 AM
301A212PTH102014	NO831LW8	May	12/29/00 12:00 AM	04/18/00 12:00 AM
398A213PEM000003	NP02RM89	May	5/2/00 12:00 AM	04/28/00 12:00 AM
378A315PEI001001	NP0FNX10	May	12/29/00 12:00 AM	03/23/00 12:00 AM
R041A12PEN100012	NP8HRNF6	May	5/12/00 12:00 AM	05/19/00 12:00 AM
305A122PTH105001	NP9MJXD8	May	5/8/00 12:00 AM	04/25/00 12:00 AM

Amended Exception:

Revised BellSouth-reported raw data values for Commitment Date for the KCL Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and service order numbers for three Provisioning metrics.

KCL received revised raw data from BellSouth. KCL compared these revised raw data to the KCL-collected data.

[3] These values are contained in response files provided to KCL by HP.

KCL could not match the revised BellSouth-reported values with the corresponding KCL-collected values for certain purchase order numbers and service order numbers. Table 2 shows the specific discrepancies for Commitment Date.

TABLE 2—COMMITMENT DATE

PON	SO_NBR	RAW DATA FILE	BLS REPORTED VALUE	KCL REPORTED VALUE	MONTH
303A222PEH101001	CO6TFTB9	JPDY	3/3/00	2/29/00	March
428A124PTJ100012	NO4HLD96	JPDY	12/30/00	2/21/00	March
406C213PTM100002	NO9HBW68	JPDY	12/30/00	1/21/00	March
428A224PTJ100009	NOBC0M48	JPDY	12/29/00	2/22/00	March
422A114PEJ101001	NOBFJ3F3	JPDY	3/3/00	2/18/00	March
302A312PEH000003	NOBQ1C99	JPDY	3/2/00	2/29/00	March
403A223PTM100003	NP32R9P9	JPDY	12/30/00	2/15/00	March
607A214PEJ102001	NP74MLL1	HO	2/16/00	12/30/00	March
422A114PEJ101001	NOBJDYR1	PMI	2/18/00	3/3/00	March
424A314PTJ000001	NO26B2P9	PMI	2/16/00	3/1/00	March
R002A11PEN100001	CP5QH432	PMI	3/21/00	3/28/00	March
R002A11PEN100003	CO270WV2	PMI	3/21/00	3/27/00	March
R002A11PEN100005	CP0X8M92	PMI	3/21/00	3/27/00	March
R002A11PTN100004	CP86GNN9	PMI	3/23/00	3/28/00	March
R002A11PTN101002	COBV58F5	PMI	3/23/00	3/27/00	March
R010A11PEN100003	CO24RH11	PMI	3/21/00	3/24/00	March
R010A11PTN100001	CO0VJ7L2	PMI	3/21/00	3/27/00	March
R010A11PTN100004	CP4CF625	PMI	3/21/00	3/23/00	March
R041A21PEN100007	NPF01H46	PMI	4/12/00	4/21/00	April
R041A21PTN100006	NP9V5K27	PMI	4/12/00	4/17/00	April
R041B21PEN100001	NPF1MLT2	PMI	4/11/00	4/17/00	April
378A315PEI001001	NP0FNX10	PMI	3/29/00	3/23/00	April
R041A12PEN100012	NP8HRNF6	PMI	5/12/00	5/19/00	May

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. If SQM reports are based on incomplete or incorrect raw data, CLECs will not receive accurate SQM information for these purposes.

Date: November 14, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Resale Provisioning Verification Evaluation (PO&P11).

Exception:

KPMG Consulting LLC (KCL) encountered BellSouth provisioning errors for Resale orders.

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

Of the 70 Resale orders that have been validated to date, 7 post-order CSRs (10.0%) contained different information than their corresponding LSRs. Of the 7 orders, 3 (42.8%) were flow-through and four (57.2%) were non-flow through[1].

Of the 88 Directory Listing for Resale orders, which were validated, 11 orders (12.5%) contained different information than their corresponding LSRs. Of the 11 orders, 8 (72.7%) were flow-through and three (27.3%) were non-flow through.

Of the 174 Switch Translations for Resale lines, which were validated, 15 lines (8.6%) contained different information than their corresponding LSRs. Of the 15 lines, five (33.3%) were flow-through and 10 (66.7%) were non-flow through.

The following tables provide the specific data.

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

CSR VERIFICATION					
PON	TN	OCN	VER	CSR Discrepancy	F/T
R047X12PTN001001	4046334415	9991	AA	Status reads Final	N
R038A21PEN000001	7704100614	9991	AF	Incorrect Listed-Name	N
R037A21PTN000001	4046339124	9993	AA	Incorrect YPH	N
R036A22PTN000001	7067242391	9990	AA	Additional Line	N
R011F12PTN100003	7068020193	9992	BB	Incorrect LN/NP	Y
R011B12PTN100003	7067229429	9992	AA	Incorrect LN/NP	Y
R011B12PTN100002	7062909707	9991	AA	Incorrect LN/NP	Y

DIRECTORY LISTING VERIFICATION					
PON	TN	OCN	VER	Directory Listing Database Discrepancy	F/T
R038A21PEN000001	7704100614	9991	AF	No listings found	N
R037A21PEN000003	4046334270	9993	AA	No listings found	N
R029A21PTN000014	6785790680	9993	AD	Listed as "non-published"	N
R011F12PTN100037	7068212781	9992	BA	Listed Name spelled incorrectly	Y
R011F12PTN100003	7068020193	9992	BB	Name listed wrong	Y
R011B21PTN000010	9127455852	9992	AC	No listings found	Y
R011B21PTN000008	7062929016	9992	AC	No listings found	Y
R011B21PEN000011	4046362184	9992	AB	No listings found	Y
R011B12PTN100003	7067229429	9991	AA	Listed as "non-published"	Y
R011B12PTN100002	7062909707	9991	AA	Listed as "non-published"	Y
R011B12PEN100001	9127455725	9991	AA	Listed as "non-published"	Y

SWITCH TRANSLATION VERIFICATION					
PON	TN	OCN	Switch Translations Discrepancy	VER	F/T
R047A12PEN000003	7705220673	9991	Not Assigned; Provisioned	AB	N
R045A11PTN000003	7709511935	9991	Not Assigned	AA	N
R041A21PEN100011	7062353476	9990	No GZC	AA	N
R041A21PEN100011	7062909109	9990	No GZC	AA	N
R041A21PEN100011	7063689094	9990	No GZC	AA	N
R041A21PEN100007	9127466398	9990	No GZC	AC	N
R041A21PEN100007	9127508284	9990	No GZC	AC	N
R041A21PEN100007	9127507024	9990	No GZC	AC	N
R035A12PTN000011	7063039642	9990	Not Assigned	AD	N
R035A12PTN000011	7063039776	9990	Not Assigned	AD	N
R028A11PTN000023	7709370232	9990	Not Restored	AA	Y
R028A11PTN000022	7705691074	9990	Not Restored	AA	Y
R028A11PTN000021	7709370284	9990	Not Restored	AA	Y
R028A11PEN000026	4043279046	9990	Not Restored	AA	Y
R028A11PEN000024	7706190397	9990	Not Restored	AA	Y

Impact

Inaccurate provisioning will affect CLECs in the following way:

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

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 24

BELLSOUTH

November 14, 2000

EXCEPTION REPORT

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

Exception:

BellSouth's TAG interface does not deliver timely responses to pre-order transactions.

Through February 4, 2000, KPMG Consulting LLC (KCL) has submitted 366 pre-order transactions that have received a response from the BellSouth OSS[1]. On aggregate, twenty-nine percent (29%) of responses from TAG API took longer than 15 seconds to arrive[2].
For pre-order test transactions, KCL's experience indicates that pre-order responses from BellSouth's TAG API are not timely (i.e., took longer than 15 seconds) for the following query types[3]:

- **Customer Service Record Query (CSRQ):** 7% of API responses (1 of 14) were received in greater than 15 seconds.
- **Telephone Number Selection Query (TNSQ):** 8% of API responses (3 of 40) were received in greater than 15 seconds.
- **Telephone Number Assignment Query (TNAQ):** 10% of API responses (6 of 60) were received in greater than 15 seconds.
- **Address Validation Query by Telephone Number (AVQ_TN):** 28% of API responses (11 of 39) were received in greater than 15 seconds.
- **Appointment Availability Query (AAQ):** 24% of API responses (31 of 129) were received in greater than 15 seconds.
- **Address Validation Query (AVQ):** 61% of API responses (28 of 46) were received in greater than 15 seconds.
- **Telephone Number Assignment Query for Multi-Line Hunting Numbers (TNAQ_MLH):** 67% of API responses (2 of 3) were received in greater than 15 seconds.

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[1] An additional 158 "Invalid Data Exception" responses were also received. Since this response type is delivered from the TAG Client residing on the CLEC's premises, timeliness data for these responses is not included in this report.
[2] Because pre-ordering information is often accessed while the customer is on the line, 15 seconds is used as a benchmark timeframe to allow for reasonably efficient customer interaction, for purposes of this exception.
[3] Transaction sample sizes are based on interim results and do not represent significant sample sizes in some cases.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 24

- **Service Availability Query (SAQ):** 74% of API responses (25 of 34) were received in greater than 15 seconds.

The following tables provide a detailed breakdown of pre-order response timeliness data, broken down by pre-order query type, for BellSouth TAG pre-order responses.

CSRQ

INQNUM	Submit Time	Time Rcvd	Duration
6350b88b00000005	01/10/00 16:48:25	01/10/00 16:48:43	18

TNSQ

INQNUM	Submit Time	Time Rcvd	Duration
476cc81700000001	01/27/00 12:06:06	01/27/00 12:06:23	17
1eb7fb6000000001	01/21/00 11:38:24	01/21/00 11:38:48	24
5adc57a400000001	01/27/00 09:58:09	01/27/00 09:58:35	26

TNAQ

INQNUM	Submit Time	Time Rcvd	Duration
266d261300000001	01/14/00 12:48:13	01/14/00 12:48:34	21
33df943300000001	01/10/00 13:48:26	01/10/00 13:48:47	21
3ebd981800000001	01/19/00 15:22:36	01/19/00 15:23:01	25
360e45b200000001	01/17/00 09:20:31	01/17/00 09:20:58	27
489415ab00000001	02/02/00 14:53:01	02/02/00 14:53:28	27
226b34e900000001	01/25/00 10:11:53	01/25/00 10:12:22	29

AVQ TN

INQNUM	Submit Time	Time Rcvd	Duration
6bd2892200000001	01/19/00 15:52:00	01/19/00 15:52:16	16
42b4f92600000001	01/24/00 11:44:27	01/24/00 11:44:43	16
59c89a7d00000001	01/27/00 16:28:48	01/27/00 16:29:05	17
0970bb8b00000005	01/10/00 15:16:43	01/10/00 15:17:00	17
5e12451a0000000I	12/22/99 13:26:18	12/22/99 13:26:36	18
127e824b00000001	01/18/00 11:30:32	01/18/00 11:30:51	19
3eccc43e00000001	01/20/00 14:12:36	01/20/00 14:12:55	19
0970bb8b00000006	01/10/00 15:17:00	01/10/00 15:17:19	19
0511a32700000002	01/14/00 11:16:42	01/14/00 11:17:02	20
2e637dc400000001	01/19/00 13:46:26	01/19/00 13:46:48	22
0511a32700000001	01/14/00 11:11:54	01/14/00 11:12:44	50

AAQ

INQNUM	Submit Time	Time Rcvd	Duration
6b6f6cd300000001	01/19/00 12:01:23	01/19/00 12:01:40	17
1681716800000001	01/20/00 13:47:48	01/20/00 13:48:05	17
1681716800000007	01/20/00 17:40:13	01/20/00 17:40:30	17
0a23f0b800000005	01/14/00 19:25:09	01/14/00 19:25:26	17
1681716800000005	01/20/00 17:39:07	01/20/00 17:39:24	17
1681716800000008	01/20/00 17:40:34	01/20/00 17:40:51	17
6b6f6cd300000002	01/19/00 13:41:30	01/19/00 13:41:48	18
6b6f6cd300000005	01/19/00 13:43:02	01/19/00 13:43:21	19
375f0cb500000003	01/11/00 14:29:12	01/11/00 14:29:31	19
375f0cb500000004	01/11/00 14:29:31	01/11/00 14:29:50	19
375f0cb500000005	01/11/00 14:29:50	01/11/00 14:30:10	20

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 24

6b6f6cd300000007	01/19/00 13:43:53	01/19/00 13:44:13	20
6b6f6cd300000003	01/19/00 13:41:48	01/19/00 13:42:08	20
328b9f7c00000002	01/18/00 11:30:51	01/18/00 11:31:11	20
7b36a40c0000000A	01/19/00 16:16:09	01/19/00 16:16:29	20
674a9f2c00000001	12/16/99 17:35:41	12/16/99 17:36:01	20
489d9f6500000001	01/12/00 08:48:25	01/12/00 08:48:46	21
6b6f6cd300000004	01/19/00 13:42:23	01/19/00 13:42:44	21
375f0cb500000008	01/11/00 14:37:26	01/11/00 14:37:47	21
293f1fec00000004	01/19/00 15:25:12	01/19/00 15:25:36	24
5b21d97b00000001	12/21/99 14:05:26	12/21/99 14:05:50	24
0a23f0b800000004	01/14/00 18:41:09	01/14/00 18:41:35	26
375f0cb500000006	01/11/00 14:30:11	01/11/00 14:30:38	27
0a23f0b800000002	01/14/00 18:19:50	01/14/00 18:20:19	29
504bb3f700000001	01/14/00 10:57:16	01/14/00 10:57:45	29
6b6f6cd300000006	01/19/00 13:43:21	01/19/00 13:43:53	32
375f0cb500000001	01/11/00 14:28:02	01/11/00 14:28:34	32
375f0cb500000002	01/11/00 14:28:34	01/11/00 14:29:12	38
0a23f0b800000003	01/14/00 18:21:55	01/14/00 18:22:33	38
1681716800000002	01/20/00 13:48:05	01/20/00 13:48:44	39
375f0cb500000007	01/11/00 14:30:38	01/11/00 14:31:18	40

