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

guy.hicks@bellsouth.com

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June 5, 2001
EXECUTIVE SECRETARY
Guy M. Hicks
General Counsel
615 214 6301
Fax 615 214 7406

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").

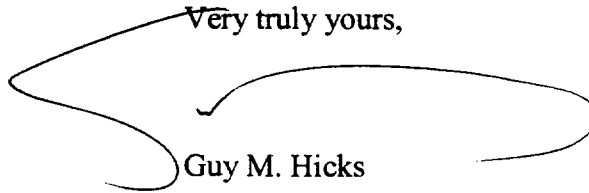
<u>Date Filed</u>	<u>Description of Document(s)</u>
03/23/01	KPMG 2 nd Amended Exception 129 and Exception 134; BellSouth Response to Exception 134; Amended Responses to Exceptions 21 and 133 (with 2 nd Attachment); Statement of Investigation for Exception 131; 2 nd Statement of Investigation Exceptions 86 and 89; Closure Reports for Exceptions 103, 115, 119, 132 and 135.
04/06/01	BellSouth Amended Responses to Exceptions 122 and 129; Second Amended Response and Attachment to Exception 133; Closure Reports for Exceptions 16, 26, 35, 93, 117, 124 and 126
04/20/01	KPMG Exception 137 and Amended Exception 137; BellSouth Response to Exception 137; 3 rd Amended Response to Exception 79; 3 rd Statement of Investigation to Exceptions 86 and 89; Closure Reports for Exceptions 21 (Addendum), 76, 77, 78, 95, 125 and 128

David Waddell, Executive Secretary
June 5, 2001
Page 2

<u>Date Filed</u>	<u>Description of Document(s)</u>
05/08/01	BellSouth Amended Response to Exceptions 131 and 137; 2 nd Amended Response to Exception 129; Closure Reports for Exceptions 38, 47, 108, 116, 118 and 133

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

Very truly yours,

A handwritten signature in black ink, appearing to read "Guy M. Hicks". The signature is stylized with a large, sweeping loop on the left side and a smaller loop on the right side.

GMH:ch

CERTIFICATE OF SERVICE

I hereby certify that on June 5, 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:

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

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

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

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

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

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

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

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

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

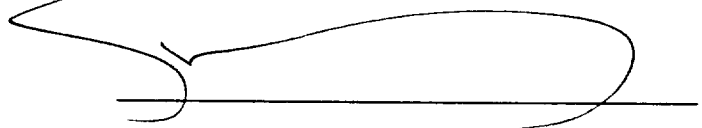
Jon E. Hastings, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

Timothy Phillips, Esquire
Office of Tennessee Attorney General
P. O. Box 20207
Nashville, Tennessee 37202

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

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





1600 Market Street
Philadelphia, PA 19103-7279

Telephone 215 299 1400

Fax 215 299 3150

March 23, 2001

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334

RECEIVED

MAR 28 2001

EXECUTIVE SECRETARY
G.P.S.C.

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

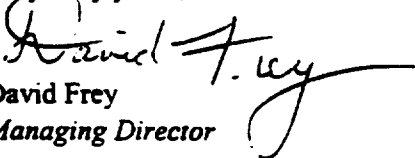
Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of KPMG Consulting, Inc.'s Exception 129 (2nd Amended) and Exception 134. Please also find enclosed the following responses from BellSouth: Exception 21 BLS Amended Response; Exception 86 BLS 2nd Statement of Investigation; Exception 89 BLS 2nd Statement of Investigation; Exception 131 BLS Statement of Investigation; Exception 133 BLS Amended Response; Exception 133 BLS Amended Response—2nd Attachment; and Exception 134 BLS Response. Please also find Closure Reports for Exceptions 103, 115, 119, 132 & 135.

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: March 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 (Second Amended)

BellSouth Georgia OSS Testing Evaluation

Item	Measurement	Issue	Date Opened	Date 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 (Fully Mechanized)	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. 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 the 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 the 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 the 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 due to code changes.	10/31/00	Closed	11/6/00

EXECPTION 129 (Second 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	Total Service Order Cycle Time	Step 4 of the May 15, 2000 (version 2.0.4) of the Raw Data User Manual is incorrect. Instead of using the service order number (so_nbr) only to identify duplicates the combination of service order number (so_nbr) and issu_dt (the date when the service order is issued) should be used.	10/5/00	Closed	10/13/00
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

EXECPTION 129 (Second Amended) **BellSouth Georgia OSS Testing Evaluation**

Item	Measurement	Issue	Date Opened	Open/ Closed	Date Corrected
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
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

EXECPTION 129 (Second Amended) **BellSouth Georgia OSS Testing Evaluation**

Item	Measurement	Issue	Date Opened	Open/Closed	Date Corrected
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
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 Report 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 due to duplicate records.	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 due to duplicate records	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 for July 2000. KCI can match BellSouth values using January 2001 data.	12/4/00	Closed	3/6/00

EXECPTION 129 (Second Amended) BellSouth Georgia OSS Testing Evaluation

Item	Measurement	Issue	Date Opened	Open/Closed	Date Corrected
80	PMP - 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	
83	Reject Interval for electronically submitted service requests	The depicted benchmark is inconsistent with the June 6 th 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 th Order.	1/10/00	Open	
85	LNP Disconnect Timeliness	The depicted benchmark is inconsistent with the June 6 th 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 th 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 th 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 th 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 th 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	
91	TSOCT for ISDN Loop	This Total Service Order Cycle Time (TSOCT) measure was calculated as an Order Completion Interval (OCI) measure. BellSouth changed to code to add the Firm Order Confirmation (FOC) interval to the TSOCT measure.	02/13/2001	Closed	02/27/2001
92	Reject Interval for Trunks and % Rejected Service Requests for Trunks	The October 2000 data includes other products than local interconnection trunks. This problem is fixed starting with December 2000 data	12/21/2000	Closed	02/15/2001
93	- Coordinated Customer Conversions - % Provisioning Troubles Received Within 7 Days of a Completed Service Order	The definition should be more explicit in stating that non-coordinated cuts (work_type_id = 3) are included in this measure. The last sentence in the business rule section states that "...are calculated searching in the <u>prior report period</u> ... following <u>30 days</u> after the completion..." The statement should say "...are calculated searching in the <u>current report period</u> ... following <u>7 days</u> after the completion..."	02/15/2001	Open	
94	- Coordinated Customer Conversions - % Provisioning Troubles Received Within 7 Days of a Completed Service Order	Step 3 of the computational instructions in the October version of the Raw Data User Manual states that if the LATE_FLAG_GT_30 is 1 then the cutover began <u>more than 15 minutes but less than 31 minutes</u> after the Scheduled Cut Start Time. The statement should say that if the LATE_FLAG_GT_30 is 1 then the cutover began <u>more than 30 minutes</u> after the scheduled cut start time.	02/15/2001	Open	
95	- Coordinated Customer Conversions - % Provisioning Troubles Received Within 7 Days of a Completed Service Order	The description of the denominator is imprecise in the Calculation section of the SQM document. The denominator is the total number of service order circuits completed during the <u>current reporting month</u> and not service order circuits completed during the <u>previous month</u> .	02/15/2001	Open	

EXECPTION 129 (Second Amended)

BellSouth Georgia OSS Testing Evaluation

Item	Measurement	Issue	Date Opened	Open/Closed	Date Corrected
96	Total Service Order Cycle Time	The SQM documentation states that the Total Service Order Cycle Time is the combination of Firm Order Confirmation and Average Order Completion Interval. For some products like UNE xDSL Loop, the total service order cycle time (TSOCT) is measured by the time interval from the time a service inquiry is received to the time when a service order is completed which is an addition of three time intervals, the 1) service inquiry interval (SI); 2) the firm order confirmation (FOC); and 3) the order completion interval (OCI). This has not been properly documented in the Georgia SQM Plan.	02/15/2001	Open	
97	LNP - Percent Missed Installation	The denominator for this measure should be the number of service orders <u>completed</u> during the reporting period and not the number of service orders <u>confirmed</u> in the reporting period.	02/15/2001	Open	
98	LNP-Firm Order Confirmation Timeliness	The calculation formula for average firm order confirmation is mistakenly labeled as "Average Reject Interval".	02/15/2001	Open	
99	LNP-Firm Order Confirmation Timeliness	The last sentence in the business rules section describes the denominator as the number of orders completed whereas it should state the number of service requests confirmed.	02/15/2001	Open	
100	Service Inquiry with Firm Order	BRITE currently cannot handle characters like '-' (dash) in the Purchase Order Number (PON) field. Since the CLEC determines the PON this incapability may result in not being able to enter the PON in BRITE correctly.	02/15/2001	Open	
101	Flow Through	The June 6 th Order prescribes a benchmark of 95% for Residence, 90% for Business and 85% for UNE products. However, BellSouth did not apply these benchmarks.	02/15/2001	Open	
102	Average Jeopardy Notice Interval	Values for 2w Analog Loop with INP Design, 2w Analog Loop with INP Non Design, 2w Analog Loop with LNP Design, 2w Analog Loop with LNP Non Design, INP Standalone, LNP Standalone, Local Interconnection Trunks, for Average Jeopardy Notice Interval & Percent Jeopardies are reported in the June 6, Docket, but not provided by BLS.	02/15/2001	Open	
103	Average Completion Notice Interval	Values for Local Interconnection Trunks, INP (Standalone), LNP (Standalone), 2w Analog Loop with INP Design, 2w Analog Loop with INP Non-Design, 2w Analog Loop with LNP Design & 2w Analog Loop with LNP Non-Design products have been requested in the June 6 Order, but not provided by BLS.	02/15/2001	Open	
104	Percent Missed Installation	The "UNE Loops w/LNP" product is listed in the June 6 th Order but no charts are produced.	02/15/2001	Open	
105	Total Service Order Cycle Time	The "UNE Loops w/LNP" product is listed in the June 6 th Order but no charts are produced.	02/15/2001	Open	
106	Total Service Order Cycle Time - Offered	The "UNE Loops w/LNP" product is listed in the June 6 th Order but no charts are produced.	02/15/2001	Open	
107	Collocation	BellSouth used the benchmark of 75 calendar days for Virtual and 130 calendar days for Physical Collocation which corresponds to the benchmark for Extra-Ordinary in the June 6 th Order. BellSouth did not apply the benchmarks listed as Ordinary.	02/15/2001	Open	
108	Held Orders	Changes made to ICAIS table to be investigated	02/15/2001	Open	
109	Total Service Order Cycle Time for Trunks	BLS reported SQM values do not agree with KCI-calculated values for May, June and July 2000. BellSouth reran their values and matches with KCI calculated values after the rerun.	10/18/00	Closed	11/22/00
110	Reject Interval for Trunks and %Rejected Service Requests for Trunks	The numerator for "%Rejected Service Requests for Trunks" is inconsistent with the denominator for "Reject Interval for Trunks" measure for May, June and July, 2000.	11/9/2000	Closed	12/6/2000

EXECPTION 129 (Second Amended)
BellSouth Georgia OSS Testing Evaluation

Item	Measurement	Issue	Date Opened	Open/ Closed	Date Corrected
111	Reject Interval for Trunks and %Rejected Service Requests for Trunks	BellSouth used the "site" field to identify the state which is inaccurate because there are 5 site and 9 states. Also, the holiday and weekend time is subtracted from the reject interval duration. These problems have been fixed starting with October 2000 data.	11/30/2000	Closed	12/6/2000
112	Hot Cuts Timeliness	KCI found that the "SFDT" field (scheduled cut start time) contains records with a datestamp but not a timestamp in June, July and August raw data. These records should have been excluded from the SQM calculation. This problem is fixed starting with October 2000 data.	10/20/2000	Closed	11/15/2000
113	Held Order Interval	KCI cannot replicate the values for July 2000. BellSouth clarified that the field circuit_cnt_id should be used to identify the number of circuits instead of using the field num_items_worked_on. Given this clarification KCI was able to replicate the July 2000 values.	10/25/2000	Closed	12/4/2000

Impact:

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

EXCEPTION 134
BellSouth Georgia OSS Testing Evaluation

Date: March 16, 2001

EXCEPTION REPORT

An exception has been identified as a result of xDSL Function Evaluation (PO&P 12).

Exception:

BellSouth does not provide expected responses to pre-order queries and submitted orders.

During the re-test of BellSouth's delivery of expected responses for xDSL capable loops, KPMG Consulting, Inc. (KCI) did not receive the expected responses to Loop Makeup – Service Inquiries (LMU-SIs) and Local Service Request – Service Inquiries (LSR-SIs).

KCI's standard for expected responses is 99% received.¹ Of the 1,006 total transactions submitted, 951 (94.5%) received the appropriate expected responses from BellSouth. Of the 447 pre-order LMU-SI and order LSR / SIs submitted to BellSouth via email to the Complex Resale Support Group (CRSG), 417 (93%) received an acknowledgement. Of the 275 LMU-SIs submitted, 252 (92%) received the subsequent (confirmation or error) expected response from BellSouth. Of the 284 LSR-SIs submitted, 282 (99%) received the expected response (FOC, Reject or Clarification) from BellSouth.

The following tables contain the lists of PONs for which responses were expected but not received from BellSouth.

Table 1—Missing Acknowledgments for LMU-SIs and LSR-SIs Submitted to the BellSouth CRSG

PON	VER	Sent Via	Transaction Type	Date Sent	Expected Response
X0P099	00	EMAIL	LMU-SI	2/9/01	Acknowledgement
X1P154	00	EMAIL	LMU-SI	2/25/01	Acknowledgement
X1P160	00	EMAIL	LMU-SI	2/25/01	Acknowledgement
X001A10005	00	EMAIL	LSR-SI	1/29/01	Acknowledgement

¹ In the absence of a Public Service Commission-approved or BellSouth-published standard, KCI, based on its professional judgment, has identified a 99% benchmark to be used for the purposes of this evaluation.

EXCEPTION 134
BellSouth Georgia OSS Testing Evaluation

PON	VER	Sent Via	Transaction Type	Date Sent	Expected Response
X001A10011	00	EMAIL	LSR-SI	1/29/01	Acknowledgement
X001A10017	00	EMAIL	LSR-SI	1/29/01	Acknowledgement
X002A10003	00	EMAIL	LSR-SI	1/29/01	Acknowledgement
X002A10108	00	EMAIL	LSR-SI	2/9/01	Acknowledgement
X002A10010	00	EMAIL	LSR-SI	1/29/01	Acknowledgement
X002A10017	00	EMAIL	LSR-SI	1/29/01	Acknowledgement
X002A10019	00	EMAIL	LSR-SI	2/13/01	Acknowledgement
X005A10002	00	EMAIL	LSR-SI	1/29/01	Acknowledgement
X011A10004	00	EMAIL	LSR-SI	1/29/01	Acknowledgement
X011A10005	00	EMAIL	LSR-SI	1/29/01	Acknowledgement
X011A10010	00	EMAIL	LSR-SI	1/29/01	Acknowledgement
X011A10011	00	EMAIL	LSR-SI	1/29/01	Acknowledgement
X011A10018	00	EMAIL	LSR-SI	1/29/01	Acknowledgement
X011A10024	00	EMAIL	LSR-SI	1/29/01	Acknowledgement
X011A10025	00	EMAIL	LSR-SI	1/29/01	Acknowledgement
X021A10003	00	EMAIL	LSR-SI	1/29/01	Acknowledgement
X021A10117	00	EMAIL	LSR-SI	2/9/01	Acknowledgement
X021A10018	00	EMAIL	LSR-SI	1/31/01	Acknowledgement
X031A10004	00	EMAIL	LSR-SI	1/29/01	Acknowledgement
X031A10010	00	EMAIL	LSR-SI	1/29/01	Acknowledgement
X031A10011	00	EMAIL	LSR-SI	1/29/01	Acknowledgement
X031A10017	00	EMAIL	LSR-SI	1/29/01	Acknowledgement

EXCEPTION 134
BellSouth Georgia OSS Testing Evaluation

PON	VER	Sent Via	Transaction Type	Date Sent	Expected Response
X031A10117	00	EMAIL	LSR-SI	2/8/01	Acknowledgement
X031A10018	00	EMAIL	LSR-SI	1/29/	Acknowledgement
X031A10024	00	EMAIL	LSR-SI	1/29/01	Acknowledgement
X031A10025	00	EMAIL	LSR-SI	1/29/01	Acknowledgement

Table 2— Submitted LMU-SIs that Received No Subsequent Response

PON	VER	Sent Via	Transaction Type	Date Sent	Expected Response
X0P134	00	EMAIL	LMU-SI	02/20/01	FOC/LMU-SI Response
X0P136	00	EMAIL	LMU-SI	02/20/01	FOC/LMU-SI Response
X0P138	00	EMAIL	LMU-SI	02/20/01	FOC/LMU-SI Response
X0P139	00	EMAIL	LMU-SI	02/20/01	FOC/LMU-SI Response
X0P079	00	EMAIL	LMU-SI	1/26/01	FOC/LMU-SI Response
X1P128	01	FAX	LMU-SI	2/28/01	FOC/LMU-SI Response
X1P136	01	FAX	LMU-SI	2/28/01	FOC/LMU-SI Response
X1P162	01	FAX	LMU-SI	2/28/01	FOC/LMU-SI Response
X1P166	01	FAX	LMU-SI	2/28/01	FOC/LMU-SI Response
X1P139	00	EMAIL	LMU-SI	2/23/00	FOC/LMU-SI Response

EXCEPTION 134
BellSouth Georgia OSS Testing Evaluation**Table 3— Submitted LMU-SIs that Received a LMU-SI Response, but No Prior FOC**

PON	VER	Sent Via	Transaction Type	Date Sent	Expected Response
X0P02	00	EMAIL	LMU-SI	01/23/01	FOC
X0P03	00	EMAIL	LMU-SI	01/23/01	FOC
X0P07	00	EMAIL	LMU-SI	01/23/01	FOC
X0P011	00	EMAIL	LMU-SI	01/23/01	FOC
X0P017	00	EMAIL	LMU-SI	01/23/01	FOC
X0P019	00	EMAIL	LMU-SI	01/23/01	FOC
X0P021	00	EMAIL	LMU-SI	01/23/01	FOC
X0P049	00	EMAIL	LMU-SI	01/24/01	FOC
X0P050	00	EMAIL	LMU-SI	01/24/01	FOC
X0P068	00	EMAIL	LMU-SI	01/26/01	FOC
X0P083	00	EMAIL	LMU-SI	01/26/01	FOC
X0P086	00	EMAIL	LMU-SI	01/26/01	FOC
X0P087	00	EMAIL	LMU-SI	01/26/01	FOC

Table 4—Missing Subsequent (Confirmation or Error) Responses from Submitted LSR-SIs

PON	VER	Sent Via	Transaction Type	Date Sent	Expected Response
X002A10104	01	FAX	LSR-SI	02/23/01	FOC/CLR/REJ
X031A10009	01	FAX	LSR-SI	02/07/01	FOC/CLR/REJ

Impact:

The absence of a response to an LMU-SI or LSR-SI will delay the ordering of xDSL services. This will negatively impact customer satisfaction with the CLEC. The CLEC will also incur additional cost and time related to researching the status of the orders.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 21— STATEMENT OF RE-OPENING



Date: March 19, 2000

KPMG declares Exception 21 re-opened.

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

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

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

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

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

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

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

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

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 21— STATEMENT OF RE-OPENING

BellSouth Response

Since KPMG has determined that LSRs receiving "Z" processing status (Pending Supplements) should not be considered either CLEC caused or BellSouth caused fallout for the purposes of the Flow Through Report until a final disposition of the LSR is determined, BellSouth has taken the necessary steps to exclude these LSRs from the Total System Fallout which contains both the BST and CLEC caused fallout. Additionally, since these LSRs are now ineligible to flow through, they are now excluded from the count of valid LSRs which is the number of LSRs eligible to flow through. Any LSRs in this Pending Supplements category will be counted in the following month's flow through reports when they have reached their final disposition.

The LSR Detail File has been updated to provide an explanation of how to identify LSRs that receive "Z" processing status and should be excluded from the count of valid LSRs. This update is effective with the posting of February 2001 data as requested by individual CLECs.

Also, BellSouth was accidentally omitting LSRs that contained more than one auto clarification error from the auto clarification count. BellSouth has corrected the flow through code so that all LSRs that are auto clarified, regardless of the number of errors contained on the LSR, are being counted as auto clarifications. This correction produced a difference of 1 auto clarification in the February report.

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 86



Date: March 15, 2000

EXCEPTION REPORT

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

Exception:

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

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

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

KPMG has been unable to replicate the following SQMs³:

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

BellSouth Response: This is the same issue as 23.4 for November and December. The raw data for Provisioning Troubles in 30 days for months prior to March 2000 cannot be

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

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

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

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 86

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

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

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

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

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

BellSouth's Amended Response:

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

2. ***Order Completion Interval in the provisioning category for the CLEC Aggregate and BellSouth Retail (October 1999).*** Using BellSouth's instructions, KPMG was unable to replicate any of the reports (POTS, UNE-Design, Non-UNE Design) for the "Dispatch" and "Non-Dispatch" categories.

BellSouth Response: BellSouth agrees that using the current raw data users manual KPMG was unable to replicate the reports for the CLEC Aggregate and BellSouth

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 86

Retail data for October for POTS, UNE-Design, and Non-UNE Design for the "Dispatch" and Non-Dispatch categories.

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

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

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

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

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

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

BellSouth provided June 2000 data to KPMG for Order Completion Interval for replication retesting.

BellSouth's Response:

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

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 89



Date: March 15, 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 SECOND STATEMENT OF INVESTIGATION FOR 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 SECOND STATEMENT OF INVESTIGATION FOR 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_BLKKG (*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%

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 89

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.

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 89

AC202703	0.53% (hour 10)	0.65% (hour 11)	Different hour used.
AC203042	0.00% (hour 16)	0.01% (hour 17)	Different hour used.
AC203657	3.94%	3.95%	BellSouth is not confident in the data generated for this trunk group and therefore does not feel either calculation is accurate.
AC204674	0.01% (hour 15)	0.04% (hour 11)	Different hour used.
AC204913	0.00% (hour 15)	0.08% (hour 9)	Different hour used.
AC205420	0.02% (hour 14)	0.06% (hour 15)	Different hour used.
AC206974	2.23% (hour 15)	2.30% (hour 16)	Different hour used.
AC208035	0.00% (hour 21)	0.02% (hour 1)	Different hour used.
AC208787	0.01% (hour 10)	0.06% (hour 8)	Different hour used.
AC213664	0.18% (hour 16)	0.24% (hour 15)	Different hour used.
AC205717	0.19% (hour 13)	0.33% (hour 12)	Different hour used.
AC212373	40.21% (hour 11)	46.21% (hour 10)	Different hour used.

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.

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.

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

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

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 89

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

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

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 89

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.

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 89

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.

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 89

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 classified as "Partially Mechanized"):

1)

- a) It must be a FOC LSR. FOC LSR's must contain the string "FOC STAGED FOR LSR" in the NOTES field of STAG_AUDIT (LEO)
- b) Must contain "Claimed By" or "CLAIMED BY" in NOTES field of STAG_AUDIT (LEO)
- c) The first three characters of SIGNOUT_CUID are not 'DB0' in STAG_LSR (LEO)

2)

- a) It must be a REJECTED LSR. A REJECTED LSR contains the string "CLARIFICATION RETURNED" in the NOTES field of STAG_AUDIT (LEO)

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 89

- 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.

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 89

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.

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 89

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

KPMG reported that 11 of 34 sample ASRs from June Exact screen printouts have an issue with the FOC_DATE and/or FOR_DURATION. The cells in red in the table sent to KPMG are where the BellSouth Raw Data value differed from the KPMG valued calculated using the EXACT screen printout.

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

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

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

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

Appendix A

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

ASR 0013900229 OWNER CPOC ORD CO5GV6J2 JEP STATUS FKR T ACA
REQTYP MD ACT C CCNA DLT PON DLT00LOC00359C VER C RPON
ECKKT 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

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 89

***** CONTACT INFORMATION *****

INIT SHIRLEY ISBELL TEL 256 264 1222 FAX 256 264 1583
STREET P.O. DRAWER 1301 FL NA RM NA
CITY ARAB ST AL ZIP 35016
EMAIL

DSGCON SHIRLEY ISBELL TEL 256 264 1222 FAX DRC FDRC
STREET P.O. DRAWER 1301 FL NA RM NA
CITY ARAB ST AL ZIP 35016
EMAIL

IMPCON SERVICE INSTALL TEL 888 517 8925 MTCE TEL
D/TREC 072700 11:30

/FOR: ICCNF *ICSC CONFIRMATION* 08/17/00 16:39
COMMAND REQUEST REFNUM
ASR 0013900229 OWNER CPOC ORD CO5GV6J2 JEP STATUS FKR T
REQTYP MD ACT C CCNA DLT PON DLT00LOC00359C SPA RT F INIT SHIRLEY ISBELL
VER C

ECCKT 1 /DF-4ESJ912 /ALBYGADZ1MD/M-/ALBYGAMA13T FMT LTERM

***** ASR DETAILS AND SERVICE OPTIONS *****

ICSC SB01 CD/TSENT 061500 15:07 APREP T-HINTON TEL 800 666 0580 2169
EMAIL

ECVER 03 PIA PRVNT PROJ LDTLALBYE911 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.

