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March 30, 2001
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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").

<u>Date Filed</u>	<u>Description of Document(s)</u>
02/15/01	KPMG Statement of Re-Opening Exceptions 35 and 99; Exception 129; 5 th Amended Exception 76; BellSouth Response to Exception 129; Amended Response to Exceptions 99 and 124; 2 nd Amended Response to Exception 119; 4 th Amended Response to Exceptions 35 and 76; 6 th Amended Response to Exception 71; 13 th Amended Response to Exception 89.
03/05/01	GPSC letter to KPMG directing termination of testing and submission of final report by March 20, 2001
03/07/01	KPMG Exceptions 130, 131, 132, and 133; Amended Exception 129 and 2 nd Amended Exception 95; BellSouth Statement of Investigation for Exception 133; 2 nd Statement of Investigation for Exception 79; Response to Exceptions 130, 131 and 132; Amended Response to Exception 130; Response to Exceptions 130, 131, and 132; 2 nd Amended Response to Exceptions 95 and 127; 3 rd Amended Response to Exception 119; 5 th

David Waddell, Executive Secretary
March 30, 2001
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<u>Date Filed</u>	<u>Description of Document(s)</u>
	Amended Response to Exception 113; 14 th Amended Response to Exception 89; Closure Reports for Exceptions 28, 94 and 114.
03/09/01	KPMG Exception 135; BellSouth Response to Exceptions 133 (with Attachment) and 135; 2 nd Amended Response to Exception 79; 5 th Amended Response to Exception 76; Closure Reports for Exceptions 24, 39, 92, 106, 120 and 123.
03/16/01	KPMG Exception 136; BellSouth Statement of Investigation for Exceptions 122 and 128; Response to Exception 128 and 136; 2 nd Amended Response to Exception 128; Closure Reports for Exceptions 60, 71, 98, 99, 112, 113, 121, 127 and 130.
03/16/01	Revised Versions of KPMG's <i>BellSouth - Georgia OSS Evaluation Master Test Plan</i> , Version 4.2; and <i>BellSouth Telecommunications, Inc. OSS Evaluation - Georgia Supplemental Test Plan</i> , Version 2.1.
03/20/01	KPMG's <i>BellSouth Telecommunication's Inc. OSS Evaluation - Georgia Master Test Plan Final Report</i> , Version 1.0

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 March 30, 2001, 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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February 15, 2001

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
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RECEIVED
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EXECUTIVE SECRETARY
G.P.S.C.

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

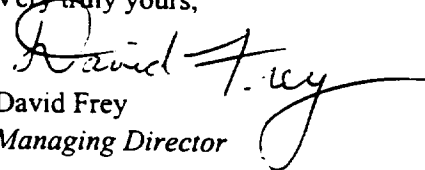
Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of KPMG Consulting, Inc.'s Exception 35 Statement of Re-Opening, Exception 76 (5th Amended), Exception 99 Statement of Re-Opening and Exception 129. Please also find enclosed the following responses from BellSouth: Exception 35 BLS 4th Amended Response; Exception 71 BLS 6th Amended Response; Exception 76 BLS 4th Amended Response; Exception 89 BLS 13th Amended Response; Exception 99 BLS Amended Response; Exception 119 BLS 2nd Amended Response; Exception 124 BLS Amended Response; and Exception 129 BLS 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
Managing Director

Enclosures

cc: Parties of Record



EXCEPTION 35 STATEMENT OF RE-OPENING

BellSouth Georgia OSS Testing Evaluation

Date: February 6, 2001

KPMG Consulting LLC re-opens Exception 35.

Background: On November 14, 2000 KPMG Consulting LLC (KCL) filed a closure report for Exception 35 with the Georgia Public Service Commission. The title of the exception was:

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

In its closure report for Exception 35, KCL noted the following:

“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

EXCEPTION 35 STATEMENT OF RE-OPENING

BellSouth Georgia OSS Testing Evaluation

structure of SL1 services by the Fourth Quarter of 2000. Given the timeframe, KCL will be unable to re-test the corrective action.

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."

Statement of Re-Opening for Exception 35:

KCL received from BellSouth on January 31, 2001 *BellSouth's Fourth Amended Response to Exception 35*. BellSouth indicated verbally to KCL that it desired KCL to perform re-test activities for implementations completed by BellSouth subsequent to the filing of the Closure Report for Exception 35.

Based on BellSouth's request, KCL re-opens Exception 35 for re-testing and will report the results of its findings.

EXCEPTION 76 (Fifth Amended) BellSouth Georgia OSS Testing Evaluation

Date: February 1, 2001

EXCEPTION REPORT

An exception has been identified as a result of the Provisioning Verification Evaluation Retest.

Exception:

KPMG Consulting LLC (KCL) encountered BellSouth Switch Translations and directory listings provisioning errors for UNE-P orders.

During provisioning verification testing, data from confirmed Local Service Requests (LSRs) was compared to switch translation data and the directory listing database.

Of the 89 switch translations for lines that were validated, 16 lines (18.0%) contained information inconsistent with the corresponding LSRs. Of the 16 lines, one (6.3%) was flow-through and 15 (93.7%) were non-flow through.

Of the 55 directory listing orders, 7 were provisioned incorrectly, resulting in a 12.7% failure rate. Of the 7 orders, 0 (0%) listings were flow-through and 7 (100%) non-flow through.

The following tables provide the specific data.

SWITCH TRANSLATION VERIFICATION					
PON	TN	OCN	Switch Translations Discrepancy	VER	F/T
409R223PEM101001	(912) 755-9434	9990	No ESX	AA	Y
415R213PTM001002	(706) 303-9662	9990	Not working	AA	N
415R213PTM001002	(706) 303-2317	9990	Not working	AA	N
415R213PTM001002	(706) 303-2318	9990	Not working	AA	N
415R213PTM001002	(706) 303-2319	9990	Not working	AA	N
605R214PTJ000001	(706) 722-9484	9994	Wrong PIC & LPIC	AA	N
605R214PTJ000001	(706) 722-9194	9994	Wrong PIC,	AA	N
625R214PTJ000002	(912) 746-4538	9990	Wrong PIC & LPIC,	AB	N
625R214PTJ000002	(912) 746-5245	9990	Wrong PIC & LPIC,	AB	N
625R214PTJ000002	(912) 746-6152	9990	Wrong PIC & LPIC,	AB	N

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BellSouth Georgia OSS Testing Evaluation

SWITCH TRANSLATION VERIFICATION					
PON	TN	OCN	Switch Translations Discrepancy	VER	F/T
625R214PTJ000003	(706) 774-1688	9990	Wrong PIC & LPIC	AB	N
625R214PTJ000003	(706) 774-6550	9990	Wrong PIC	AB	N
625R214PTJ000003	(706) 774-9891	9990	Wrong PIC	AB	N
625R214PTJ000005	(912) 746-0461	9990	Should not have NSQ	AA	N
625R214PTJ000005	(912) 746-1330	9990	Should not have NSQ	AA	N
625R214PTJ000005	(912) 746-7343	9990	Should not have NSQ	AA	N

DIRECTORY LISTINGS VERIFICATION						
PON	FT	OCN	TN	Directory Listing Discrepancy	Order Type	VER
305R112PTF100013	N	9994	(404) 214-0684	Number is listed as "non-published" and "listed number". Should only be LN.	UNE-Analog Loop	2
307R122PTF000008	N	9991	(706) 434-0810	Should be listed as RWH but listed as R W H.	UNE-Analog Loop	0
452R216PTF000002	N	9990	(706) 774-9339	No listing found but should be listed as AL.	DL	0
605R214PEJ000002	N	9994	(912) 742-6359	No listing found but should be listed as LN.	LPC	0
606R123PEM000003	N	9990	(404) 321-4748	Should be listed as RWH but listed as R W H.	Port Order	0
606R123PTM000004	N	9990	(912) 742-9886	Should be listed as RWH but listed as R W H.	Port Order	0
606R123PTM001002	N	9990	(706) 724-0819	Should be listed as RWH Enterprises but listed as Georgia R W H.	LPC	0

Impact:

Inaccurate provisioning will affect CLECs in the following way:

- Switch Translations—customers not receiving features that were ordered

EXCEPTION 76 (Fifth Amended)

BellSouth Georgia OSS Testing Evaluation

- **Directory Listing** - directory listings that are not listed or incorrectly listed will result in the CLEC customers either being omitted from the BellSouth-GA directories and/or Directory Assistance databases, or having their listings incorrectly listed.

Inaccurate provisioning will negatively affect CLEC-customer relationships through unmet expectations. A CLEC customer will receive the incorrect level or type of service, resulting in decreased customer satisfaction.

EXCEPTION 99 STATEMENT OF RE-OPENING

BellSouth Georgia OSS Testing Evaluation

Date: February 6, 2001

KPMG Consulting LLC re-opens Exception 99.

Background: On September 22, 2000 KPMG Consulting LLC (KCL) filed a closure report for Exception 99 with the Georgia Public Service Commission. The title of the exception was:

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

In its closure report for Exception 99, KCL noted the following:

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

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

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

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

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

Statement of Re-Opening for Exception 99:

KCL received from BellSouth on January 16, 2001 *BellSouth’s Amended Response to Exception 99*. In its response, BellSouth indicated the following:

“BellSouth will complete a system change project in the Customer Records Information System (CRIS) to move the PICC charges from the non-recurring charge subtotal line on the bill to the recurring charge subtotal line. This change will be made for all customers

EXCEPTION 99 STATEMENT OF RE-OPENING

BellSouth Georgia OSS Testing Evaluation

(retail and resale) and will be completed on February 1, 2001. Therefore, all bills produced after that date will reflect the change.”

Based on BellSouth’s amended response, KCL re-opens Exception 99 for re-testing and will report the results of its findings.

Date: January 13, 2001

EXCEPTION REPORT

An exception has been identified regarding activities associated with the Performance Measurements (Metrics) Evaluation as a result of the Georgia Public Service Commission's Administrative Session on June 6, 2000 (referred to as "the June 6th Order").

Exception:

A number of BellSouth's graphical charts depicting the Georgia Public Service Commission- (GPSC-) approved Performance Measurements reviewed by KPMG Consulting LLC (KCL) contained errors or identified issues.

The GPSC's June 6th Order outlined the GPSC-approved standards and benchmarks for Performance Measurement evaluations for use in the BellSouth - Georgia Operational Support System (OSS) Test. BellSouth responded to the approved standards and benchmarks by developing a series of graphical charts showing Georgia performance measurements against approved standards and benchmarks. While these new charts were developed using the same reporting environment and processes as the measurements currently published for Georgia by BellSouth and under review in KCL's third-party test, substantial new developments were required to support new measurements, new levels of disaggregation for existing measurements, and changes in the presentation of the measurements that were not heretofore addressed by the Georgia OSS third-party test.

The GPSC asked KCL, as part of the third-party test, to review the charts produced by BellSouth for consistency with published measurements, appropriate calculation method, and accuracy of calculation of the measurements for three recent reporting periods. In addition, KCL was to review the appropriateness of the calculation methods and accuracy for selected z scores in the charts.

As a result of its testing activities, KCL encountered the following issues, the details of which are included in the following table. The table provides the complete list of all issues that required further investigation and/or correction. Item numbers listed as "Closed" have been corrected to KCL's satisfaction and no longer require investigation. Item numbers listed as "Open" are still under investigation by KCL.

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Item	Measurement	Issue	Date Opened	Open/Closed	Date Corrected
1	Firm Order Confirmation Timeliness for Unbundled Interoffice Transport	1) Defect function that excludes holiday and weekend time; and 2) data were extracted from the wrong table.	8/29/2000	Closed	9/22/2000
2	Percent Missed Installation Appointments for UNE 2 Wire Loop with LNP Non-Design, less than 10 circuits	Value for this chart was not written to output of the program.	8/28/2000	Closed	9/27/2000
3	Order Completion Interval, DS, <10 circuits 1 Dispatch	For BRI Dispatch and DS1 Dispatch, which serves as the BellSouth analog for the UNE ISDN and xDSL products, BellSouth is incorrectly including CLEC data.	9/7/2000	Closed	11/15/2000
4	Repeat Troubles within 30 Days for DS1/DS3 Interoffice	For BRI Dispatch, which serves as the BellSouth analog for the UNE ISDN products, BellSouth is incorrectly excluding BellSouth records where the mcu field is null.	8/26/2000	Closed	11/15/2000
5	Percent Rejected Service Requests and Reject Interval Reports	BellSouth is using Exact_seg1_mmyydd_cnf field as the date selection criterion instead of socs.completion_date (d_cnf).	8/29/2000	Closed	8/31/2000
6	Provisioning Troubles within 30 Days	Defect function was counting incorrectly for orders.	9/7/2000	Closed	9/8/2000
7	Order Completion Interval, UIT Products	Pending Filter change request was postponed. Filter change should be included in the code.	9/7/2000	Closed	8/8/2000
8	Repeat Troubles within 30 Days for UIT Products	WFA_Close_BRC data was excluded from data extraction.	9/7/2000	Closed	9/8/2000
9	Firm Order Confirmation Timeliness for Unbundled Interoffice Transport.	BellSouth was using the order number only for joining two tables, which has potential for multiple matches.	8/22/2000	Closed	11/6/2000
10	Customer Trouble Rate	BellSouth Selection Criteria could potentially include data other than retail customers.	8/30/2000	Closed	8/31/2000
11	Maintenance Average Duration	BellSouth Selection Criteria could potentially include data other than retail customers.	8/30/2000	Closed	8/31/2000
12	Percent Rejected Service Requests and Reject Interval Reports	1) Defect function that excludes holiday and weekend time; and 2) data were extracted from the wrong table.	8/29/2000	Closed	8/30/2000
13	Provisioning Troubles within 30 Days	For BRI Dispatch and DS1 Dispatch, which serves as the BellSouth analog for the UNE ISDN and xDSL products, BellSouth is incorrectly including CLEC data.	9/8/2000	Closed	9/11/2000
14	Provisioning Troubles within 30 Days	Pending Filter change request was postponed. Filter change should be included in the code..	9/8/2000	Closed	9/11/2000
15	Percentage Rejected Service Request and Reject Interval	Selection Criteria should have included Clarifications Posted. Defect Function incorrectly extracted data for Other Design and Other non-Design.	8/29/2000	Closed	8/30/2000
16	FOC Timeliness for xDSL, ISDN, & Line Sharing	1) Defect function that excludes holiday and weekend time; and 2) data were extracted from the wrong table.	8/23/2000	Closed	9/22/2000
17	Percent Repeat Troubles within 30 Days	Defect function for calculating Line Sharing products.	8/26/2000	Closed	8/26/2000
18	Missed Repair Appointments	Incomplete function for selecting Line Sharing products.	8/26/2000	Closed	8/26/2000
20	Missed Repair Appointments and Maintenance Average Duration	Inconsistency in count for Maintenance and Repair (Missed Repair Appointments vs. Maintenance Average Duration).	10/16/2000	Closed	10/20/2000
21	Out of Service Greater than 24 hours, DS1 Dispatch	For DS1 Dispatch, the numbers for OOS24 and Missed Repair Appointments are not the same.	10/16/2000	Closed	10/20/2000
22	Order Completion Interval, DS, <10 circuits 1 Dispatch	For BRI Dispatch, KCL could derive the chart values but the BRI data contains 9 records with mcu field start with R.	8/27/2000	Closed	11/15/2000
23	Firm Order Confirmation Timeliness for xDSL and ISDN/Manual	For xDSL and ISDN non-mechanized, only significant differences in the numerator. Possible cause: holiday function.	8/24/2000	Closed	8/24/2000

EXCEPTION 129

BellSouth Georgia OSS Testing Evaluation

Item	Exception	Issue	Date Opened	Open/Closed	Date Corrected
24	Firm Order Confirmation Timeliness	Large discrepancies for UNE Other Design and UNE Other Non-Design for fully and partially mechanized service requests.	10/3/2000	Closed	10/6/2000
25	Firm Order Confirmation Timeliness	Large discrepancies for UNE Other Design and UNE Other Non-Design for non-mechanized service requests.	10/3/2000	Closed	10/6/2000
26	Firm Order Confirmation Timeliness	Small discrepancy for UNE 2 wire loop with LNP design, partially mechanized	10/3/2000	Closed	10/6/2000
27	Provisioning Troubles within 30 Days for DS1/DS3	BellSouth reported 81 as the numerator; KCL found 89.	11/1/2000	Closed	11/6/2000
28	Missed Repair Appointments for DS1/DS3	Both the numerator and denominator do not match	8/30/2000	Closed	10/20/2000
29	Repeat Troubles in 30 Days for DS1/DS3	BellSouth values and KCL generated values do not match.	9/7/2000	Closed	10/20/2000
30	Percent Missed Installation for DS1/DS3 Interoffice	Problems with matching DS1/DS3 for both dispatch and non-dispatch	10/13/2000	Closed	10/27/2000
31	% Rejected Service Requests for ISDN Resale	KCL found 1 record in the denominator whereas BellSouth did not.	10/16/2000	Closed	10/20/2000
32	Repeat Troubles within 30 Days	Repeat Troubles within 30 Days for DS1, BRI-ISDN and ADSL	10/26/2000	Closed	11/3/2000
33	Customer Trouble Report Rate	Numerator for DS1/DS3 Non-Dispatch does not match	10/18/2000	Closed	10/20/2000
34	Customer Trouble Report Rate	Numbers for DS1, BRI and ADSL do not match	10/31/2000	Closed	11/15/2000
35	Discrepancies found for xDSL, CLEC ISDN, DS1, BRI and ADSL	Provisioning Troubles within 30 Days	10/26/2000	Closed	11/6/2000
36	Total Service Order Cycle Time (UIT)	Code should be changed to exclude records with appt_code is 'L'	10/17/2000	Closed	10/20/2000
37	Total Service Order Cycle Time (ADSL)	Code should be changed to exclude records with appt_code is 'L'	10/17/2000	Closed	10/20/2000
38	Total Service Order Cycle Time (2W)	Code should be changed to exclude records with appt_code is 'L'	10/17/2000	Closed	10/20/2000
39	Maintenance Average Duration (ADSL)	BellSouth values and KCL generated values do not match.	10/27/2000	Open	
40	Pre-Ordering, Loop Makeup Inquiry (Manual)	BellSouth values and KCL generated values do not match.	10/27/2000	Closed	11/6/2000
41	Pre-Ordering, Service Inquiry (Manual) for xDSL and ISDN	BellSouth values and KCL generated values do not match.	10/27/2000	Closed	11/17/2000
42	Held Order Interval for CLEC UIT and BellSouth DS1/DS3	BellSouth values and KCL generated values do not match.	10/31/2000	Closed	11/6/2000
43	Order Completion Interval for 2w Loop with INP Design, INP Non-Design, LNP Design, LNP Non-Design and INP Standalone	BellSouth recently changed the code that uses the PON and the service order number to identify a record instead of the PON only.	10/17/2000	Closed	10/20/2000
44	%Missed Installation for 2w Loop with INP Design, INP Non-Design, LNP Design, LNP Non-Design and INP Standalone	BellSouth recently changed the code that uses the PON and the service order number to identify a record instead of the PON only.	10/17/2000	Closed	10/20/2000
45	Provisioning Troubles within 30 Days for xDSL, ISDN, Line Sharing and retail DS1 and retail BRI-ISDN	Filters for identifying that the trouble occurred within 30 days after completion of the service order should be the completion_date of the service order and the receive_date of the trouble ticket.	10/9/2000	Closed	10/13/2000
46	Provisioning Troubles within 30 Days for UIT and retail DS1/DS3	Filters for identifying that the trouble occurred within 30 days after completion of the service order should be the completion_date of the service order and the receive_date of the trouble ticket.	10/27/2000	Closed	11/15/2000
47	Provisioning Troubles within 30 Days for UNE 2w loop with INP design, INP Non-design, LNP design, LNP Non-design and INP standalone	Filters for identifying that the trouble occurred within 30 days after completion of the service order should be the completion_date of the service order and the receive_date of the trouble ticket.	10/27/2000	Closed	11/15/2000

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Item	Measurement	Issue	Date Opened	Open/Closed	Date Corrected
48	PMAP - Provisioning Troubles in 30 Days	Missing Data Elements Required for Calculations/User Manual Update	10/17/2000	Open	
49	Firm Order Confirmation Timeliness	The product selection criterion for resale ISDN is incorrect.	10/2/2000	Closed	10/6/2000
50	Repeat Troubles within 30 Days for DS1 and BRI	The selection criterion to include BellSouth customers is incorrect. The selection criterion used is "mcn does not start with an 'R' or mcn is null." The selection criterion should only exclude records for which mcn starts with an 'R' and the 2nd through 5th characters represent a valid CLEC account.	10/25/2000	Closed	11/14/2000
51	Repeat Troubles within 30 Days for DS1/DS3 Interoffice	BellSouth values and KCL generated values do not match.	10/24/2000	Closed	11/14/2000
52	Missed Repair Appointments for DS1 and BRI	BellSouth values and KCL generated values do not match.	10/31/2000	Closed	11/14/2000
53	Missed Repair Appointments for DS1/DS3 Interoffice	BellSouth values and KCL generated values do not match.	10/31/2000	Closed	11/14/2000
54	Maintenance Average Duration for DS1 and BRI	BellSouth values and KCL generated values do not match.	10/30/2000	Closed	11/14/2000
55	Maintenance Average Duration for DS1/DS3 Interoffice	BellSouth values and KCL generated values do not match.	10/30/2000	Closed	11/14/2000
56	Out of Service Greater than 24 Hours for DS1 and BRI	BellSouth values and KCL generated values do not match.	11/7/2000	Closed	11/14/2000
57	Out of Service Greater than 24 Hours for DS1/DS3 Interoffice	BellSouth values and KCL generated values do not match.	11/7/2000	Closed	11/14/2000
58	Customer Trouble Report Rate for DS1 and BRI	BellSouth values and KCL generated values do not match.	11/8/2000	Closed	11/14/2000
59	Customer Trouble Report Rate for DS1/DS3 Interoffice	BellSouth values and KCL generated values do not match.	11/8/2000	Closed	11/14/2000
60	Provisioning Troubles within 30 Days for DS1 and BRI	BellSouth values and KCL generated values do not match.	10/26/2000	Closed	11/14/2000
61	Provisioning Troubles within 30 Days for DS1/DS3 Interoffice	BellSouth values and KCL generated values do not match.	10/26/2000	Closed	11/14/2000
62	Provisioning Troubles within 30 Days	Discrepancies found for xDSL, CLEC ISDN, DS1, BRI, and ADSL.	10/17/2000	Open	
63	%Missed Installation for 2w Loop with INP Design, INP Non-Design, LNP Design, LNP Non-Design and INP Standalone	BellSouth recently changed the code that uses the PON and the service order number to identify a record instead of the PON only.	10/17/2000	Closed	10/20/2000
64	Provisioning Troubles within 30 Days for UIT and retail DS1/DS3	Filters for identifying that the trouble occurred within 30 days after completion of the service order should be the completion_date of the service order and the receive_date of the trouble ticket.	10/9/2000	Closed	10/13/2000
65	Provisioning Troubles within 30 Days for UNE 2w loop with INP design, INP Non-design, LNP design, LNP Non-design and INP standalone	Filters for identifying that the trouble occurred within 30 days after completion of the service order should be the completion_date of the service order and the receive_date of the trouble ticket.	10/9/2000	Closed	10/13/2000
66	Customer Trouble Report Rate for DS1	The product selection criterion for DS1 in the denominator is incorrect.	11/17/2000	Closed	12/1/2000
67	Held Order Interval for UNE xDSL Loop, UNE ISDN Loop, retail DS1, retail BRI and retail ADSL	BellSouth changed to 4GL code to make the code consistent with the business rules.	10/27/2000	Closed	11/8/2000
68	Held Order Interval for UNE Unbundled Interoffice Transport and retail DS1/DS3 interoffice	BellSouth changed to 4GL code to make the code consistent with the business rules.	10/27/2000	Closed	11/8/2000
69	Held Order Interval for 2 wire Analog Loop Design/Non-Design with INP/LNP Loop and INP Standalone	BellSouth changed to 4GL code to make the code consistent with the business rules.	10/27/2000	Closed	11/8/2000
70	Pre-Ordering, Loop Makeup Inquiry (Manual)	BellSouth values and KCL generated values do not match.	10/17/2000	Closed	10/27/2000

Impact:

Graphical charts containing erroneous information will not allow individuals, companies, or public bodies to make fully informed, accurate decisions.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 35



February 6, 2001

EXCEPTION REPORT

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

Exception:

BellSouth issued multiple bills containing erroneous charges to KPMG.

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

Undocumented Charges

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

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

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

Incorrectly Rated Charges

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

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

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

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 35

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

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

Missing Charges

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

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

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

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

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

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

Of the two SL1 Loops ordered, only the circuit 50.TYNU.000337...SB appeared on the 10/5/99, 11/5/99 and 12/5/99 invoices¹ of the 706-Q85-4226-226 account. For the second circuit, BellSouth did not bill the appropriate monthly-recurring, pro-rated and non-recurring charges for the USOCs UEAL2 and UEAC2.

Impact

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

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

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 35

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

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

BellSouth Response

Undocumented Charges:

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

BellSouth did investigate and determine that no CLEC, other than the third party test CLEC, has ever been billed for this USOC. BellSouth has added this USOC to the standard agreement and will provide a copy of it to KPMG.

Incorrectly Rated Charges:

BellSouth developed the system capability and process capability to support a two-tier pricing structure for SL1 services. This includes an update to LCSC Methods and Procedures and a system enhancement. The system enhancement was implemented on November 24, 2000.

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

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 35

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

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

BELLSOUTH'S SIXTH AMENDED RESPONSE TO EXCEPTION 71



February 9, 2001

Exception #71

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

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 SIXTH AMENDED RESPONSE TO EXCEPTION 71

returned in response to CDD queries was shorter than the interval specified in the documentation. In other cases, it was longer.

REQ TYPE	ACT TYPE	UNE Product Type ⁽¹⁾	ORDER TYPE	Num Lines	CDD Interval ⁽²⁾			Documentation Interval ⁽³⁾
					Submit Dt	Due Date	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 SIXTH 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	AGT. TYPE	UNE Product Type	SERVICE TYPE	No. Lines	CDD Interval			Documentation Interval
					Submit Date	Due Date	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 SIXTH 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	REQ TYPE	Resale Product Type		CDD Interval			Business Days
				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'S SIXTH AMENDED RESPONSE TO EXCEPTION 71

BellSouth Response

On a REQ TYP 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.

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 REQ TYP J.

BellSouth Amended Response

BellSouth's Products & Services Interval Guide - Issue 4a dated January 2001, reflects Calculated Due Date functionality which is tentatively scheduled in TAG Release 7.6 for June 2001, applicable to TCIF 9. BellSouth's Products & Services Interval Guide - Issue 3b dated December 2000 is applicable to TAG 2.2.0.11 (TCIF 7) pre-order functionality. The BellSouth Interconnection web site has been modified to include the following information at the Products & Services Interval Guide - Issue 3b link: "For TAG 2.2.0.11 (TCIF 7) Pre-Order Functionality - Only".

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 76



Date: February 9, 2001

EXCEPTION REPORT

An exception has been identified as a result of the Provisioning Verification Evaluation Retest.

Exception:

KPMG Consulting LLC (KCL) encountered BellSouth Switch Translations and directory listings provisioning errors for UNE-P orders.

During provisioning verification testing, data from confirmed Local Service Requests (LSRs) was compared to switch translation data and the directory listing database.

Of the 89 switch translations for lines that were validated, 16 lines (18.0%) contained information inconsistent with the corresponding LSRs. Of the 16 lines, one (6.3%) was flow-through and 15 (93.7%) were non-flow through.

Of the 55 directory listing orders, 7 were provisioned incorrectly, resulting in a 12.7% failure rate. Of the 7 orders, 0 (0%) listings were flow-through and 7 (100%) non-flow through.

The following tables provide the specific data.

SWITCH TRANSLATION VERIFICATION						
PON	TN	OCN	Switch Translations Discrepancy	VER	F/T	BellSouth Response
409R223PEM101001	(912) 755- 9434	9990	No ESX	AA	Y	Do not agree, Feature verified working in the switch. Supporting data was provided to KPMG.
415R213PTM001002	(706) 303- 9662	9990	Not working	AA	N	Agree, service not restored from suspension.
415R213PTM001002	(706) 303- 2317	9990	Not working	AA	N	Agree, service not restored from suspension.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 76

SWITCH TRANSLATION VERIFICATION						
PON	TN	OCN	Switch Translations Discrepancy	VER	F/T	BellSouth Response
415R213PTM001002	(706) 303- 2318	9990	Not working	AA	N	Agree, service not restored from suspension.
415R213PTM001002	(706) 303- 2319	9990	Not working	AA	N	Agree, service not restored from suspension.
605R214PTJ000001	(706) 722- 9484	9994	Wrong PIC & LPIC	AA	N	Agree, service not restored from suspension.
605R214PTJ000001	(706) 722- 9194	9994	Wrong PIC,	AA	N	Agree, PIC and LPIC incorrect. Service Rep error. Rep covered 12/15/00.
625R214PTJ000002	(912) 746- 4538	9990	Wrong PIC & LPIC,	AB	N	Agree, PIC and LPIC incorrect. Service Rep error. Rep covered 12/15/00.
625R214PTJ000002	(912) 746- 5245	9990	Wrong PIC & LPIC,	AB	N	Agree, PIC and LPIC incorrect. Service Rep error, Rep covered 12/15/00.
625R214PTJ000002	(912) 746- 6152	9990	Wrong PIC & LPIC,	AB	N	Agree, PIC and LPIC incorrect. Service Rep error, Rep covered 12/15/00.
625R214PTJ000003	(706) 774- 1688	9990	Wrong PIC & LPIC	AB	N	Agree, Service Rep error. Rep covered 12/15/00.
625R214PTJ000003	(706) 774- 6550	9990	Wrong PIC	AB	N	Agree, Service Rep error. Rep covered 12/15/00.
625R214PTJ000003	(706) 774- 9891	9990	Wrong PIC	AB	N	Agree, Service Rep error. Rep covered 12/15/00.
625R214PTJ000005	(912) 746- 0461	9990	Should not have NSQ	AA	N	Do not agree, NSQ is a usage sensitive feature provisioned in this switch for all customers. KPMG will notice that NSQ does not appear on the CSR for this account.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 76

SWITCH TRANSLATION VERIFICATION						
PON	TN	OCN	Switch Translations Discrepancy	VER	F/T	BellSouth Response
625R214PTJ000005	(912) 746- 1330	9990	Should not have NSQ	AA	N	Do not agree, NSQ is a usage sensitive feature provisioned in this switch for all customers. KPMG will notice that NSQ does not appear on the CSR for this account.
625R214PTJ000005	(912) 746- 7343	9990	Should not have NSQ	AA	N	Do not agree, NSQ is a usage sensitive feature provisioned in this switch for all customers. KPMG will notice that NSQ does not appear on the CSR for this account.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION

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DIRECTORY LISTINGS VERIFICATION							
PON	FT	OCN	TN	Directory Listing Discrepancy	Order Type	VER	BellSouth Response
305R112PTF100013	N	9994	(404) 214-0684	Number is listed as "non-published" and "listed number". Should only be LN.	UNE-Analog Loop	2	Do not agree. KPMG incorrectly interpreted the DA screen BellSouth provided.
307R222PTF000006	N	9991	(912) 314-0810	Should be listed as RWH but listed as R W H.	UNE-Analog Loop	1	Agree, service rep error. Rep covered 2/11/01.
452R216PTF000002	N	9990	(706) 774-9339	No listing found but should be listed as AL.	DL	0	Agree, service rep error. Rep covered 12/15/00.
605R214PEJ000002	N	9994	(912) 742-6359	No listing found but should be listed as LN.	LPC	0	Agree, service rep error. Rep covered 12/15/00.
606R123PEM000003	N	9990	(404) 321-4748	Should be listed as RWH but listed as R W H.	Port Order	0	Agree, service rep error. Rep covered 2/11/01.
606R123PTM000004	N	9990	(912) 742-9886	Should be listed as RWH but listed as R W H.	Port Order	0	Agree, service rep error. Rep covered 2/11/01.
606R123PTM001002	N	9990	(706) 724-0819	Should be listed as RWH Enterprises but listed as Georgia R W H.	LPC	0	Agree, service rep error. Rep covered 12/15/00.

Impact:

Inaccurate provisioning will affect CLECs in the following way:

- Switch Translations—customers not receiving features that were ordered
- Directory Listing - directory listings that are not listed or incorrectly listed will result in the CLEC customers either being omitted from the BellSouth-GA directories and/or Directory Assistance databases, or having their listings incorrectly listed.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION

76

Inaccurate provisioning will negatively affect CLEC-customer relationships through unmet expectations. A CLEC customer will receive the incorrect level or type of service, resulting in decreased customer satisfaction.

BellSouth Response

BellSouth's response to individual occurrences has been incorporated into the above table.

Of the 55 directory listing orders, BellSouth agrees that 6 listings (10.9%) were inconsistent with the corresponding LSRs.

Of the 89 switch translations for lines that were validated, 12 lines (13.5%) contained information inconsistent with the corresponding LSRs.

BELLSOUTH'S THIRTEENTH AMENDED RESPONSE TO EXCEPTION 89



Date: February 1, 2001

EXCEPTION REPORT

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

Exception:

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

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.³

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

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

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

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

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

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

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

BELLSOUTH'S THIRTEENTH 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
AUG/EXCLUDE	A	Not marked
FIRM ORDER RECEIVED	10/19/99	10/20/99
FIRM ORDER RECEIVED	7/26/99	7/27/99
FIRM ORDER RECEIVED	7/13/99	7/12/99
BONAFIDE APPLICATION RECEIPT	9/29/99	10/4/99
SPACE AVAILABLE TO CLEC	10/2/99	10/15/99

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

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

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

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

BELLSOUTH'S THIRTEENTH AMENDED RESPONSE TO EXCEPTION 89

AC212373	40.21%	46.21%
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BellSouth Amended Response:

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

TGSN	BellSouth-Reported Derived Raw Data Values and the TCBH used in the calculation	KPMG-Calculated Values and the maximum blocking hour used in the calculation	Reason for Discrepancy
AC158303	11.36% (hour 21)	7.83% (hour 21)	The TCBH and the maximum blocking hour is 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 is 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

BELLSOUTH'S THIRTEENTH AMENDED RESPONSE TO EXCEPTION 89

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

Comparison of the trunk group busy hour and the cluster busy hour by traffic usage to determine the control hour has created a problem in the verification of results. The cluster arrangement in affect at the time of the original data run is not retained for historical purposes. This prevents an accurate re-creation of the cluster busy hour for audit results verification.

The selection process was analyzed, and the substitution of average offered load for traffic usage was deemed a satisfactory method. The use of offered load eliminates the effect of the cluster busy hour for final groups that are used in service monitoring. Since this calculation is used in the selection of the trunk group busy hour, the trunk group busy hour is always selected as the control hour. This change has been implemented and will result in January 2001 results being computed on the modified criteria. KPMG will be able to retest this measure, beginning with January 2001 data.

The hourly trunk traffic measurement data for July, August, September, and the first 10 days of October 2000, were lost due to an error in implementing a script change in the Network Information Warehouse (NIW) platform. This script change overwrote the script that automatically archived the measurement data on a monthly basis and resulted in the data for those months not being archived. The error was corrected in October 2000, when data for those months was requested and was found not to exist.

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

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

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

BELLSOUTH'S THIRTEENTH AMENDED RESPONSE TO EXCEPTION 89

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

BellSouth Amended Response:

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.

BellSouth is continuing investigation of this issue.

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.

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

BELLSOUTH'S THIRTEENTH AMENDED RESPONSE TO EXCEPTION 89

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

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

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

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.

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

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

BELLSOUTH'S THIRTEENTH AMENDED RESPONSE TO EXCEPTION 89

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 data from BellSouth's ICAIS/BARNEY system did not agree with the raw data values for the: (a) "so_missed_cmtd_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 cmtd cd	SR	NL
So missed cmtd cd	CS	NL
So missed cmtd cd	CD	NL
So missed cmtd cd	CD	NL
So missed cmtd cd	SP	NL
Status	CA	PD
Status	CA	PD
Status	PC	MA

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Status	PC	AO
Status	CA	MA
Status	CA	AO
Status	CA	MA
Status	CP	MA
Status	CP	MA
Status	PD	CP
Status	PD	CP
Status	PD	CP
Status	PD	CP
Status	PD	CP
Status	PC	CP
Status	PC	CP
Status	PC	CP

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

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

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

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

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

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

Impact

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

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

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 99



Date: January 16, 2001

EXCEPTION REPORT

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

Exception:

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

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

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

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

Impact

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

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

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 99

BellSouth Response:

BellSouth will complete a system change project in the Customer Records Information System (CRIS) to move the PICC charges from the non-recurring charge subtotal line on the bill to the recurring charge subtotal line. This change will be made for all customers (retail and resale) and will be completed on February 1, 2001. Therefore, all bills produced after that date will reflect the change.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 119



Date: February 2, 2001

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 Completion Date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and service order numbers for one provisioning metric.

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 – *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)* – KCL compared the BellSouth-reported values for COMPLETION DATE² in the raw data files with the completion date that KCL received from Hewlett Packard for March through September 2000.

KCL could not match the BellSouth-reported values in this field with the corresponding KCL-collected values for certain purchase order numbers and service order numbers. Table 1 lists the purchase order numbers specific discrepancies for Completion 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 COMPLETION DATE is the actual date of completion of a service order.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 119

TABLE 1—COMPLETION DATE

PON	SERVICE ORDER NUMBER	RAW DATA FILE	BLS- REPORTED VALUE	KCL- REPORTED VALUE	MONTH
B100001PEJ101069	NP5M4544	JPDY	None	8/4/00	July
F10C121PEN101002	DO3H8C92	JPDY	None	8/2/00	July
F12C121PEN101003	DO8FR6M1	JPDY	None	8/2/00	July
303R222PEH000002	CO0FWMC9	JPDY	None	10/5/00	September
307R122PEH000003	CO646VD9	JPDY	None	10/3/00	September
315R212PTH000005	CODJQDQ0	JPDY	None	10/9/00	September
323R122PEH002001	DP4C6GR1	JPDY	None	10/5/00	September
323R122PTH100003	DODP2694	JPDY	None	10/9/00	September
324R112PEH000001	CO477D06	JPDY	None	10/4/00	September
422R114PEJ100003	NO4575K2	JPDY	None	10/10/00	September
428R124PEJ100004	NP993VF0	JPDY	None	10/4/00	September
441R214PTJ000003	CPW3G381	JPDY	None	9/21/00	September
444R214PTJ100002	DPB5FYN7	JPDY	None	10/9/00	September
452R216PTF000002	RP7BNJW8	JPDY	None	10/2/00	September
627R214PTJ100004	CPV7D650	JPDY	None	10/6/00	September

BellSouth Amended Response:

KPMG reported that BellSouth-reported raw data values for the completion date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and Service Order numbers for the Jeopardy measure.

The Jeopardy measure requires that the completion date (CMPLTN_DT) for a service order number (SO_NBR) be reported in the month that the order is completed. Therefore, a record that is in Jeopardy will contain a null value in the CMPLTN_DT field for each month until the order is completed.