AVQ

INQNUM	Submit Time	Time Rcvd	Duration
0283274200000001	01/20/00 11:54:48	01/20/00 11:55:04	16
09f2a6d600000001	01/27/00 13:38:09	01/27/00 13:38:26	17
29729afa00000001	02/01/00 15:38:34	02/01/00 15:38:51	17
08cd1b0f00000003	12/17/99 14:00:31	12/17/99 14:00:48	17
6c5721be00000001	01/14/00 09:59:01	01/14/00 09:59:19	18
7e7e99f500000001	01/25/00 12:01:30	01/25/00 12:01:49	19
48cf235d00000001	01/19/00 09:40:47	01/19/00 09:41:07	20
6c5721be00000003	01/14/00 10:25:22	01/14/00 10:25:43	21
08cd1b0f00000001	12/17/99 12:32:36	12/17/99 12:33:00	24
719f344800000002	01/12/00 13:35:22	01/12/00 13:35:48	26
719f344800000001	01/12/00 11:22:00	01/12/00 11:22:26	26
0627219300000001	01/03/00 16:27:28	01/03/00 16:27:54	26
29729afa00000002	02/01/00 17:07:38	02/01/00 17:08:05	27
29729afa00000002	02/01/00 16:08:19	02/01/00 16:08:47	28
2349fe3a00000001	02/02/00 14:26:25	02/02/00 14:26:53	28
4aef970400000001	01/19/00 13:41:01	01/19/00 13:41:29	28
6c5721be00000007	01/14/00 10:51:36	01/14/00 10:52:05	29
3b1ec9e700000001	02/03/00 16:53:19	02/03/00 16:53:49	30
29729afa00000002	02/01/00 16:47:29	02/01/00 16:48:01	32
465e924100000002	01/13/00 12:58:43	01/13/00 12:59:15	32
465e924100000001	01/13/00 12:28:12	01/13/00 12:28:44	32
3b1ec9e700000002	02/03/00 17:03:22	02/03/00 17:03:55	33
2349fe3a00000001	02/02/00 14:11:44	02/02/00 14:12:18	34
6c5721be00000009	01/14/00 11:00:16	01/14/00 11:00:50	34
026eb23300000001	12/17/99 17:51:42	12/17/99 17:52:16	34
6c5721be00000008	01/14/00 10:56:41	01/14/00 10:57:16	35
08cd1b0f00000002	12/17/99 12:47:18	12/17/99 12:47:55	37
6c5721be00000006	01/14/00 10:41:44	01/14/00 10:42:39	55

TNAQ_MLH

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 24

INQNUM	Submit Time	Time Rcvd	Duration
1c6f810300000001	12/17/99 09:55:02	12/17/99 09:55:21	19
747015d000000001	01/11/00 13:29:21	01/11/00 13:29:48	27

SAQ

INQNUM	Submit Time	Time Rcvd	Duration
5de5320e00000001	01/10/00 13:09:27	01/10/00 13:09:51	24
544d062100000001	01/11/00 14:43:30	01/11/00 14:43:55	25
5de5320e00000009	01/10/00 13:45:33	01/10/00 13:46:29	56
5de5320e0000000M	01/10/00 14:11:14	01/10/00 14:12:10	56
03ad03af00000002	01/25/00 11:55:41	01/25/00 11:56:38	57
777c560b00000003	01/19/00 17:12:36	01/19/00 17:13:33	57
23c06a5e00000003	01/19/00 09:39:27	01/19/00 09:40:24	57
777c560b00000002	01/19/00 16:17:17	01/19/00 16:18:14	57
26c3f1a500000002	01/27/00 14:07:54	01/27/00 14:08:51	57
3666980400000002	01/18/00 14:02:25	01/18/00 14:03:23	58
061bc28f00000001	01/24/00 11:44:46	01/24/00 11:45:44	58
3275334f00000001	01/25/00 12:06:20	01/25/00 12:07:18	58
0646afbd00000001	01/20/00 12:12:37	01/20/00 12:13:36	59
26c3f1a500000001	01/27/00 13:59:52	01/27/00 14:00:51	59
0646afbd00000002	01/20/00 13:48:44	01/20/00 13:49:44	60
3666980400000001	01/18/00 13:50:02	01/18/00 13:51:02	60
23cbda9100000001	01/14/00 17:17:10	01/14/00 17:18:10	60
03ad03af00000001	01/25/00 11:53:37	01/25/00 11:54:38	61
5b21ce5800000001	01/19/00 13:34:32	01/19/00 13:35:33	61
0646afbd00000003	01/20/00 14:12:55	01/20/00 14:13:58	63
5de8bdab00000002	01/14/00 10:25:55	01/14/00 10:26:59	64
23c06a5e00000002	01/19/00 09:38:20	01/19/00 09:39:25	65
7b35ddf800000001	01/17/00 13:48:37	01/17/00 13:49:44	67
2ff15c3600000001	01/12/00 08:46:36	01/12/00 08:47:43	67
23c06a5e00000001	01/19/00 09:37:07	01/19/00 09:38:18	71

Impact

The inability of a CLEC to receive timely pre-order responses from BellSouth will have the following impact on CLECs:

Decreased Customer Satisfaction: Delays in receiving pre-order responses will prevent a CLEC from obtaining information necessary to efficiently process a customer's service request. As a result, customer satisfaction with the CLEC will likely decrease.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 24

AMENDED EXCEPTION

Based on BellSouth improvements to pre-order transaction response times implemented with TAG Version 2.2.0.7, KCL initiated a re-test on April 19, 2000.

The Georgia Public Service Commission (GPSC) voted on June 6, 2000 to approve a set of Service Quality Measurement- (SQM-) related measures and standards to be used for the purpose of this evaluation. In accordance with the GPSC's ruling, KCL reviewed pre-order re-test timeliness results relative to BellSouth Retail pre-order timeliness. The GPSC's Order requests pre-order timeliness results disaggregated by the following back-end systems:

- RSAG – TN
- RSAG – ADDR
- DSAP
- ATLAS
- CSRACCTS
- CSROCSR

KCL analyzed BellSouth's published Retail performance data for the month of June 2000. Since BellSouth data is separated into business and residential pre-order categories, KCL compared re-test results to a weighted average of BellSouth residential and business results[4]. KCL conducted statistical analysis to determine whether the KCL result was statistically different from the BellSouth combined average.

For those pre-order types for which there is no BellSouth Retail data available, KCL reviewed results based on a standard of 8 seconds[5].

The table below provides details on the results of the pre-order timeliness re-test. Of the nine pre-order categories evaluated:

- Seven contain "Satisfied" results.
- Two contain "Not Satisfied" results.

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[4] For those query types where BellSouth Retail data was available, KCL performed three "t-tests". The first test compared the average of BellSouth business and residence averages to the KCL data. The other two tests separately compared the KCL data to: 1) the average of BellSouth business data; and 2) the average of BellSouth residence data. The results of the three tests were consistent for each query.

[5] The GPSC requested KCL use its professional judgment to apply a performance standard in those instances where none is defined.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 24

Pre-Order Re-Test Results

Pre-Order Query	BLS Back-End [illegible]	BLS [illegible] (Seconds)	KCL [illegible] (Seconds)	[illegible]
AVQ_TN	RSAG-TN	1.1	1.2[7]	Satisfied
AVQ	RSAG – ADDR	1.8	1.9[7]	Satisfied
TNAQ TNSQ TNCAN_TN	ATLAS	1.2	1.2	Satisfied
TNAQ_DID TNCAN_DID	ATLAS-DID	N/A	2.0	Satisfied
TNAQ_MLH TNCAN_MLH	ATLAS-MLH	N/A	1.0	Satisfied
AAQ	DSAP	0.5	1.0	Not Satisfied
CSRQ	CSRACCTS(res) CSROCSR (bus)	3.1	1.8	Satisfied
SAQ	OASIS	1.30	11.6[8]	Not Satisfied
CDD	N/A	N/A	0.1	Satisfied

BellSouth Response

AAQ transactions, while longer than the BellSouth average, are well within commercially acceptable timeframes. Additionally, depending upon volume and other factors the BellSouth time could vary and might be longer than .5 seconds on any given day. A .5 second variation is not commercially significant and therefore BellSouth disagrees with the finding of "not satisfied".

There are two ways to use the Service Availability Query: full query and partial query. The full query method is to request the full set of products and features associated with a CLLI. It answers the question "What products and features are supported at this CLLI?" This type of request is useful for CLECs who code local databases into their application to hold product and feature in formation. Since BellSouth updates their Service

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[6] BLS Combined Average represents a weighted average of BLS business and residential Retail response averages.

[7] The KCL average does not differ from the BLS combined average by a statistically significant amount.

[8] Service Availability Queries (SAQs) may be performed by requesting a) information on a specific service/feature or group of related features; or b) information on all features available from a particular BLS switch. The average response time for "full" SAQs performed during the re-test was 31 seconds. For SAQs requesting partial information, the average re-test response time was 2 seconds.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 24

Availability database once weekly, CLECs choosing this route can run a SAQ for the CLLIs they market once per week and store the results into their local database. They do a local database lookup for every order submission. Service Availability response times can be expected to be longer for full queries. Total response time, however, is less since much fewer requests are made i.e. only one per week per CLLI versus one per order.

The partial query method is to use the Service Availability on a per-order basis using it to answer the question "Is the set of products or features requested on this LSR supported for the associated CLLI?". A CLEC would choose this method if they are not maintaining a local database but instead querying TAG on a per-order basis to pre-determine availability of services for each particular order. TAG implements this by allowing the CLEC to include a Service Abbreviation List in the Service Availability input. This list specifies the mix of products or services the CLEC is inquiring about and results in a much smaller response and therefore a quicker response time.

BellSouth uses the full Service Availability Query in order to populate its own local database. This is the recommended approach if a CLEC's business allows them to pre-define a list of commonly used CLLIs that represents a percentage of their TAG traffic sufficient to make this approach advantageous over the per-order request method and is consistent with BellSouth's use of the SAQ and OASIS databases. Otherwise BellSouth recommends the per-order method of Service Availability requests with Service Abbreviation List inputs specified. BellSouth does not recommend using the Service Availability request on a per-order basis without the Service Abbreviation List input because this will result in redundant and unnecessary response traffic associated with this TAG pre-order function.

As noted in the footnote of the exception, the longer times were seen for responses from "full" SAQ's. As noted above, retrieving all information on features in a central office will cause long response times depending upon network factors. CLECs running these long transactions are the primary reason for the longer average response times, and is not consistent with the manner in which BellSouth uses this database.

In June/July tuning was performed on the TAG/BLP Oracle database and hardware/software configurations were made in order to improve SAQ response times.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 60

BELLSOUTH

November 9, 1000

EXCEPTION REPORT

An exception has been identified as a result of the EDI Order Functional Tests (O&P-1 and PO&P-11).

Initial Exception:

BellSouth does not deliver timely Functional Acknowledgements (FAs) via Electronic Data Interchange (EDI).

FAs are standard in the EDI ordering process to provide confirmation that a trading partner (in this case BellSouth or a CLEC) has received an EDI transaction sent by the other party. In response to a CLEC's Local Service Request (LSR), BellSouth is expected to deliver an FA notifying the CLEC that its order has been received.

For purposes of this evaluation, KPMG Consulting LLC (KCL) has proposed a benchmark of 30 minutes[1] for FA response timeliness[2]. BellSouth did not return 38% of the expected FAs within 30 minutes for LSRs submitted via EDI through March 10, 2000.

The following table provides a summary of FA response timeliness for orders submitted via EDI[3].

FA Timeliness - EDI (Initial Test)

<1 MIN	1-10 MINS	10-30 MINS	30-60 MINS	>1 HOUR	TOTAL
7	108	298	130	116	**659**
1%	16%	45%	20%	18%	**100%**

[1] A BellSouth-proposed or Georgia Public Service Commission-accepted standard for FA timeliness does not currently exist. In the absence of a published standard, KPMG has identified a benchmark to be used for the purposes of this evaluation.

[2] KPMG calculates response timeliness as the interval between the 'date/time sent' stamp on an LSR and the 'date/time received' stamp on an FA. An LSR receives a 'date/time sent stamp' when HP's EDI server initiates an NDM session with BellSouth's EDI server. An FA receives a 'date/time received' stamp when the first byte of BellSouth's response is received by HP's NDM server.

[3] The results included in this exception represents data obtained for LSRs submitted through 3/10/00.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 60

Amended Exception

UNE Re-test Results

In response to this exception, BellSouth implemented a short-term process improvement to develop a separate environment within its EDI translator to handle processing of EDI files transmitted by CLECs, and to segregate CLEC transactions from those received by other trading partners. These changes were completed on June 30, 2000. BellSouth is also engaged in a long-term activity to replace EDI hardware and software to improve processing and transmission[4].

KCL initiated a re-test of EDI FA timeliness on August 25, 2000. For FAs received between August 25 and October 9, 2000, KCL noted an improvement in FA timeliness. However, BellSouth's performance still falls below the standards (95% of FA responses within 30 minutes) established by KCL for the purposes of this evaluation.

The following table provides a summary of FA response timeliness for orders submitted during the UNE functional re-test[5].

FA Timeliness - EDI (UNE Re-test)

< 30 min	30-60 min	60-90 min	> 90 min	TOTAL
238	17	6	0	**261**
91%	7%	2%	0%	**100%**

BellSouth's performance during the functional re-test differs from FA timeliness on transactions submitted during the production volume tests. During the volume transaction tests conducted in the production ordering environment, BellSouth returned 100% of EDI FAs within 30 minutes

Resale Functional Test Results

KCL also amended this exception to include results of FA timeliness for those orders submitted through EDI during the Resale Functional Evaluation (PO&P-11). During the Resale evaluation, KCL experienced deficiencies in the timely return of EDI FAs similar to those noted during the UNE evaluation (O&P-1). BellSouth processes Resale and UNE transactions through the same EDI environment. KCL did not perform a re-test of FA timeliness for Resale service requests.

The following table provides a summary of FA response timeliness for orders submitted during the Resale Functional Evaluation.

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[4] This effort is expected to complete in 1Q01.

[5] Data represents results for FAs received through October 9, 2000. As of this date, KCL has additional EDI transactions to submit during re-testing.

FA Timeliness - EDI (Resale Test)

< 30 min	30-60 min	60-90 min	> 90 min	TOTAL
208	90	32	29	359
58%	25%	9%	8%	100%

KCL is including the PON detail associated with those UNE re-test and Resale service requests receiving late FAs as an attachment to this amended exception.

Impact

The lack of timely delivered FAs will impact CLECs in the following way:

- **Increase in operating costs.** Receiving a timely Functional Acknowledgement is an essential step in the ordering process. If a CLEC does not receive an FA within a reasonable timeframe, the CLEC will be unable to effectively monitor and respond to an LSR's order status. Investigation into an LSR's status will require additional resources which will increase a CLEC's operating costs.

BellSouth Response

BellSouth acknowledges the FAs are standard in the EDI ordering process to provide confirmation that a trading partner (in this case BellSouth or a CLEC) has received an EDI transaction sent by the other party. In response to a CLEC's Local Service Request (LSR), BellSouth is expected to deliver a FA notifying the CLEC that its order has been received.

For purposes of this evaluation, KPMG Consulting LLC (KCL) proposed a benchmark of 30 minutes[6] for FA response timeliness[7]. BellSouth explained that its aged EDI platform was in the process of being upgraded and made a translation site change in June 2000. In light of these circumstances BellSouth proposed a benchmark of 75% of FAs returned within 90 minutes. Until the BellSouth EDI platform upgrade is complete and KPMG migrates to the new CONNECT:Direct arrangement associated with the upgrade, additional improvement in this area may not be attainable. Attached are the LSRs for BellSouth information for LSRs involved in the UNE Re-Test and Resale Evaluation. BST EDI interface retains data for 150 days, therefore, details regarding orders sent prior to May 25, 2000. The items in blue represent details for LSRs associated with the Resale

[6] A BellSouth-proposed or Georgia Public Service Commission-accepted standard for FA timeliness does not currently exist. In the absence of a published standard, KCL has identified a benchmark to be used for the purposes of this evaluation.