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 89

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 SECOND STATEMENT OF INVESTIGATION FOR 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 SECOND STATEMENT OF INVESTIGATION FOR 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 date 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".

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR 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

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 89

File	SO_NBR	ISSU_DT	Field	BLS Reported Value	KCL 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

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 89

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.**

BellSouth's Amended Response:

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

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

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 89

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.

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

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

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR EXCEPTION 89

reflected a value of 3 calendar days (date of 1/28/00) and PAPER media reflected a value of 6 calendar days (date of 1/31/00).

Both of these dates were reported correctly on the "CLEC CABS Bill Verification Report" and "CLEC CABS Billing Invoice Delivery Report-Paper" and the monthly raw data file provided to PMAP for including in the Billing SQM.

BELLSOUTH'S SECOND STATEMENT OF INVESTIGATION FOR 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 Response:

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

BELLSOUTH'S STATEMENT OF INVESTIGATION FOR EXCEPTION 131



Date: March 21, 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 STATEMENT OF INVESTIGATION FOR 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 STATEMENT OF INVESTIGATION FOR 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 STATEMENT OF INVESTIGATION FOR 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 STATEMENT OF INVESTIGATION FOR 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:

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

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 Tools Help

```

10/16/2000 10:18:29:1  T0A LEO MGMT SYSTEM - BROWSE SCREEN (N01)  P01 PPMY1
WESK/CC: 3730 PON: YPR: 00 SIP: 00 JTMP TO: 0
LSRNN: 373020001016700003  T11F: ***9 INIE DATE: 10/16/2000
AN: - - - AIN: 229-838-4185  TRLS LSK: - NEXT LSK: -
DATE LINE TIME HISTORY LINE
ENDNU XREF
10/16/2000 08:58:53 C001 ISR PROCESSED AS NON-CPLX(E1)
10/16/2000 08:58:54 C018 ISR LOADED AS MECHANIZED
10/16/2000 08:58:54 C065 ISR HAS BEEN SENT TO LES00
10/16/2000 08:59:53 E00 ORDER EPR: EP0043F4 LA LIST 013 LIN SEE 60ER DOC
08825 16000136 IDENTIFICATION! ILA 13 ANN L*I*B*E*R*I*T*Y S*T
10/16/2000 00:59:53 C000 SERVICE ORDER UPDATE PLACED BY LES00
10/16/2000 00:59:53 SENT 00020000 INSERTED TO T5IGNOUT
10/16/2000 08:59:53 C380 ERROR WITH PENDING ORDER PLACED BY LES00

PF5=Browser List PF8=Change PF9=Main PF22=Print Page PF23=Print Page

```

7A
R02 C07J

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

BELLSOUTH'S STATEMENT OF INVESTIGATION FOR EXCEPTION 131

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

10/17/2000 08.43.47 ERRC ORDER ERR: NPCMM3F4 LA LIST 013 LIN SEE SOER DOC
C8825 LSG00136 UMENTATION! ILA 13 -AHN L*I*B*E*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 STATEMENT OF INVESTIGATION FOR 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      IQA LEO AUDIT SYSTEM - BROWSE SCREEN (AUD)      PNLFPMY1
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
      88950      LSG00177
10/16/2000 15.00.39 C380 INFO-ORDER D04N4RY3 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 - BLQWVRQ

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, N04JM
      M68, DD 10-30-00
10/26/2000 08.41.33 C280 845 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 STATEMENT OF INVESTIGATION FOR 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:

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

**BELLSOUTH'S STATEMENT OF INVESTIGATION FOR
EXCEPTION 131**

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 133



Date: March 19, 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 AMENDED 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 Amended 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-3) are not worded such that the intended interpretation is clear. Therefore, BellSouth has rewritten the definitions and business

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 133

rules and will incorporate them into future revisions of the Georgia SQM. The revisions are attached.

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
- Established process for monthly reconciliation of CLEC-reported outages and REM-reported outages

Transport failures that can be linked to an application will be reported. For example, a transport failure impacting more than one application could be attributed to a core router that is down or inoperable. The problem could be reported by a user or by an automated alarm. The outage would be charged against the router component. If a user of a particular application(s) reported the trouble, the outage would be charged against that application(s), as well.

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.
- 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) X 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 <ul style="list-style-type: none">• Legacy Contract Type (per reporting dimension)• Regional Scope• Hours of Downtime	Report month <ul style="list-style-type: none">• 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	• $\geq 99.5\%$

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.
- 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
<ul style="list-style-type: none">• Availability of CLEC TAFI• Availability of LMOS HOST, MARCH, SOCS, CRIS, PREDICTOR, LNP and OSPDM• ECTA	<ul style="list-style-type: none">• Availability of BellSouth TAFI• Availability of LMOS HOST, MARCH, SOCS, CRIS, PREDICTOR, LNP and OSPDM

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	Retail Analog/Benchmark
<ul style="list-style-type: none">• Regional Level	<ul style="list-style-type: none">• $\geq 99.5\%$

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 134



Date: March 19, 2001

EXCEPTION REPORT

An exception has been identified as a result of xDSL Function Evaluation (PO&P 12).

Exception:

BellSouth does not provide expected responses to pre-order queries and submitted orders.

During the re-test of BellSouth's delivery of expected responses for xDSL capable loops, KPMG Consulting, Inc. (KCI) did not receive the expected responses to Loop Makeup – Service Inquiries (LMU-SIs) and Local Service Request – Service Inquiries (LSR-SIs).

KCI's standard for expected responses is 99% received.¹ Of the 1,006 total transactions submitted, 951 (94.5%) received the appropriate expected responses from BellSouth. Of the 447 pre-order LMU-SI and order LSR / SIs submitted to BellSouth via email to the Complex Resale Support Group (CRSG), 417 (93%) received an acknowledgement. Of the 275 LMU-SIs submitted, 252 (92%) received the subsequent (confirmation or error) expected response from BellSouth. Of the 284 LSR-SIs submitted, 282 (99%) received the expected response (FOC, Reject or Clarification) from BellSouth.

The following tables contain the lists of PONs for which responses were expected but not received from BellSouth.

Table 1—Missing Acknowledgments for LMU-SIs and LSR-SIs Submitted to the BellSouth CRSG

CRSG Response: All PONs were acknowledged, rejected or recalled by the CLEC with the exception of 4, which we do not show as having been received. See details below in CRSG Received/CRSG Acknowledged columns. A rejection should be treated by the CLEC as an acknowledgement. Wording in the process flow will be changed.

¹ In the absence of a Public Service Commission-approved or BellSouth-published standard, KCI, based on its professional judgment, has identified a 99% benchmark to be used for the purposes of this evaluation.

BELLSOUTH'S RESPONSE TO EXCEPTION 134

PO#	VER	Send Via	Transaction Type	CRSG Received	CRSG Acknowledged
X0P099	00	EMAIL	LMU-SI	2/9/01	NOT FOUND
X1P154	00	EMAIL	LMU-SI	2/25/01	RECALLED BY CLEC
X1P160	00	EMAIL	LMU-SI	2-15 @16:37	2-26 @6:04
X001A10005	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC
X001A10011	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC
X001A10017	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC
X002A10003	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC
X002A10108	00	EMAIL	LSR-SI	2/9/01	NOT FOUND
X002A10010	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC
X002A10017	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC
X002A10019	00	EMAIL	LSR-SI	2-13 @16:04	2-13 @16:53
X005A10002	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC
X011A10004	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC
X011A10005	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC
X011A10010	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC
X011A10011	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC
X011A10018	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC
X011A10024	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC
X011A10025	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC
X021A10003	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC
X021A10117	00	EMAIL	LSR-SI	2/9/01	NOT FOUND
X021A10018	00	EMAIL	LSR-SI	1/31/01	UNABLE TO LOCATE
X031A10004	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC
X031A10010	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC

BELLSOUTH'S RESPONSE TO EXCEPTION 134

PON	VER	Sent Via	Transaction Type	CRSG Received	CRSG Acknowledged
X031A10011	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC
X031A10017	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC
X031A10117	00	EMAIL	LSR-SI	2-8 @12:59	2-8 @13:07
X031A10018	00	EMAIL	LSR-SI	1/29/	REJECTED TO CLEC
X031A10024	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC
X031A10025	00	EMAIL	LSR-SI	1/29/01	REJECTED TO CLEC

Table 2— Submitted LMU-SIs that Received No Subsequent Response

PON	VER	Sent Via	Transaction Type	Date Sent	Expected Response	BellSouth Response
X0P134	00	EMAIL	LMU-SI	02/20/01	FOC/LMU-SI Response	Unable to locate
X0P136	00	EMAIL	LMU-SI	02/20/01	FOC/LMU-SI Response	Disagree Clarification sent 2/22/01
X0P138	00	EMAIL	LMU-SI	02/20/01	FOC/LMU-SI Response	Disagree Clarification sent 2/22/01
X0P139	00	EMAIL	LMU-SI	02/20/01	FOC/LMU-SI Response	Disagree Clarification sent 2/22/01
X0P079	00	EMAIL	LMU-SI	1/26/01	FOC/LMU-SI Response	Unable to locate
X1P128	01	FAX	LMU-SI	2/28/01	FOC/LMU-SI Response	VER not received
X1P136	01	FAX	LMU-SI	2/28/01	FOC/LMU-SI Response	VER not received
X1P162	01	FAX	LMU-SI	2/28/01	FOC/LMU-SI Response	Disagree Reject sent 2/28/01
X1P166	01	FAX	LMU-SI	2/28/01	FOC/LMU-SI Response	Disagree Reject sent 3/01/01
X1P139	00	EMAIL	LMU-SI	2/23/00	FOC/LMU-SI Response	Disagree Clarification sent 2/27/01

BELLSOUTH'S RESPONSE TO EXCEPTION 134

Table 3— Submitted LMU-SIs that Received a LMU-SI Response, but No Prior FOC

CRSG Response: PONs were being placed into clarification in the LCSC and the clarification was not getting resolved by the CLEC, thus the PONs were canceled and LMU information was not getting sent. This problem was corrected effective on 2-5 by changing the process whereby loop make up information is not sent to the CLEC until after the LCSC sends an FOC.

PON	VER	Sent Via	Transaction Type	Date Sent	Expected Response
X0P02	00	EMAIL	LMU-SI	01/23/01	Sent by CRSB on 1-24
X0P03	00	EMAIL	LMU-SI	01/23/01	In Clarification in LCSC & Canceled
X0P07	00	EMAIL	LMU-SI	01/23/01	Sent by CRSB on 1-24
X0P011	00	EMAIL	LMU-SI	01/23/01	Sent by CRSB on 1-29
X0P017	00	EMAIL	LMU-SI	01/23/01	Sent by CRSB on 1-29
X0P019	00	EMAIL	LMU-SI	01/23/01	Sent by CRSB on 1-29
X0P021	00	EMAIL	LMU-SI	01/23/01	Sent by CRSB on 1-29
X0P049	00	EMAIL	LMU-SI	01/24/01	Sent by CRSB on 1-29
X0P050	00	EMAIL	LMU-SI	01/24/01	Sent by CRSB on 1-29
X0P068	00	EMAIL	LMU-SI	01/26/01	Sent by CRSB on 1-30
X0P083	00	EMAIL	LMU-SI	01/26/01	Sent by CRSB on 1-29
X0P086	00	EMAIL	LMU-SI	01/26/01	Sent by CRSB on 1-29
X0P087	00	EMAIL	LMU-SI	01/26/01	Sent by CRSB on 1-29

BELLSOUTH'S RESPONSE TO EXCEPTION 134

Table 4—Missing Subsequent (Confirmation or Error) Responses from Submitted LSR-SIs

PON	VER	Sent Via	Transaction Type	Date Sent	Expected Response	BellSouth Response
X002A10104	01	FAX	LSR-SI	02/23/01	FOC/CLR/REJ	Disagree Clarification sent 2/26/01
X031A10009	01	FAX	LSR-SI	02/07/01	FOC/CLR/REJ	VER not received

Impact:

The absence of a response to an LMU-SI or LSR-SI will delay the ordering of xDSL services. This will negatively impact customer satisfaction with the CLEC. The CLEC will also incur additional cost and time related to researching the status of the orders.

BellSouth's Response:

BellSouth's responses to the specific PONs in question have been inserted in the tables shown above.



Date: March 23, 2000

EXCEPTION CLOSURE REPORT

Exception:

The KPMG Consulting, Inc. (KCI) Test CLEC received invoices from BellSouth containing inaccurate information.

Summary of Exception:

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

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

The following are representative occurrences of missing or unexpected usage charges from KCI Test CLEC bills.

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

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

Item #1

Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Local automated operator serviced 3 rd party
Date of Call	4/5/00
To Place	Atlanta
To Number	404-799-9478
From Number	404-633-4121
KPMG Consulting Expected Results	\$1.91
BellSouth Bill	Not located on bill

Item #2

Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Local operator completed collect
Date of Call	4/5/00
To Place	Atlanta
To Number	404-633-0247
From Number	404-633-4121
KPMG Consulting Expected Results	\$2.82
BellSouth Bill	Not located on bill

Item #3

Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Local operator completed collect
Date of Call	4/5/00
To Place	Atlanta
To Number	404-633-0247
From Number	404-633-4121
KPMG Consulting Expected Results	\$2.82
BellSouth Bill	Not located on bill

Item #4

Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Toll record with corresponding credit record
Date of Call	4/6/00
To Place	Clayton
To Number	706-782-6488
From Number	404-633-0247
KPMG Consulting Expected Results	\$0.19
BellSouth Bill	Not located on bill

Item #5

Telephone Number	706-235-6343
Account Number	706-Q59-4492-492
Call Type	Local operator completed collect
Date of Call	4/5/00
To Place	Rome
To Number	706-235-6343
From Number	706-235-5762
KPMG Consulting Expected Results	No usage charges expected
BellSouth Bill	\$2.73

Item #6

Telephone Number	706-235-6343
Account Number	770-Q59-4492-492
Call Type	Band 4, 2 Expanded Local Area calls
KPMG Consulting Expected Results	No usage charges expected
BellSouth Bill	\$0.26

Item #7

Telephone Number	706-235-6343
Account Number	706-Q59-4492-492
Call Type	Local Call
KPMG Consulting Expected Results	7 Local calls
BellSouth Bill	8 Local calls

BellSouth's Response:**Item #1**

Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Local automated operator serviced 3 rd party
Date of Call	4/5/00
To Place	Atlanta
To Number	404-799-9478
From Number	404-633-4121
KPMG Consulting Expected Results	\$1.91
BellSouth Bill	Not located on bill

BellSouth Reply - Call was sent on ODU to KPMG.

BellSouth agrees this call was not included on the invoice sent to KPMG. However, due to the age of the call at the time the exception was reported to BellSouth, the final destination of the call within the billing system cannot be determined. BellSouth's billing



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

Item #2

Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Local operator completed collect
Date of Call	4/5/00
To Place	Atlanta
To Number	404-633-0247
From Number	404-633-4121
KPMG Consulting Expected Results	\$2.82
BellSouth Bill	Not located on bill

Two Calls matching criteria was sent on ODUF to KPMG.

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

Item #3

Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Local operator completed collect
Date of Call	4/5/00
To Place	Atlanta
To Number	404-633-0247
From Number	404-633-4121
KPMG Consulting Expected Results	\$2.82
BellSouth Bill	Not located on bill

Two Calls matching criteria was sent on ODUF to KPMG.

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

Item #4

Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Toll record with corresponding credit record
Date of Call	4/6/00
To Place	Clayton
To Number	706-782-6488
From Number	404-633-0247
KPMG Consulting Expected Results	\$0.19
BellSouth Bill	Not located on bill

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

Item #5

Telephone Number	706-235-6343
Account Number	770-Q59-4492-492
Call Type	Local operator completed collect
Date of Call	4/5/00
To Place	Rome
To Number	706-235-6343
From Number	706-235-5762
KPMG Consulting Expected Results	No usage charges expected
BellSouth Bill	\$2.73

BellSouth agrees that this call was not sent to KPMG on ODUF although the invoice correctly reflects the charges for this call. In processing this call through the billing system one of the system edits identified an error to be investigated. As the error was resolved, the call was released back into the billing system to be billed. An indicator that

CLOSURE REPORT FOR EXCEPTION 103**BellSouth Georgia OSS Testing Evaluation**

is used to tell the system whether or not a copy of the call record had already been sent to DUF was incorrectly set. This kept the record from going to KPMG. A system trouble ticket has been issued to correct this problem and was completed on 9/16/00.

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

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

Item #6

Telephone Number 706-235-6343
Account Number 770-Q59-4492-492 (706-Q59-4492-492)
Call Type Band 4, 2 Expanded Local Area calls
KPMG Consulting Expected Results No usage charges expected
BellSouth Bill \$0.26

Customer subscribes to GA Community Caller Plus. Per the GA Tariff the customer is charged for all calls outside the Basic Local Calling Area. Billed charges for these calls are correct. Billed as follows.

-DAY-	Total		-NIGHT/WKND-		
Band	Calls	Mins	Calls	Mins	Charges
4	2	3	0	0	.32
					.32
67.	Local Usage Summary				
68.	Resale Discount at 17.30% for Business				
	TOTAL REGULATED LOCAL USAGE				.26
	TOTAL NONREGULATED LOCAL USAGE				.00
	TOTAL LOCAL USAGE				.26

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

Item #7

Telephone Number 706-235-6343
Account Number 770-Q59-4492-492 (706-Q59-4492-492)
Call Type Local Call
KPMG Consulting Expected Results 7 Local calls
BellSouth Bill 8 Local calls

BellSouth agrees that one of the 8 calls was not sent to KPMG on ODUF although the invoice correctly reflects the charges for all 8 calls. In processing this call through the

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

Summary of KCI Re-test Activities:

KCI's re-test activities consisted of generating a number of test calls and then reviewing the subsequent DUF records, KCI CLEC invoices and applicable tariffs in light of the responses provided by BellSouth.

A sufficient variety of test calls was generated in January 2001 to verify BellSouth's attestations that these issues were resolved. A total of twenty-six calls were evaluated. The results are delineated in the section below.

KCI Re-test Results:**Item #1**

In the course of testing, KCI found that although it received a DUF file for the call cited in the Exception, it did not find this call on its bill. BellSouth agreed that the telephone call noted as Item #1 was sent on ODUF to KCI, but did not appear on the KCI invoice. KCI reviewed the DUF record cited by BellSouth and confirmed that it had been received and that it matched the telephone call cited in the Exception Report. BellSouth further stated in its response to this Exception Report that the final destination of the call within the billing system could not be determined due to the age of the call at the time the issue was brought to BellSouth's attention. Since the BellSouth billing system incorporates multiple error routines, BellSouth stated that one of these edits caused the usage to error and, because of the customer's limited call volume, this usage was written off. Because the call in question was included on ODUF, KCI concurs with BellSouth's assessment that the KCI CLEC would have been able to bill its end user. KCI generated additional local automated operator serviced 3rd party calls in January 2001 to determine where in the billing system this call may have dropped out. After review of the DUFs for these calls and the corresponding bill, KCI found that the test CLEC was billed accurately and correctly for each test call.

Item #2

In the course of testing, KCI found that although it received a DUF file for the call cited in the Exception, it did not find this call on its bill. BellSouth agreed that the telephone call noted as Item #2 was sent on ODUF to KCI, but did not appear on the KCI invoice. KCI reviewed the DUF records cited by BellSouth and confirmed that they had been received and that one of the DUFs cited matched the telephone call cited in the Exception

Report. BellSouth further stated in its response to this Exception Report that the final destination of the call within the billing system could not be determined due to the age of the call at the time the issue was brought to BellSouth's attention. Since the BellSouth billing system incorporates multiple error routines, BellSouth stated that one of these edits caused the usage to error and, because of the customer's limited call volume, this usage was written off. Because the call in question was included on ODUF, KCI concurs with BellSouth's assessment that the KCI CLEC would have been able to bill its end user. KCI generated additional local operator completed calls in January 2001 to determine where in the billing system this call may have dropped out. After reviewing the DUFs for these calls and the corresponding bill, KCI found that the test CLEC was billed accurately and correctly for each test call.

Item #3

In the course of testing, KCI found that although it received a DUF file for the call cited in the Exception, it did not find this call on its bill. BellSouth agreed that the telephone call noted as Item #3 was sent on ODUF to KCI, but did not appear on KCI's invoice. KCI reviewed the DUF records cited by BellSouth and confirmed that they had been received and that one of the DUFs cited matched the telephone call cited in the Exception Report. BellSouth further stated in its response to this Exception Report that the final destination of the call within the billing system could not be determined due to the age of the call at the time the issue was brought to BellSouth's attention. Since BellSouth's billing system incorporates multiple error routines, BellSouth stated that one of these edits caused the usage to error and, because of the customer's limited call volume, this usage was written off. Because the call in question was included on ODUF, KCI concurs with BellSouth's assessment that the KCI CLEC would have been able to bill its end user. KCI generated additional local operator completed collect calls in January 2001 to determine where in the billing system this call may have dropped out. After reviewing the DUFs for these calls and the corresponding bill, KCI found that the test CLEC was billed accurately and correctly for each test call.

Item #4

In the course of testing, KCI found that although it received a DUF file for the toll call with the corresponding credit record cited in the Exception, it did not find this toll call or the credit amount on its bill. In its response to this issue, BellSouth stated that the two call records (toll call and credit) cancelled each other out and cited two corresponding ODUF records. BellSouth further stated that KCI should not have expected to see either the call or the credit amount on the KCI bill. KCI reviewed the DUF records cited by BellSouth and confirmed that they had been received, and that they did match the telephone call and credit cited in the Exception Report. Based on BellSouth's explanation of the credit rules in its response to this Exception Report, KCI was able to resolve this usage billing discrepancy and close discussion on this item.

Item #5

In the course of testing, KCI found that it was billed for this local operator completed collect call, but did not receive a corresponding DUF record from BellSouth. BellSouth, in its response to this Exception Report, stated that it had not sent KCI an ODU record for this call, but had correctly billed KCI for this call. BellSouth further stated that when this call was processed through the billing system, one of the system edits identified an error to be investigated. Once the error was resolved, the call was released back into the billing system to be billed. However, an indicator that tells the system whether or not a copy of the call record had been sent to DUF was incorrectly set. This incorrectly set indicator was the reason why KCI did not receive the DUF record for this call. BellSouth rectified this problem by issuing a system trouble ticket that was completed on 9/16/00. KCI generated additional local operator completed collect calls in January 2001. After reviewing the DUFs for these calls and the corresponding bill, KCI found that the test CLEC was billed accurately and correctly for each test call.

KCI also verified that the \$2.73 charge for this local operator completed collect call (a.k.a. an Operator Assisted, Local Collect Call) was calculated correctly according to the *Georgia General Subscriber Service Tariff*. A review of the tariff revealed that the undiscounted total charge for this call would be a combination of the \$2.20 collect call charge (see the *Georgia General Subscriber Service Tariff, Sixteenth Revised Page 32, Effective January 7, 2000, Section A3.14.1(C)(1)*) plus the \$1.10 Operator Dialed Surcharge (see the *Georgia General Subscriber Service Tariff, Sixth Revised Page 33, Effective January 15, 2000, Section A3.14.1(C)(2)*). The undiscounted total charge is \$3.30 which when discounted using the 17.30% KCI Georgia business resale discount rate yields the \$2.73 charge billed by BellSouth. Based on KCI's re-calculation of the charges, BellSouth's issuance and completion of a system trouble ticket to address the incorrectly set indicator, and the generation and validation of additional calls, KCI closed discussion on this issue.

Item #6

In the course of testing, KCI found that it was billed for usage, but did not receive corresponding DUF records from BellSouth. BellSouth, in its response to this issue, stated that the telephone number subscribed to Georgia Community Calling and that KCI was billed appropriately according to the GA Tariff (or *Georgia Subscriber Service Tariff*). KCI verified that the telephone number cited did subscribe to Georgia Community Calling by noting that the USOC 1MBGE appeared on the Customer Service Record for the telephone number. According to the *Georgia General Subscriber Service Tariff, Sixth Revised Page 9.1, Effective January 1, 1998, Section A3.7.2(B)(1)(b)*, this USOC denotes a business line with Georgia Community Calling.

According to the *Georgia General Subscriber Service Tariff*, calls made to outside of the Basic Local Calling Area (for example, to the Expanded Service Area) have applicable usage charges. These usage charges for calls to points in the Expanded Service Area are billed in four mileage bands with both an associated setup charge per call and a per

conversation minute charge. Using this information, KCI verified the \$0.26 usage charge calculation seen on the bill. Since there were two Band 4, Expanded Local Area calls, the total undiscounted usage charge for these calls was a combination of the charge to setup the two calls (the rate for the Fourth Mileage Band 41-55 miles \$0.04 * 2 calls = \$0.08) and the charge for the three conversation minutes (the rate per conversation minute \$0.08 * 3 minutes = \$0.24) (see the *Georgia General Subscriber Service Tariff, Sixth Revised Page 12, Effective November 1, 1996, Section A3.7.4(D)(2)(b)*). The undiscounted total charge of \$0.32 which when discounted using the 17.30% KCI Georgia business resale discount rate yields the \$0.26 charge billed by BellSouth.