The service order numbers provided by KCL have completion dates that fall in the subsequent months. The following service orders; NP5M4544, DO3H8C92, and DO8FR6M1, have completion dates in the month of August, not July. Using the same logic, the following service orders; CO0FWMC9, CO646VD9, CODJQDQ0, DP4C6GR1, DODP2694, CO477D06, NO4575K2, NP993VF0, DPB5FYN7, RP7BNJW8, and CPV7D650 have completion dates in the month of October, not September. The data verifies that these records can be located in the month corresponding to their completion date.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 119

Records Missing Completion Date:

Service Order **CPW3G381** was completed in the field on 09/21/00 per attached MOBI (LEO) records. However, due to a system entry error, the order was not posted as a completed order until 10/4/00.

BellSouth business rules dictate that the completion date is the date the work is completed in the field or central office. The date that a record is posted in SOCS as complete is not always the same as the completion date. In the case of the **CPW3G381**, 10/4/00 was the date the order was corrected in the system and the notice sent, but the work was actually completed in the field on 09/21/00. For this record, the completion date is 09/21/00.

Service order **CPW3G381** will not be reported as completed in September data because the record was not posted as completed until October. It will not be counted in October because completions are grouped by completion dates, as defined in the preceding paragraph, that fall in that report period. Therefore, this record is never reported. The code and RDUG will be corrected to capture completed orders in the month in which they are posted as completed.

Should this rare circumstance occur in the future, the aforementioned code change will ensure that the record is captured in the report period in which it is posted as completed. This code change was entered into Team Connection as Defect # 1045.

LEO VERIFICATION

CPW3G381 912-746-1792

DB02C291 I0A LEO AUDIT SYSTEM - BROWSE SCREEN (AUD) PNLFPMY

RESH/CC: 9990 PON: 441R214PTJ000003 VER: 00 SUP: 00 JUMP TO: _____

LSRNO: 999020000920000008 TCIF: ***7 DUE DATE: 09/21/2000

AN: - - - ATN: - - THIS LSR: NEXT LSR:

DATE TIME TYPE HISTORY LINE

ERRNO XREF

09/21/2000 07.48.12 C475 855 ISSUED RETURN-FEED # 0001 FOC SENT

09/21/2000 07.48.19 ISS CPW3G381 DD 9-21 DC 1774

09/21/2000 07.48.40 TAGR PON POSTED AS ACKNOWLEDGED

10/04/2000 15.47.51 C475 POS ISSUED, SOCS STATUS - PD PENDING ORDE
R

10/04/2000 15.50.18 TAGR PON POSTED AS ACKNOWLEDGED

10/04/2000 16.02.17 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.

10/04/2000 16.32.30 C280 865 COMPLETION STAGED FOR LSR, LEO STATUS CHANGED
TO "P" (ERROR CORRECTED)

**BELLSOUTH'S SECOND AMENDED RESPONSE TO
EXCEPTION 119**

LEO VERIFICATION PAGE 2

CPW3G381 912-746-1792

DB02C291 IOA LEO AUDIT SYSTEM - BROWSE SCREEN (AUD) PNLFPMY

RESH/CC: 9990 PON: 441R214PTJ000003 VER: 00 SUP: 00 JUMP TO: _____

LSRNO: 999020000920000008 TCIF: ***7 DUE DATE: 09/21/2000

AN: - - - ATN: - - THIS LSR: NEXT LSR:

DATE TIME TYPE HISTORY LINE

ERRNO XREF

10/04/2000 16.32.30 C475 865 ISSUED RETURN-FEED # 0003 COMPLETION SENT

10/04/2000 16.33.21 TAGR PON POSTED AS ACKNOWLEDGED

10/14/2000 12.48.04 SPLT GEORGIA 912/478 NPA SPLIT
TENDU LOCBAN

10/14/2000 14.15.58 SPLT GEORGIA 912/478 NPA SPLIT
TLSR LOCBAN-TN

10/14/2000 14.15.59 SPLT GEORGIA 912/478 NPA SPLIT

TLSR LSO

10/14/2000 16.52.24 SPLT GEORGIA 912/478 NPA SPLIT
TRSLE TRSLE.TN

10/14/2000 16.52.24 SPLT GEORGIA 912/478 NPA SPLIT
TRSLE TRSLE.TN

NOTE: LON VERIFICATION DOES NOT INDICATE A SUP DD.
MOBI INDICATES A 9-21-00 COMPLETION DATE
CRIS CYCLE NUMBER 2489 - DATE RECVD ACCTG 10-05-00

LEO COMPLETION NOTICE

CPW3G381 912-746-1792

/FOR: DB02C430 IOA FOC/CN SCREEN YHBKCDT

*TCIF ***7 **

ACCTNUM: 912 746-1792 CC: 9990 PON: 441R214PTJ000003 VER: 00

AN: ATN:

LSRNO: 999020000920000008 FOC/CN: CN
LSR SECTION

TRAN-ACK-TYPE: AT CD/TSENT: 2000-09-20

TRAN-TYPE: 865 BST-NAME: BST DATE-TIME-SENT: 2000-10-04-16.32.30.766174

SYSTEM-INIT-ID: TAG TEST-IND: P IS-ID: GS-ID:

DD: 2000-09-21 RORD:

B11: BAN1: 706Q858252252 B12: BAN2: FDD: - -

DSGCON: CCNA: ZXC CLS-SVC:

INIT: MARJORIE BELILE INIT TEL-NO: 2154057432

REP: LCSC

REP-TELNO: 1-800-667-0807

ORD: CPW3G381

EBD: - - CHC: FDT:

REMARKS SECTION

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 119

NOTE: THIS ORDER HAD AN ERROR NOT CLEARED ON ACTUAL COMPLETION DATE.
EX: LIST (LCP) OR OPEX (OCP)

MOBI RECORD

912 746-1792 10020000921MCN 20000920083020000921
CPW3G381A095 UEPBXYAXQAV720000921 X (COMPLETION DATE)
ZRTI \$,QS,800 872-3116,DC

KPMG requested verification of the actual cancellation date for service order
RP7BNJW8. BellSouth retrieved LEO records to document the date and time the
cancellation was sent from SOCS. This was necessary because SOCS records had been
purged, and MOBI did not provide this information. Provided below is a copy of the
LEO records. An explanation for BellSouth's completion dates is highlighted within
these screen prints.

LEO VERIFICATION

RP7BNJW8 706-774-6120
DB02C291 IOA LEO AUDIT SYSTEM - BROWSE SCREEN (AUD) PNLFPMY
RESH/CC: 9990 PON: 452R216PTF000002 VER: 00 SUP: 00 JUMP TO: _____
LSRNO: 999020001002000004 TCIF: ***7 DUE DATE: 10/02/2000
AN: - - - ATN: - - THIS LSR: NEXT LSR:
DATE TIME TYPE HISTORY LINE
ERRNO XREF
10/02/2000 16.48.19 ERRRC ORDER ERR: RP7BNJW8 AECN IDNT 009 L AECN MUST
AP
8825 LSG 0136 PEAR!
10/02/2000 16.49.11 ISSU RP9Y1V97;DD 10-06-00
10/02/2000 16.49.18 C280 8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"
10/02/2000 16.49.18 C475 855 ISSUED RETURN-FEED # 0001 FOC SENT
10/02/2000 16.50.08 TAGR PON POSTED AS ACKNOWLEDGED
10/02/2000 17.02.28 C280 CANCEL SVC ORD BYPASSED, SUPP NOT = "01"
(THIS IS THE DATE AND TIME CANCELLATION SENT FROM SOCS TO LEO)
10/02/2000 17.33.05 C280 865 COMPLETION STAGED FOR LSR, LEO STATUS
CHANGED
TO "P"

NOTE: ORDER CANCELED - NO SOCS HISTORY AVAILABLE
MOBI INDICATES CRIS CYCLE NUMBER 2487
DATE RCVD ACCTG 10-03-00

**BELLSOUTH'S SECOND AMENDED RESPONSE TO
EXCEPTION 119**

LEO COMPLETION NOTICE

/FOR: DB02C430 IOA FOC/CN SCREEN YHBKCDT
*TCIF ***7 **
ACCTNUM: 706 774-6120 CC: 9990 PON: 452R216PTF000002 VER: 00
AN: ATN:
LSRNO: 999020001002000004 FOC/CN: CN
===== LSR SECTION

=====

TRAN-ACK-TYPE: AT CD/TSENT: 2000-10-02
TRAN-TYPE: 865 BST-NAME: BST DATE-TIME-SENT: 2000-10-02-17.33.05.622331
THIS IS THE DATE / TIME NOTIFICATION SENT TO CLEC
SYSTEM-INIT-ID: TAG TEST-IND: P IS-ID: GS-ID:
DD: 2000-10-02 RORD:
B11: BAN1: 706Q858252252 B12: BAN2: FDD: - -
DSGCON: CCNA: ZXC CLS-SVC:
INIT: MARJORIE BELILE INIT TEL-NO: 2154057432

REP: LCSC REP-TELNO: 1-800-667-0807
ORD: RP9Y1V97 EBD: - - CHC: FDT:
===== REMARKS SECTION

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 124



Date: January 29, 2001

EXCEPTION REPORT

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

BellSouth issued multiple bills that contained incorrectly rated and missing charges.

As a result of billing transaction tests, BellSouth issued bills associated with a variety of service activities to KPMG Consulting LLC (KCL). Multiple bills received by KCL contained incorrectly rated charges and missing charges.

Incorrectly Rated Charges

USOC NPU: BellSouth inappropriately billed the KCL test CLEC for pro-rated and monthly recurring charges for the Universal Service Order Code (USOC) NPU, Listing Not in Directory. The monthly rate for this USOC is \$3.50 per month, as listed in the *BellSouth Georgia General Subscriber Service Tariff, 11th Revised Page 3 (effective January 15, 2000)*. BellSouth is assessing pro-rated and non-prorated monthly-recurring charges for this USOC using a monthly rate of \$2.89 or \$1.40. Representative occurrences of this issue are found on the following invoices:

<u>Telephone Number</u>	<u>Service Order</u>	<u>Account Number</u>	<u>Invoice Date</u>
706-774-9585	CPN4C877	706Q858252252	9/5/00
706-774-9825	CPD989B5	706Q858252252	9/5/00
706-774-0796	FPQM7346	706Q858252252	10/5/00
706-774-0796	TPQM7346	706Q858252252	10/5/00
706-774-1688	CPTMH685	706Q858252252	10/5/00
706-828-3443	CPNKJ648	706Q858252252	10/5/00
706-774-6011	DPD77KY0	706Q858252252	10/5/00
478-746-5518	FPW47666	706Q858252252	11/5/00

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 124

Missing Charges

USOC SOMEK: BellSouth did not bill the KCL test CLEC for the one-time charge for the Universal Service Order Code (USOC) SOMEK, CLEC Service Request Processing, Per Mechanized LSR, or for the one-time charge for the USOC SOMAN, CLEC Service Request Processing, Per Manual LSR. These USOCs are listed in the rate spreadsheets created for the KCL test CLEC in lieu of an Inter-Connection Agreement with the following rates:

- \$3.50 for SOMEK – Non-recurring charge for 2-Wire Voice Grade Loop/Line Port Combination - OSS LSR Charge, Electronic, per LSR received from the CLEC by one of the OSS interactive interfaces.
- \$19.99 for SOMAN – Non-recurring charge for incremental manual service order.

A review of the invoices shows that BellSouth did not bill the KCL test CLEC for these charges when applicable. Representative occurrences of this error are found on the following invoices:

<u>PON</u>	<u>Service Order #</u>	<u>Account #</u>	<u>Invoice Date</u>
441R214PTJ000001	CPN4C877	706Q858252252	9/5/00
602R214PEJ100001	CPD989B5	706Q858252252	9/5/00
432R214PEJ000001	TPQM7346	706Q858252252	10/5/00
625R214PTJ000003	CPTMH685	706Q858252252	10/5/00
440R124PEJ000003	CPNKJ648	706Q858252252	10/5/00
422R114PEJ000001	NPCPBHP7	706Q893707707	10/19/00
444R214PTJ100003	DPD77KY0	706Q858252252	10/5/00
423R114PTJ100001	NPC3KKX8	706Q893707707	10/19/00
435R114PTJ000013	FPW47666	706Q858252252	11/5/00
435R114PTJ000013	TPW47666	706Q858252252	11/5/00

Impact

Issuing bills containing incorrectly rated or missing charges will have the following effect on CLECs:

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

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 124

BellSouth's Response

Incorrectly Rated Charges

USOC NPU: This USOC is one for which CLECs get a resale discount under the provisions of the resale agreements (even when they appear on UNE accounts). For KPMG, the discounts are 20.30% for residence accounts and 17.30% for business accounts. Given a \$3.50 tariff rate, the rates which should be included on KPMG's bill are \$2.79 for residence and \$2.89 for business. In addition, several accounts that KPMG established during the test were set in a "suspended" status. As specified in the Georgia General Subscriber Service Tariff (GSST A2.3.16.B.1a) the appropriate rate to charge for suspended service is 50% of that which normally would be charged to the customer. Therefore, for suspended accounts, USOC NPU would be charged \$1.40 for residence and \$1.45 for business.

The terms and conditions for rates to be charged for resale products are covered in the appropriate resale sections of the CLEC contracts. In general, the resale provisions list those exclusions from BellSouth telecommunications services that are not discounted. Since non-published listings (USOC NPU) are not on the exclusions list, then the CLEC should expect that they will be discounted when ordered.

On reviewing the accounts established for KPMG it was noted that a small number of accounts are being charged the full tariff rate for NPU. This was caused when the changes were made in March, 2000 to begin discounting this USOC for resale on UNE accounts. On March 13, 2000 a rate change program to reflect the discounted rates on existing accounts was not completely executed. The UNE residence accounts were not changed. This oversight was corrected with a second rate change on December 6, 2000. Examples of line numbers which were impacted by this are:

770-399-5507 customer code 566

770-399-7885 customer code 568

770-751-1058 customer code 058

770-751-5941 customer code 159

USOC SOMEK: In early August 2000, the rate data base staff updated the new contract rates for KPMG with an effective date of July 27, 2000. Due to an oversight, USOC SOMEK was excluded from this update. Since the rate was not in the CRIS rating tables, the rating process defaulted to zero. This activity appeared on the *UNE Account Report* created as a control mechanism to indicate situations whereby rates on service orders are missing from specific contracts (See "Interim Process" described in BellSouth's reply to KPMG Exception 16). Although SOMEK appeared on the daily report, no further investigation was undertaken because an assumption was made that the billing portion of the Georgia test was completed and that a change to the rating tables would be of no value.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 124

The service order edit described in BellSouth's Response to KPMG Exception 16 will be installed in all BellSouth processing sites following the schedule outlined below:

Miami	December 18, 2000
Georgia	December 27, 2000
Ft. Lauderdale	December 27, 2000
Jacksonville	December 27, 2000
Kentucky	January 8, 2001
North Carolina	January 8, 2001
Tennessee	January 8, 2001
Alabama	TBD
Louisiana	TBD
Mississippi	TBD
South Carolina	TBD

USOC SOMAN: KPMG reported that it expected service order FPW47666 to generate the billing of the non-recurring charge for the USOC SOMAN. This order is one of a "pair" of orders issued to complete service requested by KPMG. This type of event would give rise to one OSS charge to be billed. The companion order (TPW47666) contained the appropriate USOC SOMECH. No OSS charge should have been expected for order FPW47666.

BELLSOUTH'S RESPONSE TO EXCEPTION 129



Date: January 24, 2001

EXCEPTION REPORT

An exception has been identified regarding activities associated with the Performance Measurements (Metrics) Evaluation as a result of the Georgia Public Service Commission's Administrative Session on June 6, 2000 (referred to as "the June 6th Order").

Exception:

A number of BellSouth's graphical charts depicting the Georgia Public Service Commission- (GPSC-) approved Performance Measurements reviewed by KPMG Consulting LLC (KCL) contained errors or identified issues.

The GPSC's June 6th Order outlined the GPSC-approved standards and benchmarks for Performance Measurement evaluations for use in the BellSouth - Georgia Operational Support System (OSS) Test. BellSouth responded to the approved standards and benchmarks by developing a series of graphical charts showing Georgia performance measurements against approved standards and benchmarks. While these new charts were developed using the same reporting environment and processes as the measurements currently published for Georgia by BellSouth and under review in KCL's third-party test, substantial new developments were required to support new measurements, new levels of disaggregation for existing measurements, and changes in the presentation of the measurements that were not heretofore addressed by the Georgia OSS third-party test.

The GPSC asked KCL, as part of the third-party test, to review the charts produced by BellSouth for consistency with published measurements, appropriate calculation method, and accuracy of calculation of the measurements for three recent reporting periods. In addition, KCL was to review the appropriateness of the calculation methods and accuracy for selected z scores in the charts.

As a result of its testing activities, KCL encountered the following issues, the details of which are included in the following table. The table provides the complete list of all issues that required further investigation and/or correction. Item numbers listed as "Closed" have been corrected to KCL's satisfaction and no longer require investigation. Item numbers listed as "Open" are still under investigation by KCL.

BELLSOUTH'S RESPONSE TO EXCEPTION 129

Item	Measurement	Issue	Date Opened	Open/Closed	Date Corrected
1	Firm Order Confirmation Timeliness for Unbundled Interoffice Transport	1) Defect function that excludes holiday and weekend time; and 2) data were extracted from the wrong table.	8/29/2000	Closed	9/22/2000
2	Percent Missed Installation Appointments for UNE 2 Wire Loop with LNP Non-Design, less than 10 circuits	Value for this chart was not written to output of the program.	8/28/2000	Closed	9/27/2000
3	Order Completion Interval, DS, <10 circuits 1 Dispatch	For BRI Dispatch and DS1 Dispatch, which serves as the BellSouth analog for the UNE ISDN and xDSL products, BellSouth is incorrectly including CLEC data.	9/7/2000	Closed	11/15/2000
4	Repeat Troubles within 30 Days for DS1/DS3 Interoffice	For BRI Dispatch, which serves as the BellSouth analog for the UNE ISDN products, BellSouth is incorrectly excluding BellSouth records where the mcu field is null.	8/26/2000	Closed	11/15/2000
5	Percent Rejected Service Requests and Reject Interval Reports	BellSouth is using Exact_seg1_mmyydd_cnf field as the date selection criterion instead of socs.completion_date (d_cnf).	8/29/2000	Closed	8/31/2000
6	Provisioning Troubles within 30 Days	Defect function was counting incorrectly for orders.	9/7/2000	Closed	9/8/2000
7	Order Completion Interval, UIT Products	Pending Filter change request was postponed. Filter change should be included in the code.	9/7/2000	Closed	8/8/2000
8	Repeat Troubles within 30 Days for UIT Products	WFA_Close_BRC data was excluded from data extraction.	9/7/2000	Closed	9/8/2000
9	Firm Order Confirmation Timeliness for Unbundled Interoffice Transport.	BellSouth was using the order number only for joining two tables, which has potential for multiple matches.	8/22/2000	Closed	11/6/2000
10	Customer Trouble Rate	BellSouth Selection Criteria could potentially include data other than retail customers.	8/30/2000	Closed	8/31/2000
11	Maintenance Average Duration	BellSouth Selection Criteria could potentially include data other than retail customers.	8/30/2000	Closed	8/31/2000
12	Percent Rejected Service Requests and Reject Interval Reports	1) Defect function that excludes holiday and weekend time; and 2) data were extracted from the wrong table.	8/29/2000	Closed	8/30/2000
13	Provisioning Troubles within 30 Days	For BRI Dispatch and DS1 Dispatch, which serves as the BellSouth analog for the UNE ISDN and xDSL products, BellSouth is incorrectly including CLEC data.	9/8/2000	Closed	9/11/2000
14	Provisioning Troubles within 30 Days	Pending Filter change request was postponed. Filter change should be included in the code..	9/8/2000	Closed	9/11/2000
15	Percentage Rejected Service Request and Reject Interval	Selection Criteria should have included Clarifications Posted. Defect Function incorrectly extracted data for Other Design and Other non-Design.	8/29/2000	Closed	8/30/2000

BELLSOUTH'S RESPONSE TO EXCEPTION 129

Item	Measurement	Issue	Date Opened	Open/ Closed	Date Corrected
16	FOC Timeliness for xDSL, ISDN, & Line Sharing	1) Defect function that excludes holiday and weekend time; and 2) data were extracted from the wrong table.	8/23/2000	Closed	9/22/2000
17	Percent Repeat Troubles within 30 Days	Defect function for calculating Line Sharing products.	8/26/2000	Closed	8/26/2000
18	Missed Repair Appointments	Incomplete function for selecting Line Sharing products.	8/26/2000	Closed	8/26/2000
20	Missed Repair Appointments and Maintenance Average Duration	Inconsistency in count for Maintenance and Repair (Missed Repair Appointments vs. Maintenance Average Duration).	10/16/2000	Closed	10/20/2000
21	Out of Service Greater than 24 hours, DS1 Dispatch	For DS1 Dispatch, the numbers for OOS24 and Missed Repair Appointments are not the same.	10/16/2000	Closed	10/20/2000
22	Order Completion Interval, DS, <10 circuits 1 Dispatch	For BRI Dispatch, KCL could derive the chart values but the BRI data contains 9 records with mcu field start with R.	8/27/2000	Closed	11/15/2000
23	Firm Order Confirmation Timeliness for xDSL and ISDN/Manual	For xDSL and ISDN non-mechanized, only significant differences in the numerator. Possible cause: holiday function.	8/24/2000	Closed	8/24/2000
24	Firm Order Confirmation Timeliness	Large discrepancies for UNE Other Design and UNE Other Non-Design for fully and partially mechanized service requests.	10/3/2000	Closed	10/6/2000
25	Firm Order Confirmation Timeliness	Large discrepancies for UNE Other Design and UNE Other Non-Design for non-mechanized service requests.	10/3/2000	Closed	10/6/2000
26	Firm Order Confirmation Timeliness	Small discrepancy for UNE 2 wire loop with LNP design, partially mechanized	10/3/2000	Closed	10/6/2000
27	Provisioning Troubles within 30 Days for DS1/DS3	BellSouth reported 81 as the numerator; KCL found 89.	11/1/2000	Closed	11/6/2000
28	Missed Repair Appointments for DS1/DS3	Both the numerator and denominator do not match	8/30/2000	Closed	10/20/2000
29	Repeat Troubles in 30 Days for DS1/DS3	BellSouth values and KCL generated values do not match.	9/7/2000	Closed	10/20/2000
30	Percent Missed Installation for DS1/DS3 Interoffice	Problems with matching DS1/DS3 for both dispatch and non-dispatch	10/13/2000	Closed	10/27/2000
31	% Rejected Service Requests for ISDN Resale	KCL found 1 record in the denominator whereas BellSouth did not.	10/16/2000	Closed	10/20/2000
32	Repeat Troubles within 30 Days	Repeat Troubles within 30 Days for DS1, BRI-ISDN and ADSL	10/26/2000	Closed	11/3/2000
33	Customer Trouble Report Rate	Numerator for DS1/DS3 Non-Dispatch does not match	10/18/2000	Closed	10/20/2000
34	Customer Trouble Report Rate	Numbers for DS1, BRI and ADSL do not match	10/31/2000	Closed	11/15/2000
35	Discrepancies found for xDSL, CLEC ISDN, DS1, BRI and ADSL	Provisioning Troubles within 30 Days	10/26/2000	Closed	11/6/2000
36	Total Service Order Cycle Time (UIT)	Code should be changed to exclude records with appt_code is 'L'	10/17/2000	Closed	10/20/2000

BELLSOUTH'S RESPONSE TO EXCEPTION 129

Item	Measurement	Issue	Date Opened	Open/Closed	Date Corrected
37	Total Service Order Cycle Time (ADSL)	Code should be changed to exclude records with appt_code is 'L'	10/17/2000	Closed	10/20/2000
38	Total Service Order Cycle Time (2W)	Code should be changed to exclude records with appt_code is 'L'	10/17/2000	Closed	10/20/2000
39	Maintenance Average Duration (ADSL)	BellSouth values and KCL generated values do not match.	10/27/2000	Open	
40	Pre-Ordering, Loop Makeup Inquiry (Manual)	BellSouth values and KCL generated values do not match.	10/27/2000	Closed	11/6/2000
41	Pre-Ordering, Service Inquiry (Manual) for xDSL and ISDN	BellSouth values and KCL generated values do not match.	10/27/2000	Closed	11/17/2000
42	Held Order Interval for CLEC UIT and BellSouth DS1/DS3	BellSouth values and KCL generated values do not match.	10/31/2000	Closed	11/6/2000
43	Order Completion Interval for 2w Loop with INP Design, INP Non-Design, LNP Design, LNP Non-Design and INP Standalone	BellSouth recently changed the code that uses the PON and the service order number to identify a record instead of the PON only.	10/17/2000	Closed	10/20/2000
44	%Missed Installation for 2w Loop with INP Design, INP Non-Design, LNP Design, LNP Non-Design and INP Standalone	BellSouth recently changed the code that uses the PON and the service order number to identify a record instead of the PON only.	10/17/2000	Closed	10/20/2000
45	Provisioning Troubles within 30 Days for xDSL, ISDN, Line Sharing and retail DS1 and retail BRI-ISDN	Filters for identifying that the trouble occurred within 30 days after completion of the service order should be the completion_date of the service order and the receive_date of the trouble ticket.	10/9/2000	Closed	10/13/2000
46	Provisioning Troubles within 30 Days for UIT and retail DS1/DS3	Filters for identifying that the trouble occurred within 30 days after completion of the service order should be the completion_date of the service order and the receive_date of the trouble ticket.	10/27/2000	Closed	11/15/2000
47	Provisioning Troubles within 30 Days for UNE 2w loop with INP design, INP Non-design, LNP design, LNP Non-design and INP standalone	Filters for identifying that the trouble occurred within 30 days after completion of the service order should be the completion_date of the service order and the receive_date of the trouble ticket.	10/27/2000	Closed	11/15/2000
48	PMAP - Provisioning Troubles in 30 Days	Missing Data Elements Required for Calculations/User Manual Update	10/17/2000	Open	
49	Firm Order Confirmation Timeliness	The product selection criterion for resale ISDN is incorrect.	10/2/2000	Closed	10/6/2000
50	Repeat Troubles within 30 Days for DS1 and BRI	The selection criterion to include BellSouth customers is incorrect. The selection criterion used is "mcn does not start with an 'R' or mcn is null." The selection criterion should only exclude records for which mcn starts with an 'R' and the 2nd through 5th characters represent a valid CLEC account.	10/25/2000	Closed	11/14/2000

BELLSOUTH'S RESPONSE TO EXCEPTION 129

Item	Measurement	Issue	* Date Opened	Open/Closed	Date Corrected
51	Repeat Troubles within 30 Days for DS1/DS3 Interoffice	BellSouth values and KCL generated values do not match.	10/24/2000	Closed	11/14/2000
52	Missed Repair Appointments for DS1 and BRI	BellSouth values and KCL generated values do not match.	10/31/2000	Closed	11/14/2000
53	Missed Repair Appointments for DS1/DS3 Interoffice	BellSouth values and KCL generated values do not match.	10/31/2000	Closed	11/14/2000
54	Maintenance Average Duration for DS1 and BRI	BellSouth values and KCL generated values do not match.	10/30/2000	Closed	11/14/2000
55	Maintenance Average Duration for DS1/DS3 Interoffice	BellSouth values and KCL generated values do not match.	10/30/2000	Closed	11/14/2000
56	Out of Service Greater than 24 Hours for DS1 and BRI	BellSouth values and KCL generated values do not match.	11/7/2000	Closed	11/14/2000
57	Out of Service Greater than 24 Hours for DS1/DS3 Interoffice	BellSouth values and KCL generated values do not match.	11/7/2000	Closed	11/14/2000
58	Customer Trouble Report Rate for DS1 and BRI	BellSouth values and KCL generated values do not match.	11/8/2000	Closed	11/14/2000
59	Customer Trouble Report Rate for DS1/DS3 Interoffice	BellSouth values and KCL generated values do not match.	11/8/2000	Closed	11/14/2000
60	Provisioning Troubles within 30 Days for DS1 and BRI	BellSouth values and KCL generated values do not match.	10/26/2000	Closed	11/14/2000
61	Provisioning Troubles within 30 Days for DS1/DS3 Interoffice	BellSouth values and KCL generated values do not match.	10/26/2000	Closed	11/14/2000
62	Provisioning Troubles within 30 Days	Discrepancies found for xDSL, CLEC ISDN, DS1, BRI, and ADSL.	10/17/2000	Open	
63	%Missed Installation for 2w Loop with INP Design, INP Non-Design, LNP Design, LNP Non-Design and INP Standalone	BellSouth recently changed the code that uses the PON and the service order number to identify a record instead of the PON only.	10/17/2000	Closed	10/20/2000
64	Provisioning Troubles within 30 Days for UIT and retail DS1/DS3	Filters for identifying that the trouble occurred within 30 days after completion of the service order should be the completion_date of the service order and the receive_date of the trouble ticket.	10/9/2000	Closed	10/13/2000
65	Provisioning Troubles within 30 Days for UNE 2w loop with INP design, INP Non-design, LNP design, LNP Non-design and INP standalone	Filters for identifying that the trouble occurred within 30 days after completion of the service order should be the completion_date of the service order and the receive_date of the trouble ticket.	10/9/2000	Closed	10/13/2000
66	Customer Trouble Report Rate for DS1	The product selection criterion for DS1 in the denominator is incorrect.	11/17/2000	Closed	12/1/2000
67	Held Order Interval for UNE xDSL Loop, UNE ISDN Loop, retail DS1, retail BRI and retail ADSL	BellSouth changed to 4GL code to make the code consistent with the business rules.	10/27/2000	Closed	11/8/2000

BELLSOUTH'S RESPONSE TO EXCEPTION 129

Item	Measurement	Issue	Date Opened	Open/Closed	Date Corrected
68	Held Order Interval for UNE Unbundled Interoffice Transport and retail DS1/DS3 interoffice	BellSouth changed to 4GL code to make the code consistent with the business rules.	10/27/2000	Closed	11/8/2000
69	Held Order Interval for 2 wire Analog Loop Design/Non-Design with INP/LNP Loop and INP Standalone	BellSouth changed to 4GL code to make the code consistent with the business rules.	10/27/2000	Closed	11/8/2000
70	Pre-Ordering, Loop Makeup Inquiry (Manual)	BellSouth values and KCL generated values do not match.	10/17/2000	Closed	10/27/2000

Impact:

Graphical charts containing erroneous information will not allow individuals, companies, or public bodies to make fully informed, accurate decisions.

BellSouth Response:

KPMG reported that a number of BellSouth's graphical charts depicting the GPSC-approved Performance Measurements reviewed by KPMG Consulting LLC (KCL) contained errors or identified issues. Items listed as "Open" on the above table are still under investigation by KCL.

Items 39, 48, and 62 are shown as "Open" on the table.

- Items 39 and 62 have been closed by KCL. The statuses will be changed from "Open" to "Closed" as per KPMG
- Issues associated with Item 48 are being addressed in conjunction with Exception 86.1. Accuracy of this graphical chart will be revisited upon resolution of Exception 86.1.

CERTIFICATE OF SERVICE

Docket No. 8354-U

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

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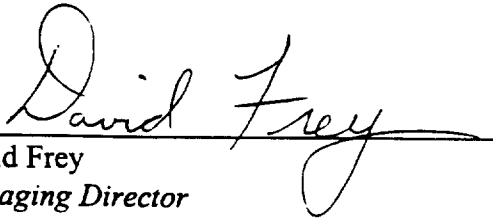
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This 15th day of February, 2001.

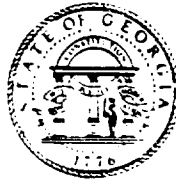


David Frey
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March 5, 2001

Mr. Brian Rutter
KPMG Consulting
303 Peachtree Street
Suite 2000
Atlanta, Georgia 30308

RECEIVED

MAR 05 2001

EXECUTIVE SECRETARY
G.P.S.C.

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

Dear Mr. Rutter:

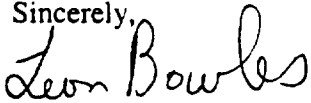
Thank you for the Interim Evaluation Summary provided to the Commission on February 20, 2001. As indicated in your presentation the majority of the seven evaluation categories have either already been completed, will have been completed by the date of this communication, or will be completed in the very near future. Based on your projected timeline six out of the seven evaluation categories will be completed by early March 2001. The remaining Metrics category is scheduled for total completion by April 30, 2001.

As discussed in the context of our meeting it is apparent that additional testing in the areas where your evaluations has been completed or are near completion will produce either marginal or no additional benefit. Given this conclusion, the Staff directs KPMG to terminate any further testing in the identified categories (Pre-Ordering, Ordering and Provisioning, Billing, Maintenance and Repair, Capacity Management, Change Management and Flow-Through Evaluation). KPMG is directed to submit its final evaluation report to the Commission by March 20, 2001. Additional testing will continue for the Metrics Category in conjunction with the aforementioned schedule. Metrics evaluations, which are not complete prior to March 20, 2001, shall be submitted to the Commission in a supplemental report.

In connection with the final report, KPMG also is directed to render an opinion for each of the evaluation categories as to whether any remaining criteria that are either Not Satisfied or Not Complete are likely to produce a material adverse impact on competition. Both the final report and the additional opinion shall be served on all parties of record in this docket. The Commission will expect appropriate representatives from KPMG to be prepared to present the results of their evaluation in the context of a public hearing.

If I can be of further assistance in this matter, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Leon Bowles".

Leon Bowles

Director of Telecommunications

cc: All Parties of Record
All Commissioners



1600 Market Street
Philadelphia, PA 19103-7279

Telephone 215 299 1400

Fax 215 299 3150

March 7, 2001

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334

RECEIVED

MAR 07 2001

EXECUTIVE SECRETARY
G.P.S.C.

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, Inc.'s Exception 95 (2nd Amended), Exception 129 (Amended), Exception 130, Exception 131, Exception 132 and Exception 133. Please also find enclosed the following responses from BellSouth: Exception 79 BLS 2nd Statement of Investigation; Exception 89 BLS 14th Amended Response; Exception 113 BLS 5th Amended Response; Exception 119 BLS 3rd Amended Response; Exception 127 BLS 2nd Amended Response; Exception 130 BLS Response; Exception 130 BLS Amended Response; Exception 131 BLS Response; Exception 132 BLS Response; Exception 133 BLS Statement of Investigation. Please also find Closure Reports for Exceptions 28, 94 and 114.

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
Managing Director

Enclosures

cc: Parties of Record



EXCEPTION 95 (Second Amended)
BellSouth Georgia OSS Testing Evaluation

Date: February 21, 2001

EXCEPTION REPORT

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

Exception:

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

Initial Exception (June 21, 2000)

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

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

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

PON*VER Company Code (CC)	Order Type	Actual Results	Expected Results
433A124PTJ100001*01 CC = 9991	MM Loop-Port Combination Inside Move	FOC/CN	According to BellSouth documentation, requests for feature changes are disallowed for this order type. An error message should have been received.
602A214PTJ100002*00 CC = 9991	MD Loop-Port	FOC/CN	According to BellSouth documentation, an activity

EXCEPTION 95 (Second Amended)
BellSouth Georgia OSS Testing Evaluation

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

EXCEPTION 95 (Second Amended)

BellSouth Georgia OSS Testing Evaluation

PON*VER Company Code (CC)	Order Type	Actual Results	Expected Results
	Conversion		should have received an error.
443A224PEM000002*00 9991	MRS Restore Service on a UNE Loop- Port Combination account	FOC/CN	Based on BellSouth's <i>Local Exchange Ordering Guide, Volume 1 (LEO Guide)</i> , the entry ("P") in the B11 field for this order type should have produced a Clarification response from BLS, not an FOC.
606A123PTM101003*02 9991	FC TN Change for a UNE Port customer	FOC/CN	KCI's BellSouth Customer Support Manager (CSM) informed KCI that, on a "Change in Service for a Port" Order (Order Type "FB/C"), the LOCBAN field must be populated with the new TN in order to receive an FOC. KCI received a FOC on this order when the LOCBAN field was populated incorrectly (i.e., it contained the customer's old TN).

Impact

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

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

EXCEPTION 95 (Second Amended)
BellSouth Georgia OSS Testing Evaluation**Amended Exception (December 8, 2000)**

KCI is amending this exception to include a number of Local Service Requests (LSRs) from the Resale Functional Evaluation (PO&P-11). These orders were initially referred to in a provisioning-related exception, and have also been identified as having ordering errors. Although BellSouth has indicated that the following LSRs contained errors, KCI receive Firm Order Confirmations (FOCs) for each one. For invalid service requests, KCI expects to receive Clarification responses.

PON	VER	CC
R015A21PTN000011	00	9992
R015A21PTN000006	00	9992
R015A21PTN000005	00	9992
R015A21PTN000004	00	9992
R015A21PEN000012	00	9992
R015A21PEN000010	00	9992
R015A21PEN000009	00	9992
R015A21PEN000008	00	9992
R015A21PEN000007	00	9992
R015A21PEN000002	AC	9992
R015A12PEN100002	00	9991
R011F12PTN100038	BA	9992
R015A12PEN100003	BB	9992
R011B21PTN000002	00	9991

EXCEPTION 95 (Second Amended)

BellSouth Georgia OSS Testing Evaluation

Second Amended Exception (February 21, 2001)

KCI initiated a UNE and Resale functional re-test on January 19, 2001. While the re-test focused on evaluating select transaction response timeliness criteria, KCI encountered a number of inaccurate FOCs during the course of test execution. The following table presents PON details for re-test service requests that contained LSR errors and received FOCs. KCI expected to receive error (ERR) or clarification (CLR) responses to each of these service requests.