[7] KCL calculates response timeliness as the interval between the 'date/time sent' stamp on an LSR and the 'date/time received' stamp on an FA. An LSR receives a 'date/time sent stamp' when HP's EDI server initiates an NDM session with BellSouth's EDI server. An FA receives a 'date/time received' stamp when the first byte of BellSouth's response is received by HP's NDM server.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 60

Evaluation. The items in red represent details for the LSRs associated with the UNE Re-Test.

BellSouth investigated 28 of the 151 late FAs and found that 15 of the FAs were returned within the proposed 30 minute benchmark.

GA Exception 60 Response Details from BellSouth

Item	PON	DOC ID	DOC DATE TIME	ACK	FA Date Time	FA Time Mins	FOC Date Time	FOC Time Hrs/Mins	Status Date Time	Status Time Hrs/Mins	Jeopardy Time Hrs/Mins	Reject Date Time	Reject Time Hrs/Mins
1	R011C22PEN100014.02	860	20000525094	Y	20000525094	5		0.00		0.00	0.00		0.00
2	R011A12PEN100024.0C	850	20000525154	Y	20000525154	6		0.00	20000525161	0.58	0.00		0.00
3	R011A21PEN000002.0C	850	20000525154	Y	20000525154	6		0.00		0.00	0.00	20000525160	0.45
4	R045A12PEN001002.01	860	20000530113	Y	20000530115	15		0.00		0.00	0.00	20000530124	1.17
5	R005G22PEN102002.06	860	20000531113	Y	20000531114	10		0.00		0.00	0.00		0.00
6	428R124PEJ100001.00	850	20000828140	Y	20000828151	69		0.00		0.00	0.00	20000828155	1.80
7	428R124PEJ100001.00	850	20000828140	Y	20000828151	69		0.00		0.00	0.00	20000828155	1.80
8	329R212PEI001001.00	850	20000828145	Y	20000828155	65		0.00		0.00	0.00	20000828165	2.00
9	432R214PEJ000001.00	850	20000828105	Y	20000828113	42		0.00		0.00	0.00		0.00
10	329R212PEI000001.01	860	20000828110	Y	20000828113	34		0.00		0.00	0.00	20000828132	2.30
11	399R213PEM100001.01	860	20000828145	Y	20000828155	61	20000829141	23.38		0.00	0.00		0.00
12	305R222PEH000001.00	850	20000828151	Y	20000828155	43	20000828165	1.63		0.00	0.00		0.00
13	320R212PEH000001.00	850	20000828155	Y	20000828163	39		0.00		0.00	0.00		0.00
14	318R112PEH000001.00	850	20000828155	Y	20000828163	36		0.00		0.00	0.00		0.00
15	454R126PEF000001.00	850	20000829101	Y	20000829103	21		0.00		0.00	0.00	20000829110	0.90
16	432R214PEJ000001.00	850	20000830111	Y	20000830114	26		0.00		0.00	0.00	20000830121	1.08
17	305R112PEH000002.00	850	20000906102	Y	20000906105	29		0.00		0.00	0.00		0.00
18	409R223PEM100001.0C	850	20000913163	Y	20000913163	6		0.00		0.00	0.00	20000914094	17.13
19	602R214PEJ100003.00	850	20000914094	Y	20000914101	27	20000915062	20.58		0.00	0.00		0.00
20	305R222PEH000003.00	850	20000914095	Y	20000914103	35	20000914112	1.47		0.00	0.00		0.00
21	625R214PEJ000008.00	850	20000914100	Y	20000914103	27		0.00		0.00	0.00		0.00
22	414R223PEM000001.0C	850	20000914110	Y	20000914111	14		0.00		0.00	0.00		0.00
23	315R212PEH000002.00	850	20000915094	Y	20000915100	21		0.00		0.00	0.00	20000915105	1.08
24	435R114PEJ000001.04	860	20000919134	Y	20000919140	28	20000920100	20.45		0.00	0.00		0.00
25	307R122PEH000003.02	860	20000922092	Y	20000922094	26	20000925073	70.30		0.00	0.00		0.00
26	383R215PEG000005.00	850	20000926151	Y	20000926154	38	20000927154	24.50		0.00	0.00		0.00
27	383R215PEG000007.00	850	20001002200	Y	20001002204	39	20001003104	14.70		0.00	0.00		0.00
28	383R215PEG000009.00	850	20001002200	Y	20001002204	35	20001003092	13.25		0.00	0.00		0.00

GA Exception 60 Response Details from BellSouth

Clarify Date Time	Clarify Time Hrs/Mins	Comp Date Time	Comp Time Hrs/Mins
20000525161	6.52		0.00
	0.00		0.00
	0.00		0.00
	0.00		0.00
20000531121	0.70		0.00
	0.00		0.00
	0.00		0.00
	0.00		0.00
20000828155	5.03		0.00
	0.00		0.00
	0.00		0.00
	0.00		0.00
20000829141	22.42		0.00
20000829141	22.37		0.00
	0.00		0.00
	0.00		0.00
20000906112	1.08		0.00
	0.00		0.00
	0.00		0.00
	0.00		0.00
20000915090	23.00		0.00
20000915092	22.47		0.00
	0.00		0.00
	0.00		0.00
	0.00		0.00
	0.00		0.00
	0.00		0.00
	0.00		0.00

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 68

BELLSOUTH

October 31, 2000

EXCEPTION REPORT

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

Exception:

BellSouth does not provide complete Firm Order Confirmation (FOC) and Completion Notice (CN) responses.

In response to a valid Local Service Request (LSR), BellSouth generates a FOC, notifying the CLEC of order confirmation and a committed due date. BellSouth transmits a CN to notify the CLEC upon completion of provisioning activities.

BellSouth's *Local Exchange Ordering Implementation Guide*[1] *(LEO Guide)* provides information on the data content and format that will be returned within the FOC and CN responses via EDI. The *LEO Guide* also contains a list of data elements, or fields, that should be present on the response. The *LEO Guide* also contains information on fields that must be populated with data values - based on the specific LSR's Requisition (REQ) and Activity (ACT) type - and on the format characteristics (e.g., nine alpha characters) of those data values.

BellSouth's *TAG API Reference Guide*[2] *(API Guide)* provides information on the data elements that will be returned within the FOC and CN responses via TAG. The *API Guide* does not contain information on data value usage and format requirements. BellSouth provides this data value information in the *LEO Guide*, which provides ordering business rules for both the TAG and EDI interfaces.

Based on a detailed comparison of a sample of FOCs and CNs received from both the TAG and EDI interfaces to the data value information specified in the *LEO Guide*, KPMG Consulting LLC (KCL) noted deficiencies in response completeness. These deficiencies fall into five categories:

1. ***Missing Data Elements***
   The FOC or CN does not contain fields listed in the BellSouth documentation.

2. ***Extraneous Data Elements***
   The FOC or CN contains fields not listed in the BellSouth documentation.

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[1] For purposes of this evaluation, KPMG utilized *LEO Guide, Version 7N.*
[2] For purposes of this evaluation, KPMG utilized *API Guide, Version 2.2.0.7.*

3. ***Missing Data Values***
   The FOC or CN does not contain data values in one or more fields. According to the BellSouth documentation, these fields are required to be populated based on the order's REQ/ACT type.

4. ***Extraneous Data Values***
   The FOC or CN contain data values in one or more fields that are prohibited or not applicable according to the BellSouth documentation.

5. ***Incorrect Data Values***
   The data values populated on a FOC or CN are inaccurate with respect to field format or content, based on rules identified in the BellSouth documentation.

The following tables present the response completeness deficiencies identified by KCL. Results are broken down by response type (FOC or CN) and by ordering interface (TAG or EDI).[3] For each category defined above, the table presents a list of those data elements and data value identified with problems, and a percentage of responses affected. For missing, extraneous, or incorrect data values, KCL also provides a reference to the relevant REQ/ACT type data requirements.

[3] For the purpose of this response completeness evaluation, KPMG reviewed a sample of 30 responses for each category (FOCs via EDI, FOCs via TAG, CNs via EDI, CNs via TAG).

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 68

FOC Responses

	Data Elements	% of Responses Affected	Data Values	% of Responses Affected	Interface
Missing	N/A	N/A	• Billing Indicator 1 (BI1) • Billing Account Number 1 (BAN1) • Version (VER) • Frame Due Time (FDT)	• 17%[4] • 100%[5] • 39%[6] • 100%[7]	EDI
Extraneous	• REMARKS-TYPE	• 100%	• Channel Pair (CHAN-PAIR)	• 23%	EDI
Incorrect	N/A	N/A	• Representative Telephone Number (REP-TEL)	• 100%[8]	EDI
Missing	N/A	N/A	• Frame Due Time (FDT)	• 100%	TAG
Extraneous	• ACSTATIONRANGE • STATUS CODE • STATUSMSG	• 100% • 100% • 100%	• Exchange Company Circuit ID (ECCKT) • Local Service Request Number (LSR NO)	• 13%[9] • 10%	TAG
Incorrect	N/A	N/A	• Representative Telephone Number (REP-TEL)	• 100%	TAG

[4] REQ/ACT Type of BV
[5] Required for all valid REQ/ACT Types
[6] Required for all valid REQ/ACT Types
[7] Required for all valid REQ/ACT Types
[8] According to BellSouth documentation, the REP-TEL phone number should be 10 numeric characters. However, this field was found to contain hyphens and an incomplete phone number.
[9] Required for REQ/ACT types AC,AD,AM,AT,AR,AV, and BV

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 68

CN Responses

	Data Elements	% of Responses Affected	Data Values	% of Responses Affected	Interface
Missing	• Frame Due Time (FDT) • Telephone Number (Ported) (TNPORTED)	• 100% • 33%	• Billing Account Number 1 (BAN1) • Frame Due Time (FDT)	• 100% • 100%	EDI
Extraneous	• REMARKS-TYPE	• 100%	• Exchange Company Circuit ID (ECCKT) • Local Service Request Number (LSR NO) • Channel Pair (CHAN-PAIR)	• 13% • 50% • 27%	EDI
Incorrect	N/A	N/A	• Representative Telephone Number (REP-TEL)	• 100%	EDI
Missing	N/A	N/A	• Frame Due Time(FDT)	• 80%	TAG
Extraneous	• ACTSTATION RANGE • TRANSETPURPOSECD STATUS CD - • STATUS MSG	• 100% • 100% • 100%	N/A	N/A	TAG
Incorrect	N/A	•	• Representative Telephone Number (REP-TEL)	• 77%	TAG

Impact

Incomplete FOCs and CNs delivered in response to valid LSRs will impact CLECs in the following ways:

- **Increase in operating costs.** Extraneous information may cause confusion for CLEC ordering representatives. More seriously, missing or incorrect data elements and data values may not provide the necessary account information to the CLEC. If a CLEC does not receive necessary account information, contacting BellSouth to obtain the information will require additional CLEC resources. Utilizing additional resources will result in an increase in CLEC operating costs.

- **Decrease in customer satisfaction.** If a CLEC does not receive necessary account information, such as frame due time, provisioning activities may be affected. Any

provisioning delays that result from this lack of information will decrease CLEC customer satisfaction.

Amended Exception:

To address some of the issues presented in this exception, as well as the issues presented in Exception 75 (BellSouth documentation did not contain Business Rules for Error, Clarification, Jeopardy, and Status response types), BellSouth issued an updated version of its *LEO Guide, Volume 1* on August 28, 2000.

In the modified documentation, BellSouth includes Business Rules for all response types (errors, confirmations, completions, status messages, and jeopardizes) in a single section. BellSouth includes a table that identifies the data elements (fields) that are applicable to each response type. While the current Business Rules for BellSouth responses accurately reflect the data elements returned on each response type, the documentation does not provide adequate definitions of *usage requirements*, by order type, for the population of all elements. For a number of fields, the documentation describes the location within BellSouth service order detail from where the response data will come. The documentation fails to consistently note the conditions (i.e., order types) driving population of data elements on response files. A description of the BellSouth service order *location* providing response data is insufficient to determine *when* data will be provided.

The following table provides a sample of the data elements containing incomplete usage requirements.

Data Element	Description	KCI Comments
ORD (Order Number)	This information is obtained from the service order field in the fielded IDENT section and provided in the ORD field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only under certain circumstances.
RORD (Related Order Number)	This information is obtained from the service order FID CRO in the unfielded IDENT section and provided in the RORD field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only under certain circumstances.
FDT (Frame Cutover Time)	This information is obtained from the service order, behind the LH FID FDT in the unfielded IDENT section. This information will be converted to military time and provided in the FDT field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only under certain circumstances.
EBD (Effective Bill	This information is obtained from	It is unclear whether this

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 68

Data Element	Description	[illegible]
Date)	behind the IEBD LH FID in the bill section on the service order and returned to the EBD field on the 855/865.	field will be returned on all 855/865 responses, or only under certain circumstances.
LOCBAN (Local Billing Account Number)	This information is obtained from the TN in the fielded IDENT section on the service order and is populated on the IDENT field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only under certain circumstances.
BAN1 (Billing Account Number 1)	The BTN information is provided from behind the BTN field in the Bill Section on the service order. On REQ TYPE B, this will be the BTN from the Interim Number Portability Order and not the Loop Order. This information will be populated on the BAN1 field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only for REQ TYPE B.
BAN2 (Billing Account Number 2)	On a non-designed loop, this information is obtained from the BTN field in the Bill Section of the service order. This field will be used only for REQ TYPE B. It will always come from the Loop order. This information is populated in the BAN 2 field on the 855/865. On a designed loop, this information is obtained from behind the TN field in the fielded IDENT section of the service order and populated in the BAN 2 field on the 855/865.	It is unclear whether this field will be returned on all 855/865 responses, or only for REQ TYPE B.

BellSouth Response

The BellSouth LEO IG provides information for each field returned in FOC and CN response transactions. BellSouth agrees with KPMG findings, the current LEO IG accurately reflects the data elements returned on each response type and the location within BellSouth service order detail or the LSR field from where the response data will come. Current LEO IG documentation facilitates CLECs ability to understand and utilize the information included in each response transactions.