Finally, KCI verified BellSouth's explanation of why no call detail was provided for the \$0.26 charge. KCI found that the telephone number in question did not have call detail on its invoice because Local Usage Detail (as documented in the *Georgia General Subscriber Service Tariff, Seventh Revised Page 35, Effective July 26, 2000, Section A3.22*) was not ordered for this telephone number. Based on KCI's re-calculation of the charges and on its review of the documentation of Georgia Community Calling and Local Usage Detail from the *Georgia General Subscriber Service Tariff*, KCI closed discussion on this issue.

Item #7

In the course of testing, KCI found that it was billed for 8 local calls, but received DUF records corresponding to only 7 local calls from BellSouth. BellSouth, in its response to this Exception Report, agreed that it had sent KCI only 7 ODUF records for these local calls, but stated that it had correctly billed KCI for 8 local calls. BellSouth further stated that when this one local call was processed through the billing system, one of the system edits identified an error to be investigated. Once the error was resolved, the call was released back into the billing system to be billed. However, an indicator that tells the system whether or not a copy of the call record had been sent to DUF was incorrectly set. This incorrectly set indicator was the reason why KCI did not receive the DUF record for this call. BellSouth rectified this problem by issuing a system trouble ticket which was completed on 9/16/00. KCI generated additional local calls in January 2001. After review of the DUFs for these calls and the corresponding bills, KCI found that the test CLEC was billed accurately and correctly for each test call. Based on KCI's generation and validation of additional calls and BellSouth's issuance and completion of a system trouble ticket to address the incorrectly set indicator, KCI closed discussion on this issue.

As a result of the analysis presented above, KCI believes that BellSouth has adequately addressed the issue identified in Exception 103.

Based on BellSouth's response, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 103.

Attachments: None.

CLOSURE REPORT FOR EXCEPTION 115

BellSouth Georgia OSS Testing Evaluation

Date: March 23, 2001

EXCEPTION CLOSURE REPORT

Exception:

BellSouth does not respond to Loop Make-Up Service Inquiries (LMU/SI) within the specified seven-day interval.

Summary of Exception:

According to the *BellSouth Loop Makeup (LMU) CLEC Information Package* (Version 1) available on the BellSouth Interconnection Service Web site, a CLEC should receive a response to an LMU/SI within seven working days.

KPMG Consulting, Inc. (KCI) submitted 104 LMU/SIs to BellSouth between July 10th and August 8th, 2000. The KCI-developed benchmark for this test is 95% of LMU/SIs returned within the seven working day interval specified by BellSouth.¹ As of August 28, 2000, KCI had received responses to 75% of LMU/SIs (78) within the specified seven day interval.

Summary of BellSouth's Response:

BellSouth responded to the original summary information table sent by KCI by adding a field that included its findings.

PON	Date Sent	Submitted via facsimile/email	BellSouth Response
X046A12002	7/10/2000	email	Not Received in CRSG
X046A110002	7/17/2000	email	Agree.
X001P11004, X001P11006, X001P11007, X039A210001, X046P12007, X001P12006	7/18/2000	email	Agree.
X039A11004, X039A12004	7/20/2000	email	Received 9/19 & 9/20 respectively in CRSG email sent 9/21 to M. Buckman. Will fax e-mail upon request.
X039P12006, X046BP11003, X046BP11004, X046BP11006, X046BP11007, X046BP11009, X046BP11010	7/21/2000	email	Agree.

¹ In the absence of a Public Service Commission-approved or BellSouth-published standard, KCI, based on its professional judgment, has identified a 95% benchmark to be used for the purposes of this evaluation.

CLOSURE REPORT FOR EXCEPTION 115

BellSouth Georgia OSS Testing Evaluation

X0R03A, X0R04A, X0R05A, X0R06A, X0R08A, X0R09A, X0R011A, X0R012A, X0R014A	8/8/2000	facsimile	Agree.
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KCI's Re-Test Activities:

KCI's re-test activities consisted of submitting 56 LMU/SIs to the Complex Resale Support Group via email.

Summary of KCI's Re-Test Results:

Out of the 56 LMU/SIs sent to BellSouth, 96% (54) received a LMU/SI response within seven working days.

As a result, KCI believes that BellSouth has adequately addressed the issues identified in Exception 115.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 115.

Attachments: None.

Date: March 23, 2001

EXCEPTION CLOSURE REPORT

Exception:

BellSouth-reported raw data values for Completion 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 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, 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 – *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)* – KCI compared the BellSouth-reported values for COMPLETION DATE² in the raw data files with the completion date that KCI received from HP for March 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 Completion Date.

TABLE 1—COMPLETION DATE

PON	SERVICE ORDER NUMBER	RAW DATA FILE	BLS-REPORTED VALUE	KCI-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

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.

CLOSURE REPORT FOR EXCEPTION 119

BellSouth Georgia OSS Testing Evaluation

PON	SERVICE ORDER NUMBER	RAW DATA FILE	BLS-REPORTED VALUE	KCI-REPORTED VALUE	MONTH
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

Summary of BellSouth's Response:

"KCI reported that BellSouth-reported raw data values for the completion date for the KCI Test CLEC do not match the KCI-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 KCI 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.

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

CLOSURE REPORT FOR EXCEPTION 119

BellSouth Georgia OSS Testing Evaluation

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 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

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)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 LOCBAN10/14/2000 14.15.58 SPLT GEORGIA 912/478 NPA SPLIT
TLRS LOCBAN-TN10/14/2000 14.15.59 SPLT GEORGIA 912/478 NPA SPLIT
KPMG Consulting, Inc.

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CLOSURE REPORT FOR EXCEPTION 119

BellSouth Georgia OSS Testing Evaluation

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:
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)

MOBI RECORD

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

KCI 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."

CLOSURE REPORT FOR EXCEPTION 119

BellSouth Georgia OSS Testing Evaluation

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

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

KPMG Consulting, Inc.

03/22/01

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Summary of KCI's Re-Test Activities:

KCI reviewed the explanations provided by BellSouth in its response to Exception 119.

KCI also compared the Completion Date timestamps in the BellSouth-provided raw data file with the corresponding timestamps in the KCI-collected data file for two subsequent months, 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.)

Summary of KCI's Re-Test Results:

KCI accepts the BellSouth response that for the *Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices* (JPDY) files, the commitment date is 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.

In the case of service order number CPW3G381, KCI found only one instance of this type of discrepancy in all the nine months (March through November 2000) of testing activity of data comparison between the BellSouth-reported data and the KCI-collected data for Completion Dates. BellSouth, in its response, has suggested that code changes are going to be implemented beginning April 2001 such that a Service Order number would be considered to be complete in the month when it is processed through SOCS and will be included in the Jeopardy report for that month. Because KCI has found only one such discrepancy, and BellSouth is addressing the issue, KCI is confident that the error in question is not significant.

During its review of subsequent months, KCI confirmed BellSouth's statement that certain Service Orders had completion dates that appeared in the October raw data file. KCI did not identify any similar Completion Date discrepancies for the other Provisioning SQMs during October and November 2000.³

As a result, KCI believes that BellSouth has adequately addressed the issues identified in Exception 119.

Based on re-testing activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 119.

Attachments: None.

³ KCI discovered two discrepancies unrelated to the ones identified in this exception for October and November 2000, which resulted in Exception 128 being issued.

Date: March 23, 2001

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

During the course of the functional re-test¹ 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"² conforms to the latest BellSouth ordering documentation³.

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 (PM)(i.e., generated by BellSouth ordering representatives).

KCI provided BellSouth with PON details for the following:

- LSRs receiving multiple error messages (including the RTR error). Supplements were issued to correct the non-RTR errors identified; these supplements received FOCs.

¹ This re-test was initiated to address deficiencies identified in other evaluation criteria (not related to CLR accuracy); however, results were monitored across all relevant evaluation criteria.

² Prior to transmission to BellSouth, this RTR value of "C" gets translated into "AT" in conformance with EDI technical specifications.

³ *Local Exchange Ordering Guide, Volume 1*

- LSRs receiving multiple error messages (including the RTR error). Supplements were issued to correct the non-RTR errors. These supplements again received an RTR error message.
- LSRs receiving a single error message (RTR issue).
- LSRs not receiving an RTR-related error messages (instances of the same test cases (on above lists) that did receive an RTR error.

Summary of BellSouth's 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

Summary of KCI Results:

During functional re-testing, KCI received inaccurate CLR's for approximately 30% of total BellSouth representative-issued clarifications on Resale EDI orders.⁴ KCI does not have a statistically significant sample size of PM CLR's received after BellSouth's coverage of its representatives on 02/09/01.

With no subsequent re-testing activities planned, KCI is assigning a Not Satisfied result to the related Resale evaluation criteria.

In the absence of additional planned re-test activity, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 132.

Attachments: None.

⁴ KCI observed 14 instances of CLR's with an inaccurate RTR error for Resale orders. KCI received a total of 48 Resale EDI PM CLR's during the Resale re-test period.



CLOSURE REPORT FOR EXCEPTION 135

BellSouth Georgia OSS Testing Evaluation

Date: March 23, 2001

EXCEPTION CLOSURE REPORT

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 (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.

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
UNE Total Billed Revenue	57,921.15	56,563.26
UNE Total Adjustments	13,984.65	12,626.76

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.

KPMG Consulting, Inc.

03/22/01

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CLOSURE REPORT FOR EXCEPTION 135

BellSouth Georgia OSS Testing Evaluation

Category	KCI Calculations	BellSouth's Report
UNE Percent Accuracy	75.856	77.677

Summary of BellSouth's Response:

"The January Billing Invoice Accuracy reports that KCI 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."

Summary of KCI Re-Test Activities:

KCI reviewed BellSouth's response listed above. KCI also reviewed BellSouth's updated KCI Test CLEC SQM reports, and compared BellSouth's re-calculated values to those KCI originally calculated.

Summary of KCI Re-Test Results:

The SQM values contained in the revised BellSouth SQM report matched those KCI calculated, exactly.

BellSouth indicated that revisions are pending that will enable PMAP to recognize either parentheses or minus signs as denotations for negative revenues. Additionally, until such revisions are made in PMAP, BellSouth will employ a manual verification process to ensure reporting accuracy (i.e., that negative revenue figures are treated appropriately in the calculations).

Based upon the procedures BellSouth is putting into place, the infrequency of the occurrence of negative revenues, and the rarity of such formatting issues through the



Consulting **CLOSURE REPORT FOR EXCEPTION 135**
BellSouth Georgia OSS Testing Evaluation

16 months during which KCI has reviewed reports for this SQM, KCI believes that BellSouth has adequately addressed the issues identified in Exception 135.

Based on re-testing activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 135.

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:

Kristy R. Holley, Division Director
Consumers' Utility Counsel
47 Trinity Avenue, S.W.
4th Floor
Atlanta, GA 30334-4600
404-656-3982 (o)

Newton M. Galloway
Smith, Galloway, Lyndall & Fuchs
Suite 400 First Union Bank Tower
100 South Hill Street
Griffin, GA 30229
770-233-6230 (o)

Charles A. Hudak
Gerry, Friend & Sapronov, LLP
Three Ravinia Drive
Suite 1450
Atlanta, GA 30346-2131
770-399-9500 (o)

Kent F. Heyman
Sr. VP and General Counsel
Mpower Communications Corp.
171 Sully's Trail, Suite 300
Pittsford, NY 14534
716-218-6551 (o)

Suzanne W. Ockleberry
AT&T
1200 Peachtree Street, NE
Suite 8100
Atlanta, GA 30309
404-810-7175 (o)

Charles V. Gerkin Jr.
Smith, Gambrell & Russell, LLP
Promenade II, Suite 3100
1230 Peachtree Street, N.E.
Atlanta, GA 30309-3592
404-815-3716 (o)

Frank B. Strickland
Holland & Knight LLP
One Atlantic Center, Suite 2000
1201 West Peachtree Street
Atlanta, GA 30309-3400
404-817-8484 (o)

Jeremy D. Marcus
Blumenfeld & Cohen
Co-Counsel for Rhythm, aka ACI Corp.
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036
202-955-6300 (o)

Scott A. Sapperstein
Sr. Policy Counsel
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619
813-829-4093 (o)

John P. Silk
Georgia Telephone Association
1900 Century Boulevard, Suite 8
Atlanta, GA 30345
404-321-5368 (o)

Eric J. Branfman
Richard M. Rindler
Swidler & Berlin
3000 K Street, NW, Suite 300
Washington, DC 20007
202-945-6940 (o)

Robert A. Ganton
Regulatory Law Office
Dept. Army
Suite 700
901 N. Stuart Street
Arlington, VA 22203-1837
703-696-1645 (o)

Peter C. Canfield
Dow Lohnes & Albertson
One Ravinia Drive, Suite 1600
Atlanta, GA 30346
770-901-8800 (o)

James M. Tennant
Low Tech Designs, Inc.
1204 Saville Street
Georgetown, SC 29440
803-527-4485 (o)

Mark Brown
Director of Legal and Government Affairs
MediaOne, Inc.
2925 Courtyards Drive
Norcross, GA 30071
770-559-2000 (o)

Daniel S. Walsh
Attorney General Office
Department of Law—State of Georgia
40 Capitol Square, S.W.
Atlanta, GA 30334-1330
404-657-2204 (o)

Harris R. Anthony
BellSouth Long Distance
400 Perimeter Center Terrace
Suite 350 – North Terraces
Atlanta, GA 30346
(770) 352-3116 (o)

Charles F. Palmer
Troutman Sanders LLP
5200 NationsBank Plaza
600 Peachtree Street, NE
Atlanta, GA 30308-2216
404-885-3402 (o)

Judith A. Holiber
Morgenstein & Jubelirer
One Market
Spear Street Tower, 32nd Floor
San Francisco, CA 94105
415-901-8700 (o)

Nanette S. Edwards
Regulatory Attorney
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802
256-382-3856 (o)

Peyton S. Hawes Jr.
127 Peachtree Street, N.E.
Suite 1100
Atlanta, GA 30303-1810
404-577-6200 (o)

Jeffrey Blumenfeld
Elise P. W. Kiely
Blumenfeld & Cohen
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036
202-955-6300 (o)

William R. Atkinson
Sprint Communications Co. L.P.
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339
404-649-6221 (o)

Dana R. Shaffer
Legal Counsel
105 Molloy Street
Suite 300
Nashville, TN 37201
615-777-7700 (o)

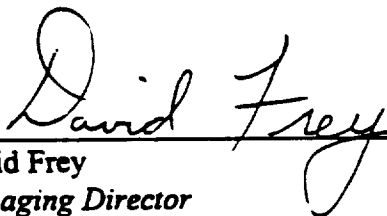
Glenn A. Harris
Lori Anne Dolquest
NorthPointe Communications, Inc.
303 Second Street, South Tower
San Francisco, CA 94107
415-403-4003 (o)

This 23rd day of March, 2001.

James A. Schendt
Regulatory Affairs Manager
Interpath Communications, Inc.
P. O. box 13961
Durham, NC 27709-3961
919-253-6265 (o)

Nancy Krabill
Director of Regulatory Affairs
1300 W. Mockingbird Lane
Suite 200
Dallas, TX 75247
678-444-4444 (o)

Anne E. Franklin
Arnall Golden & Gregory, LLP
2800 One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309
404-873-8536 (o)


David Frey
Managing Director

KPMG Consulting, Inc.
1835 Market St, 24th Floor
Philadelphia, PA 19103
(215) 405-6880

(03/21/01)



1600 Market Street
Philadelphia, PA 19103-7279

Telephone 215 299 1400

Fax 215 299 3150

RECEIVED

APR 06 2001

**EXECUTIVE SECRETARY
G.P.S.C.**

April 6, 2001

Mr. Reece McAlister
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

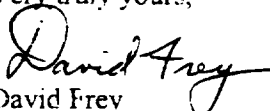
Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of the following responses from BellSouth: Exception 122 BLS Amended Response; Exception 129 BLS Amended Response; Exception 133 BLS 2nd Amended Response and accompanying attachment. Please also find Closure Reports for Exceptions 16, 26, 35, 93, 117, 124 & 126.

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



KPMG Consulting, Inc., an independent consulting company

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 122



RECEIVED

APR 06 2001

Date: March 26, 2001

EXECUTIVE SECRETARY
G.P.S.C.

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 AMENDED RESPONSE TO 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 AMENDED RESPONSE TO 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 AMENDED RESPONSE TO EXCEPTION 122

BellSouth Amended Response:

BTSI Work Request CMVC 11912 has been completed. PMAP Change Request (CR) 899 will provide time stamps from EDI, LENS, and TAG for *FOC Timeliness*; CR 1160 will provide time stamps from EDI, LENS, and TAG for *Reject Interval*. Both change requests are scheduled for implementation on April 1, 2001.

BellSouth Second Amended Response:

Provided below is a description of the time-stamping process used for LSRs and response documents processed via EDI.

When an LSR is sent to BellSouth by a CLEC (either via CONNECT:Direct or VAN), it is part of a file. At that point it is an X12 document within an X12 envelope--part of one or more documents in a file. When the file is processed through the EDI translator, each LSR becomes a distinguishable business document with a unique CC/PON/VER. The trading partner identity is authenticated during the translation, as is the X12 validity of the data. This is when the timestamp is logged.

BellSouth EDI currently processes CLECs' LSRs in either the MVS Harbinger environment or the Mercator UNIX environment. We are in the process of moving all CLECs from Harbinger to the Mercator platform, with a target for all transitions to be completed by the end of 2nd quarter, 2001. The original plan was to flash cut all CLECs to Mercator. As a result, we designed our PMAP feed based on the Mercator environment. (Note: This plan was since revised to a staggered conversion approach, and a temporary Harbinger PMAP solution was implemented.)

Our current Mercator architecture has CLEC files transmitting into our MVS system, where they are immediately copied into a file and moved via CONNECT:Direct to the UNIX production box where the Mercator translation software resides. The Mercator translation process is multi-threaded, so when the file is presented, it is immediately translated. A part of the translation process is generation of Functional Acknowledgments (997 documents). Under normal operating conditions, this entire process--from MVS to UNIX translation--will take less than two minutes.

Our desired state architecture will have both VAN and CONNECT:Direct CLEC files transmitting directly to the UNIX box, eliminating the file copying and CONNECT:Direct file transfer from the MVS to UNIX environment. Under normal operating conditions, this will reduce the entire processing time from minutes to seconds. This environment is expected to be fully functional by end of 2nd quarter, 2001.

Additionally, response documents being returned to CLECs are timestamped at translation time. Application files will be moved from BellSouth downstream systems via CONNECT:Direct to the UNIX production box where they will be translated to X12 format. Translated documents will then be transmitted via

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 122

CONNECT:Direct immediately to those CLECs using a CONNECT:Direct transport mechanism. Documents for trading partners using a VAN will be moved via CONNECT:Direct to our MVS environment for pickup by the VAN.

The Sterling Commerce CONNECT:Direct product does not have the capability of logging a timestamp. BellSouth EDI considered doing a file copy and matching envelope information to resultant translated document information to get an earlier timestamp, but found it would be a complex process, with little benefit. The desired state architecture has the files coming directly from the CLEC or VAN to the UNIX box that runs the translator, with the difference in the "in-the-door" timestamp and the "translation" timestamp being seconds, which is considered negligible.

Change Requests 899 and 1160 will be implemented on June 1, 2001.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 129



Date: March 22, 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.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 129

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 (Fully Mechanized)	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. 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 the 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 the 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 the 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 due to code changes.	10/31/00	Closed	11/6/00
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

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 129

Item	Measurement	Issue	Date Opened	Open/Closed	Date Corrected
27	Total Service Order Cycle Time	Step 4 of the May 15, 2000 (version 2.0.4) of the Raw Data User Manual is incorrect. Instead of using the service order number (so_nbr) only to identify duplicates the combination of service order number (so_nbr) and issu_dt (the date when the service order is issued) should be used.	10/5/00	Closed	10/13/00
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
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

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 129

Item	Measurement	Issue	Date Opened	Open/Closed	Date Corrected
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
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 UIT 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

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 129

Item	Measurement	Issue	Date Opened	Open/Closed	Date Corrected
71	Customer Trouble Report 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 due to duplicate records.	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 due to duplicate records	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 for July 2000. KCI can match BellSouth values using January 2001 data.	12/4/00	Closed	3/6/00
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	
83	Reject Interval for electronically submitted service requests	The depicted benchmark is inconsistent with the June 6 th 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 th Order.	1/10/00	Open	
85	LNP Disconnect Timeliness	The depicted benchmark is inconsistent with the June 6 th 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 th 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 th 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 th 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 th 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	
91	TSOCT for ISDN Loop	This Total Service Order Cycle Time (TSOCT) measure was calculated as an Order Completion Interval (OCI) measure. BellSouth changed to code to add the Firm Order Confirmation (FOC) interval to the TSOCT measure.	02/13/2001	Closed	02/27/2001
92	Reject Interval for Trunks and % Rejected Service Requests for Trunks	The October 2000 data includes other products than local interconnection trunks. This problem is fixed starting with December 2000 data	12/21/2000	Closed	02/15/2001

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 129

Item	Measurement	Issue	Date Opened	Open/Closed	Date Corrected
93	- Coordinated Customer Conversions -% Provisioning Troubles Received Within 7 Days of a Completed Service Order	The definition should be more explicit in stating that non-coordinated cuts (work_type_id = 3) are included in this measure. The last sentence in the business rule section states that "...are calculated searching in the <u>prior report period</u> ... following <u>30 days</u> after the completion..." The statement should say "...are calculated searching in the <u>current report period</u> ... following <u>7 days</u> after the completion..."	02/15/2001	Open	
94	- Coordinated Customer Conversions -% Provisioning Troubles Received Within 7 Days of a Completed Service Order	Step 3 of the computational instructions in the October version of the Raw Data User Manual states that if the LATE_FLAG_GT_30 is 1 then the cutover began <u>more than 15 minutes but less than 31 minutes</u> after the Scheduled Cut Start Time. The statement should say that if the LATE_FLAG_GT_30 is 1 then the cutover <u>began more than 30 minutes</u> after the scheduled cut start time.	02/15/2001	Open	
95	- Coordinated Customer Conversions -% Provisioning Troubles Received Within 7 Days of a Completed Service Order	The description of the denominator is imprecise in the Calculation section of the SQM document. The denominator is the total number of service order circuits completed during the <u>current reporting month</u> and not service order circuits completed during the <u>previous month</u> .	02/15/2001	Open	
96	Total Service Order Cycle Time	The SQM documentation states that the Total Service Order Cycle Time is the combination of Firm Order Confirmation and Average Order Completion Interval. For some products like UNE xDSL Loop, the total service order cycle time (TSOCT) is measured by the time interval from the time a service inquiry is received to the time when a service order is completed which is an addition of three time intervals, the 1) service inquiry interval (SI); 2) the firm order confirmation (FOC); and 3) the order completion interval (OCI). This has not been properly documented in the <i>Georgia SQM Plan</i> .	02/15/2001	Open	
97	LNP - Percent Missed Installation	The denominator for this measure should be the number of service orders <u>completed</u> during the reporting period and not the number of service orders <u>confirmed</u> in the reporting period.	02/15/2001	Open	
98	LNP-Firm Order Confirmation Timeliness	The calculation formula for average firm order confirmation is mistakenly labeled as "Average Reject Interval".	02/15/2001	Open	
99	LNP-Firm Order Confirmation Timeliness	The last sentence in the business rules section describes the denominator as the number of orders completed whereas it should state the number of service requests confirmed.	02/15/2001	Open	
100	Service Inquiry with Firm Order	BRITE currently cannot handle characters like '-' (dash) in the Purchase Order Number (PON) field. Since the CLEC determines the PON this incapability may result in not being able to enter the PON in BRITE correctly.	02/15/2001	Open	
101	Flow Through	The June 6 th Order prescribes a benchmark of 95% for Residence, 90% for Business and 85% for UNE products. However, BellSouth did not apply these benchmarks.	02/15/2001	Open	
102	Average Jeopardy Notice Interval	Values for 2w Analog Loop with INP Design, 2w Analog Loop with INP Non Design, 2w Analog Loop with LNP Design, 2w Analog Loop with LNP Non Design, INP Standalone, LNP Standalone, Local Interconnection Trunks, for Average Jeopardy Notice Interval & Percent Jeopardies are reported in the June 6, Docket, but not provided by BLS.	02/15/2001	Open	
103	Average Completion Notice Interval	Values for Local Interconnection Trunks, INP (Standalone), LNP (Standalone), 2w Analog Loop with INP Design, 2w Analog Loop with INP Non-Design, 2w Analog Loop with LNP Design & 2w Analog Loop with LNP Non-Design products have been requested in the June 6 Order, but not provided by BLS.	02/15/2001	Open	
104	Percent Missed Installation	The "UNE Loops w/LNP" product is listed in the June 6 th Order but no charts are produced.	02/15/2001	Open	
105	Total Service Order Cycle Time	The "UNE Loops w/LNP" product is listed in the June 6 th Order but no charts are produced.	02/15/2001	Open	
106	Total Service Order Cycle Time - Offered	The "UNE Loops w/LNP" product is listed in the June 6 th Order but no charts are produced.	02/15/2001	Open	
107	Collocation	BellSouth used the benchmark of 75 calendar days for Virtual and 130 calendar days for Physical Collocation which corresponds to the benchmark for Extra-Ordinary in the June 6 th Order. BellSouth did not apply the benchmarks listed as Ordinary.	02/15/2001	Open	
108	Held Orders	Changes made to ICAIS table to be investigated	02/15/2001	Open	

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 129

Item	Measurement	Issue	Date Opened	Open/Closed	Date Corrected
109	Total Service Order Cycle Time for Trunks	BLS reported SQM values do not agree with KCI-calculated values for May, June and July 2000. BellSouth reran their values and matches with KCI calculated values after the rerun.	10/18/00	Closed	11/22/00
110	Reject Interval for Trunks and %Rejected Service Requests for Trunks	The numerator for "%Rejected Service Requests for Trunks" is inconsistent with the denominator for "Reject Interval for Trunks" measure for May, June and July, 2000.	11/9/2000	Closed	12/6/2000
111	Reject Interval for Trunks and %Rejected Service Requests for Trunks	BellSouth used the "site" field to identify the state which is inaccurate because there are 5 site and 9 states. Also, the holiday and weekend time is subtracted from the reject interval duration. These problems have been fixed starting with October 2000 data.	11/30/2000	Closed	12/6/2000
112	Hot Cuts Timeliness	KCI found that the "SFDT" field (scheduled cut start time) contains records with a datestamp but not a timestamp in June, July and August raw data. These records should have been excluded from the SQM calculation. This problem is fixed starting with October 2000 data.	10/20/2000	Closed	11/15/2000
113	Held Order Interval	KCI cannot replicate the values for July 2000. BellSouth clarified that the field circuit_cnt_id should be used to identify the number of circuits instead of using the field num_items_worked_on. Given this clarification KCI was able to replicate the July 2000 values.	10/25/2000	Closed	12/4/2000

Impact:

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

BellSouth Response

Item 77:

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

Item 78:

Measurement: Provisioning Troubles in 30 Days

Issue: Missing Data Elements Required for Calculations/User Manual Update

Response: Change requests to correct the irregularities in PMAP were implemented on March 1, 2001. Retesting will be conducted on data for February 2001.