PON*VER	CC	Order Type	Error Introduced on LSR	BLS Response
330S222PTI100003*00	9990	BB/V Loop with LNP migration	Local Service Office (LSO) field was populated with invalid value of "123456". According to the BLS ordering Business Rules (<i>LEO Guide, Volume 1</i>), the LSO field is required for this order type.	FOC
307S122PTH100009*00	9991	AB/V Loop migration	Line Activity (LNA) field was populated with an invalid value of "N". N is not a valid entry for this field according to the BLS <i>LEO Guide</i> .	FOC
435S114PTJ001001*00	9990	MB/T Loop-Port Combination Outside Move	Local Service Office (LSO) field was populated with invalid value of "487752".	FOC
384S225PEI100005*00	7050	BB/V Loop with LNP migration	Line Activity (LNA) field was populated with an invalid value of "N". N is not a valid entry for this field according to the BLS <i>LEO Guide</i> .	FOC
RS17H12PTN100006*00	9990	EB/D Resale disconnect	End User State (GA) field was populated with an invalid value of "GT".	FOC
RS15A21PTN100006*00	9991	JB/R Directory Listing change	EU house number was not populated on the End User Street (EU Street 1) field.	FOC
RS41B21PEN100001*00	9990	EB/A Resale new account	Service Center (SC) field contained invalid entry of "LCCC". According to the BLS <i>LEO Guide</i> , this field should contain "LCSC".	FOC

EXCEPTION 95 (Second Amended)

BellSouth Georgia OSS Testing Evaluation

PON*VER	CC	Order Type	Error Introduced on LSR	BLS Response
RS11C22PEN100012*00	9991	EB/C Resale change	Service Center (SC) field contained invalid entry of "LCCC". According to the BLS LEO Guide, this field should contain "LCSC".	FOC
RS01A11PEN100025*00	9993	EB/W Resale migration as-is	Invalid End User Address entered on service request.	FOC
RS17H12PEN100015*00	9990	EB/D Resale disconnect	Invalid End User Address entered on service request.	FOC
RS27H12PEN100009*00	9990	EB/SS Resale suspend service	Invalid End User Address entered on service request.	FOC
RS28A21PEN100013*00	9991	EB/RS Resale restore service	Invalid End User Address entered on service request.	FOC
RS28A21PEN100007*00	9991	EB/RS Resale restore service	Invalid End User Address entered on service request.	FOC
RS05A22PEN100016*00	9993	EB/V Resale migration as-specified	Listed Address (LA) field within Directory Listing form of this service order was formatted incorrectly. KCI entered LA of "OAD", while the BLS LEO Guide calls for "(OAD)". KCI received error message for improper formatting on some PONs but received a FOC on this one.	FOC
RS05A22PEN100015*02	9993	EB/V Resale migration as-specified	Listed Address (LA) field within Directory Listing form of this service order was formatted incorrectly. KCI entered LA of "OAD", while the BLS LEO Guide calls for "(OAD)". KCI received error message for improper formatting on some PONs but received a FOC on this one.	FOC

EXCEPTION 95 (Second Amended)
BellSouth Georgia OSS Testing Evaluation

PON*VER	CC	Order Type	Error Introduced on LSR	BLS Response
RS05A22PEN100003*01	9993	EB/V Resale migration as- specified	Listed Address (LA) field within Directory Listing form of this service order was formatted incorrectly. KCI entered LA of "OAD", while the BLS LEO Guide calls for "(OAD)". KCI received error message for improper formatting on some PONs but received a FOC on this one.	FOC
RS05A22PEN100014*02	9993	EB/V Resale migration as- specified	Listed Address (LA) field within Directory Listing form of this service order was formatted incorrectly. KCI entered LA of "OAD", while the BLS LEO Guide calls for "(OAD)". KCI received error message for improper formatting on some PONs but received a FOC on this one.	FOC
RS05A22PEN100005*02	9993	EB/V Resale migration as- specified	Listed Address (LA) field within Directory Listing form of this service order was formatted incorrectly. KCI entered LA of "OAD", while the BLS LEO Guide calls for "(OAD)". KCI received error message for improper formatting on some PONs but received a FOC on this one.	FOC

EXECPTION 129 (Amended)

BellSouth Georgia OSS Testing Evaluation

Date: February 15, 2001

EXCEPTION REPORT

An exception has been identified regarding activities associated with the Performance Measurements (Metrics) Evaluation as a result of the Georgia Public Service Commission's Administrative Session on June 6, 2000 (referred to as "the June 6th Order").

Exception:

A number of BellSouth's graphical charts depicting the Georgia Public Service Commission- (GPSC-) approved Performance Measurements reviewed by KPMG Consulting, Inc. (KCI) contained errors or identified issues.

The GPSC's June 6th Order outlined the GPSC-approved standards and benchmarks for Performance Measurement evaluations for use in the BellSouth - Georgia Operational Support System (OSS) Test. BellSouth responded to the approved standards and benchmarks by developing a series of graphical charts showing Georgia performance measurements against approved standards and benchmarks. While these new charts were developed using the same reporting environment and processes as the measurements currently published for Georgia by BellSouth and under review in KCI's third-party test, substantial new developments were required to support new measurements, new levels of disaggregation for existing measurements, and changes in the presentation of the measurements that were not heretofore addressed by the Georgia OSS third-party test.

The GPSC asked KCI, as part of the third-party test, to review the charts produced by BellSouth for consistency with published measurements, appropriate calculation method, and accuracy of calculation of the measurements for three recent reporting periods. In addition, KCI was to review the appropriateness of the calculation methods and accuracy for selected z scores in the charts.

As a result of its testing activities, KCI encountered the following issues, the details of which are included in the following table. The table provides the complete list of all issues that required further investigation and/or correction. Item numbers listed as "Closed" have been corrected to KCI's satisfaction and no longer require investigation. Item numbers listed as "Open" are still under investigation by KCI.

EXECPTION 129 (Amended)

BellSouth Georgia OSS Testing Evaluation

Item	Measurement	Issue	Date Opened	Open/Closed	Date Corrected
1	Pre-Ordering, Service Inquiry with Firm Order Confirmation (Manual) for xDSL and ISDN	BellSouth values and KCI generated values do not match.	10/27/00	Closed	11/17/00
2	Pre-Ordering, Service Inquiry with Firm Order Confirmation (Manual) for xDSL and ISDN	Starting with September 2000 the closing times of UNE centers changed. BellSouth incorrectly incorporated the revised closing times to the May, June and July 2000 data.	1/29/2001	Closed	2/2/01
3	Pre-Ordering, Loop Makeup Inquiry (Manual)	BellSouth values and KCI generated values do not match.	10/27/00	Closed	11/6/00
4	% Rejected Service Request and Reject Interval	Selection Criteria should have included Clarifications Posted. Defect Function incorrectly extracted data for Other Design and Other non-Design.	8/29/00	Closed	8/30/00
5	% Rejected Service Requests for ISDN Resale	KCI found 1 record in the denominator whereas BellSouth did not.	10/16/00	Closed	10/20/00
6	Firm Order Confirmation Timeliness for xDSL and ISDN/Manual	Filter has been removed from selection criteria to make the 4GL code consistent with PMAP selection criteria.	8/21/00	Closed	8/22/00
7	Firm Order Confirmation for manually submitted service requests	The holiday function that removes weekend time and holiday time out of the foc_duration is defect for manually submitted service requests processed during the weekend.	8/22/00	Closed	8/31/00
8	Firm Order Confirmation Timeliness for xDSL Loop and ISDN Loop	BellSouth was using the order number only for joining two tables, which has potential for multiple matches.	8/22/00	Closed	11/6/00
9	Firm Order Confirmation Timeliness for xDSL and ISDN/Manual	For xDSL and ISDN non-mechanized, only significant differences in the numerator. Possible cause: holiday function.	8/24/00	Closed	8/24/00
10	Firm Order Confirmation Timeliness	The product selection criterion for resale ISDN is incorrect.	10/2/00	Closed	10/6/00
11	Firm Order Confirmation Timeliness	Large discrepancies for UNE Other Design and UNE Other Non-Design for fully and partially mechanized service requests.	10/3/00	Closed	10/6/00
12	Firm Order Confirmation Timeliness	Large discrepancies for UNE Other Design and UNE Other Non-Design for non-mechanized service requests.	10/3/00	Closed	10/6/00
13	Firm Order Confirmation Timeliness	Small discrepancy for UNE 2 wire loop with LNP design, partially mechanized	10/3/00	Closed	10/6/00
14	Firm Order Confirmation Timeliness for Unbundled Interoffice Transport	1) Defect function that excludes holiday and weekend time; and 2) data were extracted from the wrong table.	8/29/00	Closed	9/22/00
15	Firm Order Confirmation Timeliness for Unbundled Interoffice Transport	BellSouth incorrectly used the socs.completion_date as the date selection criterion. BellSouth agreed that the d_cnf field in the Exact_seg1_mmyydd table should be used instead.	8/29/00	Closed	8/31/00
16	% Rejected Service Request and Reject Interval for UNE 2w Loop with LNP Design	Issue with product selection criterion.	8/25/00	Closed	8/29/00
17	Firm Order Confirmation Timeliness for LNP Standalone	BellSouth does not identify the records that are confirmed within 36 hrs correctly.	8/6/00	Closed	8/28/00
18	Held Order Interval for 2 wire Analog Loop Design/Non-Design with INP/LNP Loop and INP Standalone	BellSouth changed the code that uses the PON and service order number together to identify a record instead of using the PON only.	10/17/00	Closed	10/20/00
19	Held Order Interval for 2 wire Analog Loop Design/Non-Design with INP/LNP Loop and INP Standalone	BellSouth changed to 4GL code to make the code consistent with the business rules.	10/27/00	Closed	11/8/00
20	Held Order Interval for UNE retail DS1 and retail BRI	BellSouth added selection criteria to ensure that only BellSouth retail customers are included in the retail DS1 and retail BRI products	9/26/00	Closed	9/27/00
21	Held Order Interval for UNE xDSL Loop, UNE ISDN Loop, retail DS1, retail BRI and retail ADSL	BellSouth changed to 4GL code to make the code consistent with the business rules.	10/27/00	Closed	11/8/00
22	Held Orders	BellSouth added selection criteria to ensure that all company misses are included in the calculation.	9/26/00	Closed	9/27/00
23	Held Order Interval for UNE Unbundled Interoffice Transport and retail DS1/DS3 interoffice	BellSouth changed to 4GL code to make the code consistent with the business rules.	10/27/00	Closed	11/8/00
24	Held Order Interval for CLEC UIT and BellSouth DS1/DS3	BellSouth values and KCI generated values do not match.	10/31/00	Closed	11/6/00

EXECPTION 129 (Amended)

BellSouth Georgia OSS Testing Evaluation

Item	Measurement	Issue	Date Opened	Open/Closed	Date Corrected
25	Percent Missed Installation Appointments for UNE 2 Wire Loop with LNP Non-Design, less than 10 circuits	Value for this chart was not written to output of the program.	8/28/00	Closed	9/27/00
26	%Missed Installation for 2w Loop with INP Design, INP Non-Design, LNP Design, LNP Non-Design and INP Standalone	BellSouth recently changed the code that uses the PON and the service order number to identify a record instead of the PON only.	10/17/00	Closed	10/20/00
27	Percent Missed Installation for DS1/DS3 Interoffice	Problems with matching DS1/DS3 for both dispatch and non-dispatch	10/13/00	Closed	10/27/00
28	Order Completion Interval, DS1 and BRI, <10 circuits	For BRI Dispatch and DS1 Dispatch, which serves as the BellSouth analog for the UNE ISDN and xDSL products, BellSouth is incorrectly including CLEC data.	9/7/00	Closed	11/15/00
29	Order Completion Interval, ISDN Loop and xDSL Loop Products	Pending filter change request was postponed. To make the code consistent with PMAP this filter has been removed.	9/7/00	Closed	9/8/00
30	Order Completion Interval for 2w Loop with INP Design, INP Non-Design, LNP Design, LNP Non-Design and INP Standalone	BellSouth recently changed the code that uses the PON and the service order number to identify a record instead of the PON only.	10/17/00	Closed	10/20/00
31	Provisioning Troubles within 30 Days for ISDN Loop and xDSL Loop	Pending Filter change request was postponed. Filter change should be included in the code.	9/8/00	Closed	9/11/00
32	Provisioning Troubles within 30 Days for xDSL Loop and ISDN Loop	For BRI Dispatch and DS1 Dispatch, which serves as the BellSouth analog for the UNE ISDN and xDSL products, BellSouth is incorrectly including CLEC data.	9/8/00	Closed	9/11/00
33	Provisioning Troubles within 30 Days for xDSL, ISDN, Line Sharing and retail DS1 and retail BRI-ISDN	The completion_date of the service order and the receive_date of the trouble ticket should be used to identify whether the trouble occurred within 30 days after provisioning of a service order. BellSouth used the closed_date of the trouble_ticket in the calculation and need to change it to the receive_date of the trouble ticket.	10/6/00	Closed	10/13/00
34	Provisioning Troubles within 30 Days	Discrepancies found for xDSL, CLEC ISDN, DS1, BRI and ADSL	10/26/00	Closed	11/6/00
35	Provisioning Troubles within 30 Days for DS1 and BRI	The selection criterion to include BellSouth retail customers only is incorrect. The selection criterion used is "mcn does not start with an 'R' or mcn is null." However, KCI identified records where the mcn field starts with and 'R' but are valid BellSouth retail customers.	10/26/00	Closed	11/14/00
36	Provisioning Troubles within 30 Days, UNE 2w with INP/LNP Loop	Defect function was counting incorrectly for the number of circuits.	9/7/00	Closed	9/8/00
37	Provisioning Troubles within 30 Days for UNE 2w loop with INP design, INP Non-design, LNP design, LNP Non-design and INP standalone	The completion_date of the service order and the receive_date of the trouble ticket should be used to identify whether the trouble occurred within 30 days after provisioning of a service order. BellSouth used the closed_date of the trouble_ticket in the calculation and need to change it to the receive_date of the trouble ticket.	10/6/00	Closed	10/13/00
38	Provisioning Troubles within 30 Days for UIT and retail DS1/DS3	The completion_date of the service order and the receive_date of the trouble ticket should be used to identify whether the trouble occurred within 30 days after provisioning of a service order. BellSouth used the closed_date of the trouble_ticket in the calculation and need to change it to the receive_date of the trouble ticket.	10/6/00	Closed	10/13/00
39	Provisioning Troubles within 30 Days for DS1/DS3 Interoffice	The selection criterion to include BellSouth retail customers only is incorrect. The selection criterion used is "mcn does not start with an 'R' or mcn is null." However, KCI identified records where the mcn field starts with and 'R' but are valid BellSouth retail customers.	10/26/00	Closed	11/14/00
40	Provisioning Troubles within 30 Days for DS1/DS3	BellSouth reported 81 as the numerator, KCI found 89.	11/1/00	Closed	11/6/00
41	Total Service Order Cycle Time for xDSL and ISDN Loop	Code should be changed to exclude records with appt_code is 'L'	10/17/00	Closed	10/20/00

EXECPTION 129 (Amended)

BellSouth Georgia OSS Testing Evaluation

Item	Measurement	Issue	Date Opened	Open/Closed	Date Corrected
42	Total Service Order Cycle Time for ISDN Loop and xDSL Loop	BellSouth changed to 4GL code to exclude subscriber misses.	12/7/00	Closed	12/20/00
43	Total Service Order Cycle Time - Offered- for ISDN Loop and xDSL Loop	BellSouth changed to 4GL code to exclude subscriber misses.	12/7/00	Closed	12/20/00
44	Total Service Order Cycle Time (UIT)	Code should be changed to exclude records with appt code is 'L'	10/17/00	Closed	10/20/00
45	Total Service Order Cycle Time for UIT	BellSouth changed to 4GL code to exclude subscriber misses.	12/7/00	Closed	12/20/00
46	Total Service Order Cycle Time - Offered- for UIT	BellSouth changed to 4GL code to exclude subscriber misses.	12/7/00	Closed	12/20/00
47	Total Service Order Cycle Time (2W)	Code should be changed to exclude records with appt code is 'L'	10/17/00	Closed	10/20/00
48	Total Service Order Cycle Time for UNE 2w with INP/LNP Loop products	BellSouth changed to 4GL code to exclude subscriber misses.	12/7/00	Closed	12/20/00
49	Total Service Order Cycle Time - Offered- for UNE 2w with INP/LNP Loop products	BellSouth changed to 4GL code to exclude subscriber misses.	12/7/00	Closed	12/20/00
50	Total Service Order Cycle Time for LNP Standalone	BellSouth changed to 4GL code to exclude subscriber misses.	12/7/00	Closed	12/20/00
51	Missed Repair Appointments	The variables which serve as counters are not initialized. The variables which serve as counters for the Line Sharing products are not incremented correctly.	8/26/00	Closed	8/29/00
52	Missed Repair Appointments and Maintenance Average Duration	Inconsistency in denominator for Maintenance and Repair (Missed Repair Appointments vs. Maintenance Average Duration) caused by duplicate records	10/16/00	Closed	10/20/00
53	Missed Repair Appointments and Out of Service > 24 hrs	Inconsistency in SQM values between Missed Repair Appointments and Out of Service > 24 hrs due to duplicate records	10/16/00	Closed	10/20/00
54	Out of Service Greater than 24 hours, DS1 Dispatch	For DS1 Dispatch, the numbers for OOS24 and Missed Repair Appointments are not the same.	10/16/00	Closed	10/20/00
55	Missed Repair Appointments for DS1 and BRI	The selection criterion to include BellSouth retail customers only is incorrect. The selection criterion used is "mcn does not start with an 'R' or mcn is null." However, KCI identified records where the mcn field starts with and 'R' but are valid BellSouth retail customers.	10/31/00	Closed	11/14/00
56	Missed Repair Appointments for DS1/DS3	Both the numerator and denominator do not match due to duplicate records.	8/30/00	Closed	10/20/00
57	Missed Repair Appointments for DS1/DS3 Interoffice	The selection criterion to include BellSouth retail customers only is incorrect. The selection criterion used is "mcn does not start with an 'R' or mcn is null." However, KCI identified records where the mcn field starts with and 'R' but are valid BellSouth retail customers.	10/31/00	Closed	11/14/00
58	Out of Service Greater than 24 Hours for DS1 and BRI	The selection criterion to include BellSouth retail customers only is incorrect. The selection criterion used is "mcn does not start with an 'R' or mcn is null." However, KCI identified records where the mcn field starts with and 'R' but are valid BellSouth retail customers.	11/7/00	Closed	11/14/00
59	Out of Service Greater than 24 Hours for DS1/DS3 Interoffice	The selection criterion to include BellSouth retail customers only is incorrect. The selection criterion used is "mcn does not start with an 'R' or mcn is null." However, KCI identified records where the mcn field starts with and 'R' but are valid BellSouth retail customers.	11/7/00	Closed	11/14/00
60	Maintenance Average Duration	BellSouth Selection Criteria could potentially include data other than retail customers.	8/30/00	Closed	8/31/00
61	Maintenance Average Duration for DS1 and BRI	The selection criterion to include BellSouth retail customers only is incorrect. The selection criterion used is "mcn does not start with an 'R' or mcn is null." However, KCI identified records where the mcn field starts with and 'R' but are valid BellSouth retail customers.	10/30/00	Closed	11/14/00
62	Maintenance Average Duration for DS1/DS3 Interoffice	A selection criterion is added in the creation of raw data.	8/30/00	Closed	8/31/00

EXECPTION 129 (Amended)

BellSouth Georgia OSS Testing Evaluation

Item	Measurement	Issue	Date Opened	Open/Closed	Date Corrected
63	Maintenance Average Duration for DS1/DS3 Interoffice	The selection criterion to include BellSouth retail customers only is incorrect. The selection criterion used is "mcn does not start with an 'R' or mcn is null." However, KCI identified records where the mcn field starts with and 'R' but are valid BellSouth retail customers.	10/30/00	Closed	11/14/00
64	Percent Repeat Troubles within 30 Days	Defect function for calculating Line Sharing products.	8/26/00	Closed	8/26/00
65	Repeat Troubles within 30 Days for BRI	For BRI Dispatch, which serves as the BellSouth analog for the UNE ISDN products, BellSouth is incorrectly excluding BellSouth records where the mcn field is null.	8/26/00	Closed	11/15/00
66	Repeat Troubles within 30 Days for DS1 and BRI	The selection criterion to include BellSouth retail customers only is incorrect. The selection criterion used is "mcn does not start with an 'R' or mcn is null." However, KCI identified records where the mcn field starts with and 'R' but are valid BellSouth retail customers.	10/25/00	Closed	11/14/00
67	Repeat Troubles within 30 Days for BellSouth retail DS1, BRI-ISDN products.	KCI calculated values and BellSouth reported values do not match.	10/26/00	Closed	11/3/00
68	Repeat Troubles in 30 Days for DS1/DS3	BellSouth values and KCI generated values do not match due to duplicate records.	9/7/00	Closed	10/20/00
69	Repeat Troubles within 30 Days for UITS Products	WFA_Close_BRC data was excluded from data extraction.	9/7/00	Closed	9/8/00
70	Repeat Troubles within 30 Days for DS1/DS3 Interoffice	The selection criterion to include BellSouth retail customers only is incorrect. The selection criterion used is "mcn does not start with an 'R' or mcn is null." However, KCI identified records where the mcn field starts with and 'R' but are valid BellSouth retail customers.	10/24/00	Closed	11/14/00
71	Customer Trouble Rate	BellSouth Selection Criteria could potentially include data other than retail customers.	8/30/00	Closed	8/31/00
72	Customer Trouble Report Rate	Numbers for DS1, BRI and ADSL do not match	10/31/00	Closed	11/15/00
73	Customer Trouble Report Rate for DS1 and BRI	The selection criterion to include BellSouth retail customers only is incorrect. The selection criterion used is "mcn does not start with an 'R' or mcn is null." However, KCI identified records where the mcn field starts with and 'R' but are valid BellSouth retail customers.	11/8/00	Closed	11/14/00
74	Customer Trouble Report Rate for DS1	The product selection criterion for DS1 in the denominator is incorrect.	11/17/00	Closed	12/1/00
75	Customer Trouble Report Rate	Numerator for DS1/DS3 Non-Dispatch does not match	10/18/00	Closed	10/20/00
76	Customer Trouble Report Rate for DS1/DS3 Interoffice	The selection criterion to include BellSouth retail customers only is incorrect. The selection criterion used is "mcn does not start with an 'R' or mcn is null." However, KCI identified records where the mcn field starts with and 'R' but are valid BellSouth retail customers.	11/8/00	Closed	11/14/00
77	Hot Cuts - Provisioning Troubles within 7 Days	BellSouth does not retain historical data and therefore the SQM values cannot be reproduced.	12/12/00	Open	
78	PMAP - Provisioning Troubles in 30 Days	Missing Data Elements Required for Calculations/User Manual Update	10/17/00	Open	
79	PMAP - Percent Missed Installation	KCI calculated values and BellSouth reported values do not match.	12/4/00	Open	
80	PMAP - Customer Trouble Report Rate for Switching Ports and Combos	KCI disagree with BellSouth calculation method to derive the denominator for this measure. BellSouth will implement a system change to differentiate the switching ports from the combos.	11/6/00	Closed	1/22/00
81	Average Answer Time in Repair Centers	KCI calculated values and BellSouth reported values do not match.	12/18/00	Open	
82	Service Inquiry with Firm Order	Relevant fields are manually entered into two tracking systems, BRITE and LON. Data entry errors may cause problems when joining two tables from these two systems together.	11/30/00	Open	

EXECPTION 129 (Amended)

BellSouth Georgia OSS Testing Evaluation

Item	Measurement	Issue	Date Opened	Open/ Closed	Date Corrected
83	Reject Interval for electronically submitted service requests	The depicted benchmark is inconsistent with the June, 6 2000 Order. The Order indicates a benchmark of 97% within 1 hr whereas BellSouth shows 95% within 1 hr.	1/10/00	Open	
84	Average Jeopardy Notice Interval	The depicted benchmarks is inconsistent with the June, 6 2000 Order.	1/10/00	Open	
85	LNP Disconnect Timeliness	The depicted benchmark is inconsistent with the June, 6 2000 Order. The Order indicates a benchmark of 95% within 15 minutes whereas BellSouth shows 95% within 24 hrs.	1/10/00	Open	
86	Held Orders	The depicted benchmark is inconsistent with the June, 6 2000 Order. The Order indicates to use "Residence and Business Dispatch" as the benchmark but "Residence and Business (Dispatch + Non-Dispatch)" is used.	1/10/00	Open	
87	Order Completion Interval for LNP Standalone	These products are listed in the June 6, 2000 Order but no charts are produced for these products.	1/10/00	Open	
88	Held Order Interval for LNP Standalone	These products are listed in the June 6, 2000 Order but no charts are produced for these products.	1/10/00	Open	
89	Provisioning Troubles within 30 Days for LNP Standalone	These products are listed in the June 6, 2000 Order but no charts are produced for these products.	1/10/00	Open	
90	Reject Interval and %Rejected Service Requests	The SQM documentation for these measurements is not complete. The SQM documentation should indicate that only service requests received and rejected during the same reporting period are included.	11/30/00	Open	

Impact:

Graphical charts containing erroneous information will not allow individuals, companies, or public bodies to make fully informed, accurate decisions.

Date: February 20, 2001

EXCEPTION REPORT

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

Exception:

BellSouth's Telephone Number Selection Query (TNSQ) pre-order does not support reservation extensions for TNs in the Augusta or Macon Central Offices.

Prior to submitting a Local Service Requests (LSR) for certain variations of service (e.g., establishment of a new customer account, addition of a new line to an existing account), a CLEC must first submit a pre-order request to secure a valid Telephone Number (TN). BellSouth's Telecommunications Access Gateway (TAG) serves as an electronic interface for submitting pre-order requests. CLECs first submit a Telephone Number Assignment Query (TNAQ) to obtain one or more available TNs. When submitting a TNAQ, the CLEC must specify the CLLI code of the end office switch from which service is being provided. The TN(s) provided in response to the TNAQ are 'reserved' for that CLEC for one day. To extend this reservation, a CLEC may submit a TNSQ.

During the course of testing, KPMG Consulting, Inc. (KCI) attempted to submit several TNSQs via TAG to extend the reservation of TNs from the Macon and Augusta Central Offices. In response to each of these pre-orders, KCI received an error messages stating: *"SYSTEM ERROR. CALL SPOC AT 888-462-8030 & GIVE THEM THIS INFO: CODE 100; LOCATION 105"*.

Impact:

The inability to reserve TNs in specific Central Offices represents a deficiency in BellSouth's TAG pre-order functionality, and impedes a CLEC's ability to conduct subsequent ordering activity. As a workaround, a CLEC would be required to submit a manual (i.e., via fax) pre-order to reserve the necessary TNs. This would introduce delays and additional costs to the CLEC's business process.

EXCEPTION 131

BellSouth Georgia OSS Testing Evaluation

Date: February 12, 2001

EXCEPTION REPORT

An exception has been identified as a result of the Data Integrity (PMR4) test for Ordering & Provisioning Service Quality Measurements (SQMs).

Exception:

BellSouth's raw data¹ used in the calculation of the BellSouth Ordering SQM reports is not accurately derived from or supported by its component early-stage data².

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.³

As part of the BellSouth-Georgia OSS Evaluation, KPMG Consulting, Inc. (KCI) is validating the integrity of the raw data used in the calculation of the SQM values reported by BellSouth. KCI 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).

KCI validated the integrity of the raw data used in the calculation of various Ordering SQMs for October 2000 by comparing them to the early-stage data from the LEO, LON, and EXACT systems. KCI identified two types of discrepancies⁴ during the testing process.

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 secured Performance Measurement and Analysis Platform (PMAP) web site.

⁴ Note that the listed discrepancies relate only to the LEO and LON systems. KCI has not yet completed its validation of the raw data from the EXACT system.

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BellSouth Georgia OSS Testing Evaluation

Accuracy of the Raw data

Table 1 lists the discrepancies related to the accuracy of the raw data.

Table 1 (Accuracy)

SYSTEM	RAW DATA FILE	DISCREPANCY
LEO	Service Orders	The early stage data from LEO show that the Firm Order Confirmation was sent manually for this PON. However, the raw data file does not report the FOC duration for this PON. BLS (reported - FOC Duration): None KCI ⁵ (calculated - FOC Duration): 3.30 hours.
LEO	Reject Interval	The early stage data from LEO shows that a Firm Order Confirmation was sent out for this PON. However, BellSouth raw data reports Reject Duration for this PON.
LON	FOC Timeliness	BLS (reported - FOC Duration): 32.18 hours KCI (calculated - FOC Duration) ⁵ : 31.7
LON	Reject Interval	The raw data reports Reject Duration. Early stage data validates the reported value in the raw data. However, early stage data also shows a Firm Order Confirmation Date.
LON	FOC Timeliness	BLS (reported - FOC Duration): 24.05 hours KCI (calculated - FOC Duration): 23.65 hours.
LON	FOC Timeliness	BLS (reported - FOC Duration): 233.68 hours. KCI (calculated - FOC Duration): 239.45 hours.

Completeness of the Raw Data

In order to determine the completeness of the raw data files, KCI compared the orders that appeared in the LON systems to the orders that appeared in the various Ordering raw data files. KCI could not find 18 orders from the LON system in the various Ordering raw data files.

⁵ KCI calculations are made in accordance with the instructions provided by BellSouth.

EXCEPTION 131

BellSouth Georgia OSS Testing Evaluation

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: February 20, 2001

EXCEPTION REPORT

An exception has been identified as a result of the UNE and Resale EDI Ordering Functional Evaluation (O&P-1 and PO&P-11).

Exception:

BellSouth delivered error messages in response to valid Local Service Requests (LSRs).

During the course of the functional re-test initiated on January 19, 2001, KPMG Consulting, Inc. (KCI) received a number of error messages indicating that the Response Type Requested (RTR) data field contained invalid data. KCI verified that its entry of "C"¹ conforms to the latest BellSouth ordering documentation².

To date, KCI has only received the RTR error message on service requests submitted via the EDI interface. In many cases, the RTR error was returned in conjunction with an additional unrelated error message. KCI re-submitted a portion of these requests, correcting the non-RTR error(s). Some of these subsequent transactions received a Firm Order Confirmation (FOC), while others received another RTR error message. Orders transmitted through the TAG interface containing the same RTR data entry have not received this error message.

KCI has not yet received BellSouth Flow Through reports containing these PONs, and is currently unable to verify if the error responses were Fully Mechanized (i.e., generated by BellSouth systems) or Partially Mechanized (i.e., generated by BellSouth ordering representatives).

The following tables provide a sample of PONs receiving this error to date.

¹ Prior to transmission to BellSouth, this RTR value of "C" gets translated into "AT" in conformance with EDI technical specifications.

² *Local Exchange Ordering Guide, Volume 1*

The following LSRs received multiple error messages, including the RTR error. Order supplements were issued to correct the non-RTR error. These supplements received FOCs.

PON	VER	Company Code	Error Message
RS01A22PEN100024	01	9991	ADDRESS IS RSAG INVALID, AND RTR IS INVALID
RS02A21PEN100002	02	9993	LISTING FORMAT INVALID, RTR FIELD INVALID
RS02A21PEN100019	01	9993	RTR IS INVALID, DRS ALREADY ON CSR, FEATURE DETAIL FORMAT INVALID AND ADL IS NOT NECESSARY ON BUS. LM
RS02A21PEN100020	02	9993	LISTING FORMAT INVALID, RTR FIELD INVALID
RS05A12PEN100015	01	9992	THE RTR IS INVALID AND THE ADDRESS IS NOT RSAG VALID, LM
RS05A22PEN100003	01	9993	RTR OF ATIS NOT VALID--- PROVIDE RSAG VALID END USER ADDRESS.
RS11B21PEN100008	01	9991	RTR IS NOT VALID---PROVIDE A RSAG VALID ADDRESS FOR END USER.
RS11C22PEN100005	01	9991	ADDRESS IS INVALID FOR RSAG, RTR IS INVALID
RS13H12PEN100027	01	9990	ADDRESS IS RSAG INVALID--- RTR IS INVALID
RS17H12PEN100018	01	9990	RTR OF AT IS NOT VALID--- PROVIDE A RSAG VALID ADDRESS FOR THE END USER.
RS17H12PEN100021	01	9990	ADDRESS IS NOT VALID FOR RSAG--RTR IS INVALID
RS17H12PEN100022	02	9990	ADDRESS IS RSAG INVALID--- RTR IS INVALID

The following LSRs received multiple error messages, including the RTR error. Order supplements were issued to correct the non-RTR error. These supplements again received an RTR error message.

PON	VER	Company Code	Error Message
RS05A12PEN100014	01	9992	RTR INCORRECTLY POPULATED - SCA
RS05A22PEN100013	01	9993	RTR FIELD NOT VALID
RS27H12PEN100004	01	9990	RTR OF AT IS NOT VALID.

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BellSouth Georgia OSS Testing Evaluation

*The following LSRs received a single error message relating to an invalid RTR.
Supplemental service orders have not yet been issued.*

PON	VER	Company Code	Error Message
428S124PEJ100003	00	9991	INVALID ENTRY FOR RTR FIELD - SCA
432S214PEJ101001	00	9990	RTR IS INVALID, LM

*The following LSRs did not receive an RTR-related error message. They are instances
of the same test cases (listed above) that did receive an RTR error.*

PON	VER	Company Code	Error Message
RS01A22PEN100008	00	9991	N/A
RS05A12PEN100001	00	9992	N/A
RS05A12PTN100003	00	9992	N/A
RS05A12PEN100004	00	9992	N/A
RS05A22PTN100004	00	9993	N/A
RS05A22PEN100014	00	9993	N/A
RS05A22PEN100016	00	9993	N/A

Impact:

The receipt of invalid error messages, in some cases multiple times per order, leads to increased timeframes for CLEC order processing. Additional time and effort is required to identify the cause of the error, verify that it is not attributable to CLEC error, and re-submit order supplements.

Date: February 12, 2001

EXCEPTION REPORT

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

Exception:

BellSouth does not compute its Operations Support System (OSS) Interface Availability Service Quality Measurements (SQMs) in accordance with the definitions and business rules that appear in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*.

SQMs are calculated to illustrate BellSouth's 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 Consulting, Inc. (KCI) is reviewing the *SQM Reports*.² KCI is evaluating the accuracy, completeness, and consistency of each metric's stated definition, calculation, and business rules.

BellSouth appears to be treating system/application outages in a manner inconsistent with the business rules listed in the Georgia *SQM Reports*. For the months of October, November, and December 2000, BellSouth has reported the OSS Interface Availability SQM for LENS to be 100%. However, KCI is aware of unscheduled, customer-affecting outages that are not reflected in these metric values. By posting details, BellSouth acknowledges on its change control Web site that outages have occurred during times throughout these same months.

Section C of the Georgia *SQM Reports* document provides the definition of OSS Interface Availability: "Percent of time OSS interface is functionally available compared to scheduled availability." The document goes on to state that only full outages are used to calculate this metric, and states, "a full outage is incurred when any of the following circumstances exist:

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

² KCI used the 10/22/99 version of the *SQM Reports* as a basis to perform this test. KCI also took into consideration changes published over time in more recent versions of the *SQM Reports*. The Business Rules listed in this Exception are listed in the *SQM Reports* published at the end of November 2000.

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BellSouth Georgia OSS Testing Evaluation

- The application or system is down.
- The application or system is inaccessible, for any reason, by the customers who normally access the application or system.
- More than one work center cannot access the application or system for any reason.
- When only one work center accesses an application or system and 40% or more of the clients in that work center cannot access the application.
- When 40% of the functions the clients normally perform or 40% of the functionality that is normally provided by an application or system is unavailable.”

All full outages should be reflected in the OSS Interface Availability SQMs. Because these outages are not included in unscheduled downtime of the systems, KCI believes the availability percentages themselves are overstated for the SQMs and months listed previously. Moreover, KCI believes that the actual process by which the OSS Interface Availability SQMs are computed is inconsistent with the business rules described within the definitions listed in the Georgia *SQM Reports*.

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. Accurate and complete definitions and business rules are essential to the CLECs' ability to interpret the performance measurement properly and conduct these functions reliably.

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 79



Date: February 27, 2001

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 have an adequate data retention policy for its early-stage data¹, the programs used to process the early-stage data, the raw data used in the calculation of the Service Quality Measurement (SQM) reports, or the computation programs used to calculate SQM report values.

Initial Exception:

BellSouth 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).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 Consulting 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	<i>Speed of Answer in the Ordering Center (Ordering)</i>	8 days
Renaissance Enterprise Management	<i>Interface Availability (OSS)</i>	Current month
Spectrum Automatic Call Distributor	<i>Average Speed of Answer in Ordering Centers – Residence (Ordering)</i>	60 days
Meridian Symposium	<i>Average Answer Time in Repair Centers for Large Business (Maintenance & Repair)</i>	2 days

¹ Early-stage data is the earliest instance of the data collected in the BellSouth OSS.

² These SQMs are referred to as "manual SQMs."

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 79

Meridian Max	<i>Average Answer Time in Repair Centers – Residence (Maintenance & Repair)</i>	7 days
QMS	<i>Average Speed to Answer - Toll (Operator Services Toll & Directory Assistance)</i>	45 days

BellSouth Initial 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	<i>Speed of Answer in the Ordering Center (Ordering)</i>	Yes*
Renaissance Enterprise Management	<i>Interface Availability (OSS)</i>	Yes
Spectrum Automatic Call Distributor	<i>Average Speed of Answer in Ordering Centers – Residence (Ordering)</i>	Yes*
Meridian Symposium	<i>Average Answer Time in Repair Centers for Large Business (Maintenance & Repair)</i>	Yes
Meridian Max	<i>Average Answer Time in Repair Centers – Residence (Maintenance & Repair)</i>	Yes*
QMS	<i>Average Speed to Answer - Toll (Operator Services Toll & Directory Assistance)</i>	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 SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 79

Amendment:

On further investigation, KPMG Consulting learned that BellSouth does not have a written policy regarding retention of any early-stage data, the computer programs used to process the early-stage data, the raw data, or the SQM-generating computer programs for an adequate time period.

In KPMG Consulting's professional opinion, to facilitate a thorough audit of BellSouth's Metrics data in the future, BellSouth should retain the early-stage data, the computer programs used to process the early-stage data, the raw data and the computer programs used to create the SQM reports (along with the reports themselves) for a period of three years after the publishing of an SQM report. Retention of all of these elements is essential for a complete and accurate audit of BellSouth's SQMs.

BellSouth's 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 Statement of Investigation

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

BELLSOUTH'S FOURTEENTH AMENDED RESPONSE TO EXCEPTION 89



Date: February 23, 2001

EXCEPTION REPORT

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

Exception:

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

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.³

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

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

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

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

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

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

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

BELLSOUTH'S FOURTEENTH 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
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

BellSouth Response:

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 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

BELLSOUTH'S FOURTEENTH AMENDED RESPONSE TO EXCEPTION 89

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)*

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

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

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

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BellSouth Amended Response:

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

TGSN	BellSouth-Reported Derived Raw Data Values and the TCBH used in the calculation	KPMG-Calculated Values and the maximum blocking hour used in the calculation	Reason for Discrepancy
AC158303	11.36% (hour 21)	7.83% (hour 21)	The TCBH and the maximum blocking hour is 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 is 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.

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AC203042	0.00% (hour 16)	0.01% (hour 17)	Different hour used.
AC203657	3.94%	3.95%	BellSouth is not confident in the data generated for this trunk group and therefore does not feel either calculation is accurate.
AC204674	0.01% (hour 15)	0.04% (hour 11)	Different hour used.
AC204913	0.00% (hour 15)	0.08% (hour 9)	Different hour used.
AC205420	0.02% (hour 14)	0.06% (hour 15)	Different hour used.
AC206974	2.23% (hour 15)	2.30% (hour 16)	Different hour used.
AC208035	0.00% (hour 21)	0.02% (hour 1)	Different hour used.
AC208787	0.01% (hour 10)	0.06% (hour 8)	Different hour used.
AC213664	0.18% (hour 16)	0.24% (hour 15)	Different hour used.
AC205717	0.19% (hour 13)	0.33% (hour 12)	Different hour used.
AC212373	40.21% (hour 11)	46.21% (hour 10)	Different hour used.

Comparison of the trunk group busy hour and the cluster busy hour by traffic usage to determine the control hour has created a problem in the verification of results. The cluster arrangement in effect at the time of the original data run is not retained for historical purposes. This prevents an accurate re-creation of the cluster busy hour for audit results verification.

The selection process was analyzed, and the substitution of average offered load for traffic usage was deemed a satisfactory method. The use of offered load eliminates the effect of the cluster busy hour for final groups that are used in service monitoring. Since this calculation is used in the selection of the trunk group busy hour, the trunk group busy hour is always selected as the control hour. This change has been implemented and will result in January 2001 results being computed on the modified criteria. KPMG will be able to retest this measure, beginning with January 2001 data.

KPMG tested the month of March 2000, and found data to be missing and results questionable due to the affects of clustering. Requests of data for subsequent months revealed that the hourly trunk traffic measurement data for July, August, September, and the first 10 days of October 2000 were lost due to an error in implementing a script change in the Network Information Warehouse (NIW) platform. This script change overwrote the script that automatically archived the measurement data on a monthly basis and resulted in the data for those months not being archived. The error was corrected in October 2000, when data for those months was requested and was found not to exist. The results of a subsequent test of November by KPMG were also found to be questionable due to the affects of clustering.