BellSouth will further enhance the LEO IG to include additional usage information for response transactions. The LEO IG enhancement requested by KPMG will be published on the BellSouth web site by 3/30/01.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 68

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 71

BELLSOUTH

November 21, 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 FOURTH AMENDED RESPONSE TO EXCEPTION 71

REQ TYPE	ACT TYPE	UNE Product Type	PROD TYPE	NUM Lines	CDD Submit Date	CDD Due Date	CDD Interval	Interval Days
E	A	NOT UNE To Calculate	POTS	3	4/5/00	4/10/00	3	7
E	A	NOT UNE To Calculate	POTS	3	4/6/00	4/11/00	3	7
E	A	NOT UNE To Calculate	POTS	3	4/7/00	4/12/00	3	7
E	A	NOT UNE To Calculate	POTS	1	4/7/00	4/10/00	1	4
E	A	NOT UNE To Calculate	POTS	1	4/7/00	4/10/00	1	4
E	A	NOT UNE To Calculate	POTS	2	4/7/00	4/11/00	2	4
E	A	NOT UNE To Calculate	POTS	2	4/7/00	4/11/00	2	4
E	T	NOT UNE To Calculate	POTS	1	4/7/00	4/10/00	1	4
E	W	NOT UNE To Calculate	ISDN	1	4/7/00	4/7/00	0	3
E	V	NOT UNE To Calculate	ISDN	1	4/10/00	4/11/00	1	16
E	W	NOT UNE To Calculate	ISDN	1	4/7/00	4/7/00	0	3
E	A	NOT UNE To Calculate	ISDN	1	4/7/00	4/10/00	1	16
E	C	NOT UNE To Calculate	ISDN	1	4/7/00	4/8/00	1	16
E	C	NOT UNE To Calculate	ISDN	1	4/7/00	4/8/00	1	16
E	C	NOT UNE To Calculate	POTS	2	4/10/00	4/12/00	2	4
E	C	NOT UNE To Calculate	POTS	2	4/10/00	4/11/00	1	4
E	C	NOT UNE To Calculate	POTS	2	4/10/00	4/12/00	2	4
E	C	NOT UNE To Calculate	POTS	2	4/10/00	4/12/00	2	4
B	V	LocalNumberPortability_NotComplexServices	POTS	2	2/18/00	2/28/00	6	5
C	D	LocalNumberPortability_NotComplexServices	POTS	1	2/18/00	2/29/00	7	5
C	V	LocalNumberPortability_NotComplexServices	POTS	5	2/22/00	3/15/00	16	5
C	V	LocalNumberPortability_NotComplexServices	POTS	1	2/22/00	3/15/00	16	5
F	A	UnbundledLocalSwitching_2WireAnalogPort	POTS	8	2/22/00	3/15/00	16	3
F	C	UnbundledLocalSwitching_2WireAnalogPort	POTS	5	2/18/00	2/28/00	6	3
F	SS	UnbundledLocalSwitching_2WireAnalogPort	POTS	3	2/18/00	2/28/00	6	3
F	D	UnbundledLocalSwitching_2WireAnalogPort	POTS	1	2/22/00	2/28/00	4	3
F	V	UnbundledLocalSwitching_2WireAnalogPort	POTS	1	2/18/00	2/28/00	6	3
A	A	UnbundledLoops	POTS	1	2/28/00	3/8/00	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'S FOURTH AMENDED RESPONSE TO EXCEPTION 71

Amended Exception

KCL initiated an ordering functional re-test on August 25, 2000. During the re-test, KCL reviewed the service provisioning intervals returned in response to Calculate Due Date (CDD) requests against the intervals contained in BellSouth documentation.

KCL continued to observe discrepancies between the documented service intervals and those returned in response to CDD pre-orders. The majority of discrepancies occurred for UNE Loop-Port Combination accounts.

The following table presents the discrepancies encountered during re-testing.

REQ TYPE	ACT TYPE	UNE Product Type	ORDER TYPE	No. Lines	CDD Interval			Documented Interval
					Submit Dt.	Due Date	BAS	Days
AB	C	Unbundled Loops	POTS	1	09/21/00	10/2/00	7	6
B	V	Unbundled Loops	POTS	6	10/02/00	10/16/00	9	7
J	R	O/S and DA UNEs	POTS	2	10/02/00	10/10/00	6	3
J	R	O/S and DA UNEs	POTS	2	10/02/00	10/6/00	4	3
J	R	O/S and DA UNEs	POTS	2	10/02/00	10/10/00	6	3
J	R	O/S and DA UNEs	POTS	1	10/02/00	10/10/00	6	3
M	A	Not a UNE to Calculate	POTS	1	09/20/00	9/25/00	3	4
M	A	Not a UNE to Calculate	POTS	1	09/28/00	10/10/00	6	4
M	C	Not a UNE to Calculate	POTS	3	09/06/00	9/11/00	3	7
M	C	Not a UNE to Calculate	POTS	3	09/20/00	9/25/00	3	7
M	C	Not a UNE to Calculate	POTS	3	10/02/00	10/10/00	6	7
M	C	Not a UNE to Calculate	POTS	3	10/02/00	10/9/00	5	7
M	C	Not a UNE to Calculate	POTS	1	10/02/00	10/10/00	6	7
M	C	Not a UNE to Calculate	POTS	1	10/02/00	10/12/00	8	7
M	C	Not a UNE to Calculate	POTS	2	09/14/00	9/20/00	4	7
M	C	Not a UNE to Calculate	POTS	2	10/02/00	10/9/00	5	7
M	D	Not a UNE to Calculate	POTS	2	10/02/00	10/10/00	6	4
M	D	Not a UNE to Calculate	POTS	2	09/20/00	9/25/00	3	4
M	D	Not a UNE to Calculate	POTS	2	10/02/00	10/9/00	5	4
M	M	Not a UNE to Calculate	POTS	2	08/28/00	9/8/00	3	4
M	V	Not a UNE to Calculate	POTS	2	09/28/00	9/25/00	3	4
M	V	Not a UNE to Calculate	POTS	2	09/20/00	9/27/00	5	4

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 71

Second Amended Exception

KCL is amending this exception to include details of discrepancies identified during a re-test of intervals for Resale service requests (PO&P-11). The following table provides details on Resale-related interval discrepancies between CDD pre-order responses and documented intervals.

REQ TYPE	ACT TYPE	Resale Product Type (1)	Nbr. Lines	CDD Interval			Documented Interval
				Submit Dt.	Due Date	Days	Days
EB	C	LINEFEATURES	1	10/09/00	10/13/2000	4	2
EB	C	RINGMASTER	3	10/09/00	10/12/2000	3	7

Notes
(1) Resale Product Type is a data element on the CDD inquiry. The valid entries are provided by BellSouth.
(2) CDD Interval obtained by subtracting the CDD query submission date from the due date returned by the CDD.
(3) Business Days

BellSouth Response

On a REQTYP E and ACTYP C, the documented due date is 4 days and 3 days for Linefeatures and Ringmaster, respectively, which mirrors the intervals in the table above.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 71

As an additional comment in response to the initial amended exception, BellSouth's Product and Services Interval Guide will be updated on 12/15/00 to include the interval for REQTYP J.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 78

BELLSOUTH

November 16, 2000

EXCEPTION REPORT

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

Initial Exception:

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

Background:

In response to a valid Local Service Request[1] (LSR), BellSouth returns a FOC. This FOC provides notification to the CLEC that its order is confirmed and provides a committed due date for completion of service provisioning. FOCs are generated for two types of service requests:

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

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

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

BellSouth Performance[3]: In response to LSRs submitted via TAG and EDI, BellSouth failed to deliver timely flow through FOCs.

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

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

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

- 83% of flow through FOCs were returned via the TAG interface within the specified timeframe[4].
- 87% of flow through FOCs were returned via the EDI interface within the specified timeframe[5].

The following tables provide a detailed breakdown of response time for flow through FOCs[6].

Flow Through FOC Timeliness Summary

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

Flow Through FOC Detail – Untimely TAG FOCs

PON	VER	CC	4-24 hrs	24-36 hrs	36-48 hrs	48-72 hrs
602A214PTJ100002	00	9991	X			
409A223PTM100001	05	9991		X		
603A224PTJ100004	00	9991			X	
409A223PTM100002	00	9991			X	
382A225PTH102002	00	9991			X	
403A223PTM000001	01	9994				X
309A222PTH100001	04	9994				X
407A213PTM100003	03	9991				X

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

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

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 78

Flow Through FOC Detail – Untimely EDI FOCs

PON	VER	CC	4-24 hrs	24-36 hrs	36-48 hrs	48-72 hrs
301A112PEH100008	03	9994	X			
428A124PEJ100010	00	9994	X			
453C126PEF100001	00	9991	X			
606A123PEM100002	00	9991		X		
409A223PEM100003	00	9991		X		
326C222PEI100002	00	9992				X
409X223PEM100004	00	9991				X

Amendment

KCL amended this exception to include the results of the Resale Functional Evaluation (PO&P-11). KCL experienced similar response timeliness problems with the delivery of Flow-Through Firm Order Confirmations (FT FOCs) on Resale service requests as those uncovered during the initial UNE evaluations (O&P-1 and O&P-2).

Of the service requests submitted via the EDI interface, 76% of FT FOCs were received within three hours7. The remaining 24% were received within 10 hours.

<3 hrs	3-4 hrs	4-6 hrs	6-10 hrs	TOTAL
62	9	3	8	82
75.6%	11.0%	3.7%	9.8%	100%
	Total Late = 24.4%			

The following table provides detail on the late FT FOCs received.

PON	VER	CC	LSR Sent	FOC Rcvd	3-4 hrs	4-6 hrs	6-10 hrs	Comments
R013H12PEN100001	00	9992	5/1/2000 5:02:54 PM	5/1/2000 8:20:55 PM	X			Disagree, BellSouth sent the FOC at 19.13 which is 2hrs and 58 mins from the received time of 16.15
R027B11PEN000003	00	9990	3/29/2000 4:32:18 PM	3/29/2000 8:12:34 PM	X			Disagree, BellSouth sent the FOC at 18.45 which is 1hr and 39 mins from

[7] The Georgia Public Service Commission (GPSC) standard for purposes of this evaluation, adopted on June 6, 2000, is 95% of FT FOCs received within 3 hours.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 78

PON	VER	CC	LSR Sent	FOC Rcvd				
								the received time of 17.06
R001A12PEN100003	00	9990	2/28/2000 4:17:47 PM	2/28/2000 7:19:24 PM	X			Disagree, BellSouth sent the FOC at 16.48 which is 18 mins from the received time of 16.30
R005E22PEN100003	00	9990	2/28/2000 4:18:57 PM	2/28/2000 7:19:24 PM	X			Disagree, BellSouth sent the FOC at 16.48 which is 18 mins from the received time of 16.30
R005A12PEN100003	00	9992	3/17/2000 4:47:48 PM	3/17/2000 8:18:15 PM	X			Disagree, BellSouth sent the FOC at 16.26 which is 26 mins from the received time of 16.00
R005A12PEN100004	00	9992	3/17/2000 4:50:23 PM	3/17/2000 8:18:15 PM	X			Disagree, BellSouth sent the FOC at 16.17 which is 17 mins from the received time of 16.00
R011C22PEN100012	01	9992	5/18/2000 5:11:15 PM	5/18/2000 9:00:50 PM	X			Disagree, BellSouth sent the FOC at 19.33 which is 2 hrs and 47 mins form the received time of 16.46
R017A11PEN000005	00	9991	3/29/2000 4:30:35 PM	3/29/2000 8:05:15 PM	X			Disagree, BellSouth sent the FOC at 17.47 which is 41 mins from the received time of 17.06
R013A12PEN100001	00	9990	3/30/2000 11:09:15am	3/30/2000 2:53:10 PM	X			Disagree, BellSouth sent the FOC at 13.12 which is 41 mins from the received time of 12.00
R001X12PEN100001	00	9990	2/24/2000 2:16:12 PM	2/24/2000 6:33:51 PM		X		Disagree, BellSouth sent the FOC at 16.41. which is 2hrs and 41 mins from the received time of 14.00

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 78

PON	VER	CC	LSR Sent	FOC Rcvd				
R013A22PEN100001	01	9991	2/25/2000 8:57:11 AM	2/25/2000 2:57:31 PM		X		Disagree, BellSouth sent the FOC at 11.26 which is 26 mins from the received time of 11.00
R005A12PEN100007	00	9992	3/17/2000 4:56:46 PM	3/17/2000 9:56:10 PM		X		Disagree, BellSouth sent the FOC at 19.47 which is 17 mins from the received time of 19.30
R001A21PEN100001	00	9990	2/18/2000 1:22:58 PM	2/18/2000 9:56:36 PM			X	Disagree, BellSouth sent the FOC at 20.01 which is 25 mins from the received time of 20.26
R005E22PEN100001	00	9991	2/18/2000 1:26:55 PM	2/18/2000 10:34:55 PM			X	Disagree, BellSouth sent the FOC at 20.32 which is 31 mins from the received time of 20.01
R010A12PEN100003	00	9991	2/18/2000 1:30:32 PM	2/18/2000 9:56:36 PM			X	Disagree, BellSouth sent the FOC at 20.26 which is 25 mins from the received time of 20.01
R027A11PEN100005	00	9991	2/18/2000 1:37:40 PM	2/18/2000 9:56:36 PM			X	Disagree, BellSouth sent the FOC at 20.26 which is 25 mins from the received time of 20.01
R001A12PEN100001	00	9991	2/18/2000 3:53:05 PM	2/18/2000 9:56:36 PM			X	Disagree, BellSouth sent the FOC at 20.26 which is 25 mins from the received time of 20.01
R017D11PEN100003	00	9991	2/25/2000 8:38:30 AM	2/25/2000 2:57:31 PM			X	Disagree, BellSouth sent the FOC at 11.26 which is 49 mins from the received time of 10.37

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 78

PON	VER	CC	LSR Sent	FOC Rcvd				
R005A12PEN100010	00	9992	3/17/2000 5:00:34 PM	3/18/2000 4:17:57 AM			X	Disagree, BellSouth sent the FOC at 20.56 which is 1 hr and 26 mins from the received time of 19.30
R005A22PEN100002	02	9993	3/27/2000 2:59:10 PM	3/28/2000 12:00:44 AM			X	Disagree, BellSouth sent the FOC at 15.32 which is 1 hr and 2 mins from the received time of 14.30

Impact

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

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

BellSouth Response

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

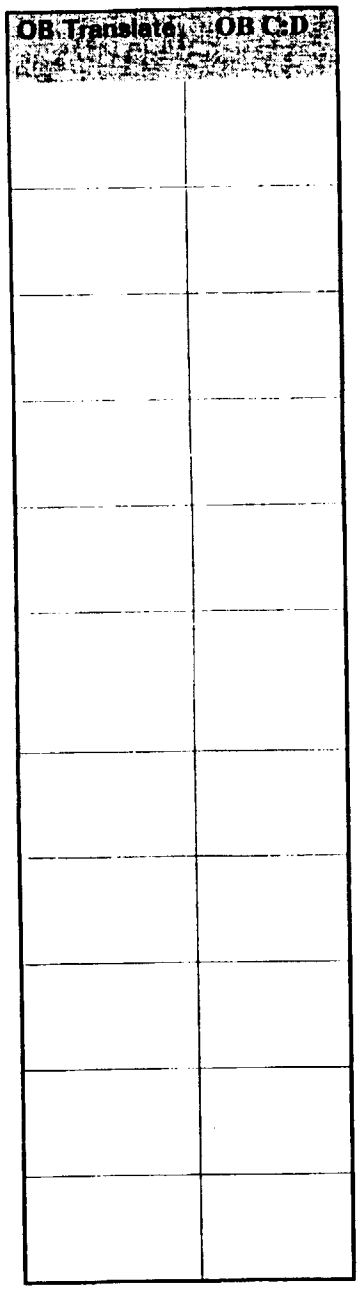
With the exception of 2 LSRs, all of the examples cited are beyond the 150 day retention period maintained by the EDI application. BellSouth is not able to provide the date and time stamp information for the other 18 LSRs listed above. The attached spreadsheet provides the EDI Translate time in and out for the LSRs for which the data is still available.