Item 81:

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

Item 82:

Measurement: Service Inquiry with Firm Order

Issue: 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.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 129

Response: BellSouth's Complex Resale Support Group (CRSG) has revised the BRITE database to accept the PON numbers exactly as received from the CLEC. This eliminated data entry restrictions that contributed to mismatches of PONs between BRITE (entered by the CRSB) and LON (entered by the LCSC).

Item 83:

Measurement: Reject Interval for electronically submitted service requests

Issue: 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 one hour.

Response: The correction to this chart has been made and was reflected in the January 2001 data run in February 2001.

Item 84:

Measurement: Average Jeopardy Notice Interval

Issue: The depicted benchmark is inconsistent with the June 6, 2000 order.

Response: Corrections have been provided to the chart development group. A chart entitled "% Jeopardy Notice within 48 hours" is replacing this chart. The measure will go into production in April 2001 and will have a benchmark of 95%.

Item 85:

Measurement: LNP Disconnect Timeliness

Issue: 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.

Response: BellSouth has entered a change request to correct the benchmark. This correction will be reflected in 271 charts produced in June 2001, using May 2001 data.

Item 86:

Measurement: Held Orders

Issue: 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.

Response: The change is in progress and should be reflected in the April 2001 charts for March 2001 data.

Item 87:

Measurement: Order completion Interval for LNP Standalone

Issue: These products are listed in the June 6, 2000 order but no charts are produced for these products.

Response: The change is in progress and should be reflected in the April 2001 charts for March 2001 data.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 129

Item 88:

Measurement: Held Order Interval for LNP Standalone

Issue: These products are listed in the June 6, 2000 order but no charts are produced for these products.

Response: For Held Order Interval for LNP Standalone, BellSouth is currently producing 6 charts in chart series B.2.26.10.

Item 89:

Measurement: Provisioning Troubles within 30 days for LNP Standalone

Issue: These products are listed in the June 6, 2000 order but no charts are produced for these products.

Response: These products do not exist after the numbers are ported. Therefore, no charts are produced. This was in the original GA order but was removed in later versions.

Item 90:

Measurement: Reject Interval and % Rejected Service Requests

Issue: 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.

Response: In the calculation for the Percent Rejected Service Requests report, BellSouth includes LSRs that are not received and rejected within the same reporting period. The opportunity exists for an LSR to be received and rejected in different months. BellSouth does not exclude these cases in order to capture all LSRs submitted and rejected. In these cases, the LSR is counted in the month in which it is received and the Reject is counted in the month in which it was returned. For the Reject Interval report, LSRs are counted in the month they are rejected.

Items 93-99:

BellSouth is currently investigating these items and will provide responses when the investigations are complete.

Item 100:

Service Inquiry with Firm Order

Issue: BRITE currently cannot handle characters like '-' (dash) in the Purchase Order Number (PON) field. Since the CLEC determines the PON this incapability may result in not being able to enter the PON in BRITE correctly.

Response: BellSouth's Complex Resale Support Group (CRSG) has revised the BRITE database to accept the PON numbers exactly as received from the CLEC. This eliminated data entry restrictions that contributed to mismatches of PONs between BRITE (entered by the CRSG) and LON (entered by the LCSC).

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 129

Items 101-108:

BellSouth is currently investigating these items and will provide responses when the investigations are complete.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 133



Date: March 28, 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 SECOND AMENDED 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 Amended 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-3) are not worded such that the intended interpretation is clear. Therefore, BellSouth has rewritten the definitions and business

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 133

rules and will incorporate them into future revisions of the Georgia SQM. The revisions are attached.

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
- Established process for monthly reconciliation of CLEC-reported outages and REM-reported outages

Transport failures that can be linked to specific applications will be charged against those applications. Some transport failures, such as failure of a core router, could impact more than one application. A transport failure of that nature would be charged against the router component. If the failure can be linked to specific applications, it will be charged against those applications, as well as the router component. Such failures can be reported by users or by automated alarms.

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.
- 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) X 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 <ul style="list-style-type: none">• Legacy Contract Type (per reporting dimension)• Regional Scope• Hours of Downtime	Report month <ul style="list-style-type: none">• 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	• $\geq 99.5\%$



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

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.
- 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
<ul style="list-style-type: none">• Availability of CLEC TAFI• Availability of LMOS HOST, MARCH, SOCS, CRIS, PREDICTOR, LNP and OSPCM• ECTA	<ul style="list-style-type: none">• 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
<ul style="list-style-type: none">• Regional Level	<ul style="list-style-type: none">• $\geq 99.5\%$

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

Date: April 6, 2001

EXCEPTION CLOSURE REPORT**Exception:**

BellSouth issued multiple bills containing erroneous information to the KPMG Consulting, Inc. (KCI) CLEC.

Summary of Exception:

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

Undocumented Charges

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

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

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

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

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

Representative occurrences of errors are detailed on the following invoices:

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

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

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

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

Incorrect Rates

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

Representative occurrences of this error are detailed below.

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

Mislabeled Information

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

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

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

Summary of BellSouth's Response:

Undocumented Charges – USOC VE1R2

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

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

Undocumented Charges – USOC SOMECH

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

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

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

Undocumented Charges – USOC UEAC2

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

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

Incorrect Rates – USOC UEAL2

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

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

Mislabeled Information

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

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

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

Summary of KCI's Re-test Activities:

KCI's re-test activities consisted of a review of the interim process implemented by BellSouth in July 2000 and associated documentation of the process; a review of invoices; an attempt at replicating and reviewing adjustment requests through to billing; and the submission of orders in January 2001 and February 2001 and a validation of the corresponding invoices.

The interim process reviewed was the temporary safeguard put in place by BellSouth to capture the issues associated with the undocumented charges (USOCs SOME2 and UEAC2) and the incorrect rates (USOC UEAL2) noted in this Exception. Specifically, the internal BellSouth UNE Account Report and the processes and documentation surrounding this report were reviewed by KCI. The UNE Account Report would have captured those USOCs that were not rated in the CLEC's Interconnection Agreement or appeared as zero-rated when ordered by the CLEC. This interim process was replaced by a permanent CRIS service order edit on December 27, 2000 for the state of Georgia.³

KCI's Re-test Results:**Undocumented Charges**

USOC VE1R2: In 4Q00, BellSouth added the USOC VE1R2 to the Standard Agreement. BellSouth provided KCI with "Attachment 2" of this Standard Agreement that

³ Please refer to the BellSouth Amended Response to Exception 124 issued January 29, 2001 for further details.

documented the monthly-recurring rate of \$0.30 for the USOC VE1R2.

KCI submitted port-loop combination orders in January 2001 to test if the USOC VE1R2 would be billed appropriately and correctly. Upon review of the corresponding invoices, KCI found no charges for the USOC VE1R2 were assessed in association with the orders submitted.

In its investigation, BellSouth found that following the issuance of the *FCC 319 Remand Order*, the KCI test CLEC's profile was modified so that it could order only the new type of port-loop combinations (post-319 Remand with no associated "glue" charges). The port-loop combinations ordered by KCI prior to the issuance of the *FCC 319 Remand Order* allowed for the application of the VE1R2 charges (non-recurring and monthly-recurring) to its bills (which KCI found to be the case).

KCI determined that since it could no longer order the pre-319 Remand port-loop combinations, it should not have expected to see any non-recurring or monthly-recurring charges for the USOC VE1R2 appearing on its bills associated with the port-loop combinations ordered in January 2001. In addition, KCI would not expect to see the USOC VE1R2 charges applied with port-loop combination orders on its bills on a going forward basis. KCI found that BellSouth had satisfactorily addressed this issue based on a review of the 4Q00 revised Standard Agreement and BellSouth's explanation of the non-appearance of the VE1R2 charges.

USOC SOMEK: According to BellSouth, the root cause of the incorrect billing of the USOC SOMEK was the fact that the USOC was not updated appropriately in the billing tables, which in turn resulted in the billing of the USOC at a zero rate.

In an effort to prevent recurrences of the billing of USOC SOMEK at a zero rate, BellSouth implemented an interim process in July 2000. KCI reviewed this interim process and was satisfied that it addressed the errors similar to those encountered with the USOC SOMEK. To permanently correct the problem and replace the interim process, BellSouth implemented a CRIS service order edit for the state of Georgia on December 27, 2000 that indicated an error for any UNE service order processed in CRIS for which a customer-specific rate entry had not been added to the billing rate tables.⁴

KCI submitted CRIS service orders from January 2001 to February 2001 that it expected would generate charges for the USOC SOMEK on the KCI test CLEC invoices. Upon review of the invoices, KCI validated that the USOC SOMEK was being billed accurately and appropriately at the \$3.50 non-recurring rate listed in the rate spreadsheets created for the KCI test CLEC in lieu of an Inter-Connection Agreement. From these results, KCI concluded that BellSouth had satisfactorily addressed the issue documented in this

⁴ Please refer to the BellSouth Amended Response to Exception 124 issued January 29, 2001 for further details.

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exception report either via a rate table update or through the proper functioning of the CRIS Service Order Edit.

USOC UEAC2: According to BellSouth, the root cause of the incorrect billing of the USOC UEAC2 was that the USOC had not been updated appropriately in the billing tables, which in turn resulted in the billing of the USOC at a zero rate.

In an effort to prevent recurrences of the billing of USOC UEAC2 at a zero rate, BellSouth implemented an interim process in July 2000. KCI reviewed this interim process and was satisfied that it addressed the errors similar to that encountered with the USOC UEAC2. To permanently correct the problem and replace the interim process, BellSouth implemented a CRIS service order edit for the state of Georgia on December 27, 2000 that will indicate an error for any UNE service order processed in CRIS for which a customer-specific rate entry has not been added to the billing rate tables.⁵

KCI submitted CRIS service orders from January 2001 to February 2001 that it expected would generate charges for the USOC UEAC2 on the KCI test CLEC invoices. Upon review of the invoices, KCI validated that the USOC UEAC2 was being billed accurately and appropriately at the \$0.30 monthly-recurring rate and the \$12.60 non-recurring rate listed in the rate spreadsheets created for the KCI test CLEC in lieu of an Inter-Connection Agreement. From these results, KCI concluded that BellSouth had satisfactorily addressed the issue documented in this exception report either via a rate table update or through the proper functioning of the CRIS Service Order Edit.

Incorrect Rates

USOC UEAL2: According to BellSouth, the root cause of the billing of incorrect rates for the USOC UEAL2 was that the USOC had not been loaded correctly in the CRIS rate tables. Specifically, the USOC was updated to the CRIS rate tables only for residence class of service and not for business class of service. The examples cited by KCI were found on business accounts. As such, the rate defaulted to zero. BellSouth added the USOC UEAL2 to the CRIS rate file for business classes of service on 3/1/00, with plans to have all occurrences of the USOC on CLEC accounts revised to reflect this charge by 3/17/00.

KCI reviewed the bills after the 3/1/00 implementation date to ensure that the update to the rate table had in fact taken effect. KCI found that for the month of March 2000, approximately 82% of the instances of the USOC UEAL2 were billed with the correct monthly-recurring rate. This percentage increased to approximately 86% in April 2000 and increased further to 100% in May 2000. As the percentages indicate, most of the monthly-recurring and pro-rated charges for the USOC UEAL2 were billed with the correct monthly-recurring rate following the 3/1/00 update to the CRIS rate table.

⁵ Please refer to the BellSouth Amended Response to Exception 124 issued January 29, 2001 for further details.

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However, for SL1 loops with service establishment dates before 3/1/00, KCI found that the monthly-recurring charges for the USOC UEAL2 were still billed at a zero rate. The issues with these pre-existing facilities were corrected as of the May 2000 invoice cycles.

In an effort to prevent recurrences of this problem, BellSouth implemented an interim process. KCI reviewed the interim process and was satisfied that it addressed the errors similar to that encountered with the USOC UEAL2. To permanently correct the problem and replace this interim process, BellSouth implemented a CRIS service order edit for the state of Georgia on December 27, 2000 that indicates an error for any UNE service order processed in CRIS for which a customer-specific rate entry has not been added to the billing rate tables (see the BellSouth Amended Response to Exception 124 issued January 29, 2001).

KCI submitted CRIS service orders from January 2001 to February 2001 that it expected would generate charges for the USOC UEAL2 on the KCI test CLEC invoices. Upon review of the invoices, KCI validated that the USOC UEAL2 was being billed accurately and appropriately at the monthly-recurring rate and the non-recurring rates listed in the rate spreadsheets created for the KCI test CLEC in lieu of an Inter-Connection Agreement. From these results, KCI concluded that BellSouth had satisfactorily addressed the issue documented in this exception report.

Mislabeled Information

Mislabeled in Detail of Adjustments Applied: KCI encountered two problems in its initial testing of adjustment requests: 1) mislabeling of the Adjustment Applied and 2) inappropriate aggregation of adjustments. According to BellSouth, the root cause of the mislabeling of the requested adjustments "Credits for Disconnected Service" was due to an error in mapping these types of transactions to the OBF "J" bill phrases. The labels were changed to match the phrases used for processing adjustments for retail customers on 4/19/00. As to the second issue, BellSouth stated that the aggregation of adjustments seen on the "J" bills is identical to the manner in which these types of transactions are aggregated in the billing systems for retail customers. However, in the instance of the three adjustments requested by KCI but aggregated as one adjustment, BellSouth stated that a LCSC representative had aggregated the three amounts together and entered one adjustment "voucher" due to a misunderstanding by the Billing Manager. BellSouth further stated that individual adjustments are normally processed unless the CLEC requests an aggregated adjustment.

KCI submitted three additional adjustment requests in July 2000 to re-test this issue. The first was a request for credit for cancellation of service for the USOC ESC and the USOC NPU as of 6/3/00 for a specific telephone number. The credit adjustment was requested to appear on the 7/29/00 invoice of a specific account number. Upon receiving the 7/29/00 invoice, KCI was able to confirm that the correct credit adjustment amount for the USOC ESC (for the period 6/4/00 through 7/28/00) had appeared on the invoice with

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the description "Credit for Service Removed --- ESC Three-Way Calling." The other credit adjustment for USOC NPU did not appear on the 7/29/00 invoice since the line was not provisioned with the "Non-Published Directory Listing" service. As such, consistent with KCI expectations, BellSouth correctly did not process a credit adjustment on the 7/29/00 invoice.

The second credit request was for cancellation of service for the USOC DRS as of 6/3/00 for a specific telephone number billed to a distinct telephone number. The credit adjustment was requested to appear on the 7/29/00 invoice of a specific account number. Upon receiving the 7/29/00 invoice, KCI was able to confirm that the correct credit adjustment amount for the USOC DRS (for the period 6/4/00 through 7/28/00) had appeared on the invoice with the description "Credit for Service Removed --- DRS Ringmaster® I- One."

The third credit request was for cancellation of service for the USOC ESF as of 6/3/00 on a specific telephone number billed to a distinct telephone number. The credit adjustment was requested to appear on the 7/29/00 invoice of a specific account number. Upon receiving the 7/29/00 invoice, KCI was able to confirm that the correct credit adjustment amount for the USOC ESF (for the period 6/4/00 through 7/28/00) had appeared on the invoice with the description "Credit for Service Removed --- ESF 30 Code Speed Calling."

As a result of the analysis presented above, KCI believes that BellSouth has adequately addressed the issues identified in Exception 16.

Based on BellSouth's response, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 16.

Attachments: None.

Date: April 6, 2001

EXCEPTION CLOSURE REPORT**Exception:****BellSouth does not deliver timely Completion Notices (CNs).****Summary of Exception:**

According to BellSouth ordering documentation, a CN is delivered to a CLEC when the service order is completed and error free¹. KPMG Consulting, Inc.'s (KCI) Customer Service Manager (CSM) indicated that for electronically-submitted Local Service Requests (LSRs), CNs will be delivered within one business day of the completion of actual service provisioning.

Through February 5, 2000 KCI received CNs on 44 service orders. Sixteen percent (16%) of these CNs were received later than one business day after the completion of provisioning².

Date of CN Receipt (CN) versus CN Due Date (DD)

CN = DD	CN = DD+1	CN = DD+2	CN = DD+3-5	CN = DD+ >5	TOTAL
33	4	2	0	5	44
75%	10%	5%	0%	11%	100%
Total Late Responses = 16%					

Summary of BellSouth's Response:

"For electronically submitted Local Service Requests LSRs, Completion Notices are transmitted when the service order is completed, error free and obtains a status of CPX or PCX. CPX is the status shown when the provisioning has been completed and PCX is the status needed to commence billing. Our internal system looks at both statuses since, depending on timing, a service order status can change from CPX to PCX while the CN is in queue to be sent to the CLEC.

There are error conditions which occur during the provisioning process which could delay receipt of a CN until resolved. For example, if a listing error is encountered after service is provisioned, the CN would be delayed until the error is cleared by a service

¹ *Local Exchange Ordering Guide, Volume 1, Issue 7N, January 2000, Section 13.1.*

² Service provisioning date is identified as the Due Date (DD) value within the CN.

representative in the Local Carrier Service Center. These errors are sometimes generated as a normal course of business during service order processing by downstream systems. There are now dedicated resources in the LCSC to resolve these types of errors on mechanically generated Resale or UNE orders. The dedicated resources for UNEs were implemented February 7, 2000. There have been dedicated resources to correct Resale service orders for over a year. Since the audit history for the above requests have been purged, BellSouth cannot provide any further details on why the CNs were delayed. BellSouth will modify the LEO IG, Vol. 1 by March 20, 2000 to clarify when a CN should be expected."

Summary of KCI Re-test Activities:

BellSouth delivers CNs upon the conclusion of two stages of provisioning activity:

- 1) Field Provisioning – the actual service completion associated with a customer's LSR
- 2) Downstream Provisioning Completion- subsequent directory listing and billing update activities

Local Number Portability (LNP) orders require an additional step prior to conclusion of completion activities. BellSouth returns LNP CNs only after the CLEC has completed the porting of associated telephone numbers with the Number Portability Administration Center (NPAC).

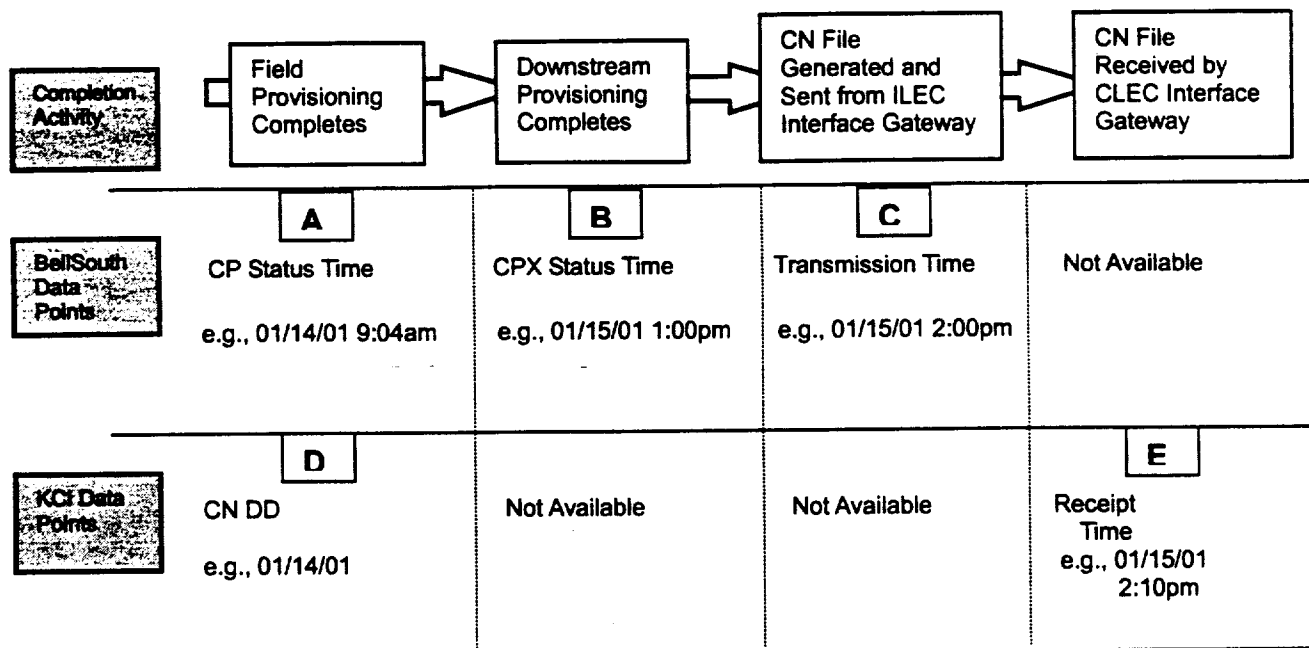
During its evaluation, KCI analyzes CLEC timestamps and data measurement points (e.g., timestamps associated with when the CLEC interface gateway transmits orders and receives responses, data points returned within responses received from BellSouth) in calculating results. For the Completion Notification Timeliness metric, these test CLEC data measurement points differ from those utilized by BellSouth in its official metrics calculation.

Figure I outlines the differences in data measurement points utilized by BellSouth and the KCI Test CLEC in calculating CN Timeliness.

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Figure I



In calculating the Service Quality Measurement, "Average Completion Notice Interval", BellSouth utilizes the following data measurement points:

- Field Provisioning Completion Date and Time (Data Point A)
- Downstream Provisioning Completion Date and Time (Data Point B)

In calculating CN Timeliness, KCI utilizes the following data measurement points:

- Field Provisioning Completion Date (Data Point D)
- CN File Receipt Date/Time Stamp (Data Point E)

In our professional judgment, the differences between the measurement points utilized by BellSouth in SQM calculation and those measurement points available to KCI for analysis prevent an adequately accurate comparison of KCI results to a benchmark of BellSouth retail parity.

However, while the data measurement points are not identical, those available to KCI do provide a reasonable proxy measurement of Completion Notification Timeliness (i.e., the interval between actual service provisioning completion and receipt of a CN response file). KCI will provide these results within its final report as diagnostic information, without assigning a result of Satisfied or Not Satisfied. The Georgia Public Service Commission may wish to investigate further the issue of data point measurement in the future.

CLOSURE REPORT FOR EXCEPTION 26BellSouth Georgia OSS Testing Evaluation

KCI Re-test Results:

The following tables provide the results of Completion Notification Timeliness for transactions submitted during the functional re-test initiated on August 25, 2000.