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

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.

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

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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

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BellSouth Amended Response:

The differences in the early-stage and the raw data were due to questionable entries in the data file. Each entry in the early stage data not counted in the raw data contained a "processing site dequeue time" listed as a negative number less than 10,000,000 milliseconds. BellSouth debugged the code to determine how the **TRAN TIME** value was calculated as a negative number. The program generating raw data expected spaces between each field. Because this massive number left no space between itself and the preceding field, rows on which it appeared were rejected.

BellSouth investigated the issue of the negative transaction times in the Navigator debug facility. Using a utility called 'navswim', BellSouth traced the **TRAN TIME** calculation to a file in one of Navigator's libraries and found the logic in the file to be incorrect. The dequeue time was sometimes computed incorrectly, affecting the SNA time and ultimately affecting calculation of the transaction time. The logic was changed to correct the problem and was included in the Navigator Release 4.6.3.

BellSouth 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 were listed as: queue_ms, proc_ms, network_ms, dequeue_ms, navigator_ms, tcpip_ms, and total_ms.

The four source systems from which data is extracted are being upgraded to correct or eliminate the generation of the invalid negative values. Completion of upgrades is expected in 2Q01.

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

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BellSouth Response:

The early stage data value in question for these dates, 2 calls missed in ALM and 3 calls missed in FL, were the result of human error. The calculation of adding alternate option calls manually to the switch data is currently being reviewed. Although October 1999 was the first full month BellSouth began the alternate option process and the number of calls missed is very low, BellSouth strives to have perfect data on the reports.

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*

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

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

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

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BellSouth Response:

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

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

The LEO source system data identifies the LSR as Mechanized (LSR.manual_code = 'MECH') because the LSR was electronically submitted through LENS (LSR.system_init_id = 'WEB'). A manual code indicating Mechanized does not preclude an LSR from being a Partially Mechanized LSR. Partially Mechanized LSRs are any electronically submitted LSR requiring manual handling. An LSR presence in LON is evidence of manual handling; thus, any LSR with a PON that can be found in both systems, LEO and LON, is reclassified as a Partially mechanized LSR.

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

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

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 be 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)

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- a) It must be a REJECTED LSR. A REJECTED LSR contains the string "CLARIFICATION RETURNED" in the NOTES field of STAG_AUDIT (LEO)
- b) LSR must have been manually claimed. This is true when the string "CLAIMED BY" or "Claimed By" is found in the Notes field of STAG_AUDIT (LEO).
- c) The first three characters of SIGNOUT_CUID are not 'DB0' in STAG_LSR (LEO)

3.)

- a) Records must be manually rejected after they were received in LEO. This is true when the FIRST_CLAR_DT in STAG_LON is greater than CREATE_TS in LEO.
- b) The record must contain the string "Claimed By", or "CLAIMED BY" in Notes field of STAG_AUDIT (LEO)
- c) Purchase Order Number (PON) must be found in STAG_LON_COPY (LON)
- d) The first three characters of SIGNOUT_CUID are not 'DB0' in STAG_LSR (LEO)

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

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

An LSR can have multiple "audit notes" entries. Each entry would have its own date/time stamp.

The date and time of the rejection is the notes timestamp from the STAG_AUDIT_TABLE if the LSR reads either "CLAIMED BY" or Claimed By" in the audit notes field and all of the following are true of the LSR:

- It was electronically submitted
- It was manually rejected
- It's Purchase Order Number (PON) exists in LON
- It has not been cancelled prior to being rejected or clarified
- The LON system first clarification date/time is greater than the date/time it was first submitted electronically.

If any of the audit notes field reads either "CLAIMED BY" or Claimed By" and any of the other above requirements are not met, the reject date and time would be the notes timestamp from STAG_AUDIT_TBL where "CLARIFICATIONS RETURNED" appears in the audit notes field.

Additional data was provided to KPMG on 7/27/00 to support the explanation of this Exception.

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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.

BellSouth Response:

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.

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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 value calculated using the EXACT screen printout.

To calculate the FOC Duration BellSouth uses the fields d_cnf (date confirmed = FOC date) and d_rec (date received). This data was taken from a snapshot of June early stage data. KPMG did not use these fields in its calculations and was unable to replicate the FOC Duration.

The first table sent to KPMG shows the early stage June snapshot data as found by BellSouth and BellSouth's calculation of the FOC Duration. The first table also lists the foc_date and foc_duration that was found by KPMG in the BellSouth Raw Data file. This table shows that the values reported by BellSouth in raw data are the same as the values found in the June early stage snapshot.

The second table sent to KPMG lists early stage data values found by using EXACT screen printouts. Data found in EXACT screen printout may vary from early stage snapshot data because fields in the EXACT system may have been modified since the time the data snapshot was taken.

NOTES: Sample EXACT screen print data as it was provided to KPMG can be found in Appendix A. From the screen print data the field 'D/TREC' corresponds to 'd_rec' and 't_rec' in the above table, and the field 'CD/TSENT' corresponds to 'd_cnf' and 't_cnf' in the table. Corresponding fields for 'd_sent' and 't_sent' from the table were not included in the screen prints because this data is not relevant for calculating the measure. The 'd_sent' and 't_sent' fields are a timestamp of when CLEC data is sent from Telis to EXACT. Due to batch processing restrictions EXACT receives this data at the time represented by the fields 'd_rec' and 't_rec' from the table.

Appendix A

```
/FOR: ICADM      *ICSC: ASR ADMINISTRATION INFORMATION *   08/17/00 16:38
COMMAND      TARGET

ASR 0013900229 OWNER CPOC  ORD CO5GV6J2      JEP  STATUS FKR T ACA
REQTYP MD ACT C CCNA DLT PON DLT00LOC00359C  VER C RPON
ECCKT 1 /DF-4ESJ912 /ALBYGADZ1MD/M-/ALBYGAMA13T FMT LTERM      ASI
***** BILLING INFORMATION *****
BILLNM ITC^DELTACOM      SBILNM PAM COOPER      ACNA DLT TE A
STREET 1791 O.G.SKINNER DR.  FL NA RM NA
CITY WESTPOINT      ST AL ZIP 31833
BILLCON      TEL 706 645 3838
VTA      EBP      VCVTA      IWBAN
***** CONTACT INFORMATION *****
```

BELLSOUTH'S FOURTEENTH AMENDED RESPONSE TO EXCEPTION 89

INTT 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 INTT 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*

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.

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

BellSouth Response:

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.

BELLSOUTH'S FOURTEENTH AMENDED RESPONSE TO EXCEPTION 89

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 be 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.

PMAP Provisioning SME

Terri Ferrara – 954-928-4768

Shirley Britton – 404-927-7598

Betty Faulk – 404-927-3515

Roy Sallis – 205-977-1185

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.

BELLSOUTH'S FOURTEENTH AMENDED RESPONSE TO EXCEPTION 89

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

BellSouth Response:

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

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

The early-stage data from BellSouth's ICAIS/BARNEY system did not agree with the raw data values for the: (a) "so_missed_cmmt_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".

BELLSOUTH'S FOURTEENTH 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 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

BellSouth Amended Response:

BellSouth reported raw data values for prod_id do not match the KCL-calculated values for certain service order numbers in the Order Completion Interval (trunks and non-trunks) and Percent Missed Installation (trunks and non-trunks) Provisioning metrics.

BellSouth clarified and updated the "Product ID Assignment for Provisioning Service Orders" document provided to KPMG Consulting to generate the prod_ids. This updated and revised version was provided to KPMG Consulting to enable replication of BellSouth's reported values.

BellSouth reported raw data values for SO_CMTT_TYPE_CD for the Order Completion Interval (OCI) measure that do not match the KCL-calculated values. Provided below are the KPMG calculated values, the service orders as they appear in raw data, and the service orders as they appear in early stage data (SOCS).

Table I identifies the OCI September 2000 records in question:

Table I

File	SO_NBR	ISSU_DT	Field	BLS	KCL
------	--------	---------	-------	-----	-----

BELLSOUTH'S FOURTEENTH AMENDED RESPONSE TO EXCEPTION 89

				Reported Value	Calculated Value
OCI	CO6PTK68	9/9/2000	SO CMTT TYPE CD	1	2
OCI	CO7MRMX7	9/9/2000	SO CMTT TYPE CD	1	2
OCI	CP0R14F4	9/9/2000	SO CMTT TYPE CD	1	2
OCI	CPJWR569	9/7/2000	SO CMTT TYPE CD	1	2
OCI	NP6JQ133	9/9/2000	SO CMTT TYPE CD	1	2

The following information in Table II was retrieved from Raw Data:

Table II

SO_NBR	SO_CMTT_ TYPE_CD	SO_CMTT_TYPE_D ESC	CMTT_ DATE	SO MISSED CMTT DESC
CO6PTK68	1	Original Due Date	9/11/2000	Subscriber Prior-Due Date change to earlier date
CO6PTK68	2	Subsequent Due Date	9/9/2000	NULL
CO7MRMX7	1	Original Due Date	9/20/2000	Subscriber Prior-Due Date change to earlier date
CO7MRMX7	2	Subsequent Due Date	9/9/2000	NULL
CP0R14F4	1	Original Due Date	9/18/2000	Subscriber Prior-Due Date change to earlier date
CP0R14F4	2	Subsequent Due Date	9/9/2000	NULL
CPJWR569	1	Original Due Date	9/8/2000	Subscriber Prior-Due Date change to earlier date
CPJWR569	2	Subsequent Due Date	9/7/2000	Company Business Office
CPJWR569	2	Subsequent Due Date	9/9/2000	NULL
NP6JQ133	1	Original Due Date	9/11/2000	Subscriber Prior-Due Date change to earlier date
NP6JQ133	2	Subsequent Due Date	9/9/2000	NULL

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The following information in Table III was retrieved from Barney (socs_sub_dd_0900):

Table III

Proc	order number	subs due date	missed appt code	supp
GAM	CPJWR569	9/9/2000		2
GAM	NP6JQ133	9/9/2000		1
GAM	CP0R14F4	9/9/2000		1
GAM	CPJWR569	9/7/2000	EB	1
GAA	CO6PTK68	9/9/2000		1
GAA	CO7MRMX7	9/9/2000		1

OCI Raw Data and SOCS

The SO_NBRs above were found in the early stage data table SOCS_SUB_DD_0900. This table contains the subsequent due dates (assigned a SO_CMTT_TYPE_CD = 2 in raw data) for the month of September. These records in early stage data are consistent with the data that was retrieved from raw data and the data that was reported by KPMG. However, the OCI raw data file contains both SO_CMTT_TYPE_CDs of 1 and 2. SO_CMTT_TYPE_CDs with a value of 1 (original due date) originate in the DUE_DATE_ORIG field in the SOCS table. **These values originate from different tables in the early stage data, but reside together in the raw data tables.**

Calculation of the OCI Measure

For each record, there exists in raw data valid original and subsequent due dates with SO_CMTT_TYPE_CDs of 1 and 2 respectively. The subsequent due dates are not necessarily later in time, they are only scheduled later than the original due date. **For the calculation of the measure, the original due date (SO_CMTT_TYPE_CD=1) is captured.**

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 Response:

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

BELLSOUTH'S FOURTEENTH AMENDED RESPONSE TO EXCEPTION 89

On June 21st, KPMG requested that Early Stage data for retesting the Billing – *Invoice Accuracy* for the CLEC aggregate metric be provided to KPMG for the month of March 2000.

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

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

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

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

BellSouth Response:

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 including in the Billing SQM.

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

BELLSOUTH'S FOURTEENTH AMENDED RESPONSE TO EXCEPTION 89

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'S FIFTH AMENDED RESPONSE TO EXCEPTION 113



Date: February 12, 2001

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 KCL 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.

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 113

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.

KCL could not match the revised BellSouth-reported values with the corresponding KCL-collected values for certain purchase order numbers and service order numbers.

³ These values are contained in response files provided to KCL by HP.

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 113

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

BellSouth Amended Response:

BellSouth and KCL 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 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.

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 113

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, KCL issued a data request for the following new updated raw data files for the KCL 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 KCL on 10/02/00, for the Data Comparison Test for ordering & Provisioning SQMs.

On November 7th, KCL 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 KCL could not match the service order numbers.

In KCL's second amended Exception 113, KCL reported that BellSouth values for the Commitment Date (CMTT_DATE) do not match KCL Consulting LLC (KCL) Test CLEC values for certain Purchase Order numbers and service order numbers for Provisioning Metrics for PMI, Jeopardy, and Held Order.

PMI:

As per the "Business Requirements" section of the SQM for Percent Missed Installation Appointments, the first CMTT_DATE (original due date) on the service order is used in the PMI calculation. Records with a SO_CMTT_TYPE_CD = 1 represent the original due date (CMTT_DATE) for a service order. The exclusion criteria, which only selects records with a SO_CMTT_TYPE_CD = 1, is included as part of the program code used to generate/cut PMI raw data. The RDUG is consistent with the stored procedure code used to assemble the PMI raw data file. This exclusion does not affect the calculation of the PMI measure.

In addition, KCL requested further clarification of the record with a SO_NBR = NP0FNX10. This particular record has a BellSouth-reported value for the commitment date of 3/29/00, and a KLC-reported value for the commitment date of 3/23/00. The history tables in the raw data file indicate that the original due date

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 113

(SO_CMTT_TYPE_CD = 1) is 3/29/00 and the subsequent due date
(SO_CMTT_TYPE_CD = 2) is 3/23/00. KCL asked BellSouth to provide an explanation
for this case in which the subsequent due date is earlier than the original due date.

BellSouth retrieved history for this record from MOBI, which provides SOCS historical
data. The data from MOBI confirms that the subscriber requested an earlier commitment
date. This is reflected by the SP (subscriber requested previous due date) code that
precedes the 3/23/00 date in the following MOBI snapshot:

M O B I 706 U57 0677 04 / 16 / 00 NP0FNX10 CPX2371 ORDER DISPLAY
ARC IS NOW ON ACF2 SECURITY. USE YOUR ACF2 PASSWORD TO SIGNON!!!
POFS

706-U57-0677 677 BILL DATE 04-16-00 NP0FNX10 CPX2371

PAGE 1

CPX706291BO N N
706 U57-0677 67720000418ROME20000310133220000310
NP0FNX10P8 UEANLYAXQA2R20000329 LSL
ZRTI \$,QS,800 872-3116,LW,770986
FDT 900P
IAECN9992, UEANL
ICENTS0Y
SPO M3Y13
PRN GALZXC1001
CRO DP1WJ4T8, NP604RH3, CP7W2TD8
CRO CPDWMDQ2
RRSO DP1WJ4T8
SD 12-29-00 SP
SD 03-23-00 SL
SD 12-29-00 SP
SD 04-18-00
---LIST
PAGE 1 OF 13 MORE...
PF2=SEARCH PF3=DISPLAY PF4=PRINT PF6=FAX
PF7=MAIN PF8=SCROLL PF11=BACK PRINTER ID:

Jeopardy:

The Jeopardy record, SO_NBR = NO9HBW68 was cancelled. BellSouth's standard
practice for handling cancelled orders is to assign a null value to the CMPLTN_DT field.
A documentation snapshot from the LEO source system has been provided below to
provide a record of what occurred with this record prior to it reaching Jeopardy raw data.
Provided below is a copy of the LEO Archive screen showing the create date and the date
the information was rejected to the CLEC. This date is marked in red.

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 113

CC: 9994 PON: 406C213PTM100002 ENTER "X" FOR ON SIT

	X	VER	CREATE	REJECT	ARCHIVED	PURGE
		DATE	NUMBER	DATE	DATE	
_00		2000-01-11	____	2000-08-19	2003-08-19	
_02		2000-01-17	____	2000-08-19	2003-08-19	
_03		2000-02-18	____1	2000-08-19	2003-08-19	

Raw data, prior to any exclusions, contains all the CMTT_DATEs for each service order. The RDUG exclusion criteria for "Jeopardy Interval" and "Percent Jeopardy" dictate that the latest CMTT_DATE in a group of records must be within the given reporting month. The latest record is retained for calculation of the "Jeopardy Interval" and "Percent Jeopardy" measures. If the latest record does not fall within the given month, the entire group of records is excluded from the calculations for that month. If the latest CMTT_DATE does fall within the reporting month, it is retained, and all other records in the group are excluded.

The three Jeopardy records (SO_NBR in 'NO4HLD96', 'NOBC0M48', 'NP32R9P9') have CMTT_DATEs reported in February, thus not affecting the March calculation of the Jeopardy measure.

The remaining three records can be explained using the logic that if the latest CMTT_DATE is within the reporting month, the rest of the records in the group are excluded. The three Jeopardy service orders retained by KCL have CMTT_DATEs prior to the latest CMTT_DATEs and from previous months. These CMTT_DATEs should not be included in the calculation of the measure.

Held Order:

For the held order record SO_NBR = NP74MLL1, the number reported by BLS for the CMTT_DATE was 2/16/00, and the value reported by KCL was 12/30/00. According to the commitment history, the original date was 2/16/00 and then was scheduled later to 12/30/00. This change could be due to a variety of reasons, but most likely the order was held off until further notice, so the date was scheduled far in the future.

Held Order Processing Methodology states that the last due date that carries a company Missed Appointment code and does not have a subsequent due date should be captured. The held interval is measured as the reporting period end date back to the first company missed date on the service order.

The date that should be captured is the original date. Therefore the date of 2/16/00 is the correct date.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 119



Date: February 15, 2001

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 Completion Date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and service order numbers for one provisioning metric.

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 – *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)* – KCL compared the BellSouth-reported values for COMPLETION DATE² in the raw data files with the completion date that KCL received from Hewlett Packard for March through September 2000.

KCL could not match the BellSouth-reported values in this field with the corresponding KCL-collected values for certain purchase order numbers and service order numbers. Table 1 lists the purchase order numbers specific discrepancies for Completion 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 COMPLETION DATE is the actual date of completion of a service order.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 119

TABLE 1—COMPLETION DATE

PON	SERVICE ORDER NUMBER	RAW DATA FILE	BLS- REPORTED VALUE	KCL- REPORTED VALUE	MONTH
B100001PEJ101069	NP5M4544	JPDY	None	8/4/00	July
F10C121PEN101002	DO3H8C92	JPDY	None	8/2/00	July
F12C121PEN101003	DO8FR6M1	JPDY	None	8/2/00	July
303R222PEH000002	CO0FWMC9	JPDY	None	10/5/00	September
307R122PEH000003	CO646VD9	JPDY	None	10/3/00	September
315R212PTH000005	CODJQDQ0	JPDY	None	10/9/00	September
323R122PEH002001	DP4C6GR1	JPDY	None	10/5/00	September
323R122PTH100003	DODP2694	JPDY	None	10/9/00	September
324R112PEH000001	CO477D06	JPDY	None	10/4/00	September
422R114PEJ100003	NO4575K2	JPDY	None	10/10/00	September
428R124PEJ100004	NP993VF0	JPDY	None	10/4/00	September
441R214PTJ000003	CPW3G381	JPDY	None	9/21/00	September
444R214PTJ100002	DPB5FYN7	JPDY	None	10/9/00	September
452R216PTF000002	RP7BNJW8	JPDY	None	10/2/00	September
627R214PTJ100004	CPV7D650	JPDY	None	10/6/00	September

BellSouth Amended Response:

KPMG reported that BellSouth-reported raw data values for the completion date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and Service Order numbers for the Jeopardy measure.

The Jeopardy measure requires that the commitment date (CMTT_DT) for a service order number (SO_NBR) be reported in the month that the order is completed. Therefore, a record that is in Jeopardy will contain a null value in the completion date (CMPLTN_DT) field for each month until the order is completed.

The service order numbers provided by KCL have completion dates that fall in subsequent months. Service Orders NP5M4544, DO3H8C92, and DO8FR6M1 have completion dates in the month of August, not July. Service Orders CO0FWMC9, CO646VD9, CODJQDQ0, DP4C6GR1, DODP2694, CO477D06, NO4575K2, NP993VF0, DPB5FYN7, RP7BNJW8, and CPV7D650 have completion dates in the month of October, not September. The data verifies that these records can be located in the months corresponding to their completion dates.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 119

Records Missing Completion Date:

Service Order CPW3G381 was completed in the field on 09/21/00. However, due to a system entry error, the completion was not processed through SOCS until 10/04/00. These dates are confirmed on the screen prints from LEO and MOBI, which are provided below.

The field completion date of 09/21/00 for CPW3G381 will not be reported in September data since the completion was not processed through SOCS until October. It will not be reported in subsequent months because records in the Jeopardy measure are currently grouped by field completion dates that fall within those report periods.

To correct this irregularity, Defect #1045 has been entered into TeamConnection. This defect will cause a record to be captured in the month that it is processed through SOCS as complete. Changes in the code and the RDUG are planned for implementation, beginning with April 2001 raw data. With the revised code, CPW3G381 would have been included in the October 2000 report for Jeopardy.

LEO VERIFICATION

CPW3G381 912-746-1792

DB02C291 I0A LEO AUDIT SYSTEM - BROWSE SCREEN (AUD) PNLFPMY

RESH/CC: 9990 PON: 441R214PTJ000003 VER: 00 SUP: 00 JUMP TO: _____

LSRNO: 999020000920000008 TCIF: ***7 DUE DATE: 09/21/2000

AN: - - - ATN: - - THIS LSR: NEXT LSR:

DATE TIME TYPE HISTORY LINE

ERRNO XREF

09/21/2000 07.48.12 C475 855 ISSUED RETURN-FEED # 0001 FOC SENT

09/21/2000 07.48.19 ISS CPW3G381 DD 9-21 DC 1774

09/21/2000 07.48.40 TAGR PON POSTED AS ACKNOWLEDGED

10/04/2000 15.47.51 C475 POS ISSUED, SOCS STATUS - PD PENDING ORDE
R

10/04/2000 15.50.18 TAGR PON POSTED AS ACKNOWLEDGED

10/04/2000 16.02.17 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.

10/04/2000 16.32.30 C280 865 COMPLETION STAGED FOR LSR, LEO STATUS CHANGED
TO "P" (ERROR CORRECTED)

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 119

LEO VERIFICATION PAGE 2

CPW3G381 912-746-1792

DB02C291 IOA LEO AUDIT SYSTEM - BROWSE SCREEN (AUD) PNLFPMY

RESH/CC: 9990 PON: 441R214PTJ000003 VER: 00 SUP: 00 JUMP TO: _____

LSRNO: 999020000920000008 TCIF: ***7 DUE DATE: 09/21/2000

AN: - - - ATN: - - THIS LSR: NEXT LSR:

DATE TIME TYPE HISTORY LINE

ERRNO XREF

10/04/2000 16.32.30 C475 865 ISSUED RETURN-FEED # 0003 COMPLETION SENT

10/04/2000 16.33.21 TAGR PON POSTED AS ACKNOWLEDGED

10/14/2000 12.48.04 SPLT GEORGIA 912/478 NPA SPLIT
TENDU LOCBAN

10/14/2000 14.15.58 SPLT GEORGIA 912/478 NPA SPLIT
TLSR LOCBAN-TN

10/14/2000 14.15.59 SPLT GEORGIA 912/478 NPA SPLIT

TLSR LSO

10/14/2000 16.52.24 SPLT GEORGIA 912/478 NPA SPLIT
TRSLE TRSLE.TN

10/14/2000 16.52.24 SPLT GEORGIA 912/478 NPA SPLIT
TRSLE TRSLE.TN

NOTE: LON VERIFICATION DOES NOT INDICATE A SUP DD.
MOBI INDICATES A 9-21-00 COMPLETION DATE
CRIS CYCLE NUMBER 2489 - DATE RECVD ACCTG 10-05-00

LEO COMPLETION NOTICE

CPW3G381 912-746-1792

/FOR: DB02C430

IOA FOC/CN SCREEN

YHBKCDT

*TCIF ***7 **

ACCTNUM: 912 746-1792 CC: 9990 PON: 441R214PTJ000003 VER: 00

AN: ATN:

LSRNO: 999020000920000008

FOC/CN: CN

===== LSR SECTION

=====

TRAN-ACK-TYPE: AT CD/TSNT: 2000-09-20

TRAN-TYPE: 865 BST-NAME: BST DATE-TIME-SENT: 2000-10-04-16.32.30.766174

SYSTEM-INIT-ID: TAG TEST-IND: P IS-ID: GS-ID:

DD: 2000-09-21 RORD:

BI1: BAN1: 706Q858252252 BI2: BAN2: FDD: - -

DSGCON: CCNA: ZXC CLS-SVC:

INIT: MARJORIE BELILE

INIT TEL-NO: 2154057432

REP: LCSC

REP-TELNO: 1-800-667-0807

ORD: CPW3G381

EBD: - - CHC: FDT:

===== REMARKS SECTION

=====

NOTE: THIS ORDER HAD AN ERROR NOT CLEARED ON ACTUAL COMPLETION DATE.
EX: LIST (LCP) OR OPEX (OCP)

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 119

MOBI RECORD

912 746-1792 10020000921MCN 20000920083020000921
CPW3G381A095 UEPBXYAXQAV720000921 X (COMPLETION DATE)
ZRTI \$,QS,800 872-3116,DC

KPMG requested verification of the actual cancellation date of RP7BNJW8. BellSouth retrieved LEO records to document the date and time the cancellation was sent from SOCS. This was necessary because the SOCS records had been purged and MOBI did not provide this information. Copies of LEO screen print follow. Explanations for BellSouth's completion dates are highlighted.

LEO VERIFICATION

RP7BNJW8 706-774-6120
DB02C291 10A LEO AUDIT SYSTEM - BROWSE SCREEN (AUD) PNLFPMY
RESH/CC: 9990 PON: 452R216PTF000002 VER: 00 SUP: 00 JUMP TO: _____
LSRNO: 999020001002000004 TCIF: ***7 DUE DATE: 10/02/2000
AN: - - - ATN: - - THIS LSR: NEXT LSR:
DATE TIME TYPE HISTORY LINE
ERRNO XREF
10/02/2000 16.48.19 ERRRC ORDER ERR: RP7BNJW8 AECN IDNT 009 L AECN MUST AP
8825 LSG 0136 PEAR!
10/02/2000 16.49.11 ISSU RP9Y1V97;DD 10-06-00

10/02/2000 16.49.18 C280 8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"

10/02/2000 16.49.18 C475 855 ISSUED RETURN-FEED # 0001 FOC SENT

10/02/2000 16.50.08 TAGR PON POSTED AS ACKNOWLEDGED

10/02/2000 17.02.28 C280 CANCEL SVC ORD BYPASSED, SUPP NOT = "01"
(THIS IS THE DATE AND TIME CANCELLATION SENT FROM SOCS TO LEO)
10/02/2000 17.33.05 C280 865 COMPLETION STAGED FOR LSR, LEO STATUS CHANGED
TO "P"

NOTE: ORDER CANCELED - NO SOCS HISTORY AVAILABLE
MOBI INDICATES CRIS CYCLE NUMBER 2487
DATE RCVD ACCTG 10-03-00

**BELLSOUTH'S THIRD AMENDED RESPONSE TO
EXCEPTION 119**

LEO COMPLETION NOTICE

/FOR: DB02C430 IOA FOC/CN SCREEN YHBKCDT
*TCIF ***7 **
ACCTNUM: 706 774-6120 CC: 9990 PON: 452R216PTF000002 VER: 00
 AN: ATN:
LSRNO: 999020001002000004 FOC/CN: CN
===== LSR SECTION
=====

TRAN-ACK-TYPE: AT CD/TSent: 2000-10-02
TRAN-TYPE: 865 BST-NAME: BST DATE-TIME-SENT: 2000-10-02-17.33.05.622331
THIS IS THE DATE / TIME NOTIFICATION SENT TO CLEC
SYSTEM-INIT-ID: TAG TEST-IND: P IS-ID: GS-ID:
DD: 2000-10-02 RORD:
BI1: BAN1: 706Q858252252 BI2: BAN2: FDD: - -
DSGCON: CCNA: ZXC CLS-SVC:
INIT: MARJORIE BELILE INIT TEL-NO: 2154057432

REP: LCSC REP-TELNO: 1-800-667-0807
ORD: RP9Y1V97 EBD: - - CHC: FDT:
===== REMARKS SECTION
=====

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 127



Date: February 12, 2001

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 Purchase Order numbers and service order numbers for two 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 (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)*, and *Total Service Order Cycle Time (TSOCT)* – 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 June through September 2000.

KCL could not match the BellSouth-reported values in this field with the corresponding KCL-collected values for certain purchase order numbers and service order numbers. Table 1 lists the purchase order numbers 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.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 127

TABLE 1—COMMITMENT DATE

PON	SERVICE ORDER NUMBER	RAW DATA FILE	BLS- REPORTED VALUE	KCL- REPORTED VALUE	MONTH
R025H11PTN100010	TOX2M187	PMI	6/19/00	6/22/00	June
423A114PTM100006	NOFGGB38	JPDY	7/6/00	3/30/00	July
B100001PEJ101069	NP5M4544	JPDY	8/4/00	7/31/00	August
307R122PTH003001	COFJRG75	PMI	9/21/00	9/28/00	September
307R222PTH100002	CO05B5R9	PMI	9/21/00	9/26/00	September
454R126PEF001001	RPP18373	PMI	9/11/00	9/9/00	September

BellSouth Amended Response:

KPMG reported that BellSouth reported values for the Commitment Date (CMTT_DATE) do not match KPMG Consulting LLC (KCL) Test CLEC values for certain Purchase Order numbers and service order numbers for two Provisioning metrics.

PMI

As per the "Business Rules section of the SQM for Percent Missed Installation Appointments, the first CMTT_DATE (original due date) on the service order is used in the PMI calculation. For example:

Service Order CO05B5R9 has two records, the first record with an original due date (SO_CMTT_TYPE_CD = 1) CMTT_DATE = 9/21/00, and the second record with a subsequent due date (SO_CMTT_TYPE_CD = 2) CMTT_DATE = 9/26/00. PMI requires that the first CMTT_DATE (original due date) on the service order be used for the PMI calculation. Records with a SO_CMTT_TYPE_CD = 1 represent the original due date (CMTT_DATE) for a service order. The exclusion criteria, which only select records with a SO_CMTT_TYPE_CD = 1, is included in the program code used to generate/cut PMI raw data. The RDUG is consistent with the stored procedure code used to assemble the PMI raw data file. This exclusion does not affect the calculation of the PMI measure. In this example, the second record with CMTT_DATE = 9/26/00 should be excluded.

In addition, KCL requested further clarification of the record with a SO_NBR = RPP18373. This particular record has a BellSouth-reported value for the commitment date of 9/11/00, and a KCL-reported value for the commitment date of 9/9/00. The history tables in the raw data file indicate that the original due date (SO_CMTT_TYPE_CD = 1) is 9/11/00 and the subsequent due date (SO_CMTT_TYPE_CD = 2) is 9/9/00. KCL asked BellSouth to provide an explanation for this case in which the subsequent due date is earlier than the original due date.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 127

BellSouth retrieved history for this record from MOBI, which provides SOCS historical data. The data from MOBI shows that this record was incorrectly assigned a SL (subscriber requested a later due date) code. This SL code precedes the 9/9/00 date in the MOBI snapshot found below. The Service Representative who handled this report made a data entry error and should have assigned the 9/9/00 date the "SP" (subscriber requested *previous* due date) code instead of the "SL" (subscriber requested a *later* due date) code. At the time that this order was processed, the SOCS system did not contain an edit to alert the user that a subsequent due date earlier than the original due date had been entered. This problem has been addressed, and an edit was incorporated into the system as of January 1, 2001, to ensure that this data entry error will not occur in the future.

M O B I 912 745 2939 939 09 / 08 / 00 RPP18373 CPX2472 ORDER
DISPLAY
ARC IS NOW ON ACF2 SECURITY. USE YOUR ACF2 PASSWORD TO SIGNON!!!
POFS

912-745-2939 939 BILL DATE 09-08-00 RPP18373 CPX2472

PAGE 1
CPX912745AN NNN
912 745-2939 93920000909MCN 20000906165720000906
RPP18373 I1 UEPRXYAXQAX520000911 SL
ZRTI \$,QS,800 872-3116,KM
CENT ROY
AECN 9990, UEPRX
SD 09-09-00
---LIST
ILN GEORGIA, HILTON
ONP (NON-PUB) GEORGIA, R W H
LA 787 CHERRY ST
SA 787 CHERRY ST, MCN, GA
LOC FLR 3;RM 300
---BILL
TAR 203,811
MAN U9990
IPON 454R126PEF001001
PAGE 1 OF 1
MORE...

PF2=SEARCH PF3=DISPLAY PF4=PRINT PF6=FAX
PF7=MAIN PF8=SCROLL PF11=BACK PRINTER ID:

JEOPARDY

Raw data, prior to any exclusions, contains all the CMTT_DATEs for each service order. The RDUG exclusion criteria for "Jeopardy Interval" and "Percent Jeopardy" dictate that the latest CMTT_DATE in a group of records must be within the given reporting month. The latest record is retained for calculation of the "Jeopardy Interval" and "Percent Jeopardy" measures. If the latest record does not fall within the given month, the entire group of records is excluded from the calculations for that month. If the latest CMTT_DATE does fall within the reporting month, it is retained, and all other records in the group are excluded.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 127

The two Jeopardy service orders (SO_NBR is NOFGGB38, NP5M4544) can be explained using the logic stated above, that is, if the latest CMTT_DATE is within the reporting month, exclude the rest of the records in the group. The two Jeopardy records retained by KCL have CMTT_DATEs prior to the latest CMTT-DATEs and from previous months. The correct CMTT_DATE for these SO_NBRs should be 7/6/00 and 8/4/00, respectively.

BELLSOUTH'S RESPONSE TO EXCEPTION 130



Date: February 23, 2001

EXCEPTION REPORT

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

Exception:

BellSouth's Telephone Number Selection Query (TNSQ) pre-order does not support reservation extensions for TNs in the Augusta or Macon Central Offices.

Prior to submitting a Local Service Requests (LSR) for certain variations of service (e.g., establishment of a new customer account, addition of a new line to an existing account), a CLEC must first submit a pre-order request to secure a valid Telephone Number (TN). BellSouth's Telecommunications Access Gateway (TAG) serves as an electronic interface for submitting pre-order requests. CLECs first submit a Telephone Number Assignment Query (TNAQ) to obtain one or more available TNs. When submitting a TNAQ, the CLEC must specify the CLLI code of the end office switch from which service is being provided. The TN(s) provided in response to the TNAQ are 'reserved' for that CLEC for one day. To extend this reservation, a CLEC may submit a TNSQ.

During the course of testing, KPMG Consulting, Inc. (KCI) attempted to submit several TNSQs via TAG to extend the reservation of TNs from the Macon and Augusta Central Offices. In response to each of these pre-orders, KCI received an error messages stating: *"SYSTEM ERROR. CALL SPOC AT 888-462-8030 & GIVE THEM THIS INFO: CODE 100; LOCATION 105"*.

Impact:

The inability to reserve TNs in specific Central Offices represents a deficiency in BellSouth's TAG pre-order functionality, and impedes a CLEC's ability to conduct subsequent ordering activity. As a workaround, a CLEC would be required to submit a manual (i.e., via fax) pre-order to reserve the necessary TNs. This would introduce delays and additional costs to the CLEC's business process.

BELLSOUTH'S RESPONSE TO EXCEPTION 130

BellSouth's Response:

We agree with the findings as detailed above. The problem was encountered due to the fact that an audit table entry was missing from the ATLAS TNLIST table in Georgia causing an SQL 100 code to be returned when the "change reservation" contract was passed to ATLAS. The missing audit table record had been deleted at some point in the past, possibly by a user organization. The immediate fix was to add the audit record back to the table, preventing the 100 return code. This will prevent the problem unless the TNLIST table entry is deleted again. The short term fix is to verify the existence of the audit table entry on the TNLIST table every night in the RJ06B04 batch job and create the entry if needed. This short term fix was implemented in Alabama 2/16 and will be implemented region wide 2/23. The long term fix will be to add code to the online program RJ06A07 so that it would continue to process when this record is not available. This code change will be implemented in the COPA April release currently planned for 4/16 in a pilot site and 4/23 for the remaining sites. This problem would have impacted any application attempting to change a reservation.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 130



Date: March 2, 2001

EXCEPTION REPORT

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

Exception:

BellSouth's Telephone Number Selection Query (TNSQ) pre-order does not support reservation extensions for TNs in the Augusta or Macon Central Offices.

Prior to submitting a Local Service Requests (LSR) for certain variations of service (e.g., establishment of a new customer account, addition of a new line to an existing account), a CLEC must first submit a pre-order request to secure a valid Telephone Number (TN). BellSouth's Telecommunications Access Gateway (TAG) serves as an electronic interface for submitting pre-order requests. CLECs first submit a Telephone Number Assignment Query (TNAQ) to obtain one or more available TNs. When submitting a TNAQ, the CLEC must specify the CLLI code of the end office switch from which service is being provided. The TN(s) provided in response to the TNAQ are 'reserved' for that CLEC for one day. To extend this reservation, a CLEC may submit a TNSQ.

During the course of testing, KPMG Consulting, Inc. (KCI) attempted to submit several TNSQs via TAG to extend the reservation of TNs from the Macon and Augusta Central Offices. In response to each of these pre-orders, KCI received an error messages stating: *"SYSTEM ERROR. CALL SPOC AT 888-462-8030 & GIVE THEM THIS INFO: CODE 100; LOCATION 105"*.

Impact:

The inability to reserve TNs in specific Central Offices represents a deficiency in BellSouth's TAG pre-order functionality, and impedes a CLEC's ability to conduct subsequent ordering activity. As a workaround, a CLEC would be required to submit a manual (i.e., via fax) pre-order to reserve the necessary TNs. This would introduce delays and additional costs to the CLEC's business process.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 130

BellSouth's Response:

We agree with the findings as detailed above. The problem was encountered due to the fact that an audit table entry was missing from the ATLAS TNLIST table in Georgia causing an SQL 100 code to be returned when the "change reservation" contract was passed to ATLAS. The missing audit table record had been deleted at some point in the past, possibly by a user organization. The immediate fix was to add the audit record back to the table, preventing the 100 return code. This will prevent the problem unless the TNLIST table entry is deleted again. The short term fix is to verify the existence of the audit table entry on the TNLIST table every night in the RJ06B04 batch job and create the entry if needed. This short term fix was implemented in Georgia 2/16 and will be implemented region wide 2/23. The long term fix will be to add code to the online program RJ06A07 so that it would continue to process when this record is not available. This code change will be implemented in the COPA April release currently planned for 4/16 in a pilot site and 4/23 for the remaining sites. This problem would have impacted any application attempting to change a reservation. It only affected the reservations done in outstate Georgia because there are two ATLAS systems that serve Georgia, one for the Atlanta area and one for the rest of Georgia (outstate). The record was deleted from the outstate system but not the Atlanta area system. There are actually 12 ATLAS systems across Bellsouth that could have been subject to this problem but it was only detected in that one system.

BELLSOUTH'S RESPONSE TO EXCEPTION 131



Date: February 22, 2001

EXCEPTION REPORT

An exception has been identified as a result of the Data Integrity (PMR4) test for Ordering & Provisioning Service Quality Measurements (SQMs).

Exception:

BellSouth's raw data¹ used in the calculation of the BellSouth Ordering SQM reports is not accurately derived from or supported by its component early-stage data².