Exception 78 Amended

PON	VER	CG	LSR Sent	FOC Rcvd	3-4 hrs	4-6 hrs	6-10 hrs	Response	IB C:D	IB Translate
R001A21PEN100001	0	9990	2/18/00 13:22	2/18/00 21:56			X	Disagree, BellSouth sent the FOC at 20.01 which is 25 mins from the received time of 20.26		
R005E22PEN100001	0	9991	2/18/00 13:26	2/18/00 22:34			X	Disagree, BellSouth sent the FOC at 20.32 which is 31 mins from the received time of 20.01		
R010A12PEN100003	0	9991	2/18/00 13:30	2/18/00 21:56			X	Disagree, BellSouth sent the FOC at 20.26 which is 25 mins from the received time of 20.01		
R027A11PEN100005	0	9991	2/18/00 13:37	2/18/00 21:56			X	Disagree, BellSouth sent the FOC at 20.26 which is 25 mins from the received time of 20.01		
R001A12PEN100001	0	9991	2/18/00 15:53	2/18/00 21:56			X	Disagree, BellSouth sent the FOC at 20.26 which is 25 mins from the received time of 20.01		
R001X12PEN100001	0	9990	2/24/00 14:16	2/24/00 18:33		X		Disagree, BellSouth sent the FOC at 16.41. which is 2hrs and 41 mins from the received time of 14.00		
R017D11PEN100003	0	9991	2/25/00 8:38	2/25/00 14:57			X	Disagree, BellSouth sent the FOC at 11.26 which is 49 mins from the received time of 10.37		
R013A22PEN100001	1	9991	2/25/00 8:57	2/25/00 14:57		X		Disagree, BellSouth sent the FOC at 11.26 which is 26 mins from the received time of 11.00		
R001A12PEN100003	0	9990	2/28/00 16:17	2/28/00 19:19	X			Disagree, BellSouth sent the FOC at 16.48 which is 18 mins from the received time of 16.30		
R005E22PEN100003	0	9990	2/28/00 16:18	2/28/00 19:19	X			Disagree, BellSouth sent the FOC at 16.48 which is 18 mins from the received time of 16.30		
R005A12PEN100003	0	9992	3/17/00 16:47	3/17/00 20:18	X			Disagree, BellSouth sent the FOC at 16.26 which is 26 mins from the received time of 16.00		

Exception 78 Amended

PON	VER	CG	ESR Sent	FOC Rcvd	3-4 hrs	4-6 hrs	6-10 hrs	Response	IR CSD	IR Translate
R005A12PEN100004	0	9992	3/17/00 16:50	3/17/00 20:18	X			Disagree, BellSouth sent the FOC at 16.17 which is 17 mins from the received time of 16.00		
R005A12PEN100007	0	9992	3/17/00 16:56	3/17/00 21:56		X		Disagree, BellSouth sent the FOC at 19.47 which is 17 mins from the received time of 19.30		
R005A12PEN100010	0	9992	3/17/00 17:00	3/18/00 4:17			X	Disagree, BellSouth sent the FOC at 20.56 which is 1 hr and 26 mins from the received time of 19.30		
R005A22PEN100002	2	9993	3/27/00 14:59	3/28/00 0:00			X	Disagree, BellSouth sent the FOC at 15.32 which is 1 hr and 2 mins from the received time of 14.30		
R017A11PEN000005	0	9991	3/29/00 16:30	3/29/00 20:05	X			Disagree, BellSouth sent the FOC at 17.47 which is 41 mins from the received time of 17.06		
R027B11PEN000003	0	9990	3/29/00 16:32	3/29/00 20:12	X			Disagree, BellSouth sent the FOC at 18.45 which is 1hr and 39 mins from the received time of 17.06		
R013A12PEN100001	0	9990	3/30/00 11:09	3/30/00 14:53	X			Disagree, BellSouth sent the FOC at 13.12 which is 41 mins from the received time of 12.00		
R013H12PEN100001	0	9992	5/1/00 17:02	5/1/00 20:20	X			Disagree, BellSouth sent the FOC at 19.13 which is 2hrs and 58 mins from the received time of 16.15	n/a	16:07:00
R011C22PEN100012	1	9992	5/18/00 17:11	5/18/00 21:00	X			Disagree, BellSouth sent the FOC at 19.33 which is 2 hrs and 47 mins form the received time of 16.46	16:13:54	16:34:00



OB Translate	OB C:D

OB Translate	OB CtD
19:16:00	n/a
19:55:00	20:02:32

BELLSOUTH'S SEVENTH AMENDED RESPONSE TO EXCEPTION 86

BELLSOUTH

November 9, 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 SEVENTH 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 SEVENTH 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 SEVENTH 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 SEVENTH 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 SEVENTH 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.

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%

BELLSOUTH'S SEVENTH 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 SEVENTH 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 SEVENTH 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 SEVENTH 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 SEVENTH 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 SEVENTH 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 SEVENTH 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 SEVENTH 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 SEVENTH 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 SEVENTH 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 SEVENTH 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 SEVENTH 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 rogramming and is extremely labor intensive, therefore, BST asks that reports for March 2000 forward be used for validation.

CR#6139- In order to replicate this measure, two fields must be added to the raw data table. The first addition should be the NODS_WO.CMPLTN_DT field. This field will contain the CMPLTN_DT from the NODS_WO table. The NODS_WO.CMPLTN_DT field will allow us to include an instruction in the Raw Data User's Guide (RDUG) to perform an important check on the data. This check, using the CMPLTN_DT for the trouble from WFA, will be used in the "TRBL_DT (NODS_TICKET)-NODS_WO.CMPLTN_DT <= 30" calculation. This check will replace the current statement which is "TRBL_DT (NODS_TICKET)-NODS_SO.CMPLTN_DT <= 30".

The second addition to raw data must be the NODS_TICKET.SOURCE field. This field will identify which source system the trbl_dt field originates (WFA or LMOS). Records from LMOS and WFA are affected differently, and require different logic to reproduce the correct results. Therefore, another set of instructions will be added to the RDUG to handle records whose TRBL_DT is being pulled from LMOS independently from those being pulled from WFA.

The addition of these two fields will give KPMG the capability to replicate June 2000 Percent Provisioning Troubles within 30 days for all regions using the raw data.

BELLSOUTH'S SEVENTH AMENDED RESPONSE TO EXCEPTION 86

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).

BELLSOUTH'S SEVENTH AMENDED RESPONSE TO EXCEPTION 86

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

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)

1.) 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 will allow 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.

BellSouth has updated the Raw Data Users Manual to include these instructions. The RDUM was released in early October 2000.

CR#625 – Remove any reference to OCI or the joining / combining of OCI & PMI. Steps 7-10 were changed in Version 2.0.10 October 11, 2000 release.

The following instruction should read for Non trunks in Step 8 to remove the word "combined": "Filter the raw data so that it only includes records according to the following criteria. This is necessary to eliminate the assumption that there is a merging of data sets.

The following instruction should read for Trunks in Step 9 to remove the word "combined": "Filter the raw data so that it only includes records according to the following criteria". This is necessary to eliminate the assumption that there is a merging of data sets. Bullet 7 should read "Include records where the cmtt_dt< the cmpltn_dt". This was necessary to eliminate the reference to OCI.

These changes to the Raw Data User Manual will be made in the November 15, 2000 release.

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 SEVENTH 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 ELEVENTH AMENDED RESPONSE TO EXCEPTION 89

BELLSOUTH

November 14, 2000

EXCEPTION REPORT

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

Exception:

Raw 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 ELEVENTH 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

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

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 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.

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 ELEVENTH AMENDED RESPONSE TO EXCEPTION 89

KPMG requested to review trunk blocking data for another month and BellSouth provided January 2000 Trunking Data on 7/24/00. Due to the fact that January Trunk Group Service Reports were rerun, KPMG requested another month. BellSouth provided March 2000 early stage data for the *Trunk Group Service Report (Percentage of Trunks Blocked Over a One-Month Period).*

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

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 (Rls. 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

[9] These discrepancies were found for the HALCRIS system on the LENS server.
[10] KPMG compared raw data records with the earlier-stage data for the population of raw data records provided by BellSouth.

alternate option calls separately from the NCO (Calls Offered) data. After the last cutover is completed, in Florida on September 26th, BellSouth plans to eliminate the manual process and begin tracking alternate option data separately on a regionwide basis. This process change will enhance quality control by reducing the need for manual additions. Therefore, additional review of the data could be performed beginning with the October 1st 2000 data.

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

1) Record 1: cc = '7574' and pon = '26017' ver = 0
The LEO source system data identifies the LSR as Mechanized (LSR.manual_code = 'MECH') because the LSR was electronically submitted through LENS (LSR.system_init_id = 'WEB'). A manual code indicating Mechanized does not preclude an LSR from being a Partially Mechanized LSR. Partially Mechanized LSRs are any electronically submitted LSR requiring manual handling. An LSR presence in LON is evidence of manual handling; thus, any LSR with a PON that can be found in both systems, LEO and LON, is reclassified as a Partially mechanized LSR.

2) Record 2: cc = '7727' and pon = 'DLT99BRS15076N' ver = 1
The reject duration for Partially Mechanized LSRs that are Manually Claimed Rejects is the interval between the timestamp when the AUDIT.notes contain the string 'Claimed By' and the time when an LSR is created in LEO. For this LSR the interval would 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.

BELLSOUTH'S ELEVENTH AMENDED RESPONSE TO EXCEPTION 89

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.

BELLSOUTH'S ELEVENTH AMENDED RESPONSE TO EXCEPTION 89

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?

BELLSOUTH'S ELEVENTH AMENDED RESPONSE TO EXCEPTION 89

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

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'S ELEVENTH AMENDED RESPONSE TO EXCEPTION 89

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 ELEVENTH AMENDED RESPONSE TO EXCEPTION 89

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

BellSouth agrees that 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, provided in December 1999, to agree with raw data values.

In order to provide an answer to this data discrepancy, the Audit Support Team will provide KPMG with June 2000 raw data due to the fact that the queries used to extract the original data are not available. BellSouth provided June 2000 raw data to KPMG on 9/22/00.

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.

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 ELEVENTH AMENDED RESPONSE TO EXCEPTION 89

BELLSOUTH'S TWELVTH AMENDED RESPONSE TO EXCEPTION 89

BELLSOUTH

November 16, 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].

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[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 TWELVTH 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

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

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 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.

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 TWELVTH AMENDED RESPONSE TO EXCEPTION 89

KPMG requested to review trunk blocking data for another month and BellSouth provided January 2000 Trunking Data on 7/24/00. Due to the fact that January Trunk Group Service Reports were rerun, KPMG requested another month. BellSouth provided March 2000 early stage data for the *Trunk Group Service Report (Percentage of Trunks Blocked Over a One-Month Period).*

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

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 (Rls. 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

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

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

alternate option calls separately from the NCO (Calls Offered) data. After the last cutover is completed, in Florida on September 26th, BellSouth plans to eliminate the manual process and begin tracking alternate option data separately on a regionwide basis. This process change will enhance quality control by reducing the need for manual additions. Therefore, additional review of the data could be performed beginning with the October 1st 2000 data.

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

1) Record 1: cc = '7574' and pon = '26017' ver = 0
The LEO source system data identifies the LSR as Mechanized (LSR.manual_code = 'MECH') because the LSR was electronically submitted through LENS (LSR.system_init_id = 'WEB'). A manual code indicating Mechanized does not preclude an LSR from being a Partially Mechanized LSR. Partially Mechanized LSRs are any electronically submitted LSR requiring manual handling. An LSR presence in LON is evidence of manual handling; thus, any LSR with a PON that can be found in both systems, LEO and LON, is reclassified as a Partially mechanized LSR.

2) Record 2: cc = '7727' and pon = 'DLT99BRS15076N' ver = 1
The reject duration for Partially Mechanized LSRs that are Manually Claimed Rejects is the interval between the timestamp when the AUDIT.notes contain the string 'Claimed By' and the time when an LSR is created in LEO. For this LSR the interval would 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.

BELLSOUTH'S TWELVTH AMENDED RESPONSE TO EXCEPTION 89

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.

BELLSOUTH'S TWELVTH AMENDED RESPONSE TO EXCEPTION 89

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

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/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?

BELLSOUTH'S TWELVTH AMENDED RESPONSE TO EXCEPTION 89

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

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'S TWELVTH AMENDED RESPONSE TO EXCEPTION 89

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 TWELVTH AMENDED RESPONSE TO EXCEPTION 89

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

BellSouth agrees that KPMG could not perform a data comparison for the BellSouth October 1999 report for Held Order Interval for Trunks. Specifically KPMG could not get BellSouth's ICAIS/BARNEY data, provided in December 1999, to agree with raw data values.

A significant issue prevented BellSouth from recreating the October 1999 ICAIS/BARNEY data, originally provided in December 1999. The original queries used to extract the original October 1999 data are irretrievable.

Because of PMAP data source coding changes in April and May, KPMG agreed to review June data. In order to provide an answer to this data discrepancy, the BellSouth Audit Support Team first provided KPMG with June 2000 data on 9/22/00. Due to several updates to the Raw Data Users Manual for Provisioning Measurements, BellSouth and KPMG agreed to use September 2000 data for this Exception.

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.

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 TWELVTH AMENDED RESPONSE TO EXCEPTION 89

BELLSOUTH'S SEVENTH AMENDED RESPONSE TO EXCEPTION 92

BELLSOUTH

November 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*

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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.

The raw data file used for the calculation of this SQM did not list the component MRLM53BM, whereas the early stage data listed the component as a part of LMOS-FE model/version. In other words, the data related to this component are missing from the raw data file.

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

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

BELLSOUTH'S SEVENTH AMENDED RESPONSE TO EXCEPTION 92

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.

BELLSOUTH'S SEVENTH AMENDED RESPONSE TO EXCEPTION 92

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.

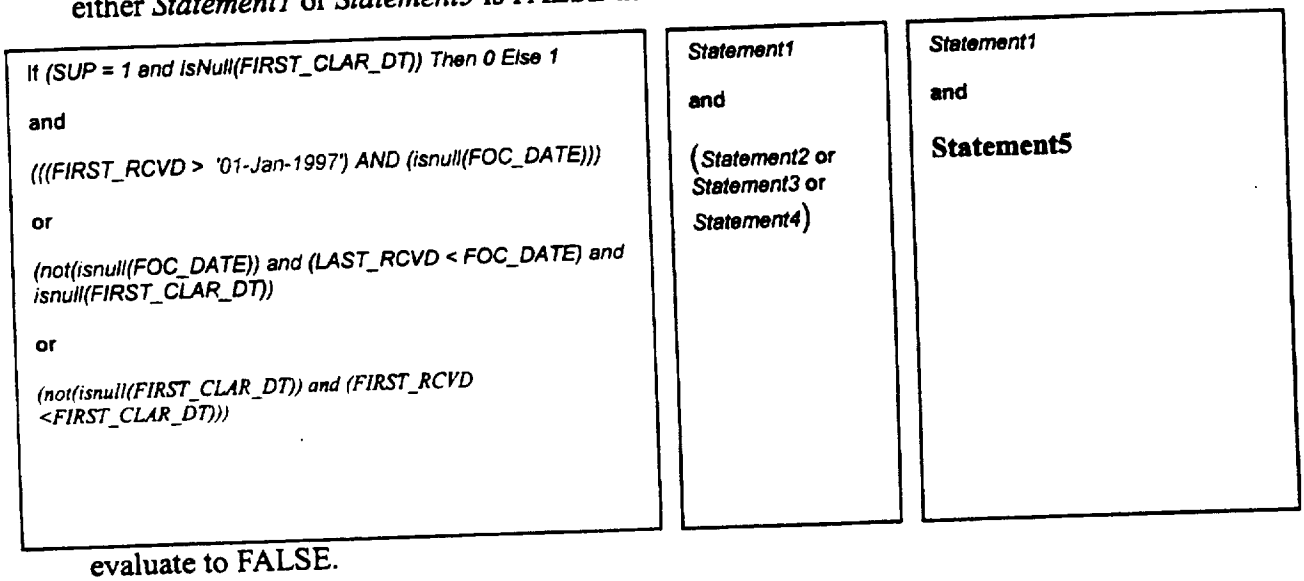
BELLSOUTH'S SEVENTH AMENDED RESPONSE TO EXCEPTION 92

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.