**Date of CN Receipt (CN) versus CN Due Date (DD):
Re-Test Results - TAG**

CN = DD	CN = DD+1	CN = DD+2	CN = DD+3-5	CN = DD+ >5	TOTAL
57	15	4	4	1	81
70%	19%	5%	5%	1%	100%

**Date of CN Receipt (CN) versus CN Due Date (DD):
Re-Test Results - EDI**

CN = DD	CN = DD+1	CN = DD+2	CN = DD+3-5	CN = DD+ >5	TOTAL
48	11	2	3	4	68
71%	16%	3%	4%	6%	100%

KCI is reporting the results of its CN Timeliness analysis as diagnostic information. As a result, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 26.

Attachments: None.



Date: April 6, 2001

EXCEPTION CLOSURE REPORT

Exception:

BellSouth issued multiple bills containing erroneous charges to KPMG Consulting, Inc. (KCI).

Summary of Exception:

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

Undocumented Charges

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

Incorrectly Rated Charges

USOC UEPLX: BellSouth inappropriately billed the KCI 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 KCI CLEC in lieu of an Interconnection 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 KCI CLEC the following:

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

Missing Charges

USOC UEAL2: BellSouth did not bill the KCI CLEC for the one-time charge for Universal Service Order Code (USOC) UEAL2, Unbundled Voice Grade SL1 Loop. This

CLOSURE REPORT FOR EXCEPTION 35

BellSouth Georgia OSS Testing Evaluation

USOC is listed in the rate spreadsheets created for the KCI 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 KCI CLEC for these charges when applicable.

Unbilled Unbundled Loop: The KCI 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.

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 CLECs, 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

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

**CLOSURE REPORT FOR EXCEPTION 35****BellSouth Georgia OSS Testing Evaluation**

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 will be 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.

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

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

Summary of KCI Re-test Activities:

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

KCI Re-test Results:Undocumented Charges:

USOC VE1R2: In 4Q00, BellSouth added the USOC VE1R2 to the Standard Agreement. BellSouth provided KCI with "Attachment 2" of this Standard Agreement that documents the non-recurring rate of \$12.60 for the USOC VE1R2.

KCI also submitted port-loop combination orders in January 2001 to test if the USOC VE1R2 would be billed appropriately and correctly. Upon review of the corresponding invoices, KCI found no charges for the USOC VE1R2 were assessed in association with the orders submitted.

In its investigation, BellSouth found that following the issuance of the *FCC 319 Remand Order*, the KCI test CLEC's profile was modified so that it could order only the new type of port-loop combinations (post-319 Remand with no associated "glue" charges). The port-loop combinations ordered by KCI prior to the issuance of the *FCC 319 Remand Order* allowed for the application of the VE1R2 charges (non-recurring and monthly-recurring) to its bills (which KCI found to be the case).

KCI determined that since it could no longer order the pre-319 Remand port-loop combinations, it should not have expected to see any non-recurring or monthly-recurring charges for the USOC VE1R2 appearing on its bills associated with the port-loop combinations ordered in January 2001. In addition, KCI would not expect to see the USOC VE1R2 charges applied with port-loop combination orders on its bills on a go-forward basis. KCI found that BellSouth had satisfactorily addressed this issue based on a review of the 4Q00 revised Standard Agreement and BellSouth's explanation of the non-appearance of the VE1R2 charges.

Incorrectly Rated Charges:

USOC UEPLX: To retest the system enhancement implemented by BellSouth on November 24, 2000, KCI submitted orders and validated the corresponding invoices in January 2001 and February 2001 that would generate charges for both first and additional non-recurring charges for SL1 services. Upon review of the invoices, KCI found that the appropriate non-recurring charges for first and additional service were applied correctly for the USOC UEAL2, Unbundled Voice Grade SL1 Loop, and the USOC USACC, Unbundled Network Element 2-Wire Conversion Change. The rates that were billed appropriately and correctly on the invoices and which are documented in the rate spreadsheets created for the KCI test CLEC in lieu of an Interconnection Agreement are as follows:

**CLOSURE REPORT FOR EXCEPTION 35****BellSouth Georgia OSS Testing Evaluation**

For the USOC UEAL2:

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

For the USOC USACC:

- \$2.01 Non-recurring charge for the first service
- \$0.31 Non-recurring charge for each additional service

KCI also submitted orders in January 2001 and February 2001 that would generate both first and additional non-recurring charges for the USOC UEPLX. Upon review of the corresponding invoices, KCI found that no non-recurring charges for the USOC UEPLX had been assessed for these orders. Further, KCI noted that the completion notices for these orders had a Field Identifier (FID) value of "WIC" associated with the instances of the USOC UEPLX. BellSouth explained that this FID "WIC" is used for "switch as is" and "switch with changes" requests to prevent non-recurring charges from billing for any USOC that has the FID present. Therefore, KCI should not have expected the non-recurring charges for the USOC UEPLX to be assessed for these orders. KCI found that BellSouth had satisfactorily addressed this issue based on the appropriate and correct billing of the two-tiered non-recurring pricing structures for the SL1 service USOCs UEAL2 and USACC.

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. KCI reviewed the interim process and was satisfied that it addressed the errors encountered with the USOC UEAL2.

KCI 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).

To correct the problem, BellSouth implemented a system enhancement on November 24, 2000. KCI submitted orders and validated the corresponding invoices in January 2001 and February 2001 that would generate both first and additional non-recurring charges for the USOC UEAL2, Unbundled Voice Grade SL1 Loop. Upon review of the invoices, KCI found that the non-recurring charges for first and additional service (\$42.54 and \$31.33, respectively) for the USOC UEAL2 were applied appropriately and correctly to the KCI test CLEC invoices.

Unbilled Unbundled Loop: In an effort to determine the cause of the unbilled circuit issue, KCI submitted additional orders to replicate the Unbundled Loop order activity,

KPMG Consulting, Inc.

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**CLOSURE REPORT FOR EXCEPTION 35****BellSouth Georgia OSS Testing Evaluation**

which had not flowed through to billing. After reviewing the associated Customer Service Records (CSRs) and corresponding bills, KCI did not witness a recurrence of the problem. While KCI was unable to determine the cause of this problem witnessed originally, it is satisfied that this issue does not warrant further investigation based upon the absence of any similar problems experienced during re-test activities.

As a result, KCI believes that BellSouth has adequately addressed the issues identified in Exception 35.

Based on re-testing activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 35.

Attachments: None.



Date: April 6, 2001

EXCEPTION CLOSURE REPORT**Exception:**

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

Summary of Exception:

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

As part of the BellSouth-Georgia OSS Evaluation, KCI is evaluating the accuracy, completeness and consistency of SQM definitions, calculations, and business rules in the *SQM Reports*.²

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

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

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

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

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

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

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

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

3. Provisioning - Percent Missed Installation Appointments

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

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

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

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

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

5. Provisioning - *Average Completion Notice Interval*

Calculation	$\Sigma (\text{Date and Time of Notice of Completion}) - (\text{Date and Time of Work Completion}) / (\text{Number of Orders Completed in Reporting Period})$
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The denominator should be the number of orders for which completion notices were sent, rather than number completed. Since there is a time lag between completion and notification times, the number of orders completed during the reporting period may differ from the number of orders for which a notification of completion has been issued to the CLEC.

6. Billing – *Invoice Accuracy*

Calculation	Invoice Accuracy = $(\text{Total Billed Revenues during current month}) - (\text{Billing Related Adjustments during current month}) / \text{Total Billed Revenues during current month} \times 100$
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“Total Billed Revenues during current month” pertain to the current month's bills, while “Billing Related Adjustments during current month” pertain to bills from both current and previous months. These two components of the numerator refer to different and inconsistent sets of bills.

**7. Billing – Usage Data Delivery Completeness**

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

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

8. Billing – Mean Time to Deliver Usage

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

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

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

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

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

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

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

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

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

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

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

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

Summary of BellSouth Response:

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

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

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

The Calculation and Definition are scheduled to be corrected in the July 2000 SQM update as outlined in the response to Observation 26. The Calculation will read:

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

Held Order Distribution Interval:

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

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

The Definition will read: "When delays occur in completing CLEC orders, the average period that CLEC orders are held for BellSouth reasons, pending a delayed completion, should be no worse for the CLEC when compared to BellSouth delayed orders.

Calculation of the interval is the total days orders are held and pending but not completed that have passed the currently committed due date; divided by the total number of held orders. This report is based on orders still pending, held and past the committed due date at the close of the reporting period. The distribution interval is based on the number of orders held and pending but not completed over 15 and 90 days. (Orders reported in the >90 day interval are also included in the >15 day interval)."

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

3. Provisioning - Percent Missed Installation Appointments

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

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

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

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

As noted in the response to Draft Exception 93, BellSouth will update the Definition, Calculation, and Business Rules in the next version of the SQM scheduled for July 2000. The updated definition will read: **Closed trouble reports received with 30 calendar days on the same line/circuit as a previous trouble report received as a percent of total troubles closed during the reporting period.**

The updated calculation will read: **(Closed trouble reports received with 30 calendar days on the same line/circuit as a previous trouble report received) / (Total trouble reports closed in the reporting period) X 100**

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

5. Provisioning - Average Completion Notice Interval

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

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

6. Billing – Invoice Accuracy

Billing related adjustments that are used to calculate the Invoice Accuracy Measure are derived from any adjustments that are applied to the billing account during the report month. There are billing situations where adjustments are made to a customer's bill that reflects several prior months' bills. The measure captures the adjustments for the month in which the adjustment appears on the customer's bill however the adjustment amount may include corrections for several prior months. This measure was designed based on historical measurement calculations for other companies who consider the calculation satisfactory. Additionally, if adjustments for previous months were updated, continual revisions and updates of the Invoice Accuracy measure for prior months would be an ongoing requirement. The ability to report adjustments on the month that the charge appears is not feasible.

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

**7. Billing – Usage Data Delivery Completeness**

The Usage Completeness measure as established by long standing national standards is tracked through reporting the volume of message records sent to the CLEC within thirty days after the AMA record is produced in the BellSouth Central Office. The number of records sent in the thirty day interval is expressed as a percentage of the total records sent. The established completeness target, for 98% of all usage to be delivered within thirty days, is included in many of the Local Interconnection contracts. Signed agreements between BellSouth Telecommunications Inc and Competitive Local Exchange Carriers include these calculations as defined for Completeness. The Usage Data Delivery Completeness measurement was defined based on the contract language of many of the negotiated CLEC contracts and is an accepted practice of reporting Usage Data Delivery Completeness.

8. Billing – Mean Time to Deliver Usage

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

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

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

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

In the OSS System Availability report, BellSouth will use a category of FULL OUTAGE as the indicator of the system being available.

***Will add this note to the Business rules section of the SQM.**

Note: Only full outages are used in the calculation of Application Availability. A full outage is incurred when any of the following circumstances exist:

1. The application or system is down.

2. The application or system is inaccessible, for any reason, by the customers who normally access the application or system.
3. More than one work center cannot access the application or system for any reason.
4. 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.

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

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

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

10. Maintenance and Repair – OSS Response Interval and Percentages

BellSouth will add the changes below to the July update of the SQM.

The metric will be renamed: ***OSS Response Percent within Interval***

Definition	The response intervals are determined by subtracting the time a request is received on the BST side of the interface until the response is received from the legacy system. Percentages of requests falling into each interval category are reported, along with the actual number of requests falling into those categories.
Calculation	$\text{OSS Response Interval} = (\text{Query Response Date and Time for Category "X"} - \text{Query Request Date and Time for Category "X"}) / (\text{Number of Queries Submitted in the Reporting Period})$ where, "X" is 0-4, ≥ 4 to 10, ≥ 10 , and ≥ 30 seconds X100.
Business Rules	This measure is designed to monitor the time required for the CLEC and BST interface system to obtain from BST's legacy systems the information required to handle maintenance and repair functions. The clock starts on the date and time when the request is received and the clock stops when the response has been transmitted through that same point to the requester. The number of requests and the percent within interval is accumulated. Percentages of requests falling into each interval category are reported, along with the actual number of requests falling into those categories."

Summary of KCI Re-Test Activities:

KCI re-test activities included the following for each issue:

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

KCI reviewed the changes BellSouth made to the July 2000 SQM.

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

KCI reviewed the changes BellSouth made to the July 2000 SQM.

3. Provisioning - Percent Missed Installation Appointments

KCI reviewed the changes BellSouth made to the July 2000 SQM.

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

KCI reviewed the changes BellSouth made to the July 2000 SQM.

5. Provisioning - *Average Completion Notice Interval*

KCI reviewed the changes BellSouth made to the July 2000 SQM.

6. Billing – *Invoice Accuracy*

KCI reviewed the changes BellSouth made to the July 2000 SQM.

7. Billing – *Usage Data Delivery Completeness*

KCI reviewed the clarification BellSouth made in response to this exception.

8. Billing – *Mean Time to Deliver Usage*

KCI reviewed the clarification BellSouth made in response to this exception.

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

KCI reviewed the changes BellSouth made to the July 2000 SQM.

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

KCI reviewed the changes BellSouth made to the July 2000 SQM.

KCI Re-Test Results:

Based upon its review, KCI developed the following conclusions for each issue.

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

KCI found the changes BellSouth made to the July 2000 SQM to be consistent with the documented calculation method and the definition as stated in the SQM for the Speed of Answer in Ordering Center – Local Carrier Service Center (LCSC) metric.

CLOSURE REPORT FOR EXCEPTION 93**BellSouth Georgia OSS Testing Evaluation**

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

KCI found the changes BellSouth made to the July 2000 SQM to be consistent with the documented calculation method and the stated intent of Mean Held Order Interval & Distribution Intervals metric.

3. Provisioning - *Percent Missed Installation Appointments*

KCI found the changes BellSouth made to the July 2000 SQM to be consistent with the documented calculation method and the stated intent of the Mean Held Order Interval & Distribution Intervals metric.

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

KCI found the changes BellSouth made to the July 2000 SQM to be consistent with the documented calculation method and the stated intent of the Percent Repeat Troubles Within 30 Days metric.

5. Provisioning - *Average Completion Notice Interval*

KCI found the changes BellSouth made to the July 2000 SQM to be consistent with the documented calculation method and the stated intent of the Average Completion Notice Interval metric.

6. Billing – *Invoice Accuracy*

KCI found the changes BellSouth made to the July 2000 SQM to be consistent with the documented calculation method and the stated intent of the Invoice Accuracy metric.

7. Billing – *Usage Data Delivery Completeness*

KCI found the response BellSouth made to this exception clarified the issues raised in this exception.

8. Billing – *Mean Time to Deliver Usage*

KCI found the response BellSouth made to this exception clarified the issues raised in this exception.

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

KCI found the changes BellSouth made to the July 2000 SQM to be consistent with the documented calculation method and the stated intent of the OSS Interface Availability metric.

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

KCI found the changes BellSouth made to the July 2000 SQM to be consistent with the documented calculation method and the stated intent of the OSS Response Interval and Percentages metric.

As a result, KCI believes that BellSouth has adequately addressed the issues identified in Exception 93.

Based on re-testing activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 93.

Attachments: None.

CLOSURE REPORT FOR EXCEPTION 117

BellSouth Georgia OSS Testing Evaluation

Date: April 6, 2001

EXCEPTION CLOSURE REPORT

Exception:

BellSouth did not provide a Clarification/Rejection response to a Loop Make-Up (LMU) Service Inquiry within the specified seven-day interval.

Summary of Exception:

According to the *BellSouth Loop Makeup (LMU) CLEC Information Package (Version 1)* from the Interconnect website, a CLEC should receive a Clarification/Rejection response to an LMU/SI within seven working days.

During initial testing 60 LMU/SIs received a Rejection/Clarification notification from the Complex Resale Support Group/Local Carrier Service Center (CRSG/LCSC). The KPMG Consulting, Inc. (KCI)-developed benchmark for this test is 95% of LMU/SIs returned within the seven working day interval specified by BellSouth.¹ KCI received 45 (75%) of the Rejection/Clarification notices within the seven day interval.

Summary of BellSouth's Response:

"BellSouth reviewed the internal documents used by CRSG/Account Team and LCSC when processing requests for LMU Service Inquiry associated with xDSL services. The documentation was enhanced to provide additional guidelines regarding handling of Clarification/Rejection responses to LMU Service Inquiry requests for xDSL services. BellSouth Clerks and service reps were to be retrained on the Clarification/Reject process associated with LMU Service Inquiry requests for xDSL services by 1/5/01."

KCI Re-Test Activities:

The Standard Service Interval for return of Manual LMU-SI, as stated in the *BellSouth Loop Makeup (LMU) CLEC Information Package (Version 3)*, is seven days. KCI used this Standard Service Interval to measure the timeliness of responses for both completed LMU/SIs and Rejections/Clarifications of LMU/SIs.

¹ In the absence of a Public Service Commission-approved or BellSouth-published standard, KCI, based on its professional judgment, has identified a 95% benchmark to be used for the purposes of this evaluation.

CLOSURE REPORT FOR EXCEPTION 117

BellSouth Georgia OSS Testing Evaluation

Summary of KCI Re-Test Results:

KCI submitted 216 LMU/SI pre-orders to BellSouth, of which 149 LMU-SIs received Rejection/Clarifications from the CRSG/LCSC. All 149 (100%) of the LMU/SIs received a Rejection/Clarification notification within seven days.

As a result, KCI believes that BellSouth has adequately addressed the issues identified in Exception 117.

Based on re-testing activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 117.

Attachments: None.



Date: April 6, 2001

EXCEPTION CLOSURE REPORT**Exception:****BellSouth issued multiple bills that contained incorrectly rated and missing charges.****Summary of Exception:**

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

Incorrectly Rated Charges

USOC NPU: BellSouth inappropriately billed the KCI 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

Missing Charges

USOC SOMEK: BellSouth did not bill the KCI 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 KCI test CLEC in lieu of an Inter-Connection Agreement with the following rates:



- \$3.50 for SOMECH – 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 KCI 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

Summary of BellSouth 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 that 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.

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 SOMEK. No OSS charge should have been expected for order FPW47666."

Summary of KCI Re-test Activities:

KCI's re-test activities consisted of the submission of CRIS orders and a review of invoices, tariffs, KCI's Resale Interconnection Agreement and internal documentation provided by BellSouth.

KCI Re-test Results:**Incorrectly Rated Charges**

USOC NPU: KCI examined the Georgia General Subscriber Service Tariff (GSST A2.3.16.B.1a) to confirm that the appropriate rate to charge for suspended service is 50% of that which normally would be charged to the customer. KCI also reviewed "Attachment 1: Resale" of the *Agreement between BellSouth Telecommunications, Inc. and CKS, Inc. (Georgia)* (KCI's Resale interconnection agreement) to confirm the 17.30% business and 20.30% residential discounts applied to KCI's test CLEC accounts as well as to confirm that the USOC NPU is not on the "Exclusions and Limitations on Services Available for Resale" list. Finally, KCI reviewed the line numbers noted in BellSouth's Amended Response to Exception 124 and confirmed that the second rate change on December 6, 2000 for the residential rates of the USOC NPU was implemented correctly (by reviewing the Customer Service Record section of the December 5, 2000 invoice of Q-Account 770-Q85-8252-252). KCI reviewed the four telephone numbers cited in BellSouth's Amended Response to Exception 124 that appear on this Q-Account. The numbers are as follows:

770-399-5507

770-399-7885

770-751-1058

770-751-5941

KCI also requested that BellSouth explain why no credits were applied to the KCI test CLEC's invoices for the December 6, 2000 residential rate change for the USOC NPU. BellSouth informed KCI that the lack of credits for this rate change was in adherence to a documented process outlined in the document *BellSouth USOC Rate Change Process and OC&C Generation*. BellSouth also provided KCI with the internal rate change checklist for the December 6, 2000 rate change as well as the internal summary sheet for the rate change. Upon review of this documentation, KCI determined that BellSouth had adhered to its documented Rate Change process with regards to the generation of OC&C credits or debits in the case of the December 6, 2000 NPU rate change. In addition, KCI also confirmed that, based on the documentation provided, it should not have expected to receive any credits for the December 6, 2000 NPU rate change on its invoices. From these reviews, KCI was able to determine that it had been accurately and appropriately billed the discounted rate for USOC NPU by BellSouth.

**Missing Charges**

USOC SOMEK: Based on BellSouth's Amended Response to Exception 124, KCI noted that the permanent CRIS Service Order Edit was implemented on December 27, 2000 for the state of Georgia. This service order edit was to prevent the recurrence of issues similar to the one encountered with the USOC SOMEK (i.e., should have been billed, but was not included in the rate tables so defaulted to a \$0.00 rate). KCI submitted CRIS service orders from January 2001 to February 2001 that it expected would generate charges for the USOC SOMEK on the KCI test CLEC invoices. Upon review of the invoices for the January 29, 2001 cycle, the February 5, 2001 cycle and the February 17, 2001 cycle, KCI validated that the USOC SOMEK was being billed accurately and appropriately at the \$3.50 non-recurring rate listed in the rate spreadsheets created for the KCI test CLEC in lieu of an Inter-Connection Agreement. From these results, KCI concluded that BellSouth had satisfactorily addressed the issue documented in this exception report either via a rate table update or through the proper functioning of the CRIS Service Order Edit.

USOC SOMAN: The one incidence of this issue was associated with an order for an outside move of a business Port-Loop Combination. Based on BellSouth's Amended Response to Exception 124, the pair of orders needed to accomplish this activity should have only resulted in the billing of the non-recurring charge for the USOC SOMEK and not the non-recurring charge for the USOC SOMAN. Neither non-recurring charge appeared on the KCI test CLEC invoice for Service Orders FPW47666 and TPW47666. The lack of a charge for the USOC SOMEK was satisfactorily addressed as noted in the previous paragraph, and the lack of a non-recurring charge for the USOC SOMAN was satisfactorily addressed by BellSouth's response to this issue.

As a result, KCI believes that BellSouth has adequately addressed the issues identified in Exception 124.

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 124.

Attachments: None.

CLOSURE REPORT FOR EXCEPTION 126

BellSouth Georgia OSS Testing Evaluation

Date: April 6, 2001

EXCEPTION CLOSURE REPORT**Exception:**

BellSouth's provisioning completion activities for xDSL orders are not consistent with the confirmation due date provided on the Firm Order Confirmation (FOC).

Summary of Exception:

As part of its testing, KPMG Consulting, Inc. (KCI) evaluated BellSouth's ability to complete the provisioning of orders by the confirmed due date.

Of the 87 orders KCI reviewed for provisioning timeliness, 77 orders (88%) were completed on the confirmed due date provided by BellSouth on the FOC. The KCI-developed benchmark for this evaluation is 95% of orders provisioned on the confirmed due date provided on the FOC.¹

Summary of BellSouth's Response:

BellSouth responded to KCI's exception directly in the data table supplied by KCI.

PON	Ver	FOC DD	CN DD	Req/Act	OCN/Resh	BellSouth's Response
X001A110002	0	09/1/00	09/6/00	AV	9992	Agree Due date was changed due to Central Office freeze FOC with new date was not sent. Service Rep will be covered by 1/16/01
X001A11003	0	10/16/00	10/17/00	AV	9991	Disagree Customer gave wrong telephone number to ANAC. Tech called DSGCON on order. Turn up was accepted as is and completed by Tech.
X001A11006	0	10/2/00	11/1/00	AV	9994	Agree Order was CP on 11-01 due to invalid Technician Assignment UNEC Manager covered Technician on 1/09/01

¹ In the absence of a Public Service Commission-approved or BellSouth-published standard, KCI, based on its professional judgment, has identified a 95% benchmark to be used for the purposes of this evaluation.

CLOSURE REPORT FOR EXCEPTION 126

BellSouth Georgia OSS Testing Evaluation

PON	Ver	FOC DD	CN DD	Req/Act	OCN/Resh	BellSouth's Response
X001A12004	0	10/3/00	10/17/00	AV	9994	Agree Order was PF'd. FOC with new due date was not sent. Service Rep will be covered by 1/16/01.
X039A11003	0	10/02/00	10/09/00	AN	9991	Agree Order was PF'd. FOC with new due date was not sent. Service Rep will be covered by 1/16/01.
X039BR11001	0	09/21/00	9/25/00	AN	9994	Agree Due date changed due to incorrect central office assignments on order. Tech will be covered by 1/16/01.
X039B11003	0	10/02/00	10/03/00	AN	9991	Agree Due date changed to 10-03-00. Company failed to dispatch on due date. Center manager covered on 1/9/01.
X039B11008	0	10/04/00	10/05/00	AN	9994	Agree Due date changed to 10-05-00 CLEC not available. Default close out not used. Tech covered on 1/9/01.
X039B11009	0	10/02/00	10/20/00	AN	9994	Disagree LSR was dated 10-10 and was received in the LCSC on 10-11 FOC sent 10-12 with a due date of 10-20.
X046A11005	0	09/29/00	10/02/00	AB	9994	Disagree CLR was sent after FOC due to incorrect cable and pair provided by KPMG. KPMG failed to send SUP to provide correct data. PON was canceled after 14 days in clarification. Service order was not canceled. Service rep will be covered 1/16/01.