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.³

As part of the BellSouth-Georgia OSS Evaluation, KPMG Consulting, Inc. (KCI) is validating the integrity of the raw data used in the calculation of the SQM values reported by BellSouth. KCI 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).

KCI validated the integrity of the raw data used in the calculation of various Ordering SQMs for October 2000 by comparing them to the early-stage data from the LEO, LON, and EXACT systems. KCI identified two types of discrepancies⁴ during the testing process.

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 secured Performance Measurement and Analysis Platform (PMAP) web site.

⁴ Note that the listed discrepancies relate only to the LEO and LON systems. KCI has not yet completed its validation of the raw data from the EXACT system.

BELLSOUTH'S RESPONSE TO EXCEPTION 131

Accuracy of the Raw data

Table 1 lists the discrepancies related to the accuracy of the raw data.

Table 1 (Accuracy)

SYSTEM	RAW DATA FILE	DISCREPANCY
LEO	Service Orders	The early stage data from LEO show that the Firm Order Confirmation was sent manually for this PON. However, the raw data file does not report the FOC duration for this PON. BLS (reported – FOC Duration): None KCI ⁵ (calculated – FOC Duration): 3.30 hours.
LEO	Reject Interval	The early stage data from LEO shows that a Firm Order Confirmation was sent out for this PON. However, BellSouth raw data reports Reject Duration for this PON.
LON	FOC Timeliness	BLS (reported – FOC Duration): 32.18 hours KCI (calculated – FOC Duration) ⁵ : 31.7
LON	Reject Interval	The raw data reports Reject Duration. Early stage data validates the reported value in the raw data. However, early stage data also shows a Firm Order Confirmation Date.
LON	FOC Timeliness	BLS (reported – FOC Duration): 24.05 hours KCI (calculated – FOC Duration): 23.65 hours.
LON	FOC Timeliness	BLS (reported – FOC Duration): 233.68 hours. KCI (calculated – FOC Duration): 239.45 hours.

Completeness of the Raw Data

In order to determine the completeness of the raw data files, KCI compared the orders that appeared in the LON systems to the orders that appeared in the various Ordering raw data files. KCI could not find 18 orders from the LON system in the various Ordering raw data files.

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.

⁵ KCI calculations are made in accordance with the instructions provided by BellSouth.

BELLSOUTH'S RESPONSE TO EXCEPTION 131

BellSouth Response:

The table below list BellSouth's response by item number for each discrepancy found by KPMG

Bell South Response by ITEM	SYSTEM	RAW DATA FILE	DISCREPANCY
1	LEO	Service Orders	The early stage data from LEO show that the Firm Order Confirmation was sent manually for this PON. However, the raw data file does not report the FOC duration for this PON. BLS (reported – FOC Duration): None KCL ⁶ (calculated – FOC Duration): 3.30 hours.
2	LEO	Reject Interval	The early stage data from LEO shows that a Firm Order Confirmation was sent out for this PON. However, BellSouth raw data reports Reject Duration for this PON.
3	LON	FOC Timeliness	BLS (reported – FOC Duration): 32.18 hours KCL (calculated – FOC Duration) ⁵ : 31.7
4	LON	Reject Interval	The raw data reports Reject Duration. Early stage data validates the reported value in the raw data. However, early stage data also shows a Firm Order Confirmation Date.
5A	LON	FOC Timeliness	BLS (reported – FOC Duration): 24.05 hours KCL (calculated – FOC Duration): 23.65 hours.
5B	LON	FOC Timeliness	BLS (reported – FOC Duration): 233.68 hours. KCL (calculated – FOC Duration): 239.45 hours.

Item 1

KPMG was unable to find the BellSouth reported Firm Order Confirmation (FOC) duration in the raw data file for a Purchase Order Number (PON) from the LEO system that was manually sent.

For October data, PMAP did not report the FOC duration for LSRs manually sent from the LEO system. Change Request #546 was submitted to capture the FOC duration that is manually sent from the LEO system. The change was completed per the Change Request #546 and will be effective, beginning with February 2001 data.

⁶ KCL calculations are made in accordance with the instructions provided by BellSouth.

BELLSOUTH'S RESPONSE TO EXCEPTION 131

Item 2

KPMG was unable to determine why the Purchase Order Number (PON) in question has a reject duration and FOC duration for the same version.

The Local Service Request (LSR) was sent to Local Exchange Service Order Generator (LESOG). While processing the LSR, LESOG erroneously caused the LSR to be placed in Auto Clarification status. Auto Clarification in LESOG is equivalent to rejects in PMAP. Auto Clarification in LESOG does not include fatal rejects. After a change request was implemented to correct the cause of the erroneous Auto Clarification, the LSR was resent to LESOG as the same version. The LSR was processed and the PON in question was FOCd. Therefore, the PON was rejected and FOCd on the same version.

Item 3

The table below summarizes the differences in KPMG and BellSouth values for FOC (Firm Order Confirmation) Timeliness for the month of October 2000.

Measurement	KPMG Value	BST Value
FOC Timeliness	45.70	32.18

This PON was submitted for a non-mechanized UNE Loop. BellSouth was able to replicate the FOC values using the October release of the SQM report along with the following clarification. "If an LSR is FOCd between 6:00PM on Friday and 8:00AM on Saturday, the interval from 6:00PM on Friday until the FOC is sent to the CLEC will be excluded." This clarification change is pending for the next release of the SQM report.

Calculations for the FOC timeliness duration interval for Non-Mechanized UNE Loop is as follows:

$$\text{FOC Timeliness Duration Interval} = (\text{FOC Date} - \text{Last_Rcvd})$$

FOC Date	=	Saturday	10/21/00	07:31am
Last_Rcvd (Last Received Date)	=	Thursday	10/19/00	09:49am

Measurement	Day	Date	Hours
Last_Rcvd	Thursday	10/19	14:11
	Friday	10/20	24:00
FOC Date	Saturday	10/21	7:31
FOC Timeliness Duration Interval before exclusion (KPMG Value). KPMG value of 45.70 = 45 hours and 42 minutes.			45:42
Hours Excluded (6:00PM to Midnight)	Friday		-6:00
Hours Excluded (Midnight to 7:31AM)	Saturday		-7:31
FOC Timeliness Duration Interval after exclusion (BST Value) BST value of 32.18 = 32 hours and 11 minutes.			32:11

BELLSOUTH'S RESPONSE TO EXCEPTION 131

Item 4

KPMG found a Purchase Order Number (PON) in PMAP that shows a reject duration and FOC duration for the same version.

In the LON system, a sales rep manually updates the version field. The PON in question was not updated to reflect the current version.

Item 5A

The following PON is classified as partially mechanized. PMAP tracks the FOC duration timestamp for partially mechanized orders in LEO. Therefore, the FOC duration is calculated using timestamps from LEO:

$$\text{LSR_FOC_DUR} = \text{NOTES_TS (CONFIRMED TIMESTAMP}^7) - \text{CREATE_TS.}$$

Measure	Date	Time Interval
NOTES_TS (CONFIRMED TIMESTAMP)	10/17/00, 9:02:36 am	9 hrs 2 mins
CREATE_TS	10/16/00, 8:58:53 am	15 hrs 1 min
Total time		24 hrs 3 mins
FOC Duration BST		24.05
FOC Duration KPMG		23.65

Per KPMG's request in relationship to item 5A, below are the screen prints from LEO for the above partially mechanized order in question.

Georgia	
File	Edit Special Fents Help
00020291 T0A LEO ADITT SYSTEM - BRUSE SCREEN (AID) PNE FPMY1	
RETR/CR: 3730 PNR: YPR: 00 STP: 00 JIMP TO: 1	
LSRNU: 373020001010000003 TRIF: ***9 INE DATE: 10/18/2000	
AN: - - - ATN: 229-838-1185 TALS LSR: - NEXT LSR: -	
DATE TIME TYPE MISTUNE LINE	
10/16/2000 08.58.53 CBUI LSR PROCESSED AS NON-CPLX(EL)	
10/16/2000 08.58.54 CB18 LSR LOADED AS MECHANIZED	
10/16/2000 08.58.54 C865 LSR HAS BEEN SENT TO LESOC	
10/16/2000 08.59.53 ERR ORDER ERR: NPO003F4 LA LIST 013 LIN SEE SOER DOC	
C8825 1SC00136 UPENTATION! ILA 13 ANN L*I*B*E*R*T*Y S-T	
10/16/2000 00.59.53 C300 SERVICE ORDER UPDATE PLACED BY LESOC	
10/16/2000 00.59.53 SENT 00020300 INSERTED TO TSIGNOUT	
10/16/2000 08.59.53 C380 ERROR WITH PENDING ORDER PLACED BY LESOC	
PF5=Browse List PF8=Jump PF9=Main PF22=Full Page PF23=Print Page	
7A B02 C073	

⁷ Confirmed timestamp (FOC timestamp) can be found in the td_status_update column.

BELLSOUTH'S RESPONSE TO EXCEPTION 131

10/17/2000 08.42.21 CLM Lsr Claimed By CUID - PPDLHXQ

10/17/2000 08.43.47 ERRC ORDER ERR: NPCMM3F4 LA LIST 013 LIN SEE SOER DOC
G8825 LSG00136 UMENTATION! ILA 13 -AHN I*I*B*F*R*T*Y S*T

10/17/2000 08.43.59 ISS NPCMM3F4 DD 10-20-00

10/17/2000 09.02.36 C280 8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"

10/17/2000 09.02.36 C475 855 ISSUED RETURN-FEED # 0001 FOC SENT

10/17/2000 09.02.43 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.

10/17/2000 09.45.58 C475 RETURN FEED RESENT - RETFD-SEQ = 0001

10/18/2000 10.46.09 C475 RETURN FEED RESENT - RETFD-SEQ = 0002

10/18/2000 14.02.34 C280 865 COMPLETION STAGED FOR LSR, LEO STATUS CHANGED
TO "P"

10/18/2000 14.02.34 C475 865 ISSUED RETURN-FEED # 0003 COMPLETION SENT

10/18/2000 14.47.42 C475 RETURN FEED RESENT - RETFD-SEQ = 0003

10/18/2000 15.17.13 C475 RETURN FEED RESENT - RETFD-SEQ = 0003

10/18/2000 19.48.12 C475 RETURN FEED RESENT - RETFD-SEQ = 0001

10/18/2000 19.48.12 C475 RETURN FEED RESENT - RETFD-SEQ = 0002

10/18/2000 19.48.21 C475 RETURN FEED RESENT - RETFD-SEQ = 0003

10/19/2000 05.17.32 C475 RETURN FEED RESENT - RETFD-SEQ = 0001

10/19/2000 05.18.27 C475 RETURN FEED RESENT - RETFD-SEQ = 0002

10/19/2000 09.46.37 C475 RETURN FEED RESENT - RETFD-SEQ = 0001

10/19/2000 09.47.24 C475 RETURN FEED RESENT - RETFD-SEQ = 0002

10/19/2000 09.47.26 C475 RETURN FEED RESENT - RETFD-SEQ = 0003

10/19/2000 10.33.44 TAGR PON POSTED AS ACKNOWLEDGED

10/19/2000 11.10.19 TAGR PON POSTED AS ACKNOWLEDGED

10/19/2000 11.12.22 TAGR PON POSTED AS ACKNOWLEDGED

BELLSOUTH'S RESPONSE TO EXCEPTION 131

Item 5B

The following PON is classified as partially mechanized. PMAP tracks the FOC duration timestamp for partially mechanized orders in LEO. Therefore, the FOC duration is calculated using timestamps from LEO:

Measure	Date	Time Interval
NOTES_TS (CONFIRMED TIMESTAMP)	10/26/00, 8:41:33 am	8hrs 41mins
CREATE_TS	10/16/00, 2:59:50 pm	9 hrs
CREATE_TS (Number of full days * 24hrs)	10/17/00 – 10/25/00	216 hrs
Total Time		233 hrs 41mins
FOC Duration BST		233.68
FOC Duration KPMG		239.45

Per KPMG's request in relationship to item 5B, below are the screen prints from LEO for the above partially mechanized order in question.

```

DB02C291      IOA LEO AUDIT SYSTEM - BROWSE SCREEN (AUD)      PNL FPMY1
RESH/CC: 4892  PON:      VER: 00 SUP: 00  JUMP TO: █
LSRNO: 489220001016001195      TCIF: ***7  DUE DATE: 10/30/2000
      AN:  -  -  -  AIN:  -  -  THIS LSR:  _  NEXT LSR:  _
DATE      TIME      TYPE HISTORY LINE
      ERRNO      XREF
10/16/2000 14.59.50 MECH LSR LOADED AS MECHANIZED

10/16/2000 14.59.51 C260 LSR HAS BEEN SENT TO LESOG

10/16/2000 15.00.39 ERR SOCS ERROR: IM  IDNT  004 ACT CODE NOT FOR THI
      8820      LSG 0135 S ORD TYPE
10/16/2000 15.00.39 C380 PARTIAL ORDER GENERATED AND CANCELLED
      68950      LSG00177
10/16/2000 15.00.39 C380 INFO-ORDER D04N4HY3 CANCELLED
      67470      LSG00281
10/16/2000 15.00.39 SGT DB02C380 INSERTED TO TSIGNOUT

10/16/2000 15.00.39 C380 LSR IN "ERROR" STATUS PLACED BY LESOG

-----
10/26/2000 08.21.28 CLM LSR Claimed By CUID - BLQWRQ

10/26/2000 08.21.42 ERRC SOCS ERROR: IM  IDNT  004 ACT CODE NOT FOR THI
      8820      LSG 0135 S ORD TYPE
10/26/2000 08.27.26 ISS OIB MARSHALL.....678 344-7579, D0QD3557, NO4JM
      M68, ID 10-30-00
10/26/2000 08.41.33 C280 8*5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"

10/26/2000 08.41.33 C475 855 ISSUED RETURN-FEED # 0001 FOC SENT

10/26/2000 08.41.34 C475 POS ISSUED, SOCS STATUS - PD      PENDING ORDE
      R
10/26/2000 08.42.28 TAGR PON POSTED AS ACKNOWLEDGED

```

BELLSOUTH'S RESPONSE TO EXCEPTION 131

10/26/2000 08.42.28 TAGR PON POSTED AS ACKNOWLEDGED

10/30/2000 17.45.59 C280 865 COMPLETION STAGED FOR LSR, LEO STATUS CHANGED
TO "P"

10/30/2000 17.45.59 C475 865 ISSUED RETURN-FEED # 0003 COMPLETION SENT

10/30/2000 17.46.52 TAGR PON POSTED AS ACKNOWLEDGED

KPMG could not find the eighteen orders listed in the table below. The orders were randomly selected from the LON system for comparison to orders in various Ordering raw data files. Out of the eighteen orders, seventeen orders were found to be for states other than Georgia.

OCN	VER
8781	01
4151	02
4085	
4224	01
7796	
7674	01
7795	02
7125	
7795	
7648	
8494	
7668	
0155	
7514	02
2644	
4085	
4085	

Operating Company Number (OCN) 7871, VER 03 is the only order for the state of Georgia. BellSouth located a record for this order in October data with a version label of 2. This represents the third submitted version (Versions 0, 1, 2) of this order. BellSouth was able to locate a version with the label of 3, a received date of 11/20/2000, and a canceled date of 11/21/2000. This version of the order would not be available in October raw data because all activity for this version occurred in November 2000. Additionally the version with the label of 3 will not appear in November raw data because this version was cancelled.

OCN	VER
7871	03

BELLSOUTH'S RESPONSE TO EXCEPTION 132



Date: February 27, 2001

EXCEPTION REPORT

An exception has been identified as a result of the UNE and Resale EDI Ordering Functional Evaluation (O&P-1 and PO&P-11).

Exception:

BellSouth delivered error messages in response to valid Local Service Requests (LSRs).

During the course of the functional re-test initiated on January 19, 2001, KPMG Consulting, Inc. (KCI) received a number of error messages indicating that the Response Type Requested (RTR) data field contained invalid data. KCI verified that its entry of "C"¹ conforms to the latest BellSouth ordering documentation².

To date, KCI has only received the RTR error message on service requests submitted via the EDI interface. In many cases, the RTR error was returned in conjunction with an additional unrelated error message. KCI re-submitted a portion of these requests, correcting the non-RTR error(s). Some of these subsequent transactions received a Firm Order Confirmation (FOC), while others received another RTR error message. Orders transmitted through the TAG interface containing the same RTR data entry have not received this error message.

KCI has not yet received BellSouth Flow Through reports containing these PONs, and is currently unable to verify if the error responses were Fully Mechanized (i.e., generated by BellSouth systems) or Partially Mechanized (i.e., generated by BellSouth ordering representatives).

The following tables provide a sample of PONs receiving this error to date.

¹ Prior to transmission to BellSouth, this RTR value of "C" gets translated into "AT" in conformance with EDI technical specifications.

² *Local Exchange Ordering Guide, Volume 1*

BELLSOUTH'S RESPONSE TO EXCEPTION 132

The following LSRs received multiple error messages, including the RTR error. Order supplements were issued to correct the non-RTR error. These supplements received FOCs.

PON	VER	Company Code	Error Message
RS01A22PEN100024	01	9991	ADDRESS IS RSAG INVALID. AND RTR IS INVALID
RS02A21PEN100002	02	9993	LISTING FORMAT INVALID. RTR FIELD INVALID
RS02A21PEN100019	01	9993	RTR IS INVALID. DRS ALREADY ON CSR. FEATURE DETAIL FORMAT INVALID AND ADL IS NOT NECESSARY ON BUS. LM
RS02A21PEN100020	02	9993	LISTING FORMAT INVALID. RTR FIELD INVALID
RS05A12PEN100015	01	9992	THE RTR IS INVALID AND THE ADDRESS IS NOT RSAG VALID, LM
RS05A22PEN100003	01	9993	RTR OF AT IS NOT VALID--- PROVIDE RSAG VALID END USER ADDRESS.
RS11B21PEN100008	01	9991	RTR IS NOT VALID---PROVIDE A RSAG VALID ADDRESS FOR END USER.
RS11C22PEN100005	01	9991	ADDRESS IS INVALID FOR RSAG. RTR IS INVALID
RS13H12PEN100027	01	9990	ADDRESS IS RSAG INVALID--- RTR IS INVALID
RS17H12PEN100018	01	9990	RTR OF AT IS NOT VALID--- PROVIDE A RSAG VALID ADDRESS FOR THE END USER.
RS17H12PEN100021	01	9990	ADDRESS IS NOT VALID FOR RSAG--RTR IS INVALID
RS17H12PEN100022	02	9990	ADDRESS IS RSAG INVALID--- RTR IS INVALID

The following LSRs received multiple error messages, including the RTR error. Order supplements were issued to correct the non-RTR error. These supplements again received an RTR error message.

PON	VER	Company Code	Error Message
RS05A12PEN100014	01	9992	RTR INCORRECTLY POPULATED - SCA
RS05A22PEN100013	01	9993	RTR FIELD NOT VALID
RS27H12PEN100004	01	9990	RTR OF AT IS NOT VALID.

BELLSOUTH'S RESPONSE TO EXCEPTION 132

*The following LSRs received a single error message relating to an invalid RTR.
Supplemental service orders have not yet been issued.*

PON	VER	Company Code	Error Message
428S124PEJ100003	00	9991	INVALID ENTRY FOR RTR FIELD - SCA
432S214PEJ101001	00	9990	RTR IS INVALID. LM

*The following LSRs did not receive an RTR-related error message. They are instances
of the same test cases (listed above) that did receive an RTR error.*

PON	VER	Company Code	Error Message
RS01A22PEN100008	00	9991	N/A
RS05A12PEN100001	00	9992	N/A
RS05A12PTN100003	00	9992	N/A
RS05A12PEN100004	00	9992	N/A
RS05A22PTN100004	00	9993	N/A
RS05A22PEN100014	00	9993	N/A
RS05A22PEN100016	00	9993	N/A

Impact:

The receipt of invalid error messages, in some cases multiple times per order, leads to increased timeframes for CLEC order processing. Additional time and effort is required to identify the cause of the error, verify that it is not attributable to CLEC error, and re-submit order supplements.

BellSouth Response:

BellSouth agrees an error message should not be sent when entry in the RTR field is AT for EDI requests. On 02/09/01, Service Reps were covered to accept AT in the RTR field for EDI orders. KPMG did not receive an error message for the following PONs which were sent after 02/09/01:

PON	RS05A12PEN100014	VER	01
	RS05A22PEN100013		01
	RS27H12PEN100004		01

These PONs are also listed in the above tables of this draft exception.

BELLSOUTH'S STATEMENT OF INVESTIGATION FOR EXCEPTION 133



Date: February 26, 2001

EXCEPTION REPORT

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

Exception:

BellSouth does not compute its Operations Support System (OSS) Interface Availability Service Quality Measurements (SQMs) in accordance with the definitions and business rules that appear in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*.

SQMs are calculated to illustrate BellSouth's 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 Consulting, Inc. (KCI) is reviewing the *SQM Reports*.² KCI is evaluating the accuracy, completeness, and consistency of each metric's stated definition, calculation, and business rules.

BellSouth appears to be treating system/application outages in a manner inconsistent with the business rules listed in the Georgia *SQM Reports*. For the months of October, November, and December 2000, BellSouth has reported the OSS Interface Availability SQM for LENS to be 100%. However, KCI is aware of unscheduled, customer-affecting outages that are not reflected in these metric values. By posting details, BellSouth acknowledges on its change control Web site that outages have occurred during times throughout these same months.

Section C of the Georgia *SQM Reports* document provides the definition of OSS Interface Availability: "Percent of time OSS interface is functionally available compared to scheduled availability." The document goes on to state that only full outages are used to calculate this metric, and states, "a full outage is incurred when any of the following circumstances exist:

- The application or system is down.

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

² KCI used the 10/22/99 version of the *SQM Reports* as a basis to perform this test. KCI also took into consideration changes published over time in more recent versions of the *SQM Reports*. The Business Rules listed in this Exception are listed in the *SQM Reports* published at the end of November 2000.

BELLSOUTH'S STATEMENT OF INVESTIGATION FOR EXCEPTION 133

- The application or system is inaccessible, for any reason, by the customers who normally access the application or system.
- More than one work center cannot access the application or system for any reason.
- When only one work center accesses an application or system and 40% or more of the clients in that work center cannot access the application.
- When 40% of the functions the clients normally perform or 40% of the functionality that is normally provided by an application or system is unavailable."

All full outages should be reflected in the OSS Interface Availability SQMs. Because these outages are not included in unscheduled downtime of the systems, KCI believes the availability percentages themselves are overstated for the SQMs and months listed previously. Moreover, KCI believes that the actual process by which the OSS Interface Availability SQMs are computed is inconsistent with the business rules described within the definitions listed in the Georgia *SQM Reports*.

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. Accurate and complete definitions and business rules are essential to the CLECs' ability to interpret the performance measurement properly and conduct these functions reliably.

BellSouth's Response

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

CLOSURE REPORT FOR EXCEPTION 28
BellSouth Georgia OSS Testing Evaluation

Date: March 7, 2001

EXCEPTION CLOSURE REPORT**Initial Exception:**

BellSouth failed to deliver 46% of expected DUF records to KPMG Consulting, Inc. (KCI).

Summary of Exception:

KCI completed 1,017¹ 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 expected².

Summary of BellSouth's Response:

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.

¹ 1,017 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.

² 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.

CLOSURE REPORT FOR EXCEPTION 28

BellSouth Georgia OSS Testing Evaluation

Summary of KCI Initial Re-test Activities:

During the period of April 25-27, 2000, KCI completed 1,821 test calls on test lines that had order activity on some lines and no order activity on others. DUF records were expected for 1,348 of these test calls.

KCI Re-test Results:

KCI did not receive all the DUF records for re-test 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.

Summary of First Amended Exception:

KPMG Consulting, Inc. (KCI) completed 1,821³ test calls during the ODUF/ADUF Functional Usage Evaluation retest on April 25-27, 2000. BellSouth failed to deliver DUF records for twenty-seven percent (27%) of the test calls for which records were expected.

Summary of BellSouth's Response:

BellSouth performed detailed DUF processing analysis based on information provided by KCI regarding missing records. BellSouth attributed the missing records to a combination of KCI call logging errors, unbillable record errors, and service order processing issues. BellSouth issued this statement based on their investigation:

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

Summary of KCI Subsequent Re-test Activities:

³ 1,821 test calls were made resulting in an expectation that 1,348 calls would have corresponding DUF records. 473 of the test calls made were not billable.

CLOSURE REPORT FOR EXCEPTION 28

BellSouth Georgia OSS Testing Evaluation

During the period of August 1 - 4, 2000, KCI completed 1,642 test calls on test lines that had order activity on some lines and no order activity on others. DUF records were expected for 1,270 of these test calls.

KCI Re-test Results:

KCI did not receive DUF records for some of the re-test calls for which records were expected. The majority of the missing records were ADUF records for three specific telephone numbers.

Second Amended Exception:

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

Summary of Second Amended Exception:

KPMG Consulting, Inc. (KCI) completed 1,642⁴ test calls during the ODUF/ADUF Functional Usage Evaluation retest on August 1 - 4, 2000. BellSouth failed to deliver DUF records for six percent of the test calls for which records were expected.

Summary of BellSouth's Response:

BellSouth performed a detailed analysis of the service order activity processed for the three telephone numbers mentioned specifically in the amended exception. BellSouth's summary response is:

"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."

⁴ 1,642 test calls were made resulting in an expectation that 1,270 calls would have corresponding DUF records. 372 of the test calls made were not billable.

CLOSURE REPORT FOR EXCEPTION 28

BellSouth Georgia OSS Testing Evaluation

BellSouth also indicated that updates (indicated by underlined text) would be issued to the CLEC Billing documentation Chapter 4, sections 2 and 3 under the sections named "Service Order Usage Timeline" to state:

"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."

KCI Re-test Results Summary:

BellSouth introduced two modifications to address the issue of DUF records not being sent. The first modification was to its processing system to address the timing of service order activity and DUF record production. The purpose of the system enhancement was to increase the percentage of DUF files returned to CLECs. This change was implemented in May 2000 and was therefore subject to the re-test KCI conducted in August 2000. The second modification addressed the policy issue about how BellSouth responds when a CLEC does not receive DUF records. BellSouth altered its CLEC billing documentation to emphasize that CLECs would only be billed for usage sent via the DUF process.

In its first re-test conducted in April 2000, KCI did not receive 27% of the DUF files it was expecting. BellSouth completed changes to its system in May 2000. During the final re-test conducted by KCI in August 2000, KCI did not receive 6% of the total DUF records it was expecting to receive. While KCI cannot prove that the system change made by BellSouth in May 2000 was the reason for the improved performance, in our professional opinion we believe such a conclusion is reasonable as the conditions of the test were essentially the same.

While BellSouth's final re-test result of 94% of DUF files returned falls below the KCI developed standard of 95%, KCI's statistical analysis indicates that BellSouth's performance is not significantly different from the standard⁵. Therefore KCI concludes that BellSouth's performance in the final re-test meets the established benchmark.

⁵ Although the test percentage is below the benchmark of 95%, the statistical evidence is NOT strong enough to conclude that the performance is below the benchmark with 95% confidence. In other words, the inherent variation in the process is large enough to have produced the substandard result, even with a process that is operating above the benchmark standard. The p-value, which indicates the chance of

CLOSURE REPORT FOR EXCEPTION 28

BellSouth Georgia OSS Testing Evaluation

In regards to the policy issue for billing by BellSouth for calls that are only sent via the DUF process, KCI was able to verify by reviewing subsequent bills that BellSouth was billing CLECs in a manner consistent with its stated policy.

Based on the combination of BellSouth's change to its processing system, the modification to its policy about how it will respond to CLECs when DUF files are not returned, and the company's performance in the final re-test, KCI concludes that BellSouth has adequately addressed the issues outlined in this exception.

Based on re-testing activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 28.

Attachments: None.

observing this result when the benchmark is being met, is 0.0694, above the 5% cutoff necessary for a statistical conclusion of failure.

CLOSURE REPORT FOR EXCEPTION 94
BellSouth Georgia OSS Testing Evaluation

Date: March 7, 2001

EXCEPTION CLOSURE REPORT**Exception:**

BellSouth failed to deliver 20% of expected resale DUF records to KPMG Consulting, Inc (KCI).

Summary of Exception:

During the period of April 4 – 7, 2000 KCI executed 898 test call scenarios for the Resale Usage Functional Evaluation (for which 576 were expected to generate DUF records). BellSouth failed to deliver DUF records for twenty percent of the test calls for which records were expected.

Summary of BellSouth's Response:

BellSouth performed detailed analysis of each of the sample records reported as missing by KCI. This analysis revealed that the missing records could be primarily attributed to:

1. Records deemed unbillable within the BellSouth billing process (in parity with retail)
2. Credit records that were not being handled correctly by BellSouth
3. KCI call logging errors

BellSouth addressed these issues in the following response:

“BellSouth sent all billable usage to KPMG on ODUF during this test except for three credit type records. It was discovered during this test, that one of the systems that processes toll type calls was not passing credit records to ODUF. A work request has been issued to pass these credit type records to the ODUF process. BellSouth will also update our ODUF documentation for CLECs to clarify what types of messages will be sent over ODUF for RESALE customers.

For calls that were dropped as incomplete or unbillable per the tariff, below are the drop reason:

- Call dropped because call is incomplete (not answered).
- Call dropped because call qualified to a Flat Rate calling plan.
- Service Feature not tariffed in State”.

**CLOSURE REPORT FOR EXCEPTION 94****BellSouth Georgia OSS Testing Evaluation**

Summary of KCI Re-test Activities:

KCI re-test activities consisted of reviewing the updated ODUF documentation as referenced in BellSouth's response. KCI then recalculated the percentage of expected resale DUF records based on validation of records affected by Issues #1 and #3 as referenced in BellSouth's response. Additionally, KCI included credit requests in a test calling period from August 1 – 4, 2000 to validate the BellSouth work request for Issue #2¹. The evaluation of the DUF records received from BellSouth revealed that the work request referenced in BellSouth's response has been successfully implemented.

KCI Re-test Results:

Accounting for DUF records affected by Issues #1 and #3 in BellSouth's response, KCI received 94% of the expected resale DUF records from BellSouth². In addition, ten records included in the initial test sample were not received due to the credit record issue (#2) identified and corrected by BellSouth (and validated by KCI). Receiving these DUF records during the initial test would have resulted in BellSouth's performance exceeding the established standard of 95%. As a result, KCI has concluded that BellSouth's test performance in delivery of resale DUF records is adequate.

Based on re-testing activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 94.

Attachments: None.

¹ KCI included credit requests on both resale and UNE lines during this test period to revalidate issue #2.

² The Georgia Public Service Commission's mandated benchmark for the BellSouth – Georgia OSS Evaluation for delivery of resale DUF records is 95%.



Date: March 7, 2001

EXCEPTION CLOSURE REPORT

Exception:

KPMG Consulting, Inc. (KCI) 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 through¹.

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.

BellSouth's Response:

"Change request 2332 was submitted to the internal change review board on 08/17/00 for SME review. Change request 2332 will clarify orders back to CLECs that use the incorrect REQTYP for listing only requests. Implementation date and prioritization will be determined through the change control process.

Change request 6359 was submitted to the internal change control process on 6/28/99, prior to implementation of the expanded BellSouth change control process for CLECs. Change request 6359 will mechanically process listing requests associated with ACT C. Implementation date will be communicated through the BellSouth change control process.

¹ KCI'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 KCI to determine actual flow through.



Of the 190 Resale and Directory Listing for Resale orders validated by KPMG, 5 orders were related to Service Rep errors. As of 5/01/00 Service Reps were recovered on Directory Listing training. As of 8/29/00 the 5 order errors identified above were covered with individual Service Reps.

BellSouth verified the orders for the switch restorals. The analysis indicated that these orders were automatic completion orders, therefore, they should have flowed through the system without manual intervention. These orders were based on virtual accounts in the test-bed. These virtual orders are accessed and completed by the Work Management Center (WMC) to prevent dispatching to technicians. The WMC erroneously completed these orders on or prior to the due date, therefore, they did not flow to MARCH. MARCH is the computer database that executes switch translations and telephone number restorals. These 8 switch translation resale lines contained different information due to a mistake in handling the virtual accounts service orders associated with the test-bed.”

KCI Re-test Activities

KCI's re-test activities consisted of a review of BellSouth's responses to the original exception and a review of its test results.

KCI Re-test Results:

Of the 70 post-order CSRs that KCI verified, 7 of the post-order CSRs (10.0%) contained different information than their corresponding LSRs, thus resulting in a 90% accuracy rate. The KCI determined standard for this evaluation criterion is a 95% accuracy rate.² Although the test percentage is below the benchmark of 95%, the statistical evidence is not strong enough to conclude that the performance is below the benchmark with 95% confidence. In other words, the inherent variation in the process is large enough to have produced the substandard result, even with a process that is operating above the benchmark standard. The p-value, which indicates the chance of observing this result when the benchmark is being met, is 0.0603, which is above the .0500 cut-off for a statistical conclusion of failure. Based on this analysis, BellSouth has satisfied this evaluation criterion.

Of the 88 Directory Listings for Resale orders that KCI verified, 11 (12.5%) contained different information than their corresponding LSRs, thus resulting in an 81.5% accuracy rate. The KCI determined standard for this evaluation criterion is a 95% accuracy rate.³ KCI will assign a “Not Satisfied” to the relevant criterion in its final report.

² The 95% benchmark was developed based on KCI's experience in the telecommunications industry.

³ The 95% benchmark was developed based on KCI's experience in the telecommunications industry.

Of the 174 Switch Translations for Resale lines that KCI verified, 15 of the lines (8.6%) contained different information than their corresponding LSRs, thus resulting in a 91.4% accuracy rate. The KCI determined standard for this evaluation criterion is a 95% accuracy rate.⁴ Given a p-value of 0.0289, the results for the Switch Translations test for Resale lines fall below the 95% benchmark.⁵ KCI will assign a "Not Satisfied" to the relevant criterion in its final report.

As a result of test activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 114.

Attachments: None.

⁴ The 95% benchmark was developed based on KCI's experience in the telecommunications industry.

⁵ Because of the larger sample size compared to that of the post order CSRs, the margin of error is lower for Switch Translators (2.89%). Therefore, although Switch Translator testing had a greater accuracy rate than that for post order CSRs, the reduced margin of error results in a Not Satisfied result, whereas post order CSR testing resulted in a Satisfied result.

CERTIFICATE OF SERVICE

Docket No. 8354-U

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

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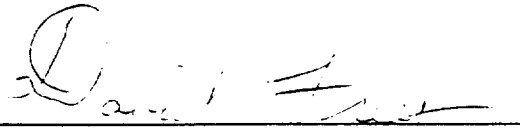
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This 7th day of March, 2001.



David Frey
Managing Director

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March 9, 2001

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
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RECEIVED

MAR 09 2001

EXECUTIVE SECRETARY
G.P.S.C.

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

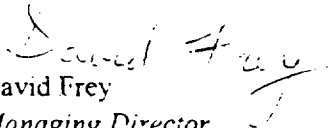
Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of KPMG Consulting, Inc.'s Exception 135. Please also find enclosed the following responses from BellSouth: Exception 76 BLS 5th Amended Response; Exception 79 BLS 2nd Amended Response; Exception 133 BLS Response; Exception 133 BLS Response—Attachment; Exception 135 BLS Response. Please also find Closure Reports for Exceptions 24, 39, 92, 106, 120 and 123.

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
Managing Director

Enclosures

cc: Parties of Record



Date: February 28, 2001

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, Inc. (KCI) cannot replicate one of BellSouth's reported Service Quality Measurements (SQMs) for the month of January 2001.

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports¹.

As part of the BellSouth-Georgia OSS Evaluation, KCI is attempting to replicate these reports (i.e., achieve exactly the same results as reported by BellSouth). To complete validation of the calculations, KCI has relied on BellSouth's published *PMAP Raw Data User Manual*, where applicable, and the corresponding raw data,² along with technical assistance³ from BellSouth.

KCI has been unable to replicate the following SQM values:

1. **Invoice Accuracy in the Billing category for the KCI Test CLEC (January 2001).**
The discrepancies found by KCI are listed in the table below:

Category	KCI Calculations	BellSouth's Report
Resale Total Billed Revenue	185,794.43	185,751.03
Resale Total Adjustments	70,725.19	70,681.79
Resale Percent Accuracy	61.934	61.948

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 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 KCI may have received in the replication of CLEC aggregate or non-PMAP (manually calculated) metrics.

EXCEPTION 135
BellSouth Georgia OSS Testing Evaluation

Category	KCI Calculations	BellSouth's Report
UNE Total Billed Revenue	57,921.15	56,563.26
UNE Total Adjustments	13,984.65	12,626.76
UNE Percent Accuracy	75.856	77.677

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. KCI'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 FIFTH AMENDED RESPONSE TO EXCEPTION 76



Date: March 2, 2001

EXCEPTION REPORT

An exception has been identified as a result of the Provisioning Verification Evaluation Retest.

Exception:

KPMG Consulting LLC (KCL) encountered BellSouth Switch Translations and directory listings provisioning errors for UNE-P orders.

During provisioning verification testing, data from confirmed Local Service Requests (LSRs) was compared to switch translation data and the directory listing database.

Of the 89 switch translations for lines that were validated, 16 lines (18.0%) contained information inconsistent with the corresponding LSRs. Of the 16 lines, one (6.3%) was flow-through and 15 (93.7%) were non-flow through.

Of the 55 directory listing orders, 7 were provisioned incorrectly, resulting in a 12.7% failure rate. Of the 7 orders, 0 (0%) listings were flow-through and 7 (100%) non-flow through.

.The following tables provide the specific data.

SWITCH TRANSLATION VERIFICATION						
PON	TN	OCN	Switch Translations Discrepancy	VER	F/T	BellSouth Response
409R223PEM101001	(912) 755-9434	9990	No ESX	AA	Y	Do not agree, Feature verified working in the switch. Supporting data was provided to KPMG.
415R213PTM001002	(706) 303-9662	9990	Not working	AA	N	Agree, service not restored from suspension.
415R213PTM001002	(706) 303-2317	9990	Not working	AA	N	Agree, service not restored from suspension.

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 76

SWITCH TRANSLATION VERIFICATION						
PON	TN	OCN	Switch Translations Discrepancy	VER	F/T	BellSouth Response
415R213PTM001002	(706) 303-2318	9990	Not working	AA	N	Agree, service not restored from suspension.
415R213PTM001002	(706) 303-2319	9990	Not working	AA	N	Agree, service not restored from suspension.
605R214PTJ000001	(706) 722-9484	9994	Wrong PIC & LPIC	AA	N	Agree, service rep error. Rep covered 12/15/00.
605R214PTJ000001	(706) 722-9194	9994	Wrong PIC	AA	N	Agree, service rep error. Rep covered 12/15/00.
625R214PTJ000002	(912) 746-4538	9990	Wrong PIC & LPIC	AB	N	Agree, service rep error. Rep covered 12/15/00.
625R214PTJ000002	(912) 746-5245	9990	Wrong PIC & LPIC	AB	N	Agree, service rep error. Rep covered 12/15/00.
625R214PTJ000002	(912) 746-6152	9990	Wrong PIC & LPIC	AB	N	Agree, service rep error. Rep covered 12/15/00.
625R214PTJ000003	(706) 774-1688	9990	Wrong PIC & LPIC	AB	N	Agree, service rep error. Rep covered 12/15/00.
625R214PTJ000003	(706) 774-6550	9990	Wrong PIC	AB	N	Agree, service rep error. Rep covered 12/15/00.
625R214PTJ000003	(706) 774-9891	9990	Wrong PIC	AB	N	Agree, service rep error. Rep covered 12/15/00.
625R214PTJ000005	(912) 746-0461	9990	Should not have NSQ	AA	N	Do not agree, NSQ is a usage sensitive feature provisioned in this switch for all customers. KPMG will notice that NSQ does not appear on the CSR for this account.
625R214PTJ000005	(912) 746-1330	9990	Should not have NSQ	AA	N	Do not agree, NSQ is a usage sensitive feature provisioned in this switch for all customers. KPMG will notice that NSQ does not appear on the CSR for this account.