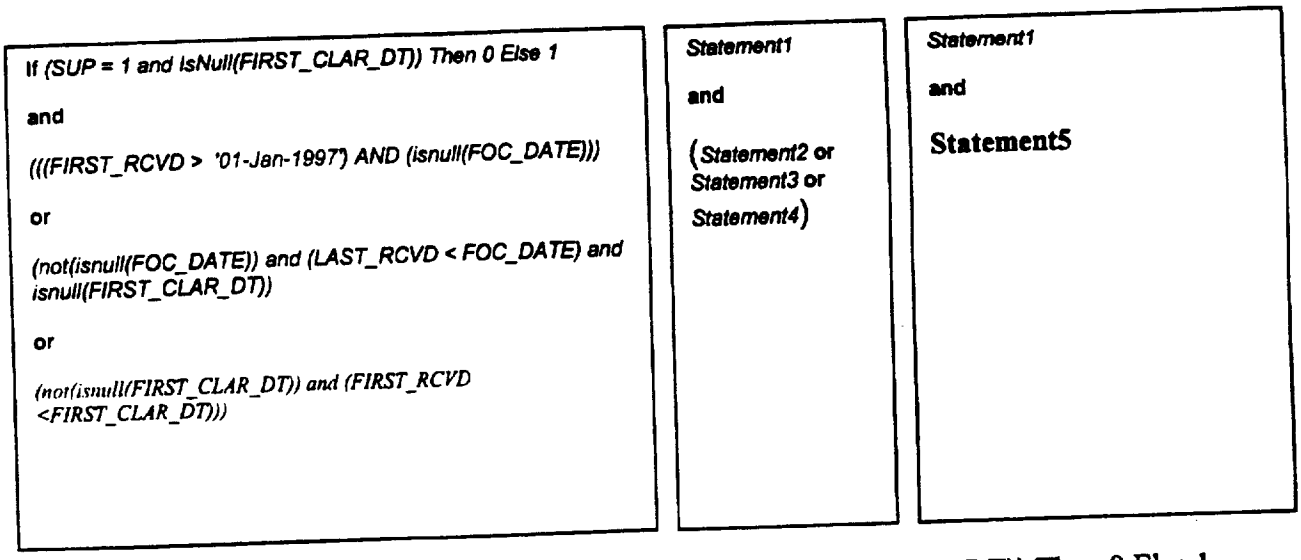
To find if the entire logic statement is TRUE or FALSE first evaluate *Statement1* using the instructions below. If *Statement1* is FALSE then there is no need to continue the evaluation because the entire original statement will be FALSE. If *Statement1* is TRUE then *Statement5* must be evaluated as 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

BELLSOUTH'S SEVENTH AMENDED RESPONSE TO EXCEPTION 92

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	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.

BELLSOUTH'S SEVENTH AMENDED RESPONSE TO EXCEPTION 92

				any more additional information on these records.	OCI/PMI/TROUBLES WITHIN 30 DAYS - This record has a status of "pending". These measurements only report on completed orders.
5	DP7H54W4	10/15/99	9128245251	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	This is a listing order - no work performed, therefore, this is not reported on.
6	DPCRPD37	10/15/99	9128532415	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	This is a listing order - no work performed, therefore, this is not reported on.
7	NP4B72G6	10/15/99	7066363748	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	This is a listing order - no work performed, therefore, this is not reported on.
8	NP7497P3	10/15/99	7063353357	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	This is a listing order - no work performed, therefore, this is not reported on.
9	NP764WT6	10/15/99	9125296473	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	This is a listing order - no work performed, therefore, this is not reported on.
10	TO420Y26	10/15/99	7706508811	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	HELD ORDER - This record had a commitment date that was outside of the reporting period, and therefore is not considered in this month's report. OCI/PMI/TROUBLES WITHIN 30 DAYS - This record has a status of "pending". These measurements only report on completed orders.

BELLSOUTH'S SEVENTH AMENDED RESPONSE TO EXCEPTION 92

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

The five trouble tickets in a sample of 50 trouble tickets from the LMOS and WFA systems, opened on October 15, 1999, are explained below. They are as follows:
(1) 7709465348,
(2) 50/QGDA/501036 /SB,
(3) 38/LXFU/600197 /SB,
(4) 8002 /T1 /ATLBGACL1MD/MRTTGAEA97F,
(5) 4117 /T3Z /ATLNGABUK12/ATLNGABUTMD

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

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

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

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

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

The remaining referenced account, as noted in the CABS Bill Verification report for 1st Bill Period noted 'Suppressed' for the paper bill as indicated in the comments column.

BELLSOUTH'S SEVENTH AMENDED RESPONSE TO EXCEPTION 92

The electronic media transmit date for this account was omitted from the final report, however the bill was transmitted to the customer on the 5th workday.

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

(1) A mechanized work request has been targeted for implementation. This request will provide a list of CABS billing account numbers and media types for the Bill Distribution Center (BDC) to use in reporting the timeliness of Invoices released. The majority of this request is currently implemented. The implementation date of the final mechanization for CABs Billing Account Numbers is scheduled for September 2000, however the manual process for review is currently in place to be tested.

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

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

KPMG has requested another month of data to review the accuracy of the raw data (by comparing a sample of raw data values with their early-stage counterparts); and the completeness of the raw data (by analyzing whether a consecutive block of early-stage data is entirely accounted for in the raw data). BellSouth determined that due to Bill Distribution errors, that the months of July and August should not be used by KPMG to revalidate the Billing Metric *Mean Time to Deliver Invoices* for CLECs. On 11/13/00, BellSouth sent raw data for September 2000 for KPMG review of the Billing Metric *Mean Time to Deliver Invoices* for CLECs.

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

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

The Spreadsheets produced by Bill Distribution for the BellSouth Aggregate billing raw data are checked for reasonableness. Th errors identified in the October 1999 data were the result of human error. The spreadsheet providing the incorrect state percentages has

been corrected and manually reviewed. Bill Distribution will continue to do monthly random reasonableness checks in the future to ensure accurate reporting.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 98

BELLSOUTH

November 14, 2000

EXCEPTION REPORT

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

Exception:

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

Background: In response to a valid Local Service Request[1] (LSR) that contains an error, BellSouth returns a CLR to the CLEC. A CLR is generated in one of two ways:

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

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

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

BellSouth Performance[2]: In response to LSRs submitted via TAG and EDI, BellSouth failed to deliver timely partially mechanized CLR responses.

- 58% of partially mechanized CLRs were returned via the TAG interface within the specified timeframe[3].

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

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

- 63% of partially mechanized CLRs were returned via the EDI interface within the specified timeframe[4].

The following tables provide a detailed breakdown of response time for partially mechanized CLRs[5].

Partially Mechanized CLR Timeliness Summary

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

Partially Mechanized CLR Detail – Untimely TAG CLRs

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

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

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

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

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 98

PON	VER	CC	24-48 hrs	48-72 hrs	[illegible] hours
305A122PTH101002	05	9994	X		
615A122PTH101009	05	9991	X		
615A122PTH101009	04	9991	X		
620A212PTH101001	00	9992	X		
620A212PTH101001	07	9992	X		
301A212PTH100014	00	9994	X		
301A212PTF100015	00	9994	X		
608A124PTJ100001	02	9991	X		
301A222PTH101001	00	9994	X		
301A222PTH101001	03	9994	X		
615A122PTF100012	00	9991	X		
301A112PTH100027	01	9994	X		
626A224PTJ100002	02	9991	X		
303A212PTH101001	01	9994	X		
626A224PTJ100007	00	9991	X		
301A222PTH101001	02	9994	X		
435A114PTJ001002	00	9991	X		
399D213PTM100001	00	9994	X		
305A212PTH100007	00	9994	X		
650A224PTJ000001	00	9994	X		
402E223PTM000002	03	9994	X		
403A223PTM100003	00	9994	X		
403A223PTM100005	00	9994	X		
600C212PTH100001	02	9994	X		
307A222PTF101015	00	9994	X		
409A223PTM100001	02	9991	X		
415D213PTM001002	00	9991	X		
417X223PTM000002	01	9991	X		
323A122PTF100003	00	9991	X		
418A313PTM100002	00	9994	X		
323A122PTH100001	00	9991	X		
398D213PTM000001	00	9994	X		
307X222PTH100001	02	9994	X		
330A222PTI100001	00	9994	X		
333A122PTI101001	00	9992	X		
374A225PTG100005	00	9992	X		
307A222PTH100014	00	9994	X		
307A222PTF102018	03	9994	X		
308F312PTH000003	05	9994	X		
398A213PTM100001	02	9994	X		
398A213PTM100002	00	9994	X		

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 98

PON	VER	CC	24-48 hrs	48-72 hrs	>72 hours
398D213PTM000001	01	9994	X		
419F223PTM101002	00	9991	X		
415D213PTM001002	01	9991	X		
423A114PTJ000001	01	9994	X		
307A122PTH101002	00	9994	X		
307A122PTH100006	00	9994	X		
307A122PTH100004	00	9994	X		
432A214PTJ100004	00	9991	X		
307A122PTF100015	05	9994	X		
433A124PTJ100001	00	9991	X		
317A122PTH000004	00	9991	X		
307A122PTF100015	00	9994	X		
435C114PTJ001019	00	9991	X		
307A122PTH101002	01	9994	X		
307A122PTH101002	02	9994	X		
428A224PTJ100009	00	9994	X		
424A314PTJ000001	00	9994	X		
307A122PTH103002	07	9994	X		
428A124PTJ100012	00	9994	X		
428A124PTJ100006	00	9994	X		
315A212PTH100023	00	9994	X		
307A222PTH101014	04	9994	X		
309A222PTH100001	03	9994		X	
604A224PTJ000001	03	9994		X	
625A214PTJ100001	05	9991		X	
305A212PTH101007	00	9994		X	
423F114PTJ100002	02	9994		X	
606A123PTM100003	00	9991		X	
403X223PTM100002	01	9994		X	
404A223PTM100001	00	9991		X	
428A224PTJ100002	00	9991		X	
407A213PTM100003	00	9991		X	
404A223PTM100001	01	9991		X	
328F312PTI000002	01	9992			X
301A112PTH100009	03	9994			X
309A222PTH100001	04	9994			X
406C213PTM100002	02	9994			X
329A212PTI100003	00	9992			X
398A213PTM100001	00	9994			X
398A213PTM100001	03	9994			X
398D213PTM000001	02	9994			X

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 98

PON	VER	CC	24-48 hrs	48-72 hrs	> 72 hours
398D213PTM000001	03	9994			X
417A223PTM000002	00	9991			X
423A114PTJ000001	00	9994			X
305A112PTH100007	00	9994			X
626A224PTJ100002	03	9991			X
315A212PTH101002	05	9994			X

Partially Mechanized CLR Detail – Untimely EDI CLRs

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

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 98

PON	VER	CC	24-48 hrs	48-72 hrs	>72 hours
329A212PEI100004	00	9992	X		
307A222PEF100013	00	9994	X		
325C222PEI001001	02	9992	X		
325C222PEI001001	00	9992	X		
325C222PEI000001	00	9992	X		
627A214PEJ100004	00	9991	X		
307A122PEH101003	03	9994	X		
307A222PEF100021	02	9994	X		
307A222PEH101001	00	9994	X		
307A222PEH101001	01	9994	X		
324A112PEH100002	06	9991	X		
307A222PEH102001	04	9994	X		
319A122PEH000003	00	9991	X		
319A122PEF000003	00	9991	X		
309A122PEH100001	03	9991	X		
315X212PEH101001	02	9991	X		
307A222PEH100009	00	9994	X		
307A122PEH100005	01	9994	X		
378A315PEI001001	05	9992	X		
305A222PEH101009	00	9994	X		
428X224PEJ102001	00	9994	X		
428A224PEJ100005	01	9994	X		
428A224PEJ100005	00	9994	X		
428A224PEJ100003	00	9994	X		
427A314PEJ101001	00	9994	X		
307A122PEF100003	00	9994	X		
409X223PEM100001	00	9991	X		
405A312PEM001002	00	9994	X		
325A212PEI000003	01	9992	X		
400A313PEM000001	02	9994	X		
402A223PEM000001	00	9994	X		
607A214PEJ103001	03	9991		X	
456A216PEF100001	00	9991		X	
627A214PEJ100001	01	9991		X	
399A213PEM100002	01	9994		X	
378A315PEI001001	04	9992		X	
309A122PEH100001	00	9991		X	
400A313PEM000001	00	9994		X	
607A214PEJ103001	00	9991		X	
420A124PEJ101001	00	9994		X	
303A222PEH101001	03	9994			X

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

Impact

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

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

Amended Exception

KCL is amending this exception to include the results of the Resale Functional Evaluation (PO&P-11). KCL experienced similar response timeliness problems with the delivery of partially-mechanized clarification on Resale service requests as those uncovered during the initial UNE evaluations (O&P-1 and O&P-2). The following tables provide a summary of PM CLR Timeliness during the Resale Evaluation.

PM CLR Timeliness – Resale TAG

< 24 hrs	24-36 hrs	36-48 hrs	48-72 hrs	> 72 hrs	TOTAL
72	11	11	2	6	**102**
70.6%	10.8%	10.8%	2.0%	5.9%	**100%**
	Total Late = 29.4%				

PM CLR Timeliness – Resale EDI

< 24 hrs	24-36 hrs	36-48 hrs	48-72 hrs	> 72 hrs	TOTAL
88	16	1	1	3	**109**
80.7%	14.7%	1.0%	1.0%	2.7%	**100%**
	Total Late = 19.3%				

The following table provides details about the late PM CLRs received.