Summary of KCI Re-Test Activities:

KCI re-tested BellSouth for provisioning orders on the confirmed due date provided on the FOC. KCI submitted and evaluated 96 orders to determine if provisioning was completed on the confirmed due date provided on the FOC.

CLOSURE REPORT FOR EXCEPTION 126

BellSouth Georgia OSS Testing Evaluation

KCI Re-Test Results:

Of the 96 orders submitted and reviewed by KCI for provisioning timeliness, 95 (99%) of the 96 orders were completed on the confirmed due date provided by BellSouth on the FOC. Completion activity for manually submitted orders was confirmed in the BellSouth CLEC Service Order Tracking (CSOTs) system.

As a result, KCI believes that BellSouth has adequately addressed the issues identified in Exception 126.

Based on re-testing activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 126.

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:

Kristy R. Holley, Division Director
Consumers' Utility Counsel
47 Trinity Avenue, S.W.
4th Floor
Atlanta, GA 30334-4600
404-656-3982 (o)

Newton M. Galloway
Smith, Galloway, Lyndall & Fuchs
Suite 400 First Union Bank Tower
100 South Hill Street
Griffin, GA 30229
770-233-6230 (o)

Charles A. Hudak
Gerry, Friend & Sapronov, LLP
Three Ravinia Drive
Suite 1450
Atlanta, GA 30346-2131
770-399-9500 (o)

Kent F. Heyman
Sr. VP and General Counsel
Mpower Communications Corp.
171 Sully's Trail, Suite 300
Pittsford, NY 14534
716-218-6551 (o)

Suzanne W. Ockleberry
AT&T
1200 Peachtree Street, NE
Suite 8100
Atlanta, GA 30309
404-810-7175 (o)

Charles V. Gerkin Jr.
Smith, Gambrell & Russell, LLP
Promenade II, Suite 3100
1230 Peachtree Street, N.E.
Atlanta, GA 30309-3592
404-815-3716 (o)

Frank B. Strickland
Holland & Knight LLP
One Atlantic Center, Suite 2000
1201 West Peachtree Street
Atlanta, GA 30309-3400
404-817-8484 (o)

Jeremy D. Marcus
Blumenfeld & Cohen
Co-Counsel for Rhythm, aka ACI Corp.
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036
202-955-6300 (o)

Scott A. Sapperstein
Sr. Policy Counsel
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619
813-829-4093 (o)

John P. Silk
Georgia Telephone Association
1900 Century Boulevard, Suite 8
Atlanta, GA 30345
404-321-5368 (o)

Daniel S. Walsh
Attorney General Office
Department of Law—State of Georgia
40 Capitol Square, S.W.
Atlanta, GA 30334-1330
404-657-2204 (o)

Eric J. Branfman
Richard M. Rindler
Swidler & Berlin
3000 K Street, NW, Suite 300
Washington, DC 20007
202-945-6940 (o)

Harris R. Anthony
BellSouth Long Distance
400 Perimeter Center Terrace
Suite 350 – North Terraces
Atlanta, GA 30346
(770) 352-3116 (o)

Robert A. Ganton
Regulatory Law Office
Dept. Army
Suite 700
901 N. Stuart Street
Arlington, VA 22203-1837
703-696-1645 (o)

Charles F. Palmer
Troutman Sanders LLP
5200 NationsBank Plaza
600 Peachtree Street, NE
Atlanta, GA 30308-2216
404-885-3402 (o)

Peter C. Canfield
Dow Lohnes & Albertson
One Ravinia Drive, Suite 1600
Atlanta, GA 30346
770-901-8800 (o)

Judith A. Holiber
Morgenstein & Jubelirer
One Market
Spear Street Tower, 32nd Floor
San Francisco, CA 94105
415-901-8700 (o)

James M. Tennant
Low Tech Designs, Inc.
1204 Saville Street
Georgetown, SC 29440
803-527-4485 (o)

Nanette S. Edwards
Regulatory Attorney
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802
256-382-3856 (o)

Mark Brown
Director of Legal and Government Affairs
MediaOne, Inc.
2925 Courtyards Drive
Norcross, GA 30071
770-559-2000 (o)

Peyton S. Hawes Jr.
127 Peachtree Street, N.E.
Suite 1100
Atlanta, GA 30303-1810
404-577-6200 (o)

Jeffrey Blumenfeld
Elise P. W. Kiely
Blumenfeld & Cohen
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036
202-955-6300 (o)

William R. Atkinson
Sprint Communications Co. L.P.
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339
404-649-6221 (o)

Dana R. Shaffer
Legal Counsel
105 Molloy Street
Suite 300
Nashville, TN 37201
615-777-7700 (o)

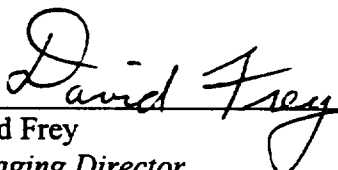
Glenn A. Harris
Lori Anne Dolquest
NorthPointe Communications, Inc.
303 Second Street, South Tower
San Francisco, CA 94107
415-403-4003 (o)

This 6th day of April, 2001.

James A. Schendt
Regulatory Affairs Manager
Interpath Communications, Inc.
P. O. box 13961
Durham, NC 27709-3961
919-253-6265 (o)

Nancy Krabill
Director of Regulatory Affairs
1300 W. Mockingbird Lane
Suite 200
Dallas, TX 75247
678-444-4444 (o)

Anne E. Franklin
Arnall Golden & Gregory, LLP
2800 One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309
404-873-8536 (o)



David Frey
Managing Director

KPMG Consulting, Inc.
1835 Market St, 24th Floor
Philadelphia, PA 19103
(215) 405-6880

(03/21/01)



1600 Market Street
Philadelphia, PA 19103-7279

Telephone 215-299-3100

Fax 215-299-3150

RECEIVED

April 20, 2001

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334

APR 20 2001
EXECUTIVE SECRETARY
G.P.S.C.

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

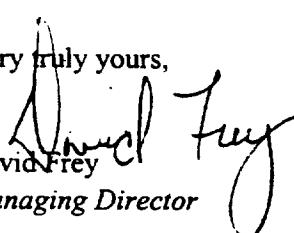
Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of KPMG Consulting, Inc.'s Exception 137 and Exception 137 (Amended). Please also find enclosed the following responses from BellSouth: Exception 79 BLS 3rd Amended Response; Exception 86 BLS 3rd Statement of Investigation; Exception 89 BLS 3rd Statement of Investigation; and Exception 137 BLS Response. Please also find closure reports for Exceptions: 21 Addendum, 76, 77, 78, 95, 125 and 128.

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



APR 20 2001

Date: March 6, 2001

EXECUTIVE SECRETARY
G.P.S.C.**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 KPMG Consulting, Inc. (KCI) Test CLEC raw data values for three types of time stamps do not match the KCI-collected values, for certain Purchase Order numbers and Version Numbers, for three Ordering SQMs.

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. KCI compared 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 Hewlett Packard (HP), for October and November 2000.

KCI found that the BellSouth-reported timestamps in the files mentioned above (Firm Order Confirmation, Local Service Request Sent/Received, Reject/Clarification Requested timestamps) did not match within a reasonable interval 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 of 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 137

BellSouth Georgia OSS Testing Evaluation

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 and BellSouth clocks;
- 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.

KCI also included an additional two minutes leeway for the TAG and EDI interfaces to account for problems not related to BellSouth's operations before listing the values in the tables below. Additionally, any time taken by BellSouth to review the transactions submitted by HP (for Firm Order Confirmation) is reflected in the time stamps recorded by BellSouth and reported in the PMAP raw data.

Tables 1, 2, and 3 show the specific discrepancies for Local Service Request Sent/Received, Firm Order Confirmation, and Reject/Clarification Requested time stamps, respectively.

Table 1: Local Service Request Sent/received Timestamp

PON	VER	METHOD	MONTH	BELLSOUTH- REPORTED VALUE	KCI -REPORTED ⁵ VALUE
302R312PEF000006	0	EDI	October	10/13/00 7:45	10/12/00 15:35
309R122PTH001001	1	TAG	October	10/2/00 10:06	10/2/00 10:36
320R212PTH102017	3	TAG	October	10/20/00 11:22	10/20/00 11:03
317R122PEH001002	0	EDI	November	11/9/00 13:15	11/13/00 16:34 ⁶
309R122PEH002002	0	EDI	November	11/10/00 12:30	11/13/00 16:38 ⁷

⁵ KCI-reported values are provided by HP.

⁶ Note that the KCI-reported time value is after the BLS reported time value, even though a local service request is sent out by the Test CLEC.

⁷ Note that the KCI-reported time value is after the BLS reported time value, even though a local service request is sent out by the Test CLEC.

EXCEPTION 137
BellSouth Georgia OSS Testing Evaluation**Table 2: Firm Order Confirmation Time Stamp**

PON	VER	METHOD	MONTH	BELLSOUTH- REPORTED VALUE	KCI -REPORTED ⁸ VALUE
302R312PEH000003	0	EDI	October	10/10/00 17:41	10/11/00 16:55
301R112PEF000001	2	EDI	October	10/9/00 16:30	10/10/00 11:43
305R112PTF102002	6	EDI	October	10/10/00 8:00	10/10/00 11:43
409R223PEM101001	0	EDI	October	10/11/00 10:47	10/11/00 16:55
404R223PTM102001	0	TAG	October	10/11/00 9:02	10/12/00 6:16
302R312PTH001002	6	TAG	November	11/30/00 14:50	12/1/00 13:15
303R222PTH000011	1	TAG	November	11/30/00 15:07	12/1/00 7:29

Table 3: Reject/Clarification Requested Time Stamp

PON	VER	METHOD	MONTH	BELLSOUTH- REPORTED VALUE	KCI -REPORTED ⁹ VALUE
319R122PTH002004	0	TAG	October	10/17/00 13:38	10/17/00 15:15
320R212PTH101017	0	TAG	October	10/17/00 13:30	10/17/00 15:15
320R212PTH102017	0	TAG	October	10/18/00 17:21	10/19/00 6:48
320R212PTF100008	0	TAG	October	10/23/00 10:47	10/23/00 11:50
454R126PTF001002	0	TAG	October	10/26/00 6:27	10/25/00 11:47
307R222PTH100009	0	TAG	October	10/25/00 4:32	10/25/00 11:47
318R112PEH101007	0	EDI	November	11/10/00 8:55	11/10/00 7:21

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.

⁸ KCI-reported values are provided by HP.

⁹ KCI-reported values are provided by HP.

Date: April 18, 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 KPMG Consulting, Inc. (KCI) Test CLEC raw data values for three types of time stamps do not match the KCI-collected values, for certain Purchase Order numbers and Version Numbers, for three Ordering SQMs.

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. KCI compared 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 Hewlett Packard (HP), for October and November 2000.

KCI found that the BellSouth-reported timestamps in the files mentioned above (Firm Order Confirmation, Local Service Request Sent/Received, Reject/Clarification Requested timestamps) did not match within a reasonable interval 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 of 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 137 (Amended)
BellSouth Georgia OSS Testing Evaluation

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 and BellSouth clocks;
- 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.

KCI also included an additional two minutes leeway for the TAG and EDI interfaces to account for problems not related to BellSouth's operations before listing the values in the tables below. Additionally, any time taken by BellSouth to review the transactions submitted by HP (for Firm Order Confirmation) is reflected in the time stamps recorded by BellSouth and reported in the PMAP raw data.

Tables 1, 2, and 3 show the specific discrepancies for Local Service Request Sent/Received, Firm Order Confirmation, and Reject/Clarification Requested time stamps, respectively.

Table 1: Local Service Request Sent/received Timestamp

PON	VER	METHOD	MONTH	BELLSOUTH- REPORTED VALUE	KCI -REPORTED ⁵ VALUE
302R312PEF000006	0	EDI	October	10/13/00 7:45	10/12/00 15:35
309R122PTH001001	1	TAG	October	10/2/00 10:06	10/2/00 10:36
320R212PTH102017	3	TAG	October	10/20/00 11:22	10/20/00 11:03
317R122PEH001002	0	EDI	November	11/9/00 13:15	11/13/00 16:34 ⁶
309R122PEH002002	0	EDI	November	11/10/00 12:30	11/13/00 16:38 ⁷

⁵ KCI-reported values are provided by HP.

⁶ Note that the KCI-reported time value is after the BLS reported time value, even though a local service request is sent out by the Test CLEC.

⁷ Note that the KCI-reported time value is after the BLS reported time value, even though a local service request is sent out by the Test CLEC.

EXCEPTION 137 (Amended)
BellSouth Georgia OSS Testing Evaluation*Table 2: Firm Order Confirmation Time Stamp*

PON	VER	METHOD	MONTH	BELLSOUTH- REPORTED VALUE	KCI -REPORTED ⁸ VALUE
302R312PEH000003	0	EDI	October	10/10/00 17:41	10/11/00 16:55
301R112PEF000001	2	EDI	October	10/9/00 16:30	10/10/00 11:43
305R112PTF102002	6	EDI	October	10/10/00 8:00	10/10/00 11:43
409R223PEM101001	0	EDI	October	10/11/00 10:47	10/11/00 16:55
404R223PTM102001	0	TAG	October	10/11/00 9:02	10/12/00 6:16
302R312PTH001002	6	TAG	November	11/30/00 14:50	12/1/00 13:15
303R222PTH000011	1	TAG	November	11/30/00 15:07	12/1/00 7:29

Table 3: Reject/Clarification Requested Time Stamp

PON	VER	METHOD	MONTH	BELLSOUTH- REPORTED VALUE	KCI -REPORTED ⁹ VALUE
319R122PTH002004	0	TAG	October	10/17/00 13:38	10/17/00 15:15
320R212PTH101017	0	TAG	October	10/17/00 13:30	10/17/00 15:15
320R212PTH102017	0	TAG	October	10/18/00 17:21	10/19/00 6:48
320R212PTF100008	0	TAG	October	10/23/00 10:47	10/23/00 11:50
454R126PTF001002	0	TAG	October	10/26/00 6:27	10/25/00 11:47
307R222PTH100009	0	TAG	October	10/25/00 4:32	10/25/00 11:47
318R112PEH101007	0	EDI	November	11/10/00 8:55	11/10/00 7:21

Amendment:

BellSouth-reported KCI Test CLEC raw data values for the aforementioned types of time stamps do not match the KCI-collected values, for certain Purchase Order numbers and Version Numbers, for three Ordering SQMs, for the months of January and February 2001.

Tables 4, 5, and 6 show the specific discrepancies for the Local Service Request Sent/Received, Firm Order Confirmation, and Reject/Clarification Requested time stamps, respectively.

⁸ KCI-reported values are provided by HP.

⁹ KCI-reported values are provided by HP.

EXCEPTION 137 (Amended)

BellSouth Georgia OSS Testing Evaluation

Table 4: Local Service Request Sent/received Timestamp

PON	VER	METHOD	MONTH	BELLSOUTH - REPORTED VALUE	KCI - REPORTED VALUE
305S112PEH100006	0	EDI	January	1/19/2001 14:15	1/19/2001 12:55
305S112PEH100007	0	EDI	January	1/19/2001 14:15	1/19/2001 13:07
305S112PEH100009	0	EDI	January	1/23/2001 17:00	1/23/2001 16:46
305S222PEH100003	0	EDI	January	1/23/2001 18:00	1/23/2001 17:03
307S122PEH100002	0	EDI	January	1/19/2001 15:15	1/19/2001 13:35
307S122PEH100003	0	EDI	January	1/19/2001 14:16	1/19/2001 13:22
307S122PTH100012	0	EDI	January	1/24/2001 13:00	1/24/2001 11:22
323S122PEH100003	0	EDI	January	1/24/2001 11:01	1/24/2001 10:31
323S122PEH101001	0	EDI	January	1/18/2001 14:15	1/18/2001 15:48
323S122PEH102001	0	EDI	January	1/19/2001 13:30	1/19/2001 11:50
422S114PEJ100001	0	EDI	January	1/19/2001 13:15	1/19/2001 10:10
422S114PEJ100007	0	EDI	January	1/22/2001 14:15	1/19/2001 13:25
422S114PEJ100007	0	EDI	January	1/22/2001 14:15	1/22/2001 11:36
422S114PTJ100002	0	TAG	January	1/23/2001 8:33	1/23/2001 9:28
422S114PTJ100008	0	TAG	January	1/23/2001 8:08	1/23/2001 9:03
432S214PEJ100001	0	EDI	January	1/22/2001 14:30	1/22/2001 12:38
615S122PEH100001	0	EDI	January	1/23/2001 18:00	1/19/2001 12:17
615S122PEH100001	0	EDI	January	1/23/2001 18:00	1/23/2001 17:14
615S122PEH100003	0	EDI	January	1/24/2001 10:45	1/24/2001 10:04
901S114PEJ100004	0	EDI	January	1/25/2001 15:00	1/25/2001 12:35
902S214PEJ100001	0	EDI	January	1/19/2001 14:45	1/19/2001 10:20
902S214PEJ100008	0	EDI	January	1/26/2001 10:45	1/25/2001 16:47
RS01A22PEN100001	0	EDI	January	1/23/2001 15:31	1/19/2001 12:18
RS01A22PEN100001	0	EDI	January	1/23/2001 15:31	1/23/2001 13:08
RS01A22PEN100002	0	EDI	January	1/19/2001 13:00	1/19/2001 12:21
RS01A11PTN100004	0	TAG	January	1/23/2001 11:49	1/23/2001 12:34
RS01A22PEN100004	0	EDI	January	1/24/2001 10:30	1/24/2001 9:14
RS05A12PEN100001	0	EDI	January	1/19/2001 12:45	1/19/2001 11:23
RS11B21PEN100001	0	EDI	January	1/19/2001 13:00	1/19/2001 11:30
RS11B21PEN100003	0	EDI	January	1/24/2001 10:30	1/24/2001 8:53
RS11B21PEN100004	0	EDI	January	1/25/2001 12:30	1/25/2001 12:19
RS13H12PEN100001	0	EDI	January	1/19/2001 12:45	1/19/2001 11:02
RS13H12PEN100004	0	EDI	January	1/24/2001 10:30	1/24/2001 8:54
RS15A12PEN100001	0	EDI	January	1/22/2001 14:15	1/19/2001 10:34
RS15A12PEN100001	0	EDI	January	1/22/2001 14:15	1/19/2001 15:02
RS15A12PEN100001	0	EDI	January	1/22/2001 14:15	1/22/2001 13:19

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PON	VER	METHOD	MONTH	BELLSOUTH - REPORTED VALUE	KCI - REPORTED VALUE
RS15A12PEN100014	0	EDI	January	1/26/2001 12:30	1/26/2001 11:38
RS15A21PEN100001	0	EDI	January	1/22/2001 13:45	1/19/2001 12:02
RS15A21PEN100001	0	EDI	January	1/22/2001 13:45	1/19/2001 15:07
RS15A21PEN100001	0	EDI	January	1/22/2001 13:45	1/22/2001 13:27
RS15A21PEN100003	0	EDI	January	1/25/2001 15:15	1/25/2001 9:37
RS17H12PEN101002	0	EDI	January	1/18/2001 15:30	1/18/2001 16:53
RS25X11PEN100003	0	EDI	January	1/25/2001 10:45	1/24/2001 11:36
RS25X11PEN101001	0	EDI	January	1/22/2001 13:30	1/23/2001 11:04
RS27H12PEN100001	0	EDI	January	1/24/2001 10:30	1/24/2001 9:02
RS28A21PEN100003	0	EDI	January	1/24/2001 10:30	1/24/2001 9:02
RS40A21PEN100001	0	EDI	January	1/19/2001 12:30	1/19/2001 10:41
RS40A21PEN100011	0	EDI	January	1/25/2001 12:45	1/25/2001 12:24
307S122PEH100013	0	EDI	February	2/1/2001 16:15	2/1/2001 14:30
422S114PTJ100004	0	TAG	February	2/1/2001 14:52	2/1/2001 15:42
422S114PTJ100010	0	TAG	February	2/1/2001 14:54	2/1/2001 15:47
RS40A21PEN100026	0	EDI	February	2/6/2001 11:30	2/6/2001 9:59
RS41A12PEN100023	1	EDI	February	2/7/2001 8:45	2/7/2001 10:13
RS41B21PEN100019	0	EDI	February	2/7/2001 14:35	2/7/2001 14:21
RS15A21PEN100005	0	EDI	February	2/7/2001 17:00	2/7/2001 16:14
RS41B21PEN100025	0	EDI	February	2/8/2001 9:00	2/7/2001 17:52
RS41B21PEN100025	0	EDI	February	2/8/2001 9:00	2/7/2001 19:03
RS05A22PEN100003	1	EDI	February	2/7/2001 19:15	2/7/2001 18:52
RS11B21PEN100030	1	EDI	February	2/7/2001 19:15	2/7/2001 18:54
RS11C22PEN100017	1	EDI	February	2/7/2001 20:58	2/7/2001 18:57
901S114PEJ100003	0	EDI	February	2/7/2001 20:58	2/7/2001 19:30
901S114PEJ100001	0	EDI	February	2/7/2001 12:45	2/9/2001 13:03
901S114PEJ100001	0	EDI	February	2/7/2001 12:45	2/9/2001 13:45
903S224PEJ101003	0	EDI	February	2/8/2001 16:30	2/9/2001 13:06
903S224PEJ101003	0	EDI	February	2/8/2001 16:30	2/9/2001 13:49
- RS02A21PEN100020	2	EDI	February	2/9/2001 14:00	2/9/2001 13:46
RS25X11PEN100015	0	EDI	February	2/13/2001 7:30	2/12/2001 19:16
RS11B21PEN100029	0	EDI	February	2/13/2001 11:16	2/13/2001 10:52
RS13H12PEN100028	0	EDI	February	2/13/2001 11:30	2/13/2001 10:57
441S214PTJ001002	0	TAG	February	2/15/2001 8:59	2/15/2001 10:08
903S224PTJ101002	0	TAG	February	2/15/2001 9:23	2/15/2001 10:18
307S122PTH101006	0	TAG	February	2/15/2001 9:24	2/15/2001 10:19
422S114PTJ102010	0	TAG	February	2/15/2001 9:39	2/15/2001 10:29
307S122PTH101005	0	TAG	February	2/15/2001 9:39	2/15/2001 10:32

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PON	VER	METHOD	MONTH	BELLSOUTH - REPORTED VALUE	KCI - REPORTED VALUE
602S214PTJ101003	0	TAG	February	2/15/2001 9:39	2/15/2001 10:35

Table 5: Firm Order Confirmation Time Stamp

PON	VER	METHOD	MONTH	BELLSOUTH - REPORTED VALUE	KCI - REPORTED VALUE
305S112PTH100016	0	TAG	January	1/22/2001 17:11	1/22/2001 19:15
307S122PTH100005	0	TAG	January	1/22/2001 17:32	1/22/2001 19:15
307S122PTH100006	0	TAG	January	1/22/2001 17:41	1/22/2001 19:15
323S122PTH100002	0	TAG	January	1/22/2001 16:44	1/23/2001 6:15
423S114PEJ100001	0	EDI	January	1/18/2001 9:30	1/18/2001 13:53
RS01A22PTN100003	0	TAG	January	1/22/2001 13:06	1/22/2001 19:44
RS05A12PTN100003	0	TAG	January	1/22/2001 13:08	1/22/2001 19:44
RS11B21PTN100002	0	TAG	January	1/22/2001 14:38	1/23/2001 6:15
RS13H12PTN100003	0	TAG	January	1/22/2001 13:13	1/22/2001 20:14
RS17H12PEN100002	1	EDI	January	1/18/2001 10:01	1/18/2001 15:50
RS28A21PTN100002	0	TAG	January	1/22/2001 13:15	1/22/2001 20:14
615S122PTH100004	1	TAG	February	2/3/2001 11:09	2/3/2001 13:14
RS05A22PEN100003	1	EDI	February	2/7/2001 19:17	2/7/2001 22:02
RS11B21PEN100030	1	EDI	February	2/7/2001 19:16	2/7/2001 22:02

Table 6: Reject/Clarification Requested Time Stamp

PON	VER	METHOD	MONTH	BELLSOUTH - REPORTED VALUE	KCI -REPORTED VALUE
305S112PTH100008	0	TAG	January	1/22/2001 17:02	1/22/2001 19:15
305S222PTH100005	0	TAG	January	1/22/2001 10:46	1/23/2001 6:15
435S114PTJ000001	0	TAG	January	1/23/2001 11:43	1/23/2001 12:36
RS25X11PEN100003	0	EDI	January	1/25/2001 14:18	1/25/2001 8:29
RS41A12PTN100005	0	TAG	January	1/22/2001 13:47	1/22/2001 20:44
444S214PEJ100003	0	EDI	February	2/7/2001 11:46	2/21/2001 15:46
423S114PTJ100012	0	TAG	February	2/13/2001 17:49	2/13/2001 18:56
422S114PTJ103004	0	TAG	February	2/15/2001 9:49	2/15/2001 10:51
307S122PTH101007	3	TAG	February	2/15/2001 11:03	2/15/2001 12:05

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BellSouth Georgia OSS Testing Evaluation

Additionally, KCI found Purchase Order Numbers and Version Numbers that exist in the KCI-collected data, but are not found in the BellSouth-reported raw data files.