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 76

SWITCH TRANSLATION VERIFICATION						
PON	TN	OCN	Switch Translations Discrepancy	VER	F/T	BellSouth Response
625R214PTJ000005	(912) 746-7343	9990	Should not have NSQ	AA	N	Do not agree, NSQ is a usage sensitive feature provisioned in this switch for all customers. KPMG will notice that NSQ does not appear on the CSR for this account.

DIRECTORY LISTINGS VERIFICATION							
PON	FT	OCN	TN	Directory Listing Discrepancy	Order Type	VE R	BellSouth Response
305R112PTF100013	N	9994	(404) 214-0684	Number is listed as "non-published" and "listed number". Should only be LN.	UNE-Analog Loop	2	Do not agree. KPMG incorrectly interpreted the DA screen BellSouth provided.
307R222PTF000008	N	9991	(706) 434-0810	Should be listed as RWH but listed as R W H.	UNE-Analog Loop	1	Do not agree. KPMG incorrectly interpreted the DA screen BellSouth provided.
452R216PTF000002	N	9990	(706) 774-9339	No listing found but should be listed as AL.	DL	0	Agree, service rep error. Rep covered 12/15/00.
605R214PEJ000002	N	9994	(912) 742-6359	No listing found but should be listed as LN.	LPC	0	Agree, service rep error. Rep covered 12/15/00.
606R123PEM000003	N	9990	(404) 321-4748	Should be listed as RWH but listed as R W H.	Port Order	0	Agree, service rep error. Rep covered 2/11/01.
606R123PTM000004	N	9990	(912) 742-9886	Should be listed as RWH but listed as R W H.	Port Order	0	Agree, service rep error. Rep covered 2/11/01.
606R123PTM001002	N	9990	(706) 724-0819	Should be listed as RWH Enterprises but listed as Georgia R W H.	LPC	0	Agree, service rep error. Rep covered 12/15/00.

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 76

Impact:

Inaccurate provisioning will affect CLECs in the following way:

- Switch Translations—customers not receiving features that were ordered
- Directory Listing - directory listings that are not listed or incorrectly listed will result in the CLEC customers either being omitted from the BellSouth-GA directories and/or Directory Assistance databases, or having their listings incorrectly listed.

Inaccurate provisioning will negatively affect CLEC-customer relationships through unmet expectations. A CLEC customer will receive the incorrect level or type of service, resulting in decreased customer satisfaction.

BellSouth Amended Response (Fifth Amended)

BellSouth's response to individual occurrences has been incorporated into the above table.

Of the 55 directory listing orders, BellSouth agrees that 5 listings were inconsistent with the corresponding LSRs.

Of the 89 switch translations for lines that were validated, 12 lines contained information inconsistent with the corresponding LSRs.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 79



Date: March 5, 2001

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 have an adequate data retention policy for its early-stage data¹, the programs used to process the early-stage data, the raw data used in the calculation of the Service Quality Measurement (SQM) reports, or the computation programs used to calculate SQM report values.

Initial Exception:

BellSouth 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).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 Consulting LLC (KCL) 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	<i>Speed of Answer in the Ordering Center (Ordering)</i>	8 days
Renaissance Enterprise Management	<i>Interface Availability (OSS)</i>	Current month

¹ Early-stage data is the earliest instance of the data collected in the BellSouth OSS.

² These SQMs are referred to as "manual SQMs."

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 79

Source Data System	SQM Affected	Retention Duration
Spectrum Automatic Call Distributor	<i>Average Speed of Answer in Ordering Centers – Residence (Ordering)</i>	60 days
Meridian Symposium	<i>Average Answer Time in Repair Centers for Large Business (Maintenance & Repair)</i>	2 days
Meridian Max	<i>Average Answer Time in Repair Centers – Residence (Maintenance & Repair)</i>	7 days
QMS	<i>Average Speed to Answer - Toll (Operator Services Toll & Directory Assistance)</i>	45 days

BellSouth Initial 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	<i>Speed of Answer in the Ordering Center (Ordering)</i>	Yes*
Renaissance Enterprise Management	<i>Interface Availability (OSS)</i>	Yes

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 79

Spectrum Automatic Call Distributor	<i>Average Speed of Answer in Ordering Centers – Residence (Ordering)</i>	Yes*
Meridian Symposium	<i>Average Answer Time in Repair Centers for Large Business (Maintenance & Repair)</i>	Yes
Meridian Max	<i>Average Answer Time in Repair Centers – Residence (Maintenance & Repair)</i>	Yes*
QMS	<i>Average Speed to Answer - Toll (Operator Services Toll & Directory Assistance)</i>	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.

Amendment:

On further investigation, KCL learned that BellSouth does not have a written policy regarding retention of any early-stage data, the computer programs used to process the early-stage data, the raw data, or the SQM-generating computer programs for an adequate time period.

In KCL's professional opinion, to facilitate a thorough audit of BellSouth's Metrics data in the future, BellSouth should retain the early-stage data, the computer programs used to process the early-stage data, the raw data and the computer programs used to create the SQM reports (along with the reports themselves) for a period of three years after the publishing of an SQM report. Retention of all of these elements is essential for a complete and accurate audit of BellSouth's SQMs.

Second Amendment:

In December 2000, KCL met with the Georgia Public Service Commission (GPSC) and BellSouth to further discuss the issue of an appropriate data retention interval. KCL articulated its professional opinion that retaining the relevant data for an 18-month time period could be sufficient if periodic audits of appropriate data were conducted.

KCL suggests that BellSouth continue to formalize its data retention policies with the guidance of the GPSC. Additional discussions will be held between KCL, BellSouth and the GPSC on this issue.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 79

Impact:

Inadequate retention of data and the associated computer programs 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 Amended Response

BellSouth has investigated the feasibility and costs for implementing a data retention policy in keeping with KPMG's professional opinion to "retain the early stage data, the computer programs used to process the early stage data, the raw data and the computer programs used to create the SQM reports (along with the reports themselves)" for a period of eighteen months. Three options to augment BellSouth's current data retention guidelines were considered and are described below.

Options for Data Retention

Option	Description	Estimated 4-Year Costs
1	Off-Line Storage of Early-Stage Data for 18 Months	\$ 4M
2	Duplicate SQM Report Generation Systems with Off-Line Storage of Early-Stage Data for 18 Months	\$ 42M
3	Duplicate SQM Report Generation Systems with On-Line Storage of Early-Stage Data for 18 Months	\$ 60M

Note: Costs are based on high-level assumptions and estimates. They represent order of magnitude only.

Retention of eighteen months of early-stage data will require approximately 24.4 Gb of storage per day. In addition to these requirements, the KPMG recommendation necessitates duplication and maintenance of dual platforms (PMAP 2.0 and PMAP/NG) to facilitate re-creation of production environments for an eighteen-month period. This requirement could result in reliance on hardware and software for which vendor support has been discontinued and for which internal expertise must be maintained. Complexities of the production process and the pace of change driven by multiple regulatory bodies further complicate successful implementation of KPMG's recommendation. For these reasons, along with the high costs of implementation, BellSouth eliminated Options 2 and 3 from further consideration.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 79

BellSouth proposes to implement Option 1, an alternate data retention policy, as stated below.

"It is the policy of BellSouth Performance Measurements to retain the early-stage data for a period of eighteen months to facilitate detailed audits of PMAP reports. 'Early-stage data' is defined as that which is extracted from source systems (CABS, CRIS, EXACT, WFA, SOCS, LMOS, etc.) and maintained as ASCII flat files for the purpose of generating SQM reports. 'Early-stage' data is further defined as source system data that is transmitted manually for said purpose. The mechanical flat files and the manual files of early-stage data will be retained for a period of eighteen months.

"BellSouth will retain PMAP raw data for a minimum of three years. 'PMAP raw data' is defined as that which is available for download for the current month from the BellSouth website. Further, BellSouth will retain for three years the monthly aggregate database, i. e., that which has been processed and normalized from raw data, and the resources necessary to re-create the SQM reports from that database."

Full implementation of the above-stated data retention policy is tentatively scheduled for 3Q01.

BELLSOUTH'S RESPONSE TO EXCEPTION 133



Date: March 6, 2001

EXCEPTION REPORT

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

Exception:

BellSouth does not compute its Operations Support System (OSS) Interface Availability Service Quality Measurements (SQMs) in accordance with the definitions and business rules that appear in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*.

SQMs are calculated to illustrate BellSouth's 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 Consulting, Inc. (KCI) is reviewing the *SQM Reports*.² KCI is evaluating the accuracy, completeness, and consistency of each metric's stated definition, calculation, and business rules.

BellSouth appears to be treating system/application outages in a manner inconsistent with the business rules listed in the Georgia *SQM Reports*. For the months of October, November, and December 2000, BellSouth has reported the OSS Interface Availability SQM for LENS to be 100%. However, KCI is aware of unscheduled, customer-affecting outages that are not reflected in these metric values. By posting details, BellSouth acknowledges on its change control Web site that outages have occurred during times throughout these same months.

Section C of the Georgia *SQM Reports* document provides the definition of OSS Interface Availability: "Percent of time OSS interface is functionally available compared to scheduled availability." The document goes on to state that only full outages are used to calculate this metric, and states, "a full outage is incurred when any of the following circumstances exist:

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

² KCI used the 10/22/99 version of the *SQM Reports* as a basis to perform this test. KCI also took into consideration changes published over time in more recent versions of the *SQM Reports*. The Business Rules listed in this Exception are listed in the *SQM Reports* published at the end of November 2000.

BELLSOUTH'S RESPONSE TO EXCEPTION 133

- The application or system is down.
- The application or system is inaccessible, for any reason, by the customers who normally access the application or system.
- More than one work center cannot access the application or system for any reason.
- When only one work center accesses an application or system and 40% or more of the clients in that work center cannot access the application.
- When 40% of the functions the clients normally perform or 40% of the functionality that is normally provided by an application or system is unavailable."

All full outages should be reflected in the OSS Interface Availability SQMs. Because these outages are not included in unscheduled downtime of the systems, KCI believes the availability percentages themselves are overstated for the SQMs and months listed previously. Moreover, KCI believes that the actual process by which the OSS Interface Availability SQMs are computed is inconsistent with the business rules described within the definitions listed in the Georgia *SQM Reports*.

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. Accurate and complete definitions and business rules are essential to the CLECs' ability to interpret the performance measurement properly and conduct these functions reliably.

BellSouth Response:

KCL states that BellSouth does not compute its Operations Support System (OSS) Interface Availability SQM in accordance with the definitions and business rules that appear in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*.

The measurements for Interface Availability (OSS-2 for Pre-Ordering/Ordering and OSS-3 for Maintenance/Repair) are based upon the BellSouth problem management process, a tool developed by BellSouth to track and measure OSS performance. Originally created for internal BellSouth use, the process was designed to report outages of specific applications and the hardware on which they reside, enabling the internal measurement of OSS availability. Although the process is now applied to interfaces utilized by external customers, the original intent and interpretation of the OSS measurement process as developed by BellSouth have not changed. Further, it is upon this historical interpretation that the benchmark of $\geq 99.5\%$ for these SQMs was derived.

BellSouth agrees that the definitions and business rules in the Georgia SQMs for Interface Availability (OSS 2 and OSS-2) are not worded such that the intended interpretation is clear. Therefore, BellSouth has rewritten the definitions and business rules and will incorporate them into future revisions of the Georgia SQM. The revisions are attached.

BELLSOUTH'S RESPONSE TO EXCEPTION 133

Recent BellSouth analysis of PMAP-reported values revealed that not all assets had been appropriately mapped to Renaissance Enterprise Management (REM), the tool used to compile trouble report data. Subsequently, January Encore data has been corrected and action taken to ensure future compliance:

- Completed detailed review of REM assets and linkages to applications
- Established additional linkages, where appropriate
- Established procedure for reporting transport outages directly associated with specific applications
- Enhanced Project Management Organization (PMO) to better manage the internal change control process
- Dedicated resource to manage business requirements
- Established process for monthly review of REM assets
- Established process for periodic internal audits

OSS-2: Interface Availability (Pre-Ordering/Ordering)

Definition

Percent of time applications are functionally available as compared to scheduled availability. Calculations are based upon availability of applications and interfacing applications utilized by CLECs for pre-ordering and ordering. "Functional Availability" is defined as the number of hours in the reporting period that the applications/interfaces are available to users. "Scheduled Availability" is defined as the number of hours in the reporting period that the applications/interfaces are scheduled to be available.

Scheduled availability is posted on the Interconnection web site: (www.interconnection.bellsouth.com/oss/oss_hour.html)

Exclusions

- CLEC-impacting troubles caused by factors outside of BellSouth's purview, e.g., troubles in customer equipment, troubles in networks owned by telecommunications companies other than BellSouth, etc.
- Troubles reported to BellSouth but not confirmed by BellSouth as outages.
- Degraded service, e.g., slow response time, loss of non-critical functionality, etc.

Business Rules

This measurement captures the functional availability of applications/interfaces as a percentage of scheduled availability for the same systems. Only full outages are included in the calculations for this measure. Full outages are defined as occurrences of either of the following:

- Application/interfacing application is down or totally inoperative.
- Application is totally inoperative for customers attempting to access or use the application. This includes transport outages when they may be directly associated with a specific application.

Comparison to an internal benchmark provides a vehicle for determining whether or not CLECs and retail BST entities are given comparable opportunities for use of pre-ordering and ordering systems.

Calculation

Interface Availability (Pre-Ordering/Ordering) = $(a + b) \times 100$

- a = Functional Availability
- b = Scheduled Availability

Report Structure

- Not CLEC Specific
- Not product/service specific
- Regional Level

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
Report month • Legacy Contract Type (per reporting dimension) • Regional Scope • Hours of Downtime	Report month • Legacy Contract Type (per reporting dimension) • Regional Scope • Hours of Downtime

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Regional Level	• $\geq 99.5\%$

OSS Interface Availability

Application	Applicable to	% Availability
EDI	CLEC	x
TAG	CLEC	x
LENS	CLEC	x
LEO	CLEC	x
LESOG	CLEC	x
LNP Gateway	CLEC	x
COG	CLEC	*
SOG	CLEC	*
DOM	CLEC	*
DOE	CLEC/BST	x
SONGS	CLEC/BST	x
ATLAS/COFFI	CLEC/BST	x
BOCRIS	CLEC/BST	x
DSAP	CLEC/BST	x
RSAG	CLEC/BST	x
SOCS	CLEC/BST	x
CRIS	CLEC/BST	x
* Under Development		

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X
	Tier III	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Regional Level	• ≥ 99.5%

SEEM OSS Interface Availability

Application	Applicable to	% Availability
EDI	CLEC	x
HAL	CLEC	x
LENS	CLEC	x
LEO Mainframe	CLEC	x
LESOG	CLEC	x
PSIMS	CLEC	x
TAG	CLEC	x

OSS-3: Interface Availability (Maintenance & Repair)

Definition

Percent of time applications are functionally available as compared to scheduled availability. Calculations are based upon availability of applications and interfacing applications utilized by CLECs for maintenance and repair. "Functional Availability" is defined as the number of hours in the reporting period that the applications/interfaces are available to users. "Scheduled Availability" is defined as the number of hours in the reporting period that the applications/interfaces are scheduled to be available.

Scheduled availability is posted on the Interconnection web site: (www.interconnection.bellsouth.com/oss/oss_hour.html)

Exclusions

- CLEC-impacting troubles caused by factors outside of BellSouth's purview, e.g., troubles in customer equipment, troubles in networks owned by telecommunications companies other than BellSouth, etc.
- Troubles reported to BellSouth but not confirmed by BellSouth as outages.
- Degraded service, e.g., slow response time, loss of non-critical functionality, etc.

Business Rules

This measurement captures the functional availability of applications/interfaces as a percentage of scheduled availability for the same systems. Only full outages are included in the calculations for this measure. Full outages are defined as occurrences of either of the following:

- Application/interfacing application is down or totally inoperative.
- Application is totally inoperative for customers attempting to access or use the application. This includes transport outages when they may be directly associated with a specific application.

Comparison to an internal benchmark provides a vehicle for determining whether or not CLECs and retail BST entities are given comparable opportunities for use of maintenance and repair systems.

Calculation

OSS Interface Availability $(a \div b) \times 100$

- a = Functional Availability
- b = Scheduled Availability

Report Structure

- Not CLEC Specific
- Not product/service specific
- Regional Level

Data Retained

Relating to CLEC Experience	Relating to BellSouth Performance
• Availability of CLEC TAFI • Availability of LMOS HOST, MARCH, SOCS, CRIS, PREDICTOR, LNP and OSPCM • ECTA	• Availability of BellSouth TAFI • Availability of LMOS HOST, MARCH, SOCS, CRIS, PREDICTOR, LNP and OSPCM

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
• Regional Level	• $\geq 99.5\%$

OSS Interface Availability (M&R)

OSS Interface	% Availability
BST TAFI	x
CLEC TAFI	x
CLEC ECTA	x
BST & CLEC	x
CRIS	x
LMOS HOST	x
LNP	x
MARCH	x
OSPCM	x
PREDICTOR	x
SOCS	x

SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	X
	Tier III	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Regional Level	• ≥ 99.5%

OSS Interface Availability (M&R)

OSS Interface	% Availability
CLEC TAFI	x
CLEC ECTA	x

BELLSOUTH'S RESPONSE TO EXCEPTION 135



Date: March 5, 2001

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, Inc. (KCI) cannot replicate one of BellSouth's reported Service Quality Measurements (SQMs) for the month of January 2001.

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports¹.

As part of the BellSouth-Georgia OSS Evaluation, KCI is attempting to replicate these reports (i.e., achieve exactly the same results as reported by BellSouth). To complete validation of the calculations, KCI has relied on BellSouth's published *PMAP Raw Data User Manual*, where applicable, and the corresponding raw data,² along with technical assistance³ from BellSouth.

KCI has been unable to replicate the following SQM values:

1. ***Invoice Accuracy in the Billing category for the KCI Test CLEC (January 2001).***
The discrepancies found by KCI are listed in the table below:

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 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 KCI may have received in the replication of CLEC aggregate or non-PMAP (manually calculated) metrics.

BELLSOUTH'S RESPONSE TO EXCEPTION 135

Category	KCI Calculations	BellSouth's Report
Resale Total Billed Revenue	185,794.43	185,751.03
Resale Total Adjustments	70,725.19	70,681.79
Resale Percent Accuracy	61.934	61.948
UNE Total Billed Revenue	57,921.15	56,563.26
UNE Total Adjustments	13,984.65	12,626.76
UNE Percent Accuracy	75.856	77.677

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. KCI'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:

The January Billing Invoice Accuracy reports that KPMG attempted to replicate were incorrect due to formatting inconsistencies in the January data file. Negative revenues in January billing data were denoted by parentheses rather than by minus signs. PMAP did not recognize the parentheses and read the negative values as zeroes.

The formatting error was corrected on February 27th, and the reports were rerun and reposted to the PMAP website (https://pmap.bellsouth.com/prior_month_rpt_updates.cfm) on March 2nd. The notice reads, "Billing Invoice Accuracy reports for CLEC and SQM re-posted on 3/2 to correct errors in Negative Revenue and Adjustment values that were the result of formatting inconsistencies."

Pending revisions to PMAP will enable the system to recognize either parentheses or minus signs as denotations for negative revenues. A manual verification process will be utilized to ensure reporting accuracy until implementation of the mechanized changes.

Date: March 9, 2001

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

During KPMG Consulting, Inc.'s (KCI's) initial pre-order evaluation¹, twenty-nine percent (29%) of total pre-order responses from BellSouth's TAG API took longer than 15 seconds to arrive². For pre-order test transactions, KCI's experience indicated that pre-order responses from BellSouth's TAG API were not timely (i.e., took longer than 15 seconds) for the following query types³:

- **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 Results presented in the initial Exception 24 represented pre-order data from November 10, 1999 through February 4, 2000.

² At the time of the initial Exception, no Georgia Public Service Commission- (GPSC-) issued standard for pre-order timeliness existed. Because pre-ordering information is often accessed while the customer is on the line, 15 seconds was used as an initial benchmark timeframe to allow for reasonably efficient customer interaction, for purposes of this exception.

³ Transaction sample sizes were 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.

Summary of BellSouth's Response:

In response to KCI's initial Exception, BellSouth implemented process improvements into TAG Version 2.2.0.7 in order to address transaction response timeliness.

In response to KCI's amended Exception (following re-test activities), BellSouth offered the following 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 information. Since BellSouth updates their Service 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."

Summary of KCI Re-test Activities:

Based on the implementation of TAG Version 2.2.0.7, KCI initiated a re-test on April 19, 2000. KCI submitted a total of 827 pre-order transactions during the course of this re-test, covering the range of electronically-available pre-order query types.

The 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 evaluation⁴. In accordance with the GPSC's ruling, KCI reviewed pre-order re-test timeliness results relative to BellSouth Retail pre-order timeliness.⁵ The GPSC's Order requests pre-order timeliness results disaggregated by the following back-end systems:

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

KCI analyzed BellSouth's published Retail performance data for the month of June 2000⁶. Since BellSouth data is separated into business and residential pre-order categories, KCI compared re-test results to a weighted average of BellSouth residential

⁴ This standard does not include allowances for transaction transmission time from the test CLEC to BellSouth and for response transmission time from BellSouth back to the test CLEC.

⁵ Please refer to KCI's document *Transaction Response Timeliness Evaluation Methodology*, dated January 16, 2001.

⁶ BellSouth performance data for the June 2000 timeframe represented the first available Retail data.

CLOSURE REPORT FOR EXCEPTION 24

BellSouth Georgia OSS Testing Evaluation

and business results⁷. KCI conducted statistical analysis to determine whether the KCI result was statistically different from the BellSouth combined average.

For those pre-order types for which there is no BellSouth Retail data available, KCI reviewed results based on a standard of 6 seconds⁸.

KCI Re-test Results:

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

- Eight produced "Satisfied" results.
- One produced a "Not Satisfied" result.

Pre-Order Re-Test Results

Pre-Order Query	BLS Back-End System	BLS Combined Average ⁹ (seconds)	KCI Re-Test Average (seconds)	Evaluation Result
AVQ TN	RSAG-TN	1.1	1.2 ¹⁰	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 ¹¹	Satisfied

⁷ For those query types where BellSouth Retail data was available, KCI performed three "t-tests". The first test compared the average of BellSouth business and residence averages to the KCI data. The other two tests separately compared the KCI 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.

⁸ The GPSC instructed KCI to use its professional judgment to apply a performance standard in those instances where a standard is not defined.

⁹ BLS Combined Average represents a weighted average of BLS business and residential Retail response averages.

¹⁰ The KCI average does not differ from the BLS combined average by a statistically significant amount.

¹¹ Although the KCI result of 1.0 seconds technically exceeds the BLS retail average of 0.5 seconds by a statistically significant amount, it is KCI's professional judgment that the response interval for Test-CLEC-submitted AAQ pre-orders is within a reasonable timeframe.

CLOSURE REPORT FOR EXCEPTION 24
BellSouth Georgia OSS Testing Evaluation

Pre-Order Query	BLS Back-End System	BLS Combined Average (seconds)	KCI Re-Test Average (seconds)	Evaluation Result
CSRQ	CSRACCTS(res) CSROCSR (bus)	3.1	1.8	Satisfied
SAQ	OASIS	1.30	11.6 ¹²	Not Satisfied
CDD	N/A	N/A	0.1	Satisfied

With no additional re-test activities planned, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 24.

Attachments: None.

¹² 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 current SQM-related standard for pre-order response timeliness does not distinguish between variations of SAQs. In addition, BLS retail timeliness results are not disaggregated by 'full' versus 'partial' SAQ inquiries. The distribution of SAQ pre-order variations executed by KCI may not reflect the distribution of SAQ variations included in the BLS retail results. The average response time for "full" SAQs performed during the KCI re-test was 31 seconds. For SAQs requesting partial information, the average re-test response time was 2 seconds.

Date: March 9, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth's electronic ordering systems do not provide the functionality required for submitting partial migrations to UNE Loops.

Summary of Exception:

As part of functional testing activities, KPMG Consulting, Inc. (KCI) successfully submitted service requests for partial migrations¹ to Unbundled Network Element (UNE) Ports and UNE Combinations. KCI assumed that the business rules for partial migrations of UNE Loops were similar to those for partial migrations of other services. KCI submitted service requests for Loop partial migrations via both TAG and EDI².

KCI received error messages in response to these submitted Loop partial migration service requests. KPMG Help Desk representatives coordinated with BellSouth's Customer Support Manager (CSM) to resolve these errors. KCI initially believed that the error messages stemmed from a documentation error (i.e., that documentation relating to UNE Ports and UNE Loop-Port Combinations should also apply to UNE Loop service requests). However, after several cycles of submitting supplemental service requests and receiving additional errors, BellSouth representatives informed KCI that BellSouth's electronic ordering systems do not support partial migrations of UNE loops.

Summary of BellSouth's Response:

"BellSouth does not support partial migrations of Loops (Reqtyp A) manually or electronically. Verbiage was added to the LEO-IG on March 17, 2000 to define applicability of AN and ATN by Reqtyp. BellSouth has assessed the feasibility of supporting partial migration of Loops and submitted a request via the Change Control

¹ According to BellSouth's Interconnection Services Web site, a partial migration is the conversion of one or more, but not all, of the lines of an existing multi-line account from one local exchange carrier to another.

² BellSouth ordering documentation contains few specific references to partial migration service requests. According to the documentation, either the Account Number (AN) or Account Telephone Number (ATN) and either the Existing Account Number (EAN) or Existing Account Telephone Number (EATN) data elements are required for partial migrations to UNE Ports and UNE Loop-Port Combinations. These fields are designated as "Not Applicable" (NA) for Loop orders by the *BellSouth Local Exchange Ordering (LEO) Guide, Volume 1, Issue 7N, January 2000*, Sections 4.3.1.5; 4.3.1.6; 5.5.3.2; 5.5.3.3. (Migrations to UNE Port = REQ TYPE F, ACT TYPE V. Migrations to UNE Loop-Port Combos = REQ TYPE M, ACT TYPE V. Migrations to UNE Loops = REQ TYPE A, ACT TYPE V).

Process. The request will be reviewed and prioritized by the Change Control Team at the 6/28/00 meeting."

Summary of KCI Re-test Activities:

KCI's re-test activities for this exception consisted of conducting a review of BellSouth's activities relating to Change Request CR0029. KCI reviewed the request in *BellSouth's Change Request Log, dated April 2000* and attended the June 28th Change Control meeting to observe the presentation and prioritization of this request.

KCI Re-test Results:

BellSouth does not support stand-alone UNE Loop partial migrations in the TCIF 7 release of its ordering interfaces. BellSouth has submitted requests via the Change Control Process to introduce this ordering functionality into its OSS '99 (TCIF 9) interface release. This functionality addition is proceeding through the Change Control Process (see CR0029 for additional information and implementation schedule).

In accordance with the Georgia Public Service Commission's (GPSC's) Order authorizing independent third-party testing, KCI evaluated those services that are electronically-orderable through BellSouth's ordering interfaces. KCI produced this exception with the specific belief that that stand-alone Loop partial migrations are electronically orderable in TCIF 7. However, after subsequent investigation, KCI determined that stand-alone Loop partial migrations are not electronically-orderable in TCIF 7. As a result, the ordering of stand-alone Loop partial migrations should not have been included in the evaluation of ordering functionality specified by the GPSC.

The GPSC may elect to monitor this issue with respect to subsequent TCIF releases in the future.

With no subsequent re-testing activities planned, KCI closes this exception for testing purposes.

Based on re-testing activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 39.

Attachments: None.

Date: March 9, 2001

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

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.³

As part of the BellSouth-Georgia OSS Evaluation, KPMG Consulting, Inc. (KCI) is validating the integrity of the raw data used in the calculation of SQM values reported by BellSouth. KCI 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, KCI 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 the CLEC aggregate

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, KCI used January 2000 as the test month for this SQM.

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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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Summary of BellSouth's Response:

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

⁵ Please note that KCI 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, KCI used January 2000 as the test month for this SQM.

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.

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.

KCI found that the Raw Data from December was incomplete. KCI issued another raw data request for the same Pre-Ordering *OSS Interface Availability* to review March 2000. KCI 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 KCI is a valid Local Access Message Trunk.

Local Trunks are identified by:

Reqty[1,1] = 'M' and

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

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

Item 20, ASR = 9928800124 PON = 04269123-D9998 is not a valid Local Trunk. It is included in the Early-stage Data (PMAP Raw Data) due to an error in the logic since 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

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

Using early-stage BARNEY snapshot data for June 2000, BellSouth is able to explain why each of the records identified by KCI 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 KCI is also included for each record.

Record #1

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

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

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

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

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

Record #2

Record LON OCN PON VER
 2 2816295 7268 W19299



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

The following text references three text boxes located further down the page. Throughout the text they are referred to as boxes 1 through 3 with box 1 as the leftmost box.

The boxes below represent a breakdown of the original logic statement into smaller more manageable parts.

The leftmost box contains the original logic statement.

The second box from the left substitutes *Statement1*, *Statement2*, *Statement3*, and *Statement4* for longer statements in the first box (e.g. *(SUP = 1 and IsNull(FIRST_CLAR_DT)) Then 0 Else 1* becomes *Statement1*). This makes it easier to see the overall logic involved and helps to break the logic into more manageable pieces. Also in the second box *Statement2*, *Statement3* and *Statement4* are grouped together because of the location of the parentheses in the original logic statement. This means that the comparison between *Statement2*, *Statement3*, and *Statement4* will be performed before any of the other logic.

The third and final box represents the most basic form of the more complex logic from the first box. In this box *Statement5* represents the results of the comparison between *Statement2*, *Statement3*, and *Statement4* from the previous box. In order for the entire statement in the fourth box to be TRUE both *Statement1* and *Statement5* must be true. If either *Statement1* or *Statement5* is FALSE then the entire statement in the fourth box will evaluate to FALSE.

To find if the entire logic statement is TRUE or FALSE first evaluate *Statement1* using the instructions below. If *Statement1* is FALSE then there is no need to continue the evaluation because the entire original statement will be FALSE. If *Statement1* is TRUE then *Statement5* must be evaluated as discussed below.

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If the entire logic statement evaluates to TRUE then the associated record is kept in PMAP for further processing. If the entire logic statement evaluates to FALSE then the associated record drops out to an error table

Now that the original logic statement has been broken down into smaller more manageable pieces, each piece can be further evaluated. This next section will break down *Statement1*, and *Statement5* into their individual components.

Statement1

Statement1 is the same thing as (SUP = 1 and IsNull(FIRST_CLAR_DT)) Then 0 Else 1. To evaluate this statement first analyze the first part (SUP = 1 and IsNull(FIRST_CLAR_DT)). If both SUP = 1 and the field FIRST_CLAR_DT is null then this part of the statement evaluates to TRUE. If SUP does not = 1 or FIRST_CLAR_DT is not null then the first part of Statement1 will evaluate to FALSE.

If (SUP = 1 and IsNull(FIRST_CLAR_DT)) Then 0 Else 1 and ((FIRST_RCVD > '01-Jan-1997') AND (isnull(FOC_DATE))) or (not(isnull(FOC_DATE)) and (LAST_RCVD < FOC_DATE) and isnull(FIRST_CLAR_DT)) or (not(isnull(FIRST_CLAR_DT)) and (FIRST_RCVD < FIRST_CLAR_DT))	Statement1 and (Statement2 or Statement3 or Statement4)	Statement1 and Statement5
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In Then 0 Else 1 part of Statement1 the 0 equals a value of FALSE and the 1 equals a value of TRUE. This part of Statement1 has the effect of reversing the value that was found in the first part of the statement. This second part of Statement1 can be thought of as saying 'If first part is TRUE then Statement1 is FALSE' or 'If first part is FALSE then Statement1 is TRUE'.

If (SUP = 1 and IsNull(FIRST_CLAR_DT)) Then 0 Else 1 and ((FIRST_RCVD > '01-Jan-1997') AND (isnull(FOC_DATE))) or (not(isnull(FOC_DATE)) and (LAST_RCVD < FOC_DATE) and isnull(FIRST_CLAR_DT)) or (not(isnull(FIRST_CLAR_DT)) and (FIRST_RCVD < FIRST_CLAR_DT))	Statement1 and (Statement2 or Statement3 or Statement4)	Statement1 and Statement5
---	--	--

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,

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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. KCI 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. KCI 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.
3	CP5DM4P2	10/15/99	7063352321	This SO_NBR could not be found in the PMAP raw data. KCI 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. KCI received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	HELD ORDER - This record had a commitment date that was outside of the reporting period, and therefore is not considered in this month's report. OCI/PMI/TROUBLES WITHIN 30 DAYS - This record has a status of "pending". These measurements only report on completed orders.
5	DP7H54W4	10/15/99	9128245251	This SO_NBR could not be found in the PMAP raw data. KCI 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. KCI received only a	This is a listing order - no work performed, therefore, this is not reported

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Record	SO NBR	ISSU DT	TEL NUM	Discrepancy Detail	Reason for absence in Raw Data
				block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	on.
7	NP4B72G6	10/15/99	7066363748	This SO_NBR could not be found in the PMAP raw data. KCI 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. KCI 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. KCI 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. KCI 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.

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

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

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

Item one 770-946-5348 this fell out of the LMOS data due to an invalid disposition code of 799. Item two 50/QGDA/501036 fell out of the WFA data due to having an invalid OCN. Item three 38/LXFU/600197 fell out of WFA data due a product mismatch, 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.

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

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.

KCI 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 KCI to revalidate the Billing Metric *Mean Time to Deliver Invoices* for CLECs. On 11/13/00, BellSouth sent raw data for September 2000 for KCI 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**

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totals were reported in the SQM reports on PMAP. Early-stage reports have been corrected and are available for review after November 1999.

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

Summary of KCI Re-Test Activities:

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

KCI reviewed BellSouth’s response. In order to verify that BellSouth had adequately addressed the data storage capacity issue, KCI requested, received and reviewed the data feeds from the TAG server for August 2000, the first month after the problem was addressed.

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

KCI reviewed BellSouth’s response. In accordance with the response, KCI requested and received the raw data for March 2000, and compared the early-stage data with the raw data used to calculate the reported metric values.

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

KCI reviewed BellSouth’s response. In accordance with the response, KCI requested and received the raw data for June 2000, and then compared the data to the corresponding early-stage data.

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

KCI reviewed BellSouth’s response.

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*

KCI reviewed BellSouth’s response.

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

KCI reviewed BellSouth's response.

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

KCI reviewed BellSouth's response.

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

KCI reviewed BellSouth's response, and took note of the additional problems listed for July and August 2000, which prevented retesting on these months. KCI performed its retest using the September 2000 early-stage and raw data.

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

KCI reviewed BellSouth's response. Based upon BellSouth's statement that early-stage data were corrected in November 1999, KCI performed its retest using the December 1999 early-stage and raw data.

Results of KCI Re-Test Activities:

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

KCI understands the reasons that data was not found for 10/24/1999 and 1/16/2000. Additionally, KCI's comparison of the early-stage and raw data for August 2000 found no discrepancies – in particular none of the daily feeds of data were lost.

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

KCI found that all the early-stage data for March 2000 was appropriately accounted for in the raw data file for this month – including the SL13GTWY component. Additionally, the characterizations of components (i.e., their associated systems) in the early-stage data matched the corresponding characterizations in the raw data.

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

In June 2000, KCI determined that 11 early-stage records could not be found in the raw data file. However, BellSouth provided suitable explanations for these

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exclusions. (The explanation is listed in BellSouth's response.) Therefore, KCI believes that the June 2000 raw data are complete and accurate.

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

Upon review of BellSouth's response, KCI believes that the two records KCI determined to be missing from the raw data file were indeed properly excluded. As a result, KCI believes that the raw data files for October 1999 were complete, and no additional testing was required.

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*

Upon review of BellSouth's response, KCI believes that the ten records KCI determined to be present in the early-stage ICAIS file but missing from the raw data file were indeed properly excluded. As a result, KCI believes that the raw data files for October 1999 were complete, and no additional testing was required.

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*

Upon review of BellSouth's response, KCI believes that the five trouble tickets present in the early-stage LMOS and WFA systems but missing from the raw data file were properly excluded. As a result, KCI believes that the raw data files for October 1999 were complete, and no additional testing was required.

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

Upon review of BellSouth's response, KCI agrees that the component (MRLM53BM) that is listed as an LMOS system component need not necessarily appear in the raw data, because it is redundant to another component (MRLM53BM) that was listed. (As BellSouth indicated in its response, the two components share the same hard drive and the same data, and are not on line at the same time.) As a result, the raw data files for December 1999 were determined to be complete, and no additional testing was required.

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

BellSouth had indicated in its response (page 13) that it would implement a mechanized work order for September 2000 to assist in calculating the *Mean Time to Deliver Invoices* SQM report, and that until the implementation was completed, it would employ additional manual reviews to ensure completeness. KCI's understanding is that the implementation of the work order was not completed in September 2000, but is scheduled for full implementation by March 2001. It is KCI's understanding that BellSouth will continue its manual review process until the mechanized work order is fully implemented.

Based upon its additional testing (comparison of early-stage and raw data), KCI believes that the early-stage data for September 2000 were appropriately accounted for in the raw data file used to calculate the *Mean Time to Deliver Invoices* SQM report for the CLEC aggregate, CABS system level of disaggregation.

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

Based upon KCI's additional testing, KCI believes that the early-stage data for December 1999 were accurately accounted for in the raw data file used to calculate the *Mean Time to Deliver Invoices* SQM report for BellSouth retail.

As a result, KCI believes that BellSouth has adequately addressed the issues identified in Exception 92.

Based on re-testing activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 92.

Attachments: None.

Date: March 9, 2001

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

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

Testing resumed on May 15, 2000. During this phase, KCI observed fifty-four (54) Hot-Cut (loop migration orders). Six (6) of these fifty-four (54) orders were deemed "Not Satisfied" because BellSouth was unable to meet the agreed upon Frame Due Time (FDT).¹ Through this phase, BellSouth performed at a success rate of 89%. The BLS Service Quality Measurements Plan – Provisioning – Report Measurement P-6A standard for performance is 95%.

KCI's Observations: KCI 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

BellSouth's Response:

BellSouth provided the following tables in response to the CLEC loop migrations for which BellSouth did not meet the FDT.

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

CLOSURE REPORT FOR EXCEPTION 106

BellSouth Georgia OSS Testing Evaluation

Observation Date	Order Number	Number of Lines	Response	Action
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

CLOSURE REPORT FOR EXCEPTION 106

BellSouth Georgia OSS Testing Evaluation

Observation Date	Order Number	Number of Lines	Response	Action
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.