PON	VER	CC	CLEC LSR Sent	CLR Rcvd	24-36 hrs	36-48 hrs	48-72 hrs	> 72 hrs	
R006A21PTN000001	00	9993	3/17/2000 9:26:27am	3/20/2000 9:35:43am	X				

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 98

PON	VER	CC	LSR Sent	CLR Rcvd	24-36 hrs	36-[illegible] hrs	[illegible]	[illegible]	BellSouth Response
R042A12PTN100016	01	9990	5/18/2000 12:32:45pm	5/19/2000 12:46:27pm	X				Do not agree CLR sent in 20 hrs
R029A21PTN000005	00	9993	4/3/2000 1:41:12 pm	4/4/2000 2:06:28 pm	X				
R042A12PTN100012	00	9990	4/10/2000 10:31:59am	4/11/2000 11:17:43am	X				Agree
R010A21PTN100001	00	9993	3/15/2000 10:39:07am	3/16/2000 2:09:56 pm	X				
R010A21PTN100002	00	9993	3/15/2000 10:39:57am	3/16/2000 2:18:57 pm	X				Agree
R010A11PTN100001	00	9992	3/15/2000 10:21:30am	3/16/2000 2:15:57 pm	X				Agree
R013C21PTN000002	01	9991	4/12/2000 1:38:30 pm	4/13/2000 6:18:45 pm	X				
R013B21PTN000001	01	9993	4/12/2000 1:10:15 pm	4/13/2000 6:18:44 pm	X				Agree
R011C22PTN100001	02	9992	3/15/2000 11:02:45am	3/16/2000 4:30:58 pm	X				
R041A21PTN100006	00	9990	4/7/2000 9:48:07 am	4/10/2000 3:44:08 pm	X				

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 98

PON	VER	CC	LSR Sent	CLR Rcvd	24-36 hrs	36-48 hrs	[illegible] hrs	[illegible]	BellSouth Response
R047A12PTN000001	00	9991	4/12/2000 5:53:45 pm	4/14/2000 9:08:44 am		X			
R042A12PTN100012	02	9990	4/17/2000 2:24:25 pm	4/19/2000 8:11:03 am		X			Agree
R010A21PTN100005	01	9993	4/25/2000 3:07:30 pm	4/27/2000 9:10:59 am		X			
R031H21PTN000001	00	9990	5/2/2000 3:52:56 pm	5/4/2000 11:17:48am		X			Agree
R047A11PTN000017	00	9991	4/7/2000 2:55:08 pm	4/11/2000 10:48:42am		X			
R010A21PTN100005	00	9993	4/18/2000 1:43:09 pm	4/20/2000 11:26:47am		X			Agree
R044A21PTN000001	00	9993	4/19/2000 12:44:34pm	4/21/2000 10:52:46am		X			
R039A21PTN000001	01	9991	5/5/2000 2:27:22 pm	5/9/2000 1:07:07 pm		X			Agree
R025H11PTN100004	00	9991	4/28/2000 2:06:40 pm	5/2/2000 12:53:56pm		X			
R006A21PTN000001	03	9993	3/27/2000 2:08:12 pm	3/29/2000 1:04:46 pm		X			Agree
R006C22PTN000001	00	9992	3/22/2000 4:20:04 pm	3/24/2000 3:16:42 pm		X			
R017D11PTN100005	02	9991	3/14/2000 4:32:15 pm	3/17/2000 3:07:34 pm			X		Do not agree CLR sent in 46 hrs 25 mins
R029A21PTN000032	00	9993	5/18/2000 11:34:45am	5/23/2000 10:25:29am			X		Agree
R042A12PTN000020	00	9990	5/2/2000 2:10:06 pm	5/5/2000 4:11:53 pm				X	Agree
R011F12PTN100015	00	9992	3/22/2000 10:33:11am	3/28/2000 12:00:44am				X	Agree
R026D12PTN000001	00	9990	5/3/2000 4:06:28 pm	5/9/2000 3:20:07 pm				X	Agree
R047A11PTN000026	00	9991	4/19/2000 10:49:54am	4/26/2000 8:43:52 am				X	Do not agree, Invalid TN for complex service assigned by KPMG in error. BellSouth followed established process.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 98

PON	VER	CC	LSR Sent	CLR Rcvd	24-36 hrs	36-48 hrs	48+ hrs	BellSouth	
R040A21PTN100021	00	9990	4/26/2000 10:20:26am	5/3/2000 2:17:41 pm				X	Do not agree. BellSouth sent FOC and then sent CLR due to working TN assigned by KPMG in error. BellSouth followed established process.
R011F12PTN100029	01	9992	5/18/2000 10:38:03am	6/1/2000 6:04:44 pm				X	Do not agree, BellSouth sent FOC and then sent CLR due to working TN assigned by KPMG in error. BellSouth followed established process.
R047A11PEN001004	00	9991	04/04/00 11:06 am	04/05/00 12:22 pm	X				
R055H12PEN000001	03	9990	05/03/00 02:41 pm	05/04/00 04:32 pm	X				
R047A11PEN001016	00	9991	04/04/00 11:15 am	04/05/00 12:22 pm	X				
R036A21PEN000012	00	9990	05/02/00 03:17 pm	05/03/00 04:11 pm	X				
R041B21PEN100001	00	9990	04/07/00 10:15 am	04/10/00 04:42 pm	X				
R011C22PEN100007	02	9992	03/17/00 02:53 pm	03/20/00 05:18 pm	X				
R025X11PEN100001	00	9991	02/24/00 02:10 pm	02/25/00 02:57 pm	X				
R026A11PEN000002	00	9993	04/07/00 03:18 pm	04/10/00 04:42 pm	X				
R011C22PEN100006	03	9992	03/17/00 02:48 pm	03/20/00 05:18 pm	X				
R011C22PEN100005	02	9992	03/17/00 02:43 pm	03/20/00 05:18 pm	X				
R028D11PEN000001	02	9990	03/17/00 01:39 pm	03/20/00 03:49 pm	X				
R035A12PEN000001	00	9991	02/18/00 02:10 pm	02/21/00 06:09 pm	X				
R038A21PEN000001	01	9991	02/22/00 01:16 pm	02/23/00 08:38 pm	X				
R041A21PEN100007	00	9990	04/07/00 09:49 am	04/10/00 04:42 pm	X				

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 98

R011C22PEN100003	03	9992	03/17/00 02:07 pm	03/20/00 05:18 pm	X				

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 98

PON	VER	TCC	LSR Sent	CLR Rcvd	2456	3C-13			
R002A11PEN100001	00	9993	03/15/00 10:25 am	03/16/00 03:47 pm	X				
R042A12PEN000004	04	9990	04/17/00 11:30 am	04/19/00 08:45 am		X			
R028D11PEN100008	00	9990	04/12/00 03:31 pm	04/17/00 08:21 am			X		Agree
R047A12PEN001004	00	9991	05/16/00 04:10 pm	05/22/00 02:25 pm				X	Do not agree, BellSouth sent FOC and then sent CLR due to working TN assigned by KPMG in error. BellSouth followed established process.
R015C12PEN100001	00	9991	03/10/00 03:17 PM	03/17/00 04:15 PM				X	Do not agree, BellSouth sent FOC on 03/10/00 then sent CLR. Unable to obtain CLR reason PON over 6 months old, data has been archived
R015C12PEN000001	00	9991	03/13/00 11:37 AM	03/17/00 04:50 PM				X	Do not agree, BellSouth sent FOC on 03/13/00 then sent CLR. Unable to obtain CLR reason PON over 6 months old, data has been archived

BellSouth Response

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 108

BELLSOUTH

November 15, 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. The implementation data for the ordering phase is currently being negotiated.

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 FOURTH AMENDED RESPONSE TO EXCEPTION 108

BellSouth would like to clarify one point regarding the ADSL ordering process. FASS, is the only web-based front end interface used by the retail units. SOEG and SOCS are downstream systems that are used to track the ADSL request and process and provision the service.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 111

BELLSOUTH

November 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 Consulting LLC (KCL) cannot replicate one of BellSouth's reported Service Quality Measurements (SQMs) for the month of July 2000.

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.

KCL has been unable to replicate the following SQM values:

1. ***Total Service Order Cycle Time*** **in the Provisioning category for the KCL Test CLEC (July 2000).** The discrepancies found by KCL are listed in the table below:

Category	KCL Calculations	BellSouth's Reports
Non-Dispatch OCN 9994 UNE Non-Design < 10 Circuits > 30 Days	1	0
Non-Dispatch OCN 9994 UNE Non-Design < 10 Circuits	109	0

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

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

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 111

Category	KCL Calculation	BellSouth Report
Average Interval (Days)		

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 applicable SQM 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

KPMG was unable to replicate the July 2000 test CLEC report for *Total Service Order Cycle Time* (TSOCT). BellSouth was able to replicate the July 2000 test CLEC TSOCT report with the following changes, from CR # 478, to the Raw Data Users Manual.

Change #1

For the July 2000 version of the RDUM for the Total Service Order Cycle Time measure the following bullet point should be added to Step #3: 'Include records that have an so_cmtt_type_cd = 1 which indicates an original commitment.'

This change the RDUM will enable the selection of only records that indicate an original commitment. This change will be incorporated in the next release of the RDUM.

Change #2

For the May 2000 version of the RDUM for the Total Service Order Cycle Time measure Step # 4 should read 'Filter records on so_nbr/issu_dt and identify where the same so_nbr/issu_dt combination appears more than once. Keeping the first record, exclude all duplicate references to that so_nbr/issu_dt combination.'

This change to the RDUM is necessary because unique orders are defined by the combination of the so_nbr and issu_dt fields. This change was incorporated in the October 4, 2000 Version 2.0.10 release of the RDUM.

The exclusion "so_cmtt_cd is null" was inadvertently removed from the RDUM in July, but was added back in the October 4, 2000 Version 2.0.10 release of the RDUM.

Date: November 14, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Resale Provisioning Verification Evaluation (PO&P11).

Exception:

KPMG Consulting LLC (KCL) encountered BellSouth provisioning errors for Resale orders.

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

Of the 70 Resale orders that have been validated to date, 7 post-order CSRs (10.0%) contained different information than their corresponding LSRs. Of the 7 orders, 3 (42.8%) were flow-through and four (57.2%) were non-flow through[1].

Of the 88 Directory Listing for Resale orders, which were validated, 11 orders (12.5%) contained different information than their corresponding LSRs. Of the 11 orders, 8 (72.7%) were flow-through and three (27.3%) were non-flow through.

Of the 174 Switch Translations for Resale lines, which were validated, 15 lines (8.6%) contained different information than their corresponding LSRs. Of the 15 lines, five (33.3%) were flow-through and 10 (66.7%) were non-flow through.

The following tables provide the specific data.

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

CSR VERIFICATION					
PON	TN	OCN	VER	CSR Discrepancy	F/T
R047X12PTN001001	4046334415	9991	AA	Status reads Final	N
R038A21PEN000001	7704100614	9991	AF	Incorrect Listed-Name	N
R037A21PTN000001	4046339124	9993	AA	Incorrect YPH	N
R036A22PTN000001	7067242391	9990	AA	Additional Line	N
R011F12PTN100003	7068020193	9992	BB	Incorrect LN/NP	Y
R011B12PTN100003	7067229429	9992	AA	Incorrect LN/NP	Y
R011B12PTN100002	7062909707	9991	AA	Incorrect LN/NP	Y

DIRECTORY LISTING VERIFICATION					
PON	TN	OCN	VER	Directory Listing Database Discrepancy	F/T
R038A21PEN000001	7704100614	9991	AF	No listings found	N
R037A21PEN000003	4046334270	9993	AA	No listings found	N
R029A21PTN000014	6785790680	9993	AD	Listed as "non-published"	N
R011F12PTN100037	7068212781	9992	BA	Listed Name spelled incorrectly	Y
R011F12PTN100003	7068020193	9992	BB	Name listed wrong	Y
R011B21PTN000010	9127455852	9992	AC	No listings found	Y
R011B21PTN000008	7062929016	9992	AC	No listings found	Y
R011B21PEN000011	4046362184	9992	AB	No listings found	Y
R011B12PTN100003	7067229429	9991	AA	Listed as "non-published"	Y
R011B12PTN100002	7062909707	9991	AA	Listed as "non-published"	Y
R011B12PEN100001	9127455725	9991	AA	Listed as "non-published"	Y

SWITCH TRANSLATION VERIFICATION					
PON	TN	OCN	Switch Translations Discrepancy	VER	F/T
R047A12PEN000003	7705220673	9991	Not Assigned; Provisioned	AB	N
R045A11PTN000003	7709511935	9991	Not Assigned	AA	N
R041A21PEN100011	7062353476	9990	No GZC	AA	N
R041A21PEN100011	7062909109	9990	No GZC	AA	N
R041A21PEN100011	7063689094	9990	No GZC	AA	N
R041A21PEN100007	9127466398	9990	No GZC	AC	N
R041A21PEN100007	9127508284	9990	No GZC	AC	N
R041A21PEN100007	9127507024	9990	No GZC	AC	N
R035A12PTN000011	7063039642	9990	Not Assigned	AD	N
R035A12PTN000011	7063039776	9990	Not Assigned	AD	N
R028A11PTN000023	7709370232	9990	Not Restored	AA	Y
R028A11PTN000022	7705691074	9990	Not Restored	AA	Y
R028A11PTN000021	7709370284	9990	Not Restored	AA	Y
R028A11PEN000026	4043279046	9990	Not Restored	AA	Y
R028A11PEN000024	7706190397	9990	Not Restored	AA	Y

Impact

Inaccurate provisioning will affect CLECs in the following way:

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

BELLSOUTH'S RESPONSE TO EXCEPTION 113

BELLSOUTH

November 7, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Data Comparison test for Ordering & Provisioning service quality measurements (SQMs).

Exception:

BellSouth-reported raw data values for Commitment Date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Service Order numbers and Purchase Order numbers for six Provisioning metrics.

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, 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 each of the Provisioning metrics – *Mean Held Order Interval and Distribution Intervals, Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices, Percent Missed Installation Appointments, Average Completion Interval / Order Completion Interval Distribution, Average Completion Notice Interval,* and *Total Service Order Cycle Time* – KCL compared the BellSouth-reported values for COMMITMENT DATE in the raw data files with the due date (commitment date)[2] that KCL received from Hewlett Packard for March, April, and May 2000.

KCL could not match the BellSouth-reported values in these fields with the corresponding KCL-collected values for certain service order numbers and purchase order numbers. The table below shows the specific discrepancies for Commitment Date.

COMMITMENT DATE

PON	SO_NBR	MONTH	BLS-REPORTED VALUE	KCL-REPORTED[3] VALUE

[1] These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.
[2] Commitment Date is the due date indicated in the FOC that is received by HP and provided to KCL.
[3] These values are contained in response files provided to KCL by HP.