Table 7 shows these Purchase Order Numbers and Version Numbers.

Table 7: KCI-Collected PON/VERs missing from the BellSouth-reported data

PON	VER	METHOD	MONTH
444S214PTJ100002	0	TAG	January
RS05A22PEN100001	5	EDI	January
RS25X11PEN100001	0	EDI	January
RS25X11PTN100002	0	TAG	January
RS27H12PTN100008	0	TAG	January
RS41A12PEN100010	0	EDI	January
444S214PTJ102002	0	TAG	February
444S214PTJ103002	0	TAG	February
444S214PTJ104002	0	TAG	February
444S214PTJ105002	0	TAG	February
444S214PTJ106002	0	TAG	February
444S214PTJ107002	0	TAG	February
444S214PTJ108002	0	TAG	February
RS05A22PEN101001	0	EDI	February

EXCEPTION 137 (Amended)
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.

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 79



Date: April 13, 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.

Initial Exception		
Source Data	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 THIRD 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
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*

BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 79

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 THIRD 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

As a result of continuing discussions with KPMG regarding data retention, BellSouth proposes the following data retention policy.

"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, LON, LEO, LNP Gateway, 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.

"BellSouth will archive the production software elements used to create the PMAP reports. This archive will include: 4GL and SQL code, UNIX scripts, DataStage jobs, data table descriptions, and other information necessary to allow viewing of the production software elements. This archive will be created each month and stored on CD-ROM; it will be viewable on a standalone personal computer. The software elements will be retained for a period of eighteen months."

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

BELLSOUTH'S THIRD STATEMENT OF INVESTIGATION FOR EXCEPTION 86



Date: April 17, 2001

EXCEPTION REPORT

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

Exception:

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

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

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

KPMG has been unable to replicate the following SQMs³:

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

BellSouth Response: This is the same issue as 23.4 for November and December. The raw data for Provisioning Troubles in 30 days for months prior to March 2000 cannot be

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

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

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

BELLSOUTH'S THIRD STATEMENT OF INVESTIGATION FOR EXCEPTION 86

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

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

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

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

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

BellSouth's Amended Response:

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

2. ***Order Completion Interval in the provisioning category for the CLEC Aggregate and BellSouth Retail (October 1999).*** Using BellSouth's instructions, KPMG was unable to replicate any of the reports (POTS, UNE-Design, Non-UNE Design) for the "Dispatch" and "Non-Dispatch" categories.

BellSouth Response: BellSouth agrees that using the current raw data users manual KPMG was unable to replicate the reports for the CLEC Aggregate and BellSouth

BELLSOUTH'S THIRD STATEMENT OF INVESTIGATION FOR EXCEPTION 86

Retail data for October for POTS, UNE-Design, and Non-UNE Design for the "Dispatch" and Non-Dispatch categories.

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

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

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

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

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

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

BellSouth provided June 2000 data to KPMG for Order Completion Interval for replication retesting.

BellSouth's Response:

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

BELLSOUTH'S THIRD STATEMENT OF INVESTIGATION FOR EXCEPTION 89



Date: April 17, 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.

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

Field Name	Early-Stage Data Value	Raw Data Value
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 THIRD STATEMENT OF INVESTIGATION FOR 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 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.

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AC202703	0.53% (hour 10)	0.65% (hour 11)	Different hour used.
AC203042	0.00% (hour 16)	0.01% (hour 17)	Different hour used.
AC203657	3.94%	3.95%	BellSouth is not confident in the data generated for this trunk group and therefore does not feel either calculation is accurate.
AC204674	0.01% (hour 15)	0.04% (hour 11)	Different hour used.
AC204913	0.00% (hour 15)	0.08% (hour 9)	Different hour used.
AC205420	0.02% (hour 14)	0.06% (hour 15)	Different hour used.
AC206974	2.23% (hour 15)	2.30% (hour 16)	Different hour used.
AC208035	0.00% (hour 21)	0.02% (hour 1)	Different hour used.
AC208787	0.01% (hour 10)	0.06% (hour 8)	Different hour used.
AC213664	0.18% (hour 16)	0.24% (hour 15)	Different hour used.
AC205717	0.19% (hour 13)	0.33% (hour 12)	Different hour used.
AC212373	40.21% (hour 11)	46.21% (hour 10)	Different hour used.

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.

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.

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

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

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

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

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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 classified as "Partially Mechanized"):

1)

- a) It must be a FOC LSR. FOC LSR's must contain the string "FOC STAGED FOR LSR" in the NOTES field of STAG_AUDIT (LEO)
- b) Must contain "Claimed By" or "CLAIMED BY" in NOTES field of STAG_AUDIT (LEO)
- c) The first three characters of SIGNOUT_CUID are not 'DB0' in STAG_LSR (LEO)

2)

- a) It must be a REJECTED LSR. A REJECTED LSR contains the string "CLARIFICATION RETURNED" in the NOTES field of STAG_AUDIT (LEO)

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- 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.

BELLSOUTH'S THIRD STATEMENT OF INVESTIGATION FOR EXCEPTION 89

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.

BELLSOUTH'S THIRD STATEMENT OF INVESTIGATION FOR EXCEPTION 89

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

KPMG reported that 11 of 34 sample ASRs from June Exact screen printouts have an issue with the FOC_DATE and/or FOR_DURATION. The cells in red in the table sent to KPMG are where the BellSouth Raw Data value differed from the KPMG valued calculated using the EXACT screen printout.

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

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

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

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

Appendix A

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

ASR 0013900229 OWNER CPOC ORD C05GV6J2 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

BELLSOUTH'S THIRD STATEMENT OF INVESTIGATION FOR EXCEPTION 89

***** CONTACT INFORMATION *****

INIT SHIRLEY ISBELL TEL 256 264 1222 FAX 256 264 1583

STREET P.O. DRAWER 1301 FL NA RM NA

CITY ARAB ST AL ZIP 35016

EMAIL

DSGCON SHIRLEY ISBELL TEL 256 264 1222 FAX DRC FDRC

STREET P.O. DRAWER 1301 FL NA RM NA

CITY ARAB ST AL ZIP 35016

EMAIL

IMPCON SERVICE INSTALL TEL 888 517 8925 MTCE TEL

D/TREC 072700 11:30

/FOR: ICCNF *ICSC CONFIRMATION* 08/17/00 16:39

COMMAND REQUEST REFNUM

ASR 0013900229 OWNER CPOC ORD CO5GV6J2 JEP STATUS FKR T

REQTYP MD ACT C CCNA DLT PON DLT00LOC00359C SPA RT F INIT SHIRLEY ISBELL
VER C

ECCKT 1 /DF-4ESJ912 /ALBYGADZ1MD/M-/ALBYGAMA13T FMT LTERM

***** ASR DETAILS AND SERVICE OPTIONS *****

ICSC SB01 CD/TSENT 061500 15:07 APREP T-HINTON TEL 800 666 0580 2169

EMAIL

ECVER 03 PIA PRVNT PROJ LTDLTALBYE911 CNO

APP 060900 DLRD CDLRD PTD 061400 DD 061600 EBD

BAN 912 S01-0005 LSO 912432 SC TSP

SECLOC ECSPC

FDLRD FCDLRD FPTD FDD

FNI CFNI RTI CIWBAN

***** SERVICE OPTIONS *****

MBA CAD SCD ASU CFW CWG CND HWL MWI HNTYP QUE SPC

TWC SMDI IEX RCF SSS CDND DID DIDQ

DIDR TNSC

RMKS

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

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.

BELLSOUTH'S THIRD STATEMENT OF INVESTIGATION FOR EXCEPTION 89

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 THIRD STATEMENT OF INVESTIGATION FOR 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 THIRD STATEMENT OF INVESTIGATION FOR 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_cmtt_cd" field (used to derive the appointment reason dimension) for five trunk service orders in the raw data file "Held Order Interval for Trunks"; and (b) "status" field for 17 service orders in the raw data files "Held Order Interval for Trunks & Non-Trunks, and Order Completion Interval and Distribution".

BELLSOUTH'S THIRD STATEMENT OF INVESTIGATION FOR 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

BELLSOUTH'S THIRD STATEMENT OF INVESTIGATION FOR EXCEPTION 89

File	SO_NBR	ISSU_DT	Field	BLS Reported Value	KCL 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

BELLSOUTH'S THIRD STATEMENT OF INVESTIGATION FOR EXCEPTION 89

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.**

BellSouth's Amended Response:

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

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

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

BELLSOUTH'S THIRD STATEMENT OF INVESTIGATION FOR EXCEPTION 89

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.

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 THIRD STATEMENT OF INVESTIGATION FOR 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 Response:

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

BELLSOUTH'S RESPONSE TO EXCEPTION 137



Date: March 22, 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 KPMG Consulting, Inc. (KCI) Test CLEC raw data values for three types of time stamps do not match the KCI-collected values, for certain Purchase Order numbers and Version Numbers, for three Ordering SQMs.

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. KCI compared 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 Hewlett Packard (HP), for October and November 2000.

KCI found that the BellSouth-reported timestamps in the files mentioned above (Firm Order Confirmation, Local Service Request Sent/Received, Reject/Clarification Requested timestamps) did not match within a reasonable interval 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 of 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 137

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 and BellSouth clocks;
- 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.

KCI also included an additional two minutes leeway for the TAG and EDI interfaces to account for problems not related to BellSouth's operations before listing the values in the tables below. Additionally, any time taken by BellSouth to review the transactions submitted by HP (for Firm Order Confirmation) is reflected in the time stamps recorded by BellSouth and reported in the PMAP raw data.

Tables 1, 2, and 3 show the specific discrepancies for Local Service Request Sent/Received, Firm Order Confirmation, and Reject/Clarification Requested time stamps, respectively.

Table 1: Local Service Request Sent/received Timestamp

PON	VER	METHOD	MONTH	BELLSOUTH- REPORTED VALUE	KCI -REPORTED ⁵ VALUE
302R312PEF000006	0	EDI	October	10/13/00 7:45	10/12/00 15:35
309R122PTH001001	1	TAG	October	10/2/00 10:06	10/2/00 10:36
320R212PTH102017	3	TAG	October	10/20/00 11:22	10/20/00 11:03
317R122PEH001002	0	EDI	November	11/9/00 13:15	11/13/00 16:34 ⁶
309R122PEH002002	0	EDI	November	11/10/00 12:30	11/13/00 16:38 ⁷

⁵ KCI-reported values are provided by HP.

⁶ Note that the KCI-reported time value is after the BLS reported time value, even though a local service request is sent out by the Test CLEC.

⁷ Note that the KCI-reported time value is after the BLS reported time value, even though a local service request is sent out by the Test CLEC.

BELLSOUTH'S RESPONSE TO EXCEPTION 137

Table 2: Firm Order Confirmation Time Stamp

PON	VER	METHOD	MONTH	BELLSOUTH- REPORTED VALUE	KCI -REPORTED ⁸ VALUE
302R312PEH000003	0	EDI	October	10/10/00 17:41	10/11/00 16:55
301R112PEF000001	2	EDI	October	10/9/00 16:30	10/10/00 11:43
305R112PTF102002	6	EDI	October	10/10/00 8:00	10/10/00 11:43
409R223PEM101001	0	EDI	October	10/11/00 10:47	10/11/00 16:55
404R223PTM102001	0	TAG	October	10/11/00 9:02	10/12/00 6:16
302R312PTH001002	6	TAG	November	11/30/00 14:50	12/1/00 13:15
303R222PTH000011	1	TAG	November	11/30/00 15:07	12/1/00 7:29

Table 3: Reject/Clarification Requested Time Stamp

PON	VER	METHOD	MONTH	BELLSOUTH- REPORTED VALUE	KCI -REPORTED ⁹ VALUE
319R122PTH002004	0	TAG	October	10/17/00 13:38	10/17/00 15:15
320R212PTH101017	0	TAG	October	10/17/00 13:30	10/17/00 15:15
320R212PTH102017	0	TAG	October	10/18/00 17:21	10/19/00 6:48
320R212PTF100008	0	TAG	October	10/23/00 10:47	10/23/00 11:50
454R126PTF001002	0	TAG	October	10/26/00 6:27	10/25/00 11:47
307R222PTH100009	0	TAG	October	10/25/00 4:32	10/25/00 11:47
318R112PEH101007	0	EDI	November	11/10/00 8:55	11/10/00 7:21

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.

⁸ KCI-reported values are provided by HP.

⁹ KCI-reported values are provided by HP.

BELLSOUTH'S RESPONSE TO EXCEPTION 137

BellSouth Response

The following two tables list the KCI discrepancies and the BellSouth response to each item in KCI Table 1.

KCI Table 1: Local Service Request Sent/received Timestamp

PON	VER	METHOD	MONTH	BELLSOUTH- REPORTED VALUE	KCI -REPORTED ¹⁰ VALUE
302R312PEF000006	0	EDI	October	10/13/00 7:45	10/12/00 15:35
309R122PTH001001	1	TAG	October	10/2/00 10:06	10/2/00 10:36
320R212PTH102017	3	TAG	October	10/20/00 11:22	10/20/00 11:03
317R122PEH001002	0	EDI	November	11/9/00 13:15	11/13/00 16:34 ¹¹
309R122PEH002002	0	EDI	November	11/10/00 12:30	11/13/00 16:38 ¹²

<i>Table 1: Explanation</i>	
	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 10/12/00 at 15:26, which corresponds to the KCI reported value.
	The log files for TAG are kept for 45 days on a rolling basis. BellSouth no longer has the log files pertaining to this PON.
	The log files for TAG are kept for 45 days on a rolling basis. BellSouth no longer has the log files pertaining to this PON.
	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 11/13/00 at 16:26, which corresponds to the KCI reported value.
	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 11/13/00 at 16:26, which corresponds to the KCI reported value.

The following two tables list the KCI discrepancies and the BellSouth response to each item in KCI Table 2.

¹⁰ KCI-reported values are provided by HP.

¹¹ Note that the KCI-reported time value is after the BLS reported time value, even though a local service request is sent out by the Test CLEC.

¹² Note that the KCI-reported time value is after the BLS reported time value, even though a local service request is sent out by the Test CLEC.

BELLSOUTH'S RESPONSE TO EXCEPTION 137

KCI Table 2: Firm Order Confirmation Time Stamp

PON	VER	METHOD	MONTH	BELLSOUTH- REPORTED VALUE	KCI -REPORTED ¹³ VALUE
302R312PEH000003	0	EDI	October	10/10/00 17:41	10/11/00 16:55
301R112PEF000001	2	EDI	October	10/9/00 16:30	10/10/00 11:43
305R112PTF102002	6	EDI	October	10/10/00 8:00	10/10/00 11:43
409R223PEM101001	0	EDI	October	10/11/00 10:47	10/11/00 16:55
404R223PTM102001	0	TAG	October	10/11/00 9:02	10/12/00 6:16
302R312PTH001002	6	TAG	November	11/30/00 14:50	12/1/00 13:15
303R222PTH000011	1	TAG	November	11/30/00 15:07	12/1/00 7:29

<i>Table 2: Explanation</i>	
	EDI processing for this PON completed on 10/10/00 at 6:02 PM, after which it was placed into a queue to be sent to KCI. The historical data is not available to explain why the FOC was not received by KCI soon after being placed in the queue.
	This PON was manually FOCd on 10/10/00 at 10:22 AM and processed by EDI on 10/10/00 at 10:42 AM. BellSouth was not accurately capturing the FOC timestamp for manually FOCd orders at this time. The necessary changes have been completed and the data beginning with January 2001 is remedied.
	This PON was manually FOCd on 10/10/00 at 10:23 AM and processed by EDI on 10/10/00 at 10:42 AM. BellSouth was not accurately capturing the FOC timestamp for manually FOCd orders at this time. The necessary changes have been completed and the data beginning with January 2001 is remedied.
	EDI processing for this PON completed on 10/11/00 at 11:02 AM, after which it was placed into a queue to be sent to KCI. The historical data is not available to explain why the FOC was not received by KCI soon after being placed in the queue.
	The BST time reported is the time that the BellSouth made the FOC initially available for the user (KCI). Since the user's listener was not up and available for data receipt from BellSouth, the system attempted five resends before the user was available to receive data. The KCI reported time shows the time that the resend was actually received by the user.
	The timestamp indicated by KCI as the BellSouth FOC time actually reflects the received time for this PON. BellSouth shows a FOC timestamp of 12/1/00 at 12:17 PM.
	The timestamp indicated by KCI as the BellSouth FOC time actually reflects the received time for this PON. BellSouth shows a FOC timestamp of 12/1/00 at 6:30 AM.

The following two tables list the KCI discrepancies and the BellSouth response to each item in KCI Table 3.

KCI Table 3: Reject/Clarification Requested Time Stamp

¹³ KCI-reported values are provided by HP.

BELLSOUTH'S RESPONSE TO EXCEPTION 137

PON	VER	METHOD	MONTH	BELLSOUTH- REPORTED VALUE	KCI -REPORTED ¹⁴ VALUE
319R122PTH002004	0	TAG	October	10/17/00 13:38	10/17/00 15:15
320R212PTH101017	0	TAG	October	10/17/00 13:30	10/17/00 15:15
320R212PTH102017	0	TAG	October	10/18/00 17:21	10/19/00 6:48
320R212PTF100008	0	TAG	October	10/23/00 10:47	10/23/00 11:50
454R126PTF001002	0	TAG	October	10/26/00 6:27	10/25/00 11:47
307R222PTH100009	0	TAG	October	10/25/00 4:32	10/25/00 11:47
318R112PEH101007	0	EDI	November	11/10/00 8:55	11/10/00 7:21

<i>Table 3: Explanation</i>	
	The BST time reported is the time that BellSouth made the clarification available for the user (KCI). No other information regarding this PON is available as the log files for TAG are kept on a rolling 45-day basis.
	The BST time reported is the time that BellSouth made the clarification initially available for the user (KCI). Since the user's listener was not up and available for data receipt from BellSouth, the system attempted one resend before the user was available to receive data. The KCI reported time shows the time that the resend was actually received by the user.
	The BST time reported is the time that BellSouth made the clarification initially available for the user (KCI). Since the user's listener was not up and available for data receipt from BellSouth, the system attempted three resends before the user was available to receive data. The KCI reported time shows the time that the resend was actually received by the user.
	The BellSouth timestamp is in Central time, while the KCI timestamp is in Eastern time. This does not appear to be a discrepancy.
	This PON/version combination was rejected twice. The BellSouth timestamp reflects the most recent reject time, while the KCI timestamp reflects the first reject time. The first clarification/reject occurred before the LSR was sent to LESOG. LESOG resent the LSR to LEO, and the service representative clarified/rejected it a second time.
	The BST time reported is the time that BellSouth made the clarification initially available for the user (KCI). Since the user's listener was not up and available for data receipt from BellSouth, the system attempted three resends before the user was available to receive data. The KCI reported time shows the time that the resend was actually received by the user.
	This PON/version combination was rejected twice, the first time in error. The BellSouth timestamp reflects the second reject time, while the KCI timestamp reflects the first reject time.

BellSouth can most effectively investigate and address EDI and TAG 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. KCI is requested to test the most recent month's data for discrepancies of this nature.

¹⁴ KCI-reported values are provided by HP.

CLOSURE REPORT FOR EXCEPTION 21—ADDENDUM

BellSouth Georgia OSS Testing Evaluation

Date: April 20, 2001

EXCEPTION CLOSURE REPORT

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

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

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

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

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

At the time the exception was closed, it was understood that LSRs received a “Z” processing status when a supplemental LSR was submitted by a CLEC prior to the original LSR being canceled. It was also understood that the original LSR received the “Z” status as its final disposition. This information did not indicate that the LSRs should be considered CLEC-caused fall-out.

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

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

CLOSURE REPORT FOR EXCEPTION 21—ADDENDUM

BellSouth Georgia OSS Testing Evaluation

Summary of BellSouth's Response

"Since KPMG has determined that LSRs receiving "Z" processing status (Pending Supplements) should not be considered either CLEC caused or BellSouth caused fallout for the purposes of the Flow Through Report until a final disposition of the LSR is determined, BellSouth has taken the necessary steps to exclude these LSRs from the Total System Fallout which contains both the BST and CLEC caused fallout. Additionally, since these LSRs are now ineligible to Flow Through, they are now excluded from the count of valid LSRs which is the number of LSRs eligible to Flow Through. Any LSRs in this Pending Supplements category will be counted in the following month's Flow Through reports when they have reached their final disposition."

Summary of KCI's Re-test Activities:

KCI's re-testing activities consisted of: 1) a review of BellSouth's response; and 2) the replication of the Flow Through calculation for "Z" processing status LSRs for the month of October 2000.

KCI's Re-test Results:

"Z" Processing Status: The results of replication activities for October 2000 Flow Through calculations determined that LSRs with a "Z" processing status were no longer treated as BellSouth-caused fall-out, except where additional errors resulting from BellSouth causes existed on the LSRs. However, a coding error on BellSouth's part in the identification of Auto Clarifications resulted in a discrepancy between the number of "Z" processing LSRs KCI calculated and the number reported by BellSouth. This discrepancy resulted in some LSRs that should have been reported as Auto Clarifications being reported as "Z" processing LSRs. Since the discrepancy was extremely small¹ and both categories are exclusions, there was no significant impact on the overall Flow Through calculation. As such, it is KCI's professional opinion that this discrepancy is not significant enough to affect the overall evaluation. Also, BellSouth indicated in its amended response to Exception 21 dated March 19, 2001, that it had corrected the coding error that was causing the discrepancy.²

¹ 744 LSRs were not identified as Auto Clarifications out of a total of 40,824 Auto Clarifications reported (approximately 1.8%) on a total volume of 341,108 LSRs for the month.

² KCI did not independently verify the correction. However, based upon its understanding of the coding issue, it is KCI's professional opinion that the change in coding required was relatively minor and did not warrant a formal review.

CLOSURE REPORT FOR EXCEPTION 21—ADDENDUM
BellSouth Georgia OSS Testing Evaluation

Based on the re-testing results, KCI believes that BellSouth has adequately addressed the issues raised in re-opening Exception 21.

Based on re-testing activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 21.

Attachments: None.

CLOSURE REPORT FOR EXCEPTION 76
BellSouth Georgia OSS Testing Evaluation

Date: April 20, 2001

EXCEPTION CLOSURE REPORT**Exception:**

KPMG Consulting, Inc. (KCI) encountered BellSouth provisioning errors for Unbundled Network Element (UNE) orders.

Summary of Exception:

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

Of the 279 UNE orders, which were validated, 98 post-order CSRs (35%) contained different information than their corresponding LSRs. Of the 98 orders, 42 (43%) were flow through and 56 (57%) were non-flow through¹.

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

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

Summary of BellSouth's Response:

BellSouth provided its reasons for the provisioning errors for UNE orders experienced by KCI, and several proposed remedies. These included issues that had been corrected by BellSouth subsequent to KCI's test; proposed changes that BellSouth was in the process of implementing; service representative errors; and KCI errors during testing/analysis activities. BellSouth requested that KCI conduct a re-test of provisioning for UNE orders once all the proposed remedies had been implemented.

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.

CLOSURE REPORT FOR EXCEPTION 76BellSouth Georgia OSS Testing Evaluation

KCI Re-test Activities:

KCI's re-test activities consisted of submitting additional Local Service Requests (LSRs) and comparing them after completion to: a) post-order Customer Service Records (CSRs); b) the BellSouth Directory Listing Database; and c) Switch Translation data.

KCI Re-test Results:

Of the 72 post-order CSRs that KCI verified, 7 of the post-order CSRs (10%) 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 Based on this result, BellSouth has satisfied this evaluation criterion.³

Of the 55 Directory Listings for UNE-P orders that KCI verified, five (9%) contained different information than their corresponding LSRs, thus resulting in a 91% accuracy rate. The KCI-determined standard for this evaluation criterion is a 95% accuracy rate.⁴ Based on this result, BellSouth has satisfied this evaluation criterion.⁵

Of the 89 Switch Translations for UNE-P lines that KCI verified, 12 of the lines (13%) contained different information than their corresponding LSRs, thus resulting in an 87% accuracy rate. The KCI-determined standard for this evaluation criterion is a 95% accuracy rate.⁶ Based on this result, KCI will assign a "Not Satisfied" to the relevant criterion in its final report.⁷

² The 95% benchmark was developed based on KCI's professional judgment.

³ 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 sub-standard 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 0.0682, which is above the .0500 cut-off for a statistical conclusion of failure.

⁴ Please refer to footnote #2.