CLOSURE REPORT FOR EXCEPTION 106

BellSouth Georgia OSS Testing Evaluation

Observation Date	Order Number	Number of Lines	Response	Action
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."

KCI's Review Activities:

KCI reviewed its findings for the three PONs for which BellSouth disagreed with KCI's results. KCI's re-test activities consisted of discussions and interviews with BellSouth and the CLEC that participated in the hot cut testing, and a review of documentation submitted to KCI relating to the three disputed PONs

KCI Review Results:

After discussions with BellSouth about the three PONS in dispute, KCI concluded that its original findings remained accurate. That is, KCI observed that BellSouth performed forty-eight of fifty-four (48/54) loop migration (Hot Cut) installations correctly, resulting in a success rate of eighty nine percent (89%). The BellSouth Service Quality Measurement Plan – Provisioning – Report Measurement P-6A defines a benchmark of 95% within + or – 15 minutes of the scheduled start time for coordinated customer conversions.

However, while the test percentage results are below the benchmark standard of 95%, the statistical evidence is not strong enough to conclude that the performance is below the benchmark with 95% confidence. In other words, the inherent variation in the process is large enough to have produced the substandard result, even with a process that is operating above the benchmark standard. The p-value, which indicates the chance of

CLOSURE REPORT FOR EXCEPTION 106

BellSouth Georgia OSS Testing Evaluation

observing this result when the benchmark is being met, is 0.0945, above the .0500 cut-off for a statistical conclusion of failure.

Based on its review, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 106.

Attachments: None.

Date: March 9, 2001

EXCEPTION CLOSURE REPORT

Exception:

BellSouth-reported raw data files used in the calculation of three ordering metrics for the KPMG Consulting, Inc. (KCI) Test CLEC incorrectly report certain purchase order numbers and version numbers as non-mechanized orders in August and September 2000.

Summary of Exception:

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Georgia Public Service Commission (GPSC), 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, KCI compared the data that BellSouth uses to produce SQM reports for the KCI Test CLEC with the corresponding data that KCI collects using its own test management tools. KCI looked at the purchase order numbers and the version numbers in the raw data reported by BellSouth in PMAP for the Test CLEC for August and September 2000. It found that certain Purchase Order Numbers (PONs) and Version Numbers (VERs) were listed as NON-MECHANIZED orders. KCI provided to BellSouth a sample of such PONs and VERs from the raw data file "Ordering Service Orders".

Summary of BellSouth Response:

"In Georgia Exception #120, KCI observed that certain purchase order numbers and version numbers were incorrectly being reported as non-mechanized orders for the KCI Test CLEC in August and September 2000 raw data.

The LSRs related to the PONs in question were submitted electronically and then fell out for manual handling – becoming partially-mechanized orders. In response to Georgia Exception #120, it was determined that these LSRs were incorrectly classified as non-mechanized LSRs.

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

CLOSURE REPORT FOR EXCEPTION 120

BellSouth Georgia OSS Testing Evaluation

BellSouth has taken the following action to prevent partially-mechanized LSRs from being reported as non-mechanized LSRs: BellSouth has classified records where the first character of the 'image' field is 0, 1, 2, 3, 4, 5, 6, 7, 8, or 9 as non-mechanized. Any records that do not have a fax image number in the 'image' field are counted as mechanized or partially mechanized, differentiated by the "claimed by" field.

This change was completed in **Change Request #572** and became effective beginning with October data."

Summary of KCI Re-Test Activities:

KCI reviewed BellSouth's response. KCI also compared the October and November 2000 Ordering raw data files for the KCI Test CLEC provided by BellSouth, to the comparable data collected by KCI. The raw data files were downloaded from the PMAP web site.

KCI Re-Test Results:

The October and November 2000 raw data files appropriately classified the orders submitted via the paper medium as non-mechanized orders. Orders submitted electronically were classified as mechanized or partially-mechanized orders. None of the orders submitted electronically were classified as non-mechanized orders.

KCI will continue to compare the BellSouth-provided raw data files to the comparable KCI-collected data, as part of KCI's regular testing activities.

As a result, KCI believes that BellSouth has adequately addressed the issue identified in Exception 120.

Based on re-testing activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 120.

Attachments: None.

Date: March 9, 2001

EXCEPTION CLOSURE REPORT

Exception:

KPMG Consulting, Inc. (KCI) discovered that BellSouth's raw data is insufficient for calculating the October 2000 *Percent Provisioning Troubles within 30 Days of Service Order Activity* Service Quality Measurement (SQM) for the KCI Test CLEC.

Summary of Exception:

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 reports¹.

As part of the BellSouth-Georgia OSS Evaluation, KCI is attempting to replicate these reports (i.e., achieve exactly the same results as reported by BellSouth). To complete validation of the calculations, KCI has relied on BellSouth's published *PMAP Raw Data User Manual*, where applicable, and the corresponding raw data,² along with technical assistance³ from BellSouth when necessary.

KCI attempted to replicate the KCI Test CLEC's October 2000 SQM report for the *Percent Provisioning Troubles within 30 Days of Service Order Activity* SQM with the guidance of the November 15, 2000 version of the *PMAP Raw Data User Manual*. KCI discovered that two variable fields mentioned in the computation instructions of the manual were missing from the September 2000 Order Completion Interval (OCI) data file, which is used to generate the denominator counts in the October SQM. The following table lists the *Raw Data User Manual* steps in question along with the fields that were missing from the OCI data:

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 KCI may have received in the replication of CLEC aggregate or non-PMAP (manually calculated) metrics.



Consulting CLOSURE REPORT FOR EXCEPTION 123

BellSouth Georgia OSS Testing Evaluation

Raw Data Manual Location	Instruction	Missing Fields
Step 7; Bullet 2	If nods_ticket_source = 1 then exclude records where cmplt_n_dt is null or blank else if nods_ticket_source = 0 then exclude records where wo_cmplt_n_dt is null or blank.	nods_ticket_source ; wo_cmplt_n_dt
Step 8; Bullets 5	If nods_ticket_source = 1 then include records with a cmplt_n_dt between the first and last day of the prior month for which the raw data is valid. (For July raw data the cmplt_n_dt is between June 1 and June 30)	nods_ticket_source ; wo_cmplt_n_dt
Step 8; Bullet 6	If nods_ticket_source = 0 then include records with a wo_cmplt_n_dt between the first and last day of the prior month for which the raw data is valid. (For July raw data the wo_cmplt_n_dt is between June 1 and June 30)	nods_ticket_source ; wo_cmplt_n_dt

Summary of BellSouth Response:

When attempting to replicate the KCI Test CLEC's October 2000 SQM report for the *Percent Provisioning Troubles within 30 Days of Service Order Activity* SQM the September 2000 Order Completion Interval (OCI) data file is used to calculate the denominator.

The November 15, 2000 version of the *PMAP Raw Data User Manual (RDUM)* contains a documentation error for the *Percent Provisioning Troubles within 30 Days* measure. There are several instructions referring to the Order Completion Interval (OCI) data file that are incorrect. These instructions have been removed and the changes are reflected in the current RDUM (December 15, 2000 version). The following instructions have been removed:

- **Step 7; Bullet 2:** If **nods_ticket_source** = 1 then exclude records where **cmplt_n_dt** is null or blank else if **nods_ticket_source** = 0 then exclude records where **wo_cmplt_n_dt** is null or blank.



Consulting CLOSURE REPORT FOR EXCEPTION 123

BellSouth Georgia OSS Testing Evaluation

-
- **Step 8; Bullet 5:** If nods_ticket_source = 1 then include records with a cmpltm_dt between the first and last day of the prior month for which the raw data is valid. (For July raw data the cmpltm_dt is between June 1 and June 30)
 - **Step 8; Bullet 6:** If nods_ticket_source = 0 then include records with a wo_cmpltm_dt between the first and last day of the prior month for which the raw data is valid. (For July raw data the wo_cmpltm_dt is between June 1 and June 30)

The OCI data file is not missing any variable fields; the RDUM documentation (November 15, 2000 version) incorrectly suggests the use of fields that do not exist in the OCI raw data file.

Summary of KCI Re-Test Activities:

Based upon BellSouth's response, KCI revised its computer programs to incorporate the methodology detailed in the December 15, 2000 version of the *Raw Data Users Manual*. KCI then compared its recalculated values to the original BellSouth-reported values. Additionally, KCI reviewed the KCI Test CLEC SQM reports for November and December 2000.⁴

Results of KCI Re-Test Activities:

When KCI implemented the instructions found in the December 15, 2000 version of the *Raw Data Users Manual*, the resulting KCI recalculated values matched the original BellSouth-reported values for the month of October 2000. Further, the values KCI calculated for this SQM for the November and December 2000 reports also match those reported by BellSouth.

As a result, KCI believes that BellSouth has adequately addressed the issue identified in Exception 123.

Based on re-testing activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 123.

Attachments: None.

⁴ KCI reviews the KCI Test CLEC reports for every month as a part of its regular testing activities.

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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EXECUTIVE SECRETARY
G.P.S.C.

March 16, 2001

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334

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

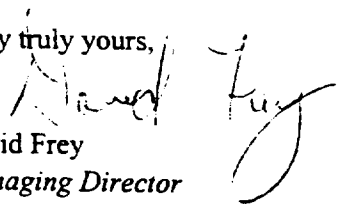
Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of KPMG Consulting, Inc.'s Exception 136. Please also find enclosed the following responses from BellSouth: Exception 95 BLS 2nd Amended Response; Exception 122 BLS Statement of Investigation; Exception 128 BLS Statement of Investigation; Exception 128 BLS Response; and Exception 136 BLS Response. Please also find Closure Reports for Exceptions 60, 71, 98, 99, 112, 113, 121, 127 and 130.

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
Managing Director

Enclosures

cc: Parties of Record



BELLSOUTH'S RESPONSE TO EXCEPTION 136



Date: March 12, 2001

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 the Local Service Request Sent/Received time stamp types do not match the KPMG Consulting, Inc. (KCI)-collected values for the KCI Test CLEC for certain Purchase Order and Version numbers for two Ordering metrics in August and September 2000.

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

As part of the BellSouth-Georgia OSS Evaluation, KCI compared the data that BellSouth uses to produce SQM reports for the KCI Test CLEC with the corresponding data that KCI collects using its own test management tools. KCI compared (a) the Purchase Order numbers and the Version numbers between the data collected by KCI and the raw data reported by BellSouth in PMAP for the Test CLEC, (b) the Firm Order Confirmation², Local Service Request Sent/Received³, and Reject/Clarification⁴ Requested time stamps in the BellSouth raw data files with the corresponding data that KCI received from HP for August and September 2000.

The BellSouth-reported values in the fields mentioned above did not match the KCI-collected values for certain Purchase Order numbers and Version 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.

² Firm Order Confirmation is the HP recorded timestamp when a FOC is received from BellSouth, INODE timestamp for EDI server and RECEIVE timestamp for TAG server.

³ LSR sent/received is the HP recorded timestamp of when HP transmits an LSR to BellSouth. This timestamp is compared to the LSR received timestamp that BellSouth reports in the PMPA raw data.

⁴ Clarification requested timestamp is the HP recorded timestamp of when a request is received by HP from BellSouth (INODE timestamp for EDI server and RECEIVE timestamp for TAG server).

BELLSOUTH'S RESPONSE TO EXCEPTION 136

KCI notes that the following were taken into consideration when comparing the KCI-collected information with the BellSouth reported information:

- a) The HP clock is based on the eastern time zone and BellSouth clock is based on the central time zone, leading to a time difference of 60 minutes between the HP clock and the BellSouth clock;
- b) The HP system clock is one minute and eight seconds behind the BellSouth system clock;
- c) Transactions through the EDI servers have a 30-minute batch processing time for both the incoming and outgoing transactions, which theoretically could introduce a discrepancy of up to 60 minutes.

KCI also included an additional two minutes leeway for the EDI interfaces to account for problems not related to BellSouth's operations before listing the values in the table below.

Table 1 shows the specific discrepancies for Local Service Request Sent/Received time stamps.

Table 1: Local Service Request Sent/received Timestamp

PON	VER	METHOD	MONTH	BELLSOUTH - REPORTED VALUE	KCI -REPORTED ⁵ VALUE
305R222PEH000001	0	EDI	August	8/28/00 4:15 PM	8/25/00 11:45 AM
318R112PEH000001	0	EDI	August	8/28/00 5:01 PM	8/28/00 4:56 PM
320R212PEH000001	0	EDI	August	8/28/00 5:01 PM	8/28/00 4:53 PM
399R213PEM100001	1	EDI	August	8/28/00 4:15 PM	8/28/00 3:55 PM
307R122PEF000003	0	EDI	September	9/14/00 1:15 PM	9/14/00 10:27 AM
409R223PEM100001	0	EDI	September	9/13/00 5:00 PM	9/13/00 4:16 PM

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 contain incomplete or incorrect raw data, CLECs will not receive accurate SQM information for these purposes.

⁵ KCI-reported values are provided by HP.

BELLSOUTH'S RESPONSE TO EXCEPTION 136

BellSouth Response:

The following table lists the BellSouth response for the specific discrepancies for Local Service Request Sent/Received time stamps.

PON	VER	Explanation
305R222PEH000001	0	Multiple instances of this PON/version combination were submitted to BellSouth. BellSouth will only accept and process one instance of a PON/version combination. The KCI timestamp indicates a fatally rejected instance of this PON/version combination, while the BellSouth timestamp reflects a separate instance of this PON/version combination, which was accepted and processed. BellSouth shows a fatally rejected timestamp of 8/25/00 at 11:50AM.
318R112PEH000001	0	This order was placed into the EDI jobstream at 4:12 PM and processed at 4:32 PM. When this processing finishes, orders are passed on to LEO as one large batch, where the timestamp shows a received value of 5:01 PM. It is unusual for this transfer of orders from EDI to LEO to take 29 minutes, as it did in this case, but BellSouth no longer has the historical data to explain why this occurred.
320R212PEH000001	0	This order was placed into the EDI jobstream at 4:12 PM and processed at 4:32 PM. When this processing finishes, orders are passed on to LEO as one large batch, where the timestamp shows a received value of 5:01 PM. It is unusual for this transfer of orders from EDI to LEO to take 29 minutes, as it did in this case, but BellSouth no longer has the historical data to explain why this occurred.
399R213PEM100001	1	This order was placed into the EDI jobstream at 3:32 PM. Within EDI, orders are processed by a job that executes every 15 minutes normally, but in this case, there was an extra delay in the execution of the job, which did not execute until 3:57 PM. When the job finishes the orders are passed on to LEO, where the timestamp reflects a value of 4:15 PM. BellSouth no longer has the historical data to explain why this occurred.
307R122PEH000003	0	Multiple instances of this PON/version combination were submitted to BellSouth. BellSouth will only accept and process one instance of a PON/version combination. The KCI timestamp indicates a fatally rejected instance of this PON/version combination, while the BellSouth timestamp reflects a separate instance of this PON/version combination, which was accepted and processed. BellSouth shows a fatally rejected timestamp of 9/14/00 at 10:33AM.

BELLSOUTH'S RESPONSE TO EXCEPTION 136

PON	VER	Explanation
409R223PEM100001	0	This order was placed into the EDI jobstream at 4:36 PM and processed at 4:36 PM. When this processing finishes, orders are passed on to LEO as one large batch, where the timestamp shows a received value of 5:00 PM. It is unusual for this transfer of orders from EDI to LEO take 24 minutes, as it did in this case, but BellSouth no longer has the historical data to explain why this occurred.

BellSouth can most effectively investigate and address EDI timestamp discrepancies if they are identified in the most recent month's data. Information needed to explain the discrepancies becomes increasingly difficult to obtain with the passing of time. KPMG is requested to test the most recent month's data for discrepancies of this nature.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 95



Date: March 13, 2001

EXCEPTION REPORT

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

Exception:

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

Initial Exception (June 21, 2000)

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

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

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

PON*VER Company Code (CC)	Order Type	Actual Results	Expected Results
433A124PTJ100001*01 CC = 9991	MM Loop-Port Combination Inside Move	FOC/CN	According to BellSouth documentation, requests for feature changes are disallowed for this order type. An error message should have been received.
602A214PTJ100002*00 CC = 9991	MD Loop-Port	FOC/CN	According to BellSouth documentation, an activity

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 95

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

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 95

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

Impact

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

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

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 95

Amended Exception (December 8, 2000)

KCI is amending this exception to include a number of Local Service Requests (LSRs) from the Resale Functional Evaluation (PO&P-11). These orders were initially referred to in a provisioning-related exception, and have also been identified as having ordering errors. Although BellSouth has indicated that the following LSRs contained errors, KCI receive Firm Order Confirmations (FOCs) for each one. For invalid service requests, KCI expects to receive Clarification responses.

PON	VER	CC
R015A21PTN000011	00	9992
R015A21PTN000006	00	9992
R015A21PTN000005	00	9992
R015A21PTN000004	00	9992
R015A21PEN000012	00	9992
R015A21PEN000010	00	9992
R015A21PEN000009	00	9992
R015A21PEN000008	00	9992
R015A21PEN000007	00	9992
R015A21PEN000002	AC	9992
R015A12PEN100002	00	9991
R011F12PTN100038	BA	9992
R015A12PEN100003	BB	9992
R011B21PTN000002	00	9991

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 95

Second Amended Exception (February 21, 2001)

KCI initiated a UNE and Resale functional re-test on January 19, 2001. While the re-test focused on evaluating select transaction response timeliness criteria, KCI encountered a number of inaccurate FOCs during the course of test execution. The following table presents PON details for re-test service requests that contained LSR errors and received FOCs. KCI expected to receive error (ERR) or clarification (CLR) responses to each of these service requests.

PON*VER	CC	Order Type	Error Introduced on LSR	BellSouth Response
330S222PTI100003*00	9990	BB/V Loop with LNP migration	Local Service Office (LSO) field was populated with invalid value of "123456". According to the BLS ordering Business Rules (<i>LEO Guide, Volume 1</i>), the LSO field is required for this order type.	Do not agree. 7727 is the correct CC for this LNP order. In an effort to increase flow through and reduce clarifications due to inaccurate data provided by CLECs, BellSouth attempt to use the end user address to obtain the correct LSO for provisioning LNP. A change request will be submitted to the Change Review Board to modify the LEO IG to indicate LSO is not applicable for LNP.
307S122PTH100009*00	9991	AB/V Loop migration	Line Activity (LNA) field was populated with an invalid value of "N". N is not a valid entry for this field according to the BLS <i>LEO Guide</i> .	Agree. Defect # 13200 has been opened and will be prioritized for implementation.
435S114PTJ001001*00	9990	MB/T Loop-Port Combination Outside Move	Local Service Office (LSO) field was populated with invalid value of "487752".	Do not agree. In an effort to increase flow through and reduce clarifications due to inaccurate data provided by CLECs, BellSouth attempts to use the end user address to obtain the correct LSO for REQTYP MB. A change request will be submitted to the Change Review Board to modify the LEO IG.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 95

PON*VER	CC	Order Type	Error Introduced on LSR	BellSouth Response
384S225PEI100005*00	7050	BB/V Loop with LNP migration	Line Activity (LNA) field was populated with an invalid value of "N". N is not a valid entry for this field according to the BLS <i>LEO Guide</i> .	Agree. Service rep error. Rep covered by 3/8/01.
RS17H12PTN100006*00	9990	EB/D Resale disconnect	End User State (GA) field was populated with an invalid value of "GT".	Do not agree. In an effort to increase flow through and reduce clarifications due to inaccurate data provided by CLECs, BellSouth attempts to use the telephone number to obtain the correct address for provisioning. A change request will be submitted to the Change Review Board to modify the LEO IG.
RS15A21PTN100006*00	9991	JB/R Directory Listing change	EU house number was not populated on the End User Street (EU Street 1) field.	Agree. Service rep error. Rep covered by 3/8/01.
RS41B21PEN100001*00	9990	EB/A Resale new account	Service Center (SC) field contained invalid entry of "LCCC". According to the BLS <i>LEO Guide</i> , this field should contain "LCSC".	Do not agree. The <i>LEO Guide</i> indicates the SC field requires 4 alpha/numeric characters. As noted by KPMG, the <i>LEO IG</i> does not indicate specific valid entries required for the SC field.
RS11C22PEN100012*00	9991	EB/C Resale change	Service Center (SC) field contained invalid entry of "LCCC". According to the BLS <i>LEO Guide</i> , this field should contain "LCSC".	Do not agree. The <i>LEO Guide</i> indicates the SC field requires 4 alpha/numeric characters. As noted by KPMG, the <i>LEO IG</i> does not indicate specific valid entries required for the SC field.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 95

PON*VER	CC	Order Type	Error Introduced on LSR	BellSouth Response
RS01A11PEN100025 *00	9993	EB/W Resale migration as-is	Invalid End User Address entered on service request.	Do not agree. In an effort to increase flow through and reduce clarifications due to inaccurate data provided by CLECs, BellSouth attempts to use the telephone number to obtain the correct address for provisioning. A change request will be submitted to the Change Review Board to modify the LEO IG.
RS17H12PEN100015 *00	9990	EB/D Resale disconnect	Invalid End User Address entered on service request.	Do not agree. In an effort to increase flow through and reduce clarifications due to inaccurate data provided by CLECs, BellSouth attempts to use the telephone number to obtain the correct address for provisioning. A change request will be submitted to the Change Review Board to modify the LEO IG.
RS27H12PEN100009 *00	9990	EB/SS Resale suspend service	Invalid End User Address entered on service request.	Do not agree. In an effort to increase flow through and reduce clarifications due to inaccurate data provided by CLECs, BellSouth attempts to use the telephone number to obtain the correct address for provisioning. A change request will be submitted to the Change Review Board to modify the LEO IG.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 95

PON*VER	CC	Order Type	Error Introduced on LSR	BellSouth Response
RS28A21PEN100013 *00	9991	EB/RS Resale restore service	Invalid End User Address entered on service request.	Do not agree. In an effort to increase flow through and reduce clarifications due to inaccurate data provided by CLECs, BellSouth attempts to use the telephone number to obtain the correct address for provisioning. A change request will be submitted to the Change Review Board to modify the LEO IG.
RS28A21PEN100007 *00	9991	EB/RS Resale restore service	Invalid End User Address entered on service request.	Do not agree. In an effort to increase flow through and reduce clarifications due to inaccurate data provided by CLECs, BellSouth attempts to use the telephone number to obtain the correct address for provisioning. A change request will be submitted to the Change Review Board to modify the LEO IG.
RS05A22PEN100016 *00	9993	EB/V Resale migration as-specified	Listed Address (LA) field within Directory Listing form of this service order was formatted incorrectly. KCI entered LA of "OAD", while the BLS LEO Guide calls for "(OAD)". KCI received error message for improper formatting on some PONs but received a FOC on this one.	Do not agree. KPMG failed to use the required characters "()" and format as documented in the Listed Address field. This was a flow through order. BellSouth systems generated the service order with a Listed Address as requested by KPMG.
RS05A22PEN100015 *02	9993	EB/V Resale migration as-specified	Listed Address (LA) field within Directory Listing form of this service order was formatted incorrectly. KCI entered LA of "OAD", while the BLS LEO Guide calls for "(OAD)". KCI received error message for improper formatting on some PONs but received a FOC on this one.	Do not agree. KPMG failed to use the required characters "()" and format as documented in the Listed Address field. This was a flow through order. BellSouth systems generated the service order with a Listed Address as requested by KPMG.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 95

PON*VER	CC	Order Type	Error Introduced on LSR	BellSouth Response
RS05A22PEN100003 *01	9993	EB/V Resale migration as-specified	Listed Address (LA) field within Directory Listing form of this service order was formatted incorrectly. KCI entered LA of "OAD", while the BLS LEO Guide calls for "(OAD)". KCI received error message for improper formatting on some PONs but received a FOC on this one.	Do not agree. KPMG failed to use the required characters "()" and format as documented in the Listed Address field. This was a flow through order. BellSouth systems generated the service order with a Listed Address as requested by KPMG.
RS05A22PEN100014 *02	9993	EB/V Resale migration as-specified	Listed Address (LA) field within Directory Listing form of this service order was formatted incorrectly. KCI entered LA of "OAD", while the BLS LEO Guide calls for "(OAD)". KCI received error message for improper formatting on some PONs but received a FOC on this one.	Do not agree. KPMG failed to use the required characters "()" and format as documented in the Listed Address field. This was a flow through order. BellSouth systems generated the service order with a Listed Address as requested by KPMG.
RS05A22PEN100005 *02	9993	EB/V Resale migration as-specified	Listed Address (LA) field within Directory Listing form of this service order was formatted incorrectly. KCI entered LA of "OAD", while the BLS LEO Guide calls for "(OAD)". KCI received error message for improper formatting on some PONs but received a FOC on this one.	Do not agree. KPMG failed to use the required characters "()" and format as documented in the Listed Address field. This was a flow through order. BellSouth systems generated the service order with a Listed Address as requested by KPMG.

BellSouth Response

BellSouth's response to individual PONs is included in the above table. BellSouth continues to assess ways to improve flow through and reduce clarifications due to incorrect data provided by CLECs. As a result, certain required fields may not be used by BellSouth for every order. For example, in a manual environment if the telephone number is not clearly visible the end user name and/or address on the LSR and CSR may be used to confirm the correct account is accessed.

BELLSOUTH'S STATEMENT OF INVESTIGATION FOR EXCEPTION 122



Date: March 8, 2001

EXCEPTION REPORT

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

Exception:

Definitions and Business Rules in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)* are incomplete or inaccurate for the Firm Order Confirmation (FOC) Timeliness and Reject Interval Ordering Service Quality Measurements.

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

As part of the BellSouth-Georgia OSS Evaluation, KPMG Consulting, LLC (KCL) is reviewing the *SQM Reports*.² KCL is evaluating the accuracy and completeness of each metric's stated definition, calculation, and business rules, as well as the consistency between these items.

KCL observed the following.

1. Ordering – FOC Timeliness

Examples of the business rules listed in *SQM Reports* for Fully Mechanized and Partially Mechanized are as follows:

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 the 10/22/99 version of the *SQM Reports* as a basis to perform this test. KCL also took into consideration changes published over time in more recent versions of the *SQM Reports*. The Business Rules listed in this Exception are listed in the *SQM Reports* published at the end of November 2000.

BELLSOUTH'S STATEMENT OF INVESTIGATION FOR EXCEPTION 122

- **“Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until the LSR is processed, appropriate service orders are generated and a Firm Order Confirmation is returned to the CLEC.”
- **“Partially Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR which falls out for manual handling until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is returned to the CLEC.”

BellSouth has recently informed KCL that it records the LEO time stamp for both the incoming and outgoing timestamps for purposes of SQM reporting, which would seemingly contradict the Commission-approved SQM definitions, based on our professional judgment. For inbound LSRs the definition is very clear, specifying use of the specific interface timestamps. The outbound timestamp to be used based on the definition is less clear. However, KCL, based on its professional judgment, interprets the point at which an FOC is “returned to the CLEC” to be the point at which the BellSouth interface gateway transmits the FOC to the CLEC interface. At the time at which an FOC is sent from LEO to the BellSouth interface gateway (the measurement point recorded per BellSouth’s current practice), the FOC has not yet been returned to the CLEC, but has been transmitted from one BellSouth system to another.

2. Ordering – Reject Interval

The business rules listed in *SQM Reports* for Fully Mechanized and Partially Mechanized, as examples, are as follows:

- **“Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until the LSR is rejected (date and time stamp or reject in LEO). Auto Clarifications are considered in the Fully Mechanized category.”
- **“Partially Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until it falls out for manual handling. The stop time on partially mechanized LSRs is when the LCSC Service Representative clarifies the LSR back to the CLEC via LEO.”

BellSouth has recently informed KCL that it records the LEO time stamp for both the incoming and outgoing timestamps for purposes of SQM reporting, which would seemingly contradict the stated SQM definitions based on our professional judgment.

BELLSOUTH'S STATEMENT OF INVESTIGATION FOR EXCEPTION 122

BellSouth Response:

1. The Business Rule in the current Georgia SQM for the Fully Mechanized *FOC Timeliness Report* uses the date and time stamps in EDI, LENS or TAG. However, BellSouth is currently capturing and reporting the start date and time stamp and stop date and time stamp from LEO because there is no direct feed from EDI, LENS or TAG at this time. A Work Request (CMVC 11912) has been opened and is pending for BTSI to provide the necessary date and time stamps from EDI, LENS and TAG to PMAP. There is also a Change Request (898) in TeamConnection in anticipation of the direct feeds from the CLEC ordering systems to PMAP.

The pending GA Rocket Docket SQM will include the following Business Rules:

- **Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until the LSR is processed, appropriate service orders are generated and a Firm Order Confirmation is returned to the CLEC via EDI, LENS or TAG.
- **Partially Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) which falls out for manual handling until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is returned to the CLEC via EDI, LENS or TAG.

2. The Business Rule in the current Georgia SQM for the Fully Mechanized *Reject Interval Report* uses the date and time stamps in EDI, LENS or TAG. However, BellSouth is currently capturing and reporting the start date and time stamp from LEO because there is no direct feed from EDI, LENS or TAG at this time. The stop date and time is currently captured from LEO. A Work Request (CMVC 11912) has been opened and is pending for BTSI to provide the necessary date and time stamps from EDI, LENS and TAG to PMAP. There is also a Change Request (899) in TeamConnection in anticipation of the direct feeds from the CLEC ordering systems to PMAP.

The pending GA Rocket Docket SQM will include the following Business Rules:

- **Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until the LSR is rejected via EDI, LENS or TAG. Auto Clarifications are considered in the Fully Mechanized category.
- **Partially Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until it falls out for manual handling. The stop time for partially mechanized LSRs is when a "Clarification" is returned to the CLEC via EDI, LENS or TAG.

BELLSOUTH'S STATEMENT OF INVESTIGATION FOR EXCEPTION 122

BellSouth's Amended Response:

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

BELLSOUTH'S STATEMENT OF INVESTIGATION FOR EXCEPTION 128



Date: March 8, 2001

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 Completion Date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Purchase Order Numbers and Service Order Numbers for one Provisioning metric.

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 – *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)* – KCL compared the BellSouth-reported values for COMPLETION DATE² in the raw data files with the completion date that KCL received from Hewlett Packard for October and November 2000.

KCL could not match the BellSouth-reported values in this field with the corresponding KCL-collected values for certain Purchase Order Numbers and Service Order Numbers. The following table lists the specific discrepancies for Completion 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 Completion Date is the actual date of completion of a service order.

BELLSOUTH'S STATEMENT OF INVESTIGATION FOR EXCEPTION 128

COMPLETION DATE

PURCHASE ORDER NUMBER	SO_NBR	RAW DATA FILE	BELLSOUTH- REPORTED VALUE	KCL- COLLECTED VALUE	MONTH
324R112PEH000003	CO33BBN0	JPDY	None	10/13/00	October
452R216PTF000002	RP7BNJW8	JPDY	None	10/02/00	October

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

BELLSOUTH'S RESPONSE TO EXCEPTION 128



Date: March 12, 2001

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 Completion Date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Purchase Order Numbers and Service Order Numbers for one Provisioning metric.

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 – *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)* – KCL compared the BellSouth-reported values for COMPLETION DATE² in the raw data files with the completion date that KCL received from Hewlett Packard for October and November 2000.

KCL could not match the BellSouth-reported values in this field with the corresponding KCL-collected values for certain Purchase Order Numbers and Service Order Numbers. The following table lists the specific discrepancies for Completion 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 Completion Date is the actual date of completion of a service order.

BELLSOUTH'S RESPONSE TO EXCEPTION 128

COMPLETION DATE

PURCHASE ORDER NUMBER	SO_NBR	RAW DATA FILE	BELLSOUTH- REPORTED VALUE	KCL- COLLECTED VALUE	MONTH
324R112PEH000003	CO33BBN0	JPDY	None	10/13/00	October
452R216PTF000002	RP7BNJW8	JPDY	None	10/02/00	October

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

For the record SO_NBR = **CO33BBN0**, BellSouth was able to determine that the service order did contain a completion status discrepancy between the two data feed systems; specifically, the SO_NBR in question was shown as complete on the production SOCS system (which feeds ICAIS) yet was held in pending status on the ICAIS system (which feeds PMAP).

BellSouth concluded that this occurred due to a business rule that exists in the 'SOCS daily fixed fielded extract,' which is a standard extract from SOCS used to feed downstream systems. In certain instances, the final disposition of a service order is not updated in the extract to allow the appropriate changes in the ICAIS system. BellSouth believes the problem affects less than one percent of total service orders in the database.

To resolve this issue, BellSouth will build another extract from SOCS that duplicates the process of the original extract but removes all business rules and extracts every service order in SOCS every time it is run. This extract will represent a complete picture of all the service orders currently active in the online system at the time of extract. Currently, an initial estimate of this work is being developed; but, it is projected to take a minimum of eight weeks.

BELLSOUTH'S RESPONSE TO EXCEPTION 128

In response to this SO_NBR = **RP7BNJW8**, this record was cancelled on October 2, 2000. KPMG requested verification of the actual cancellation date. BellSouth retrieved LEO records to document the date and time the cancellation was sent from SOCS. This was necessary due to the SOCS records being purged and MOBI not providing this information. The following is a copy of these records. An explanation for BellSouth's completion dates is highlighted within these screen prints.

LEO VERIFICATION

RP7BNJW8 706-774-6120

DB02C291 I0A LEO AUDIT SYSTEM - BROWSE SCREEN (AUD)

PNLFPMY

RESH/CC: 9990 PON: 452R216PTF000002 VER: 00 SUP: 00 JUMP TO: _____

LSRNO: 999020001002000004 TCIF: ***7 DUE DATE: 10/02/2000

AN: - - - ATN: - - - THIS LSR: NEXT LSR:

DATE TIME TYPE HISTORY LINE

ERRNO XREF

10/02/2000 16.48.19 ERRC ORDER ERR: RP7BNJW8 AECN IDNT 009 L AECN
MUST AP

8825 LSG 0136 PEAR!

10/02/2000 16.49.11 ISSU RP9Y1V97;DD 10-06-00

10/02/2000 16.49.18 C280 8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED
TO "F"

10/02/2000 16.49.18 C475 855 ISSUED RETURN-FEED # 0001 FOC SENT

10/02/2000 16.50.08 TAGR PON POSTED AS ACKNOWLEDGED

10/02/2000 17.02.28 C280 CANCEL SVC ORD BYPASSED, SUPP NOT = "01"
(THIS IS THE DATE AND TIME CANCELLATION SENT FROM SOCS TO
LEO)

10/02/2000 17.33.05 C280 865 COMPLETION STAGED FOR LSR, LEO STATUS
CHANGED

TO "P"

NOTE: ORDER CANCELED – NO SOCS HISTORY AVAILABLE
MOBI INDICATES CRIS CYCLE NUMBER 2487
DATE RCVD ACCTG 10-03-00

Date: March 1, 2001

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 the Local Service Request Sent/Received time stamp types do not match the KPMG Consulting, Inc. (KCI)-collected values for the KCI Test CLEC for certain Purchase Order and Version numbers for two Ordering metrics in August and September 2000.

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

As part of the BellSouth-Georgia OSS Evaluation, KCI compared the data that BellSouth uses to produce SQM reports for the KCI Test CLEC with the corresponding data that KCI collects using its own test management tools. KCI compared (a) the Purchase Order numbers and the Version numbers between the data collected by KCI and the raw data reported by BellSouth in PMAP for the Test CLEC, (b) the Firm Order Confirmation², Local Service Request Sent/Received³, and Reject/Clarification⁴ Requested time stamps in the BellSouth raw data files with the corresponding data that KCI received from HP for August and September 2000.

The BellSouth-reported values in the fields mentioned above did not match the KCI-collected values for certain Purchase Order numbers and Version 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.

² Firm Order Confirmation is the HP recorded timestamp when a FOC is received from BellSouth, INODE timestamp for EDI server and RECEIVE timestamp for TAG server.

³ LSR sent/received is the HP recorded timestamp of when HP transmits an LSR to BellSouth. This timestamp is compared to the LSR received timestamp that BellSouth reports in the PMPA raw data.

⁴ Clarification requested timestamp is the HP recorded timestamp of when a request is received by HP from BellSouth (INODE timestamp for EDI server and RECEIVE timestamp for TAG server).

EXCEPTION 136

BellSouth Georgia OSS Testing Evaluation

KCI notes that the following were taken into consideration when comparing the KCI-collected information with the BellSouth reported information:

- a) The HP clock is based on the eastern time zone and BellSouth clock is based on the central time zone, leading to a time difference of 60 minutes between the HP clock and the BellSouth clock;
- b) The HP system clock is one minute and eight seconds behind the BellSouth system clock;
- c) Transactions through the EDI servers have a 30-minute batch processing time for both the incoming and outgoing transactions, which theoretically could introduce a discrepancy of up to 60 minutes.

KCI also included an additional two minutes leeway for the EDI interfaces to account for problems not related to BellSouth's operations before listing the values in the table below.

Table 1 shows the specific discrepancies for Local Service Request Sent/Received time stamps.

Table 1: Local Service Request Sent/received Timestamp

PON	VER	METHOD	MONTH	BELLSOUTH - REPORTED VALUE	KCI -REPORTED ⁵ VALUE
305R222PEH000001	0	EDI	August	8/28/00 4:15 PM	8/25/00 11:45 AM
318R112PEH000001	0	EDI	August	8/28/00 5:01 PM	8/28/00 4:56 PM
320R212PEH000001	0	EDI	August	8/28/00 5:01 PM	8/28/00 4:53 PM
399R213PEM100001	1	EDI	August	8/28/00 4:15 PM	8/28/00 3:55 PM
307R122PEF000003	0	EDI	September	9/14/00 1:15 PM	9/14/00 10:27 AM
409R223PEM100001	0	EDI	September	9/13/00 5:00 PM	9/13/00 4:16 PM

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 contain incomplete or incorrect raw data, CLECs will not receive accurate SQM information for these purposes.

⁵ KCI-reported values are provided by HP.

Date: March 16, 2001

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

FAs are a standard component of the EDI ordering process and 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, Inc. (KCI) has proposed a benchmark of 95% of FAs received within 30 minutes¹ for FA response timeliness². During initial UNE and Resale functional testing, BellSouth performance failed to meet this standard.

The following tables provide a summary of BellSouth EDI FA Timeliness results during initial testing. KCI also provided BellSouth with PON detail for those transactions receiving late FA responses.

UNE FA Timeliness - EDI (Initial Test)

<30 min.	30-60 min.	60-90 min.	> 90 min.	TOTAL
534	198	52	77	861
62%	23%	6%	9%	100%

As the table above indicates, KCI received 62% of UNE FAs within 30 minutes, which falls below the benchmark of 95% received within 30 minutes.

¹ On June 6, 2000 the Georgia Public Service Commission (GPSC) established a set of standards and benchmarks to be used for purposes of KCI's third party evaluation. The June 6th document did not contain a standard for FA timeliness. In the absence of a published standard, KCI, based on its professional judgment, has identified a benchmark to be used for the purposes of this evaluation.

² KCI 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 HP's NDM server receives the first byte of BellSouth's response.

CLOSURE REPORT FOR EXCEPTION 60BellSouth Georgia OSS Testing Evaluation

Resale FA Timeliness - EDI (Initial Test)

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

As the table above indicates, KCI received 58% of Resale FAs within 30 minutes, which falls below the benchmark of 95% received within 30 minutes.