BELLSOUTH'S RESPONSE TO EXCEPTION 113

PON	SO_NBR	MONTH	BLS-REPORTED VALUE	KCL-REPORTED[3] VALUE
R010A11PTN100001	CO0VJ7L2	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R010A11PEN100003	CO24RH11	March	3/21/00 12:00 AM	03/24/00 12:00 AM
R002A11PEN100003	CO270WV2	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R002A11PTN101002	COBV58F5	March	3/23/00 12:00 AM	03/27/00 12:00 AM
R002A11PEN100005	CP0X8M92	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R010A11PTN100004	CP4CF625	March	3/21/00 12:00 AM	03/23/00 12:00 AM
R002A11PEN100001	CP5QH432	March	3/21/00 12:00 AM	03/28/00 12:00 AM
R002A11PTN100004	CP86GNN9	March	3/23/00 12:00 AM	03/28/00 12:00 AM
424A314PTJ000001	NO26B2P9	March	2/16/00 12:00 AM	03/01/00 12:00 AM
422A114PEJ101001	NOBJDYR1	March	2/18/00 12:00 AM	03/03/00 12:00 AM
615A122PTH102014	CP7R0531	April	4/27/00 12:00 AM	04/25/00 12:00 AM
R047A11PTN000018	NO4Y4Y46	April	4/27/00 12:00 AM	04/18/00 12:00 AM
378A315PEI001001	NP0FNX10	April	3/29/00 12:00 AM	03/23/00 12:00 AM
R041A21PTN100006	NP9V5K27	April	4/12/00 12:00 AM	04/17/00 12:00 AM
R041A21PEN100007	NPF01H46	April	4/12/00 12:00 AM	04/21/00 12:00 AM
R041B21PEN100001	NPF1MLT2	April	4/11/00 12:00 AM	04/17/00 12:00 AM
311F212PEH102002	CO2MXTV7	May	5/11/00 12:00 AM	05/10/00 12:00 AM
R036A22PTN000003	COVQ5886	May	5/1/00 12:00 AM	04/27/00 12:00 AM
R041A12PEN100009	NO0VF3L7	May	5/17/00 12:00 AM	05/18/00 12:00 AM
301A212PEH101016	NO2WDK96	May	5/5/00 12:00 AM	04/14/00 12:00 AM
301A212PTH102014	NO831LW8	May	12/29/00 12:00 AM	04/18/00 12:00 AM
398A213PEM000003	NP02RM89	May	5/2/00 12:00 AM	04/28/00 12:00 AM
378A315PEI001001	NP0FNX10	May	12/29/00 12:00 AM	03/23/00 12:00 AM
R041A12PEN100012	NP8HRNF6	May	5/12/00 12:00 AM	05/19/00 12:00 AM
305A122PTH105001	NP9MJXD8	May	5/8/00 12:00 AM	04/25/00 12:00 AM

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. If SQM reports are based on incomplete or incorrect raw data, CLECs will not receive accurate SQM information for these purposes.

BellSouth Response

BellSouth and KPMG have had several conference calls to investigate the discrepancy between BellSouth reported raw data values for Commitment Date for KCL Test CLEC and KCL collected values.

When KCL compared the BellSouth-reported values for COMMITMENT DATE in the raw data files with the due date (commitment date) that KCL received for March, April, and May 2000, KCL could not match the BellSouth-reported values in these fields with

BELLSOUTH'S RESPONSE TO EXCEPTION 113

the corresponding KCL-collected values for certain service order numbers and purchase order numbers.

On September 29th, it was determined that the Test CLEC data KCL downloaded from the PMAP website for the months of March, April, and May, may not have been accurate as the reports had been rerun since that time. On September 29th, KPMG issued a data request for the following new updated raw data files for the KPMG Test CLEC for March, April, and May:

(a) Average Completion Notice Interval
(b) Held Orders
(c) Jeopardy Notice Interval
(d) Order Completion Interval Distribution for Trunks & Non-Trunks
(e) Percent missed Installation Appointments for Trunks & Non-Trunks
(f) Total Service Order Cycle Time
(g) Troubles within 30 days of Provisioning Trunks & Non-Trunks

BellSouth sent the updated raw data to KPMG on 10/02/00 for the Data Comparison Test for ordering & Provisioning SQMs.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 113

BELLSOUTH

November 14, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Data Comparison test for Ordering & Provisioning service quality measurements (SQMs).

Exception:

BellSouth-reported raw data values for Commitment Date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Service Order numbers and Purchase Order numbers for six Provisioning metrics.

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, 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 each of the Provisioning metrics – *Mean Held Order Interval and Distribution Intervals, Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices, Percent Missed Installation Appointments, Average Completion Interval / Order Completion Interval Distribution, Average Completion Notice Interval,* and *Total Service Order Cycle Time* – KCL compared the BellSouth-reported values for COMMITMENT DATE in the raw data files with the due date (commitment date)[2] that KCL received from Hewlett Packard for March, April, and May 2000.

KCL could not match the BellSouth-reported values in these fields with the corresponding KCL-collected values for certain service order numbers and purchase order numbers. The table below shows the specific discrepancies for Commitment Date.

COMMITMENT DATE

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

[2] Commitment Date is the due date indicated in the FOC that is received by HP and provided to KCL.

PON	SO_NBR	MONTH	BLS-REPORTED VALUE	KCL-REPORTED[3] VALUE
R010A11PTN100001	CO0VJ7L2	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R010A11PEN100003	CO24RH11	March	3/21/00 12:00 AM	03/24/00 12:00 AM
R002A11PEN100003	CO270WV2	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R002A11PTN101002	COBV58F5	March	3/23/00 12:00 AM	03/27/00 12:00 AM
R002A11PEN100005	CP0X8M92	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R010A11PTN100004	CP4CF625	March	3/21/00 12:00 AM	03/23/00 12:00 AM
R002A11PEN100001	CP5QH432	March	3/21/00 12:00 AM	03/28/00 12:00 AM
R002A11PTN100004	CP86GNN9	March	3/23/00 12:00 AM	03/28/00 12:00 AM
424A314PTJ000001	NO26B2P9	March	2/16/00 12:00 AM	03/01/00 12:00 AM
422A114PEJ101001	NOBJDYR1	March	2/18/00 12:00 AM	03/03/00 12:00 AM
615A122PTH102014	CP7R0531	April	4/27/00 12:00 AM	04/25/00 12:00 AM
R047A11PTN000018	NO4Y4Y46	April	4/27/00 12:00 AM	04/18/00 12:00 AM
378A315PEI001001	NP0FNX10	April	3/29/00 12:00 AM	03/23/00 12:00 AM
R041A21PTN100006	NP9V5K27	April	4/12/00 12:00 AM	04/17/00 12:00 AM
R041A21PEN100007	NPF01H46	April	4/12/00 12:00 AM	04/21/00 12:00 AM
R041B21PEN100001	NPF1MLT2	April	4/11/00 12:00 AM	04/17/00 12:00 AM
311F212PEH102002	CO2MXTV7	May	5/11/00 12:00 AM	05/10/00 12:00 AM
R036A22PTN000003	COVQ5886	May	5/1/00 12:00 AM	04/27/00 12:00 AM
R041A12PEN100009	NO0VF3L7	May	5/17/00 12:00 AM	05/18/00 12:00 AM
301A212PEH101016	NO2WDK96	May	5/5/00 12:00 AM	04/14/00 12:00 AM
301A212PTH102014	NO831LW8	May	12/29/00 12:00 AM	04/18/00 12:00 AM
398A213PEM000003	NP02RM89	May	5/2/00 12:00 AM	04/28/00 12:00 AM
378A315PEI001001	NP0FNX10	May	12/29/00 12:00 AM	03/23/00 12:00 AM
R041A12PEN100012	NP8HRNF6	May	5/12/00 12:00 AM	05/19/00 12:00 AM
305A122PTH105001	NP9MJXD8	May	5/8/00 12:00 AM	04/25/00 12:00 AM

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. If SQM reports are based on incomplete or incorrect raw data, CLECs will not receive accurate SQM information for these purposes.

BellSouth Response

BellSouth and KPMG have had several conference calls to investigate the discrepancy between BellSouth reported raw data values for Commitment Date for KCL Test CLEC and KCL collected values.

[3] These values are contained in response files provided to KCL by HP.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 113

When KCL compared the BellSouth-reported values for COMMITMENT DATE in the raw data files with the due date (commitment date) that KCL received for March, April, and May 2000, KCL could not match the BellSouth-reported values in these fields with the corresponding KCL-collected values for certain service order numbers and purchase order numbers.

On September 29th, it was determined that the Test CLEC data KCL downloaded from the PMAP website for the months of March, April, and May, may not have been accurate as the reports had been rerun since that time. On September 29th, KPMG issued a data request for the following new updated raw data files for the KPMG Test CLEC for March, April, and May:

(a) Average Completion Notice Interval
(b) Held Orders
(c) Jeopardy Notice Interval
(d) Order Completion Interval Distribution for Trunks & Non-Trunks
(e) Percent missed Installation Appointments for Trunks & Non-Trunks
(f) Total Service Order Cycle Time
(g) Troubles within 30 days of Provisioning Trunks & Non-Trunks

BellSouth sent the updated raw data to KPMG on 10/02/00 for the Data Comparison Test for ordering & Provisioning SQMs.

On November 7th, KPMG sent to BellSouth a list of PONs from the various Provisioning raw data files - Mean Held Order Interval and Distribution Intervals (HO), Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices (JPDY), Percent Missed Installation Appointments (PMI), Average Completion Interval / Order Completion Interval Distribution (OCI), Average Completion Notice Interval (ACNI), and Total Service Order Cycle Time (TSOCT)- from March-Sept 2000, where KPMG could not match the service order numbers.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 113

KPMG Test CLEC Data Discrepancies related to KPMG GA Exception #113

KPMG provided a list of PONs to BellSouth for which KPMG was unable to match the BellSouth reported SO_NBR. In the table (included below), the KPMG SO_NBR represents the value provided by HP for a particular PON. The BLS SO_NBR indicates the value KPMG found in BellSouth raw data for the PON, Month, and File listed in the table. BellSouth was able to locate all but one SO_NBR in BellSouth data that KPMG indicated as non-matching.

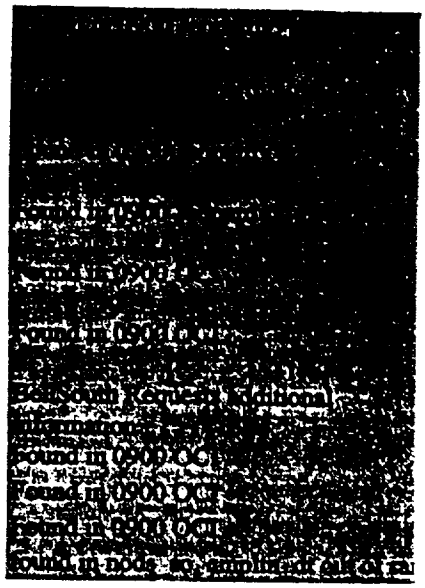
BellSouth was unable to find the KPMG SO_NBR 'COFRCD61' and PON '359R112PTI000001' in BellSouth data. BellSouth requests additional information from KPMG about this PON and SO_NBR in order to be able to respond to this request.

The table below lists the BellSouth response to each of the discrepancies listed by KPMG.

PON	KPMG SO_NBR	BLS SO_NBR	File	Month	BellSouth Response
307A122PTH101004	CO84TF34	CO470YN5	OCI, TSOCT	Mar	
317A122PTH002004	CP6YF141	CP366NV7	HO	Mar	
374A225PEG100006	NPDYXGC1	DP6FN7M6	HO	Mar	
374A225PEG100008	NP7VDVX7	DP53VG64	HO	Mar	
374A225PTG100005	NP8B4865	DP1B0789	HO, JPDY	Mar	
374A225PTG100007	NP7B7V80	DPFPRGX9	HO	Mar	
402A223PTM000002	NO6HJL78	NODLNLD0	HO	Mar	
414A223PEM000002	COHMJ158	CONK0234	HO	Mar	
415D213PTM000003	COPY5310	COX5L051	HO	Mar	
435C114PTJ002019	TONY2154	TOBWB3B9	OCI, TSOCT	Mar	
440A124PTM100004	COQ5X316	CODRKLD8	JPDY	Mar	
455A116PEF100003	NPG0M150	NP21W699	HO	Mar	
R025A11PEN100007	FPLC1586	TPLC1586	TSOCT	Mar	
R025A11PEN100009	FPT5M663	TPT5M663	TSOCT	Mar	
R025A11PTN100002	FOHTY627	TOHTY627	TSOCT	Mar	
R025A11PTN100008	FPHL1104	TPHL1104	TSOCT	Mar	
R025X11PTN100002	FOLF7383	TOLF7383	OCI, TSOCT	Mar	
R035A21PTN000001	COW6X692	COQ2L772	HO	Mar	
R041A21PTN100010	NOHQV653	NP50N703	HO	Apr	
R041B21PEN100002	NPK20525	NO3K4V74	HO	Apr	
R047X12PTN001001	DONX2232	NO266R36	PMI	Apr	
R051A11PTN000002	DOH4H727	COH9B934	TSOCT	Apr	
R011A21PTN000001	COW5Q649	CO8H0331	OCI, TSOCT	May	
R026D12PTN000001	NO8VNYF6	DP33TM79	JPDY, OCI, PMI	May	
R026H12PEN000004	TOHKM175	FOPBK851	HO, JPDY, OCI, PMI	May	
R047A12PTN000002	DOP6L502	COW29355	JPDY, OCI, TSOCT	May	
R026H12PEN000004	TOHKM175	FOPBK851	HO	June	
R047A12PTN000002	DOP6L502	COV2J319	OCI, TSOCT	June	
602R214PEJ100001	CPD989B5	CPHJ6187	HO	Aug	
303R222PEH002001	CO2K19K8	CO6B7KJ2	HO	Sept	

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 113

333R122PTI000002	CO9CCBF4	CP07GLD8	JPDY, OCI, PMI, TSOCT	Sept
333R122PTI001001	NOFMFGM0	CO26PNW9	JPDY, OCI, PMI, TSOCT	Sept
335R222PEI000003	COB22WL0	CPCTX713	JPDY, OCI, PMI, TSOCT	Sept
335R222PTI000001	CO02TXQ7	CP9DJHL1	JPDY, OCI, PMI, TSOCT	Sept
335R222PTI000002	COFL8LF2	CPBFX153	JPDY, OCI, PMI, TSOCT	Sept
357R212PEI000001	CO6BBR74	CP4W0NT7	JPDY, OCI, PMI, TSOCT	Sept
359R112PTI000001	COFRCD61	CP384L80	JPDY, OCI, PMI, TSOCT	Sept
432R214PEJ000003	TPFLWK94	FPFLWK94	HO	Sept
432R214PTJ000002	FOQF2140	TOQF2140	HO	Sept
440R124PTJ000002	COC7HN58	DOGRT155	HO	Sept
602R214PEJ100001	CPD989B5	CPHJ6187	HO	Sept



The following discussion of the relationship between PONs, SO_NBRs, and the raw data files will explain each of the KPMG non-matching values. In PMAP, a single PON can have multiple SO_NBRs associated with it. Depending on the type of work performed on a particular SO_NBR and the time the work was completed, a given SO_NBR can be found in a different raw data file or month than the other SO_NBRs that share the same PON. A particular SO_NBR will only be found in the raw data file for which that SO_NBR is valid. For example, an order that is not complete will not be in the TSOCT (Total Service Order Completion Time) raw data. This can result in situations where the multiple SO_NBRs associated with a single PON can appear in different raw data files. Similarly, a particular SO_NBR can be found a different month of raw data then the other SO_NBRs associated with the same PON when the work on the SO_NBRs was completed in different months.

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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