Summary of BellSouth's Response:*Initial BellSouth response:*

"BellSouth's EDI mechanism effectively processes 150 envelopes per hour. These envelopes contain varying quantities of LSRs. When more than 150 envelopes are received more processing time is needed to accommodate the volume. BellSouth is working to better accommodate the processing of CLEC EDI traffic by developing a separate environment for CLEC related transactions. However, the delivery of the information to the CLEC would still be subject to limitations associated with volume. The positive impact to delivery of the acknowledgements, FOCs, etc. will not be known until the project is completed on June 9, 2000.

BellSouth is also engaged in a long-term activity to replace EDI hardware and software to improve processing and transmission to meet a standard of 95% of FAs delivered within 30 minutes. This effort will not be completed until 1Q01."

Additional 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 for FA response timeliness. 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."

CLOSURE REPORT FOR EXCEPTION 60

BellSouth Georgia OSS Testing Evaluation

BellSouth also provided response to a sample of individual PONs included within this exception. "BellSouth investigated 28 of the 151 late FAs and found that 15 of the FAs were returned within the proposed 30 minute benchmark."³

Summary of KCI Re-test Activities:

KCI conducted two re-tests of EDI FA Timeliness.

1. The first re-test evaluated **UNE** FA timeliness following BellSouth implementation of improvements to its EDI environment. In response to this exception, BellSouth developed 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. During this re-test, initiated on August 25, 2000, KCI submitted over 300 EDI transactions.
2. The second re-test evaluated **Resale** FA timeliness. KCI initiated this re-test on January 19, 2001, following completion of a BellSouth EDI infrastructure upgrade project. One of the intents of this infrastructure upgrade was to improve the delivery time of FAs and other order responses delivered via EDI⁴. During this Resale re-test, KCI submitted over 200 transactions.

KCI Re-test Results:

Based on an analysis of re-test orders, KCI determined that:

1. 93% of UNE EDI FAs were delivered within 30 minutes^{5 6}.
2. 99% of Resale EDI FAs were delivered within 30 minutes.

³ Note that BellSouth's claims are based on an analysis of BellSouth timestamps. As explained above (see footnote #2), KCI utilizes test CLEC timestamps for purposes of this third party evaluation.

⁴ See BellSouth Carrier Notification SN91082007 for additional detail on BellSouth's EDI infrastructure upgrade project.

⁵ Although the test percentage is below the benchmark of 95%, the statistical evidence is not strong enough to conclude that the performance is below the benchmark with 95% confidence. In other words, the inherent variation in the process is large enough to have produced the substandard result, even with a process that is operating above the benchmark standard. The p-value, which indicates the chance of observing this result when the benchmark is being met, is 0.0584, above the .0500 cutoff for a statistical conclusion of failure.

⁶ These results differ from those provided in KCI's Amended Exception 60 (dated October 15, 2000). Data provided in the Amended Exception represented *interim* re-test results. Final results are presented within this document.



CLOSURE REPORT FOR EXCEPTION 60

BellSouth Georgia OSS Testing Evaluation

Based on re-test activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 60.

Attachments: None.



Date: March 16, 2001

EXCEPTION CLOSURE REPORT

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*.

Summary of Exception:

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)². 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.

During the course of testing, KPMG Consulting, Inc. (KCI) obtained standard intervals via pre-order transactions and BellSouth documentation. KCI noted instances of discrepancies between the intervals returned from these two sources for the same order type.

The following table provides a list of order types for which KCI experienced interval discrepancies.

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.

² During the course of testing, KCI utilized version 2 (TCIF 7) of BellSouth's TAG interface. For this version, TAG supports CDD transactions as pre-order queries.

CLOSURE REPORT FOR EXCEPTION 71

BellSouth Georgia OSS Testing Evaluation

REQ TYPE	ACT TYPE	QLR ³	CDD Interval	Documentation Interval
E	A	1	1	4
E	A	2	2	4
E	A	3	3	7
E	T	1	1	4
E	W	1	0	3
E	V (ISDN)	1	1	16
E	C (ISDN)	1	1	16
E	C	2	1	4
B	V	2	6	5
C	V	5	16	5
C	D	1	7	5
F	A	8	16	3
F	C	5	6	3
F	SS	3	6	3
F	D	1	4	3
F	V	1	6	3
J	R	2	6	3
M	A	1	3	4
M	C	3	3	7
M	M	2	3	4
M	V	2	3	4
E	C (Linefeatures)	1	4	2
E	C (Ringmaster)	3	3	7

Summary of BellSouth's Response:

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

³ QLR = Quantity of Lines Requested



The actual Due Date assigned is based on the following:

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

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

ISDN – TAG is calculating a shorter interval than what is in the products and service guide. TAG 2.2x API uses tables that were extracted from the BellSouth Products and Services Interval Guides. The tables are hard coded in the API and have never been updated. The Interim Due Date Calculation solution was implemented to meet a BellSouth mandate and was never intended to be used long term. A change request has been issued to update the tables to reflect the current information will be implemented 7/21/00. This change will follow the current interim change control process to be prioritized and implemented in a future release.” *KCI Note: BellSouth subsequently modified the implementation date of this feature. Feature 10511 is currently targeted for TAG release 7.6, tentatively scheduled for June, 2001.*

“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 REQ TYP J.”

BellSouth also indicated that internal testing yielded different results than those presented on KCI's exception for several order types. KCI agreed to re-test these instances.

Summary of KCI Re-test Activities:

KCI executed approximately 60 CDD re-test transactions for a variety of order types to review the service intervals returned in response to these CDD queries. Re-test transactions were submitted against TAG Versions 2.2.0.8 and 2.2.0.11.

CLOSURE REPORT FOR EXCEPTION 71

BellSouth Georgia OSS Testing Evaluation

KCI Re-test Results:

The following table provides a sample of KCI re-test results by order type.

REQ TYPE	ACT TYPE	QLR	KCI Re-Test Results
E	A	1	Re-tested in TAG Version 2.2.0.11. CDD response interval matched documented interval (4 days).
E	A	2	Re-tested in TAG Version 2.2.0.11. CDD response interval matched documented interval (4 days).
E	A	3	Re-tested in TAG Version 2.2.0.11. CDD response interval matched documented interval (7 days).
E	T	1	Re-tested in TAG Version 2.2.0.11. CDD response interval matched documented interval (4 days).
E	W	1	Re-tested in TAG version 2.2.0.8. CDD response interval matched documented interval (2 days)
E	V	1	Re-tested in TAG Version 2.2.0.8. CDD response interval matched documented interval (4 days).
E	C	1	Re-tested in TAG Version 2.2.0.8. CDD response interval matched documented interval (4 days).
E	C	2	Re-tested in TAG Version 2.2.0.8. CDD response interval matched documented interval (4 days).
B	V	2	Re-tested in TAG Version 2.2.0.8. CDD response interval matched documented interval (5 days).
C	V	5	Re-tested in TAG Version 2.2.0.8. CDD response interval matched documented interval (5 days).
C	D	1	Re-tested in TAG Version 2.2.0.8. CDD response interval matched documented interval (5 days).
F	A	8	Re-tested in TAG Version 2.2.0.8. CDD response interval matched documented interval (3 days).

CLOSURE REPORT FOR EXCEPTION 71

BellSouth Georgia OSS Testing Evaluation

REQ TYPE	ACT TYPE	QLR	KCI Re-Test Results
F	C	5	Re-tested in TAG Version 2.2.0.8. CDD response interval matched documented interval (3 days).
F	SS	3	Re-tested in TAG Version 2.2.0.11. CDD response interval matched documented interval (3 days).
F	D	1	Re-tested in TAG Version 2.2.0.11. CDD response interval matched documented interval (3 days).
F	V	1	Re-tested in TAG Version 2.2.0.11. CDD response interval matched documented interval (3 days).
J	R	1	Re-tested in TAG Version 2.2.0.11. CDD response interval matched documented interval (0 days).
M	A	1	Re-tested in TAG Version 2.2.0.11. CDD response interval matched documented interval (4 days).
M	C	3	Re-tested in TAG Version 2.2.0.11. CDD response interval matched documented interval (7 days).
M	M	2	Re-tested in TAG Version 2.2.0.11. CDD response interval matched documented interval (4 days).
M	V	1	Re-tested in TAG Version 2.2.0.11. CDD response interval matched documented interval (4 days).
E	C (Line features)	1	Re-tested in TAG Version 2.2.0.11. Depending on feature being added (and whether it requires dispatch or not), documented interval could be 2 days or 4 days. CDD does not allow user to differentiate by feature type, and always returns interval of 4 days.
E	C (Ringmaster)	3	Re-tested in TAG Version 2.2.0.11. CDD response interval matched documented interval (3 days).

Although one instance of a discrepancy still exists between service intervals obtained from BellSouth documentation and service intervals returned on CDD pre-order

responses, it is KCI's professional opinion that this discrepancy is not significant enough to affect the overall evaluation.

Based on re-test activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 71.

Attachments: None.

Date: March 16, 2001

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

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

1. Fully Mechanized

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

2. Partially Mechanized (PM)

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, Inc.(KCI) 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. During initial Resale and UNE functional testing, BellSouth performance did not meet this standard.

During initial testing, KCI received PM CLRs within the following timeframes.

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.

CLOSURE REPORT FOR EXCEPTION 98
BellSouth Georgia OSS Testing Evaluation**PM CLR Timeliness Summary – Initial UNE Test**

CLRs Received via TAG (UNE)				
< 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 (UNE)				
< 24 hrs	24-48 hrs	48-72 hrs	> 72 hrs	TOTAL
130	60	9	6	205
63%	29%	4%	3%	100%

PM CLR Timeliness Summary – Initial Resale Test

CLRs Received via TAG (Resale)					
< 24 hrs	24-36 hrs	36-48 hrs	48-72 hrs	> 72 hrs	TOTAL
72	11	11	2	4	100
72%	11%	11%	2%	4%	100%
CLRs Received via EDI (Resale)					
< 24 hrs	24-36 hrs	36-48 hrs	48-72 hrs	> 72 hrs	TOTAL
88	16	1	1	0	106
83% ²	15%	1%	1%	0%	100%

Summary of BellSouth's Response:**UNE Transactions:**

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

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

² Although the Resale EDI timeliness result percentage is below the benchmark of 85%, the statistical evidence is not strong enough to conclude that the performance is below the benchmark with 95% confidence. In other words, the inherent variation in the process is large enough to have produced the substandard results, even with a process that is operating above the benchmark standard. The p-value, which indicates the chance of observing this result when the benchmark is being met, is 0.1339, above the 0.0500 cut-off for a statistical conclusion of failure.

CLOSURE REPORT FOR EXCEPTION 98

BellSouth Georgia OSS Testing Evaluation

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

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

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

In summary, BellSouth disagrees with the categorization of 12 out of 48 sampled TAG CLRs (25%). Additionally, BellSouth disagrees with the categorization of 10 out of 37 sampled EDI CLRs (27%). Given this analysis, BellSouth's results would increase to 95% and 98% of CLRs within 48 hours, respectively for TAG and EDI. All of these LSRs were processed prior to the new standards. BellSouth is currently developing and executing procedures to meet the interim standards that were set by the Georgia PSC on 6/6/00. The progress of these efforts will be tracked in the Service Quality Measures results that are filed each month with the GA PSC.

CLOSURE REPORT FOR EXCEPTION 98BellSouth Georgia OSS Testing Evaluation

Resale Transactions:

BellSouth provided responses to individual Resale transactions listed in this exception. BellSouth disputed 6 of the PONs in KCI's results."

Summary of KCI Re-test Activities:

KCI initiated a re-test of PM CLR timeliness for UNE transactions on August 25, 2000. Over 200 Local Service Requests (LSRs) were submitted to BellSouth via the TAG and EDI ordering interfaces. KCI calculated the response timeliness associated with all PM CLRs received. CLRs were classified as PM based on actual flow through result data for each transaction provided by BellSouth to KCI's flow through analysis team. Using this BellSouth data, KCI identified the actual system performance for each order and determined whether ordering representatives' manual intervention occurred.

BellSouth has not requested that KCI perform a re-test of PM CLR timeliness for Resale transactions.

KCI Re-test Results:

For purposes of this evaluation, the Georgia Public Service Commission- (GPSC-) issued standard for PM CLR timeliness is 85% within 24 hours³. Based on an analysis of re-test orders, KCI determined that 89% of PM CLRs processed via EDI were received within 24 hours; 82% of PM CLRs processed via TAG were received within 24 hours⁴.

The related evaluation criteria for UNE transactions will be assigned a Satisfied result.

Re-test activity was not conducted for Resale PM CLR timeliness via TAG⁵, so the related evaluation criterion will be assigned a Not Satisfied result.

³ The GPSC issued standards to be used for purposes of the third-party evaluation on June 6, 2000.

⁴ Although the TAG timeliness result percentage is below the benchmark of 85%, the statistical evidence is not strong enough to conclude that the performance is below the benchmark with 95% confidence. In other words, the inherent variation in the process is large enough to have produced the substandard results, even with a process that is operating above the benchmark standard. The p-value, which indicates the chance of observing this result when the benchmark is being met, is 0.2643, above the 0.0500 cut-off for a statistical conclusion of failure.

⁵ In its exception response, BellSouth disputed 6 PONs in the Resale timeliness results. Upon review, KCI agreed with 3 of these disputes - transactions receiving CLRs after FOCs according to BellSouth facility verification process - and has removed them from the overall CLR timeliness analysis. This did not affect the overall percentage of Resale PM CLRs delivered on time. Although KCI does not agree with the remaining 3 disputed PONs, their exclusion would not affect the overall evaluation result (i.e., the percentage on time would still fall below the standard).

CLOSURE REPORT FOR EXCEPTION 98
BellSouth Georgia OSS Testing Evaluation

Based on re-test activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 98.

Attachments: None.

Date: March 16, 2001

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

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

Summary of BellSouth's Response:

"BellSouth will complete a system change project in the Customer Records Information System (CRIS) to move the PICC charges from the non-recurring charge subtotal line on the bill to the recurring charge subtotal line. This change will be made for all customers (retail and resale) and will be completed on February 1, 2001. Therefore, all bills produced after that date will reflect the change."

Summary of KCI's Re-test Activities:

KCI's re-test activities consisted of a review of invoices and the corresponding Customer Service Records (CSRs) following the February 1, 2001 system change implemented by BellSouth.

KCI's Re-test Results:

KCI examined earning telephone numbers appearing on its 2/5/01 invoices for which no Primary Interexchange Carrier (PIC) had been chosen. KCI found in each instance that a PICC charge of \$4.31 was assessed for each multi-line business line or trunk that did not have a selected Primary Interexchange Carrier selected. KCI verified that the telephone numbers were business lines or trunks and that no PIC was selected by reviewing the corresponding CSRs.

CLOSURE REPORT FOR EXCEPTION 99BellSouth Georgia OSS Testing Evaluation

KCI then reviewed the appropriate invoice and noted that in the Other Charges & Credits (OC&C) section under each earning telephone number the PICC charge appears with the statement, "Charge for No Presubscribed Interexchange Carrier for (line number). If our information is incorrect, please call your Service Ordering Business office or correct this statement and mail it with your payment." Further, KCI verified that these PICC charges were categorized as recurring charges in accordance with the system change noted by BellSouth in its amended response to Exception 99.

As a result, KCI believes that BellSouth has adequately addressed the issues identified in Exception 99.

Based on BellSouth's response and KCI's review of invoices and CSRs, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 99.

Attachments: None.

Date: March 16, 2001

EXCEPTION CLOSURE REPORT

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).

Summary of Exception:

KPMG Consulting, Inc. (KCI) 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/SIs¹.

KCI 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, KCI 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).

BellSouth's Response:

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

The CSRG 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 CSRG, 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 csrg.une@bridge.bellsouth.com and request to be included on the daily Open PON Status Report."

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

KCI's Re-test Activities:

KCI's re-test activities consisted of evaluations of 1) BellSouth's response to Exception 112; 2) BellSouth's new documentation *BellSouth Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide for Loop Makeup* found on the BellSouth Interconnection website. 3) Submitting Local Service Requests accompanied by Service Inquiries and a) receiving Acknowledgments and b) obtaining status through the CRSG.

According to the new documentation, the status of CLEC manually submitted xDSL orders may be obtained by submitting a request for status to the CRSG. The status will provide information on all open PONs to the CLEC. KCI re-tested BellSouth's compliance in providing CLECs with status of pre-order LMU / SIs accompanied by order LSR/SIs which had been submitted to the CRSG through functional testing. Current status of orders was provided to KCI when requested.

Additionally, *BellSouth Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide for Manual Loop Makeup* (Issue 1.1 January 31, 2001) Section 5.1 states that BellSouth will provide an Acknowledgement to the CLEC upon receipt of a Manual LMU request from a CLEC. KCI re-tested BellSouth's compliance in providing Acknowledgment of receipt of pre-order LMU / SIs submitted to the CRSG. Acknowledgements were sent to KCI for all LSR/SIs submitted to the CRSG.

KCI's Re-test Results:

BellSouth has updated its processes and documentation to support providing CLECs with pre-order and order status for xDSL capable loops, and sending receipt of Acknowledgments for pre-order LMU accompanied by Service Inquiries submitted to the CRSG. Re-test activities support that these processes and procedures have been put in place and are available to CLECs. A review of the documentation shows that it has been updated to make this information available to CLECs.

Based on re-test activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 112.

Attachments: None.

Date: March 16, 2001

EXCEPTION CLOSURE REPORT

Initial Exception:

BellSouth-reported raw data values for Commitment Date for the KPMG Consulting, Inc. (KCI) Test CLEC do not match the KCI-collected values for certain Service Order numbers and Purchase Order numbers for six Provisioning metrics.

Summary of Exception:

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, KCI compared the data that BellSouth uses to produce SQM reports for the KCI test CLEC with the corresponding data that KCI 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* – KCI compared the BellSouth-reported values for COMMITMENT DATE in the raw data files with the due date (commitment date)² that KCI received from Hewlett Packard for March, April, and May 2000.

KCI could not match the BellSouth-reported values in these fields with the corresponding KCI-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 KCI.

CLOSURE REPORT FOR EXCEPTION 113

BellSouth Georgia OSS Testing Evaluation

TABLE 1—COMMITMENT DATE

PON	SO_NBR	MONTH	BLS-REPORTED VALUE	KCI-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 KCI Test CLEC do not match the KCI-collected values for certain Purchase Order numbers and service order numbers for three Provisioning metrics.

KCI received revised raw data from BellSouth. KCI compared these revised raw data to the KCI-collected data.

³ These values are contained in response files provided to KCI by HP.

CLOSURE REPORT FOR EXCEPTION 113

BellSouth Georgia OSS Testing Evaluation

KCI could not match the revised BellSouth-reported values with the corresponding KCI-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	KCI- 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

Summary of BellSouth Response:

BellSouth and KCI have had several conference calls to investigate the discrepancy between BellSouth reported raw data values for Commitment Date for KCI Test CLEC and KCI collected values.

When KCI compared the BellSouth-reported values for COMMITMENT DATE in the raw data files with the due date (commitment date) that KCI received from Hewlett Packard for March, April, and May 2000, KCI could not match the BellSouth-reported

values in these fields with the corresponding KCI-collected values for certain service order numbers and purchase order numbers.

On September 29th, it was determined that the Test CLEC data KCI 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, KCI issued a data request for the following new updated raw data files for the KCI 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 KCI on 10/02/00, for the Data Comparison Test for ordering & Provisioning SQMs.

On November 7th, KCI 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 KCI could not match the service order numbers.

In KCI's second amended Exception 113, KCI reported that BellSouth values for the Commitment Date (CMTT_DATE) do not match KCI Consulting, Inc. (KCI) Test CLEC values for certain Purchase Order numbers and service order numbers for Provisioning Metrics for PMI, Jeopardy, and Held Order.

PMI:

As per the "Business Requirements" section of the SQM for Percent Missed Installation Appointments, the first CMTT_DATE (original due date) on the service order is used in the PMI calculation. Records with a SO_CMTT_TYPE_CD = 1 represent the original due date (CMTT_DATE) for a service order. The exclusion criteria, which only selects records with a SO_CMTT_TYPE_CD = 1, is included as part of the program code used to generate/cut PMI raw data. The RDUG is consistent with the stored procedure code used to assemble the PMI raw data file. This exclusion does not affect the calculation of the PMI measure.

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BellSouth Georgia OSS Testing Evaluation

In addition, KCI requested further clarification of the record with a SO_NBR = NP0FNX10. This particular record has a BellSouth-reported value for the commitment date of 3/29/00, and a KCI-reported value for the commitment date of 3/23/00. The history tables in the raw data file indicate that the original due date (SO_CMTT_TYPE_CD = 1) is 3/29/00 and the subsequent due date (SO_CMTT_TYPE_CD = 2) is 3/23/00. KCI asked BellSouth to provide an explanation for this case in which the subsequent due date is earlier than the original due date.

BellSouth retrieved history for this record from MOBI, which provides SOCS historical data. The data from MOBI confirms that the subscriber requested an earlier commitment date. This is reflected by the SP (subscriber requested previous due date) code that precedes the 3/23/00 date in the following MOBI snapshot:

MOBI 706 U57 0677 04 / 16 / 00 NP0FNX10 CPX2371 ORDER DISPLAY
ARC IS NOW ON ACF2 SECURITY. USE YOUR ACF2 PASSWORD TO SIGNON!!!
POFS

706-U57-0677 677 BILL DATE 04-16-00 NP0FNX10 CPX2371

PAGE 1

CPX706291BO NN
706 U57-0677 67720000418ROME20000310133220000310
NP0FNX10P8 UEANLYAXQA2R20000329 LSL
ZRTI \$,QS,800 872-3116,LW,770986
FDT 900P
LAECN9992, UEANL
ICENTS0Y
SPO M3Y13
PRN GALZXC1001
CRO DP1WJ4T8, NP604RH3, CP7W2TD8
CRO CPDWMDQ2
RRSO DP1WJ4T8
SD 12-29-00 SP
SD 03-23-00 SL
SD 12-29-00 SP
SD 04-18-00

--LIST

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MORE...

PF2=SEARCH PF3=DISPLAY PF4=PRINT PF6=FAX
PF7=MAIN PF8=SCROLL PF11=BACK PRINTER ID:

Jeopardy:

The Jeopardy record, SO_NBR = NO9HBW68 was cancelled. BellSouth's standard practice for handling cancelled orders is to assign a null value to the CMPLTN_DT field.

KPMG Consulting, Inc.

03/15/01

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CLOSURE REPORT FOR EXCEPTION 113

BellSouth Georgia OSS Testing Evaluation

A documentation snapshot from the LEO source system has been provided below to provide a record of what occurred with this record prior to it reaching Jeopardy raw data. Provided below is a copy of the LEO Archive screen showing the create date and the date the information was rejected to the CLEC. This date is marked in red.

CC: 9994 PON: 406C213PTM100002 ENTER "X" FOR ON SIT

X	VER	CREATE	REJECT	ARCHIVED	PURGE
		DATE	NUMBER	DATE	DATE
_00		2000-01-11	___	2000-08-19	2003-08-19
_02		2000-01-17	___	2000-08-19	2003-08-19
_03		2000-02-18	___1	2000-08-19	2003-08-19

Raw data, prior to any exclusions, contains all the CMTT_DATEs for each service order. The RDUG exclusion criteria for "Jeopardy Interval" and "Percent Jeopardy" dictate that the latest CMTT_DATE in a group of records must be within the given reporting month. The latest record is retained for calculation of the "Jeopardy Interval" and "Percent Jeopardy" measures. If the latest record does not fall within the given month, the entire group of records is excluded from the calculations for that month. If the latest CMTT_DATE does fall within the reporting month, it is retained, and all other records in the group are excluded.

The three Jeopardy records (SO_NBR in 'NO4HLD96', 'NOBC0M48', 'NP32R9P9') have CMTT_DATEs reported in February, thus not affecting the March calculation of the Jeopardy measure.

The remaining three records can be explained using the logic that if the latest CMTT_DATE is within the reporting month, the rest of the records in the group are excluded. The three Jeopardy service orders retained by KCI have CMTT_DATEs prior to the latest CMTT_DATEs and from previous months. These CMTT_DATEs should not be included in the calculation of the measure.

Held Order:

For the held order record SO_NBR = NP74MLL1, the number reported by BLS for the CMTT_DATE was 2/16/00, and the value reported by KCI was 12/30/00. According to the commitment history, the original date was 2/16/00 and then was scheduled later to 12/30/00. This change could be due to a variety of reasons, but most likely the order was held off until further notice, so the date was scheduled far in the future.

Held Order Processing Methodology states that the last due date that carries a company Missed Appointment code and does not have a subsequent due date should be captured. The held interval is measured as the reporting period end date back to the first company missed date on the service order.

The date that should be captured is the original date. Therefore the date of 2/16/00 is the correct date.

Summary of KCI Re-Test Activities:

KCI reviewed the explanations provided by BellSouth. KCI also compared the Commitment Date timestamps in the BellSouth-provided raw data file with the corresponding timestamps in the KCI-collected data file for the six months subsequent to the above review period, that is June through November 2000. (KCI compares the KCI-collected data to the corresponding BellSouth-provided data for every month as a part of its regular testing activities.)

KCI Re-Test Results:

KCI accepts the BellSouth-response above as follows:

- For the *Percent Missed Installation Appointment* (PMI) files, BellSouth appropriately included the original Commitment Date in its raw data files, even if this date occurred after a subsequent Commitment Date requested by a customer.
- For the *Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices* (JPDY) files, where the record with the last Commitment Date is not in the given month, the group is appropriately excluded. Further, if the last Commitment Date is within the given month, all records (other than the one with the last Commitment Date) will be excluded in a given group.
- For the *Mean Held Order Interval and Distribution Intervals* (HO) data files, the last due date that carries a company Missed Appointment code and does not have a subsequent due date should be captured. The held interval is measured as the reporting period end date back to the first company missed date on the service order. Thus, the date that should be captured is the original date.

After comparing the KCI-collected and corresponding BellSouth-provided Commitment Date timestamps for June through September 2000, KCI identified four discrepancies for the *Percent Missed Installation Appointments* SQM, and two discrepancies for the *Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices* SQM. These discrepancies are listed in Exception 127. The types of discrepancies were similar to those above, and KCI considers those issues resolved as well, for the same reasons as listed above.

KCI did not identify any Commitment Date discrepancies for the other Provisioning SQMs during the June through September 2000 time period. Further, KCI did not identify any Commitment Date discrepancies for any Provisioning SQMs during October and November 2000.

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As a result, KCI believes that BellSouth has adequately addressed the issues identified in Exception 113.

Based on re-testing activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 113.

Attachments: None.



Date: March 16, 2001

EXCEPTION CLOSURE REPORT

Exception:

BellSouth's manual ordering documentation does not contain references to decline CLEC requests to Related Purchase Order Number (RPON) designed with non-designed services.

Summary of Exception:

BellSouth's manual ordering documentation does not indicate that RPONing a designed order with a non-designed order is not possible.

KPMG Consulting, Inc. (KCI) attempted to submit orders that were designed (xDSL capable loop) with a related purchase order number that was non-designed (SL1 Loop). KCI received clarifications that "RPON cannot be used to relate to another LSR that does not require a Service Inquiry."

KCI requested further information regarding these clarifications via the Help Desk Log. BellSouth responded back: "Per LEO-IG, Vol 1, 4.3.1.40, RPON-Note 13: If LSR requires a Service Inquiry, RPON can not be used to relate another LSR that does not require a Service Inquiry; SL1-Non Designed Loop does not require a Service Inquiry; SL2-Designed Loop requires a Service Inquiry."

KCI is presently using CG-LEOO-009 Issue 9H and there is no reference stating the inability to submit such an order.

Summary of BellSouth's Response:

"The BellSouth Business Rules document was updated on 12/22/00 to add Note 13 (as stated above) to the RPON field."

Summary of KCI Re-test Activities:

KCI's retest activities consisted of: 1) a review of BellSouth's response to Exception 121; 2) a review of *BellSouth's updated BellSouth Business Rules for Local Ordering TCIF9/LSOG4* (December 22, 2000, Issue 9K).

BellSouth updated its documentation to reflect that the Related Purchase Order Number (RPON) field is not applicable when ordering Non-Designed with Designed loops. This



is reflected in Section 28.2.2 RPON Section - Rule 13 which states, "*If LSR requires a Service Inquiry, RPON can not be used to relate another LSR that does not require a Service Inquiry.*" A Non Designed (SL1) Loop does not require a Service Inquiry; a Designed Loop(xDSL Capable Loop) requires a Service Inquiry. Based on this modified documentation, BellSouth does not support the ordering of these loops linked with a RPON.

KCI Re-test Results:

Based on updated *BellSouth Business Rules for Local Ordering*, BellSouth followed the correct process for returning a clarification that stated "RPON cannot be used to relate to another LSR that does not require a Service Inquiry"

Based on re-test activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 121.

Attachments: None.

Date: March 16, 2001

EXCEPTION CLOSURE REPORT

Exception:

BellSouth-reported raw data values for Commitment Date for the KPMG Consulting, Inc. (KCI) Test CLEC do not match the KCI-collected values for certain Purchase Order numbers and service order numbers for two Provisioning metrics.

Summary of Exception:

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, KCI is comparing the data that BellSouth uses to produce SQM reports for the KCI test CLEC with the corresponding data that KCI collects using its own test management tools. For each of the Provisioning metrics – *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)*, and *Total Service Order Cycle Time (TSOCT)* – KCI compared the BellSouth-reported values for COMMITMENT DATE in the raw data files with the due date (commitment date)² that KCI received from Hewlett Packard for June through September 2000.

KCI could not match the BellSouth-reported values in this field with the corresponding KCI-collected values for certain purchase order numbers and service order numbers. Table 1 lists the purchase order numbers 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 KCI.

CLOSURE REPORT FOR EXCEPTION 127

BellSouth Georgia OSS Testing Evaluation

TABLE 1—COMMITMENT DATE

PON	SERVICE ORDER NUMBER	RAW DATA FILE	BLS- REPORTED VALUE	KCI- REPORTED VALUE	MONTH
R025H11PTN100010	TOX2M187	PMI	6/19/00	6/22/00	June
423A114PTM100006	NOFGGB38	JPDY	7/6/00	3/30/00	July
B100001PEJ101069	NP5M4544	JPDY	8/4/00	7/31/00	August
307R122PTH003001	COFJRG75	PMI	9/21/00	9/28/00	September
307R222PTH100002	CO05B5R9	PMI	9/21/00	9/26/00	September
454R126PEF001001	RPP18373	PMI	9/11/00	9/9/00	September

Summary of BellSouth's Response:

KCI reported that BellSouth reported values for the Commitment Date (CMTT_DATE) do not match KPMG Consulting, Inc. (KCI) Test CLEC values for certain Purchase Order numbers and service order numbers for two Provisioning metrics.

PMI

As per the "Business Rules section of the SQM for Percent Missed Installation Appointments, the first CMTT_DATE (original due date) on the service order is used in the PMI calculation. For example:

Service Order CO05B5R9 has two records, the first record with an original due date (SO_CMTT_TYPE_CD = 1) CMTT_DATE = 9/21/00, and the second record with a subsequent due date (SO_CMTT_TYPE_CD = 2) CMTT_DATE = 9/26/00. PMI requires that the first CMTT_DATE (original due date) on the service order be used for the PMI calculation. Records with a SO_CMTT_TYPE_CD = 1 represent the original due date (CMTT_DATE) for a service order. The exclusion criteria, which only select records with a SO_CMTT_TYPE_CD = 1, is included in the program code used to generate/cut PMI raw data. The RDUG is consistent with the stored procedure code used to assemble the PMI raw data file. This exclusion does not affect the calculation of the PMI measure. In this example, the second record with CMTT_DATE = 9/26/00 should be excluded.

In addition, KCI requested further clarification of the record with a SO_NBR = RPP18373. This particular record has a BellSouth-reported value for the commitment date of 9/11/00, and a KCI-reported value for the commitment date of 9/9/00. The history tables in the raw data file indicate that the original due date (SO_CMTT_TYPE_CD = 1) is 9/11/00 and the subsequent due date (SO_CMTT_TYPE_CD = 2) is 9/9/00. KCI asked BellSouth to provide an explanation

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for this case in which the subsequent due date is earlier than the original due date.

BellSouth retrieved history for this record from MOBI, which provides SOCS historical data. The data from MOBI shows that this record was incorrectly assigned a SL (subscriber requested a later due date) code. This SL code precedes the 9/9/00 date in the MOBI snapshot found below. The Service Representative who handled this report made a data entry error and should have assigned the 9/9/00 date the "SP" (subscriber requested *previous* due date) code instead of the "SL" (subscriber requested a *later* due date) code. At the time that this order was processed, the SOCS system did not contain an edit to alert the user that a subsequent due date earlier than the original due date had been entered. This problem has been addressed, and an edit was incorporated into the system as of January 1, 2001, to ensure that this data entry error will not occur in the future.

MOBI 912 745 2939 939 09 / 08 / 00 RPP18373 CPX2472 ORDER DISPLAY
ARC IS NOW ON ACF2 SECURITY. USE YOUR ACF2 PASSWORD TO SIGNON!!!
POFS

912-745-2939 939 BILL DATE 09-08-00 RPP18373 CPX2472

PAGE 1

CPX912745AN NNN

912 745-2939 93920000909MCN 20000906165720000906

RPP18373 II UEPRXYAXQAX520000911 SL

ZRTI \$,QS,800 872-3116,KM

CENT R0Y

AECN 9990, UEPRX

SD 09-09-00

---LIST

ILN GEORGIA, HILTON

ONP (NON-PUB) GEORGIA, R W H

LA 787 CHERRY ST

SA 787 CHERRY ST, MCN, GA

LOC FLR 3;RM 300

---BILL

TAR 203,811

MAN U9990

IPON 454R126PEF001001

PAGE 1 OF 1

MORE...

PF2=SEARCH PF3=DISPLAY PF4=PRINT

PF6=FAX

PF7=MAIN PF8=SCROLL

PF11=BACK PRINTER ID:

JEOPARDY

Raw data, prior to any exclusions, contains all the CMTT_DATES for each service order. The RDUG exclusion criteria for "Jeopardy Interval" and "Percent Jeopardy" dictate that

the latest CMTT_DATE in a group of records must be within the given reporting month. The latest record is retained for calculation of the "Jeopardy Interval" and "Percent Jeopardy" measures. If the latest record does not fall within the given month, the entire group of records is excluded from the calculations for that month. If the latest CMTT_DATE does fall within the reporting month, it is retained, and all other records in the group are excluded.

The two Jeopardy service orders (SO_NBR is NOFGGB38, NP5M4544) can be explained using the logic stated above, that is, if the latest CMTT_DATE is within the reporting month, exclude the rest of the records in the group. The two Jeopardy records retained by KCI have CMTT_DATES prior to the latest CMTT-DATES and from previous months. The correct CMTT_DATE for these SO_NBRs should be 7/6/00 and 8/4/00, respectively.

Summary of KCI's Re-Test Activities:

KCI reviewed the explanations provided by BellSouth. KCI also compared the Commitment Date timestamps in the BellSouth-provided raw data file with the corresponding timestamps in the KCI-collected data file for the two months subsequent to the above review period – that is October and November 2000. (KCI compares the KCI-collected data to the corresponding BellSouth-provided data for every month as a part of its regular testing activities.)

KCI's Re-Test Results:

KCI accepts the BellSouth-response above as follows:

- For the *Percent Missed Installation Appointment* (PMI) files, BellSouth appropriately included the original Commitment Date in its raw data files, even if this date occurred after a subsequent Commitment Date requested by a customer. In the event a subscriber requests a Commitment Date prior to the originally determined one, BellSouth now has automatic checks in place to ensure that the value "SP" is entered by service representatives.
- For the *Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices* (JPDY) files, BellSouth retains the latest record, and only the latest record, if this record contains a Commitment Date in the given month. If the latest record contains a Commitment Date that is not in the given month, all records in the group are excluded.

KCI did not identify any Commitment Date discrepancies for any Provisioning SQMs during its comparison of the KCI-collected data and the corresponding BellSouth-provided raw data for October and November 2000.

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As a result, KCI believes that BellSouth has adequately addressed the issues identified in Exception 127.

Based on re-testing activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 127.

Attachments: None.

Date: March 16, 2001

EXCEPTION CLOSURE REPORT

Exception:

BellSouth's Telephone Number Selection Query (TNSQ) pre-order does not support reservation extensions for TNs in the Augusta or Macon Central Offices.

Summary of Exception:

Prior to submitting a Local Service Requests (LSR) for certain variations of service (e.g., establishment of a new customer account, addition of a new line to an existing account), a CLEC must first submit a pre-order request to secure a valid Telephone Number (TN). BellSouth's Telecommunications Access Gateway (TAG) serves as an electronic interface for submitting pre-order requests. CLECs first submit a Telephone Number Assignment Query (TNAQ) to obtain one or more available TNs. When submitting a TNAQ, the CLEC must specify the CLLI code of the end office switch from which service is being provided. The TN(s) provided in response to the TNAQ are 'reserved' for that CLEC for one day. To extend this reservation, a CLEC may submit a TNSQ.

During the course of testing, KPMG Consulting, Inc. (KCI) attempted to submit several TNSQs via TAG to extend the reservation of TNs from the Macon and Augusta Central Offices. In response to each of these pre-orders, KCI received an error messages stating: *"SYSTEM ERROR. CALL SPOC AT 888-462-8030 & GIVE THEM THIS INFO: CODE 100; LOCATION 105"*.

Summary of BellSouth's Response:

"We agree with the findings as detailed above. The problem was encountered due to the fact that an audit table entry was missing from the ATLAS TNLIST table in Georgia causing an SQL 100 code to be returned when the "change reservation" contract was passed to ATLAS. The missing audit table record had been deleted at some point in the past, possibly by a user organization. The immediate fix was to add the audit record back to the table, preventing the 100 return code. This will prevent the problem unless the TNLIST table entry is deleted again. The short term fix is to verify the existence of the audit table entry on the TNLIST table every night in the RJ06B04 batch job and create the entry if needed. This short term fix was implemented in Georgia 2/16 and will be implemented region wide 2/23. The long term fix will be to add code to the online program RJ06A07 so that it would continue to process when this record is not available. This code change will be implemented in the COPA April release currently planned for

4/16 in a pilot site and 4/23 for the remaining sites. This problem would have impacted any application attempting to change a reservation. It only affected the reservations done in outstate Georgia because there are two ATLAS systems that serve Georgia, one for the Atlanta area and one for the rest of Georgia (outstate). The record was deleted from the outstate system but not the Atlanta area system. There are actually 12 ATLAS systems across Bellsouth that could have been subject to this problem but it was only detected in that one system."

Summary of KCI's Re-test Activities:

Following BellSouth's fix of adding the appropriate audit record back to the ATLAS table, KCI submitted 8 TNSQ transactions for TNs served by the Augusta and Macon central offices.

KCI's Re-test Results:

KCI received successful responses to all TNSQ re-test transactions. KCI was able to extend its TN reservations for the requested interval and utilize the TNs on subsequent service requests.

Based on re-test activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 130.

Attachments: None.

CERTIFICATE OF SERVICE

Docket No. 8354-U

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

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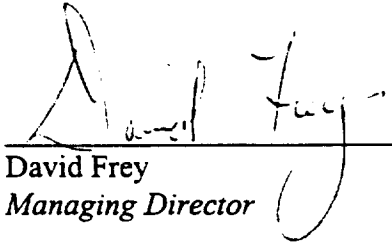
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This 16th day of March, 2001.



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