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 sub-standard 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 0.1396, which is above the .0500 cut-off for a statistical conclusion of failure.

⁶ Please refer to footnote #2.

⁷ Given a p-value of 0.0016, the results for the Switch Translations test for UNE-P lines fall below the 95% benchmark.

CLOSURE REPORT FOR EXCEPTION 76

BellSouth Georgia OSS Testing Evaluation

In the absence of additional planned re-test activity, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 76.

Attachments: None.

CLOSURE REPORT FOR EXCEPTION 77BellSouth Georgia OSS Testing Evaluation

Date: April 20, 2001

EXCEPTION CLOSURE REPORT**Exception:****BellSouth does not deliver timely fully mechanized Clarification (CLR) responses.****Summary of Exception:**

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

1. Fully Mechanized

A fully mechanized error, including both fatal rejects and auto clarifications, is a system-generated error message.

2. Partially Mechanized

A partially mechanized clarification 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).

When this exception was initially issued on May 9, 2000, BellSouth committed to returning 95% of fully mechanized errors within one hour, and 85% of partially mechanized errors within 48 hours. On June 6, 2000 the Georgia Public Service Commission (GPSC) adopted an official set of standards and benchmarks to be used for purposes of KPMG Consulting, Inc.'s (KCI's) evaluation. The June 6 standards specify that 97% of fully mechanized errors be returned within one hour, and 85% of partially mechanized errors be returned within 24 hours.

BellSouth's Performance²: In response to LSRs submitted via TAG and EDI, BellSouth failed to deliver timely fully mechanized CLR responses. The results are listed below:

- 92% of fully mechanized errors for UNE orders were returned via the TAG interface within one hour³.

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

² This initial exception included data for LSRs submitted up to April 21, 2000. All Local Number Portability (LNP) service requests were *excluded* from this data set. Information for fully versus partially mechanized CLR responses for LNP orders was not provided to KCI at the time of this exception. Subsequent timeliness calculations do contain data for LNP orders.

CLOSURE REPORT FOR EXCEPTION 77

BellSouth Georgia OSS Testing Evaluation

- 17% of fully mechanized errors for UNE orders were returned via the EDI interface within one hour⁴.
- 9% of fully mechanized errors for Resale orders were returned via the EDI interface within one hour.

The following table provides a detailed breakdown of response time intervals for fully mechanized errors⁵.

Fully Mechanized Error Timeliness Summary

UNE Errors Received via TAG						
<1 hr	1-2 hrs	2-4 hrs	4-12 hrs	12-24 hrs	24-48 hrs	>48 hrs
95	2	0	3	1	2	0
92.2%	1.9%	0%	2.9%	1.0%	1.9%	0.0%
UNE Errors Received via EDI						
<1 hr	1-2 hrs	2-4 hrs	4-12 hrs	12-24 hrs	24-48 hrs	>48 hrs
15	59	5	5	2	0	1
17.2%	67.8%	5.7%	5.7%	2.3%	0.0%	1.1%
Resale Errors Received via EDI						
<1 hr	1-2 hrs	2-4 hrs	4-12 hrs	12-24 hrs	24-48 hrs	>48 hrs
4	27	10	3	0	0	0
9%	61%	23%	7%	0%	0%	0%

KCI also provided PON detail to BellSouth for the late responses identified in the initial exception.

Summary of BellSouth's Response:

“ TAG UNE : BellSouth disagrees with KPMG's results for TAG fully mechanized response timeliness. Using the timestamps obtained by BellSouth from LEO, the TAG FM response timeliness is 100% < 1 hr.

³ Response timeliness did not significantly improve after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness of response issues. For fully mechanized CLRs received between 2/8/00 and 4/21/00, 93% were returned within one hour via TAG.

⁴ Response timeliness did not improve after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness issues. For fully mechanized CLRs received between 2/8/00 and 4/21/00, 15% were received within one hour.

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

CLOSURE REPORT FOR EXCEPTION 77

BellSouth Georgia OSS Testing Evaluation

EDI UNE : BellSouth completed a random sample review of the EDI UNE PONs in the EDI table. BellSouth disagrees with 5 of the 5 PONs sampled in the 1-2 hr category and 2 of the 2 PONs sampled in the 2-4 hr category. Extrapolating these results, EDI FM response timeliness for UNE PONs is 100% < 1 hr.

EDI Resale: BellSouth randomly reviewed 12 of the 27 EDI PONs in the 1-2 hr category and disagree with KPMG's findings on all 12 PONs. BellSouth also disagrees with 7 of the 10 incidents in the 2-4 hr category. The response timeliness based on this research leads to a result of 86% of the FM CLR responses < 1 hr. BellSouth will migrate to a Mercator EDI solution on 12/15/00 to improve EDI timeliness results."

KCI Note: BellSouth provided specific responses to a number of individual PONs identified in KCI's exception. These responses provided a view of response timeliness based on use of BellSouth timestamps. Initial responses included timestamps obtained from LEO, a back-end BellSouth system. KCI subsequently received a sample of timestamps from BellSouth's EDI translator, the closest point to BellSouth's interface gateway at which BellSouth can uniquely distinguish between transactions at a PON level. For purposes of this Ordering evaluation, KCI utilizes independent third party timestamps (i.e., KCI CLEC timestamps) for use in response timeliness analysis and evaluation results. However, KCI did conduct a review of timeliness based on BellSouth EDI translator timestamps for information purposes. See the KCI Re-test description listed below for additional information.

Summary of KCI Re-test Activities:

KCI conducted two sets of transaction-based re-test activities to evaluate fully mechanized error response timeliness:

1. KCI initiated a first re-test on August 25, 2000. This re-test evaluated UNE LSRs submitted via the TAG and EDI interfaces.
2. KCI initiated a second re-test on January 19, 2001. This second re-test evaluated UNE LSRs submitted via TAG and EDI, and Resale LSRs submitted via EDI.

In addition, based on timestamps provided in BellSouth's exception response, KCI conducted a comparison of response timeliness based on BellSouth-provided timestamps versus KCI/HP-provided timestamps for EDI fully mechanized error timeliness from the first re-test. While KCI's results for this and all other Ordering criteria is based on KCI/HP timestamps, data pertaining to the BellSouth/KCI data comparison is provided for information purposes only.

CLOSURE REPORT FOR EXCEPTION 77
BellSouth Georgia OSS Testing Evaluation**KCI's Re-test Results:****1. August 25, 2000 re-test results⁶**

Based on results from the August 25, 2000 UNE re-test, BellSouth failed to meet the standard response intervals for fully mechanized error timeliness via both TAG and EDI interfaces. The results of the re-test were as follows:

- 68% of fully mechanized errors for UNE orders were returned via the TAG interface within one hour.
- 64% of fully mechanized errors for UNE orders were returned via the EDI interface within one hour.

August 25, 2000 Re-test Results

15	2	1	2	2	22
68%	9%	5%	9%	9%	100%
76	39	2	1	--	118
64%	33%	2%	1%	--	100%

Timestamp Analysis for Fully Mechanized (FM) Error Timeliness, First Re-test Data⁷

Total Responses	Responses On Time	% On Time (< 1 hr)	Total Responses	Responses On Time	% On Time (<1 hr)
114	109	96%	118	76	64%

Notes:

1. Interval calculations were performed on those transactions categorized as "late" based on KCI timestamp analysis.

⁶ First re-test results provided here differ slightly from initial re-test results reported in KCI's Amended Exception 77. Data provided in the amended exception reflected interim re-test results; data provided in this closure statement reflects final re-test results.

⁷ For additional information on KCI's transaction response timeliness evaluation methodology, please refer to KCI's document *Transaction Response Timeliness Evaluation Methodology* filed with the Georgia Public Service Commission on January 16, 2001.

CLOSURE REPORT FOR EXCEPTION 77
BellSouth Georgia OSS Testing Evaluation

2. Total responses reviewed using KCI timestamps exceeds total responses reviewed using BellSouth timestamps due to the inclusion of several additional responses that were not classified as Fully Mechanized at the time of the initial BellSouth review.

2. January 19, 2001 re-test results

KCI initiated a second re-test to test remaining sub-standard results. Based on results of the January 19, 2001 UNE and Resale re-test, BellSouth met the response time standard for fully mechanized errors returned via the TAG interface (UNE), but did not meet the standard for fully mechanized errors returned via the EDI interface (UNE and Resale). The results of the re-test were as follows:

- 94% of fully mechanized errors for UNE orders were returned via the TAG interface within one hour⁸.
- 84% of fully mechanized errors for UNE orders were returned via the EDI interface within one hour.
- 85% of fully mechanized errors for Resale orders were returned via the EDI interface within one hour.

January 19, 2001 Re-test Results

84	3	0	1	1	89
94%	3%	0%	1%	1%	100%
62	4	1	4	3	74
84%	5%	1%	5%	4%	100%
61	6	1	4	0	72
85%	8%	1%	6%	0%	100%

⁸ Although the test percentage is below the benchmark of 97%, 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 0.1297, above the 0.0500 cutoff for a statistical conclusion of failure.

CLOSURE REPORT FOR EXCEPTION 77

BellSouth Georgia OSS Testing Evaluation

Based on re-test results, KCI will assign a result of "Satisfied" in its final report for the TAG UNE fully mechanized response timeliness evaluation criteria, and a result of "Not Satisfied" for the EDI UNE and Resale fully mechanized response timeliness criteria.

With no other re-testing activities planned, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 77.

Attachments: None.

CLOSURE REPORT FOR EXCEPTION 78BellSouth Georgia OSS Testing Evaluation

Date: April 20, 2001

EXCEPTION CLOSURE REPORT**Exception:**

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

Summary of Exception:

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

1. Flow Through

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

2. Non-Flow Through

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

When KCI initially issued this exception on May 9, 2000, BellSouth committed to returning 95% of FOCs for flow through service requests within four hours and to returning 85% of FOCs for non-flow through service requests within 48 hours. The Georgia Public Service Commission (GPSC), on June 6, 2000, subsequently adopted an official set of standards and benchmarks to be used for purposes of KCI's evaluation. The June 6 standards specified that 95% of flow through FOCs be returned within three hours and that 85% of non-flow through FOCs be returned within 36 hours.

BellSouth Performance (April 2000)²: In response to LSRs submitted via TAG and EDI, BellSouth failed to deliver timely flow through FOCs.

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

² This initial exception included data for LSRs submitted through April 21, 2000. All Local Number Portability (LNP) service requests were *excluded* from this data set. Information on fully versus partially mechanized CLR responses for LNP orders was not provided to KCI at the time of this exception. Subsequent timeliness calculations do contain data on LNP orders.

CLOSURE REPORT FOR EXCEPTION 78

BellSouth Georgia OSS Testing Evaluation

The results of the test were as follows:

- 83% of flow through UNE FOCs were returned via the TAG interface within four hours³.
- 87% of flow through UNE FOCs were returned via the EDI interface within four hours⁴.
- 76% of flow through Resale FOCs were returned via the EDI interface within three hours.

The following table provides a detailed breakdown of response time intervals for flow through FOCs⁵.

Flow Through FOC Timeliness Summary—April 2000

UNE FOCs Received via TAG				
<4 hrs	4-24 hrs	24-36 hrs	36-48 hrs	48-72 hrs
38	1	1	3	3
83%	2%	2%	7%	7%
UNE FOCs Received via EDI				
<4 hrs	4-24 hrs	24-36 hrs	36-48 hrs	48-72 hrs
47	3	2	0	3
87%	6%	4%	0%	4%
Resale FOCs Received via EDI				
<3 hrs	3-4 hrs	4-6 hrs	6-10 hrs	>10 hrs
62	9	3	8	0
76%	11%	4%	10%	0%

KCI also provided PON details to BellSouth for the late responses identified in its initial exception.

³ Response timeliness improved after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness of response issues. For flow through FOCs received between 2/8/00 and 4/21/00, 91% were returned within four hours via TAG.

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

⁵ KCI used Actual Flow Through data (provided by BellSouth as part of the Flow Through Evaluation) to determine whether FOCs were flow through or non-flow through.

CLOSURE REPORT FOR EXCEPTION 78**BellSouth Georgia OSS Testing Evaluation**

Summary of BellSouth's Response:

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

Summary of the 8 TAG orders provided.

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

Summary of 7 EDI orders provided.

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

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

KCI Note: BellSouth provided data indicating that CLEC (KCI/HP) TAG Listener downtime affected the timeliness calculation for two PONs. KCI excluded these PONs from its final analysis (overall results did not change based on these exclusions). BellSouth also provided specific responses to a number of individual PONs identified in KCI's exception. These responses provided a view of response timeliness based on use of BellSouth timestamps. Initial responses included timestamps obtained from LEO, a back-end BellSouth system. KCI subsequently received a sample of timestamps from BellSouth's EDI translator, the closest point to BellSouth's interface gateway at which BellSouth can uniquely distinguish between transactions at a PON level. For purposes of this ordering evaluation, KCI utilizes independent third party timestamps (i.e., KCI CLEC timestamps) for use in response timeliness analysis and evaluation results.

Summary of KCI's Re-test Activities:

KCI conducted two sets of transaction-based re-test activities to evaluate flow through FOC timeliness:

1. KCI initiated a first re-test on August 25, 2000. This re-test evaluated UNE LSRs submitted via the TAG and EDI interfaces.
2. KCI initiated a second re-test on January 19, 2001. This second re-test evaluated UNE LSRs submitted via TAG and EDI, and Resale LSRs submitted via EDI.

CLOSURE REPORT FOR EXCEPTION 78

BellSouth Georgia OSS Testing Evaluation

KCI's Re-test Results:**1. August 25, 2000 re-test results**

Based on the results of the first UNE re-test, BellSouth failed to meet the standard response intervals for flow through FOC timeliness via both EDI and TAG interfaces. The results of the re-test were as follows:

- 82% of flow through FOCs for UNE orders were returned via the EDI interface within three hours.
- 56% of flow through FOCs for UNE orders were returned via the TAG interface within three hours.

August 25, 2000 Re-test Results⁶

31	5	1	0	1	38
82%	13%	3%	0%	3%	100%
33	22	3	1	0	59
56%	37%	5%	2%	0%	100%

2. January 19, 2001 re-test results

As a result of sub-standard response timeliness intervals during the first re-test, KCI initiated a second re-test. Based on results of the second UNE and Resale re-test, BellSouth met the response time standard for flow through FOCs returned via the EDI interface (UNE and Resale), but failed to meet the standard for flow through FOCs returned via the TAG interface (UNE).

- 100% of flow through FOCs on UNE orders were returned via the EDI interface within three hours.
- 95% of flow through FOCs on Resale orders were returned via the EDI interface within three hours.
- 84% of flow through FOCs on UNE orders were returned via the TAG interface within three hours.

⁶ Totals may not equal 100% due to rounding.

CLOSURE REPORT FOR EXCEPTION 78

BellSouth Georgia OSS Testing Evaluation

January 19, 2001 Re-test Results⁷

EDIS - EDI Flow Through Response Timeliness					
50	0	0	0	0	50
100%	0%	0%	0%	0%	100%
EDIS - Resale Flow Through Response Timeliness					
38	5	1	0	1	45
84%	11%	2%	0%	2%	100%
EDIS - TAG Flow Through Response Timeliness					
79	4	0	0	0	83
95%	5%	0%	0%	0%	100%

Based on its re-test results, KCI will assign a result of "Satisfied" in its final report for the EDI UNE and Resale flow through response timeliness evaluation criteria, and a result of "Not Satisfied" for the TAG UNE flow through response timeliness criterion.

With no other re-testing activities planned, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 78.

Attachments: None.

⁷ Totals may not equal 100% due to rounding.

Date: April 20, 2001

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

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 a 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 a Fatal Reject or Clarification (CLR) notification.

In response to a portion of KPMG Consulting, Inc.'s (KCI's) LSRs containing data values populated contrary to business rule documentation, BellSouth delivered FOCs. After issuing confirmations, 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.

In its initial exception issued June 21, 2000, KCI provided details to BellSouth for 10 LSRs receiving FOCs in error for the initial UNE (MTP) test. KCI issued an amended exception to include details for 14 additional LSRs receiving FOCs in error for the Resale (STP) test, and a second amended exception to include details for 18 additional LSRs (MTP and STP) receiving FOCs in error during KCI's second functional re-test¹.

Summary of BellSouth's Response:

UNE LSRs:

BellSouth provided a response to each individual PON referenced by KCI. BellSouth "agreed" with 2 of the PONs referred, "disagreed" with 7, and could not locate the remaining one PON. Based on disagreements between KCI and BellSouth on the activity of a number of LSRs, KCI agreed to review FOC accuracy during a functional re-test.

¹ Although KCI's second functional re-test was designed to address deficiencies in evaluation criteria other than FOC response accuracy, results were monitored across all relevant evaluation criteria.

CLOSURE REPORT FOR EXCEPTION 95BellSouth Georgia OSS Testing Evaluation

Resale LSRs:

- **Initial Resale Functional Test:** BellSouth provided a response to each individual PON referenced by KCI. BellSouth agreed that orders were sent with errors and failed to receive an error message. All Resale LSRs referred stemmed from the same ordering error (use of an invalid REQ TYPE for Directory Listing-only changes on Resale accounts).
“BellSouth currently does not have an up front clarification edit to identify this particular LSR ordering error. Change Request 2332 has been submitted for prioritization into a future software release. When implemented Change Request 2332 will return a clarification notice if the LSR ordering error described in the above table is submitted.”
- **Resale Functional Re-Test:** BellSouth provided a response to each individual PON referenced by KCI. Although BellSouth stated “disagreement” with the majority of PONs on the list provided, BellSouth did not provide evidence to counter KCI’s claim that the data provided on the LSRs was in conflict with the Business Rules.

Summary of KCI’s Re-test Activities – UNE Transactions:

KCI initiated a UNE functional re-test on August 25, 2000. Over 200 Local Service Requests (LSRs) for UNE service were submitted to BellSouth via the TAG and EDI ordering interfaces. KCI monitored the FOCs received for each transaction to determine whether the confirmation response was appropriate based on the LSR submitted.

Summary of KCI Re-test Results – UNE Transactions:

KCI determined that 99% of FOCs received during UNE re-test activities were accurate response types (i.e., received in response to valid LSRs). Based on re-test analysis, KCI believes that BellSouth’s performance with respect to accurate UNE FOC responses is adequate.

Results – Resale Transactions

KCI analysis confirmed that all of the inaccurate Resale FOCs received during the initial functional evaluation resulted from the introduction of a single ordering error. BellSouth plans to implement a system enhancement to capture this type of ordering error and return an error message. BellSouth has not yet set a targeted release date for this system edit, which is proceeding through BellSouth’s internal electronic interface release

CLOSURE REPORT FOR EXCEPTION 95

BellSouth Georgia OSS Testing Evaluation

process².

In addition, KCI received inaccurate FOCs for 13% of its total FOCs received during the second functional re-test. These inaccurate FOCs were received for a variety of issues, and were both system and representative-generated responses.

As a result of inaccurate Resale FOCs received during functional testing, KCI is assigning a "Not Satisfied" result to the associated Resale evaluation criterion in its final report.

Based on re-testing activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 95.

Attachments: None.

² As this system edit is not expected to be CLEC impacting (i.e., it will not require changes to CLEC interfaces or to the Business Rules), this change request is not proceeding through the CLEC Change Control Process.



CLOSURE REPORT FOR EXCEPTION 125

BellSouth Georgia OSS Testing Evaluation

Date: April 20, 2001

EXCEPTION CLOSURE REPORT

Exception:

BellSouth's process for generating Completion Dates (CN DDs) for Local Service Requests (LSRs) may result in inaccuracies between the CN DD provided to the CLEC and the actual date of service completion.

Summary of Exception:

BellSouth delivers CNs upon the conclusion of "field provisioning"¹ activities as well as all subsequent downstream (listing and billing) provisioning activities². Within the CN, BellSouth provides the field provisioning completion date (located in the 'DD' field). Regardless of downstream errors encountered during the provisioning process and the time at which the CN response is actually transmitted, the CN DD field should accurately represent the actual date of service provisioning.

Based on discussions with BellSouth, KPMG Consulting, Inc. (KCI) believes BellSouth's process for generating CN DDs is inaccurate.

- For Local Number Portability (LNP) service requests, the CN DD field appears to be populated with the date on which the CN was sent. This is not always the date on which the service provisioning actually completed.
- For non-LNP service requests, BellSouth populates the CN DD with the completion date from the first internal service order. For some service requests, BellSouth generates multiple internal service orders. On occasion, these service orders may not complete on the same day. As a result, the CLEC could receive a CN DD that is earlier than the actual completion date.

Summary of BellSouth's Response:

"BellSouth has opened defect 3078 to correct the due date populated in completion notification for LNP orders. The defect will be prioritized and implemented in a future software release.

¹ The "field provisioning" date is defined as the date on which actual service completion occurred.

² For Local Number Portability (LNP) orders, BellSouth returns CNs following all provisioning activities and after the CLEC completes the porting of associated Telephone Numbers with the Number Portability Administration Center (NPAC).



BellSouth has opened feature 11920 to wait until all applicable service orders are completed prior to sending completion notification for non-LNP orders. The feature will be prioritized and implemented in a future software release.

CLECs may continue to obtain service order status by using the BellSouth's CLEC Service Order Tracking System (CSOTS). CSOTS provides CLECs with service order status including completion."

Summary of KCI's Re-test Activities:

KCI initiated a functional re-test on August 25, 2000. KCI conducted status queries via CSOTS for nearly 300 transactions.

Implementation dates for the features opened by BellSouth have not yet been identified. As a result, KCI does not expect to issue orders to re-test CN DD accuracy following feature implementation.

Summary of KCI's Re-test Results:

During the period of functional re-testing initiated on August 25, 2000, KCI observed 9 instances (5 TAG transactions and 4 EDI transactions) of completion dates provided on CNs differing from the completion dates identified on CSOTS. Of these, eight instances represented LNP orders with CN DDs later than the CSOTS completion date. The remaining one instance was an inside move order with a CN DD earlier than the CSOTS completion date.

These instances represent less than 3% of all transactions queried via CSOTS. In KCI's professional judgment, these issues are not significant enough to affect the overall evaluation of the test criterion.

Since BellSouth's targeted release dates for the feature changes identified above have not been set and are likely to be outside the expected timeframe of the BellSouth-Georgia OSS Evaluation, KCI does not expect to issue orders to re-test system functionality following feature implementation.

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



Consulting **CLOSURE REPORT FOR EXCEPTION 125**
BellSouth Georgia OSS Testing Evaluation

Based on the absence of future re-test activity, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 125.

Attachments: None.

CLOSURE REPORT FOR EXCEPTION 128

BellSouth Georgia OSS Testing Evaluation

Date: April 20, 2001

EXCEPTION CLOSURE REPORT**Exception:**

BellSouth-reported raw data values for Completion 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 one Provisioning metric.

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 – *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)* – KCI compared the BellSouth-reported values for COMPLETION DATE² in the raw data files with the completion date that KCI received from Hewlett Packard for October and November 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. The following table lists the specific discrepancies for Completion Date.

COMPLETION DATE

PURCHASE ORDER NUMBER	SO_NBR	RAW DATA FILE	BELLSOUTH-REPORTED VALUE	KCI-COLLECTED VALUE	MONTH
324R112PEH000003	CO33BBN0	JPDY	None	10/13/00	October
452R216PTF000002	RP7BNJW8	JPDY	None	10/02/00	October

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.

CLOSURE REPORT FOR EXCEPTION 128

BellSouth Georgia OSS Testing Evaluation

Summary of BellSouth's 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.

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 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"

CLOSURE REPORT FOR EXCEPTION 128

BellSouth Georgia OSS Testing Evaluation

(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

Summary of KCI Re-Test Activities:

KCI reviewed the explanations provided by BellSouth.

KCI also compared the Completion Date timestamps in the BellSouth-provided raw data files with the corresponding timestamps in the KCI-collected data file for the two months subsequent to the above review period – that is December 2000 and January 2001. (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 agrees with BellSouth's response as follows:

- For the SO_NBR = CO33BBN0, BellSouth concluded that the discrepancy 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 down-stream systems. Further BellSouth believes the problem affects less than one percent of total service orders in the database, which would imply that the actual impact on the final metrics values is extremely low.

Based upon BellSouth's estimate, and the fact that this is the first occurrence of this type of error that KCI has found in all its months of testing, KCI believes the impact is not significant. Further, BellSouth is in the process of eliminating this rare type of error through its creation of new extract code. As such, KCI believes that BellSouth's response is reasonable.
- For the SO_NBR = RP7BNJW8, KCI believes BellSouth's explanation that the order was cancelled and therefore should not appear in the raw data file is reasonable..

KCI compared the completion date timestamps in the BellSouth reported raw data files to those KCI collected for December 2000 and January 2001. KCI did not find any discrepancies between the two sets of timestamps.

CLOSURE REPORT FOR EXCEPTION 128

BellSouth Georgia OSS Testing Evaluation

As a result, KCI believes that BellSouth has adequately addressed the issues identified in Exception 128.

Based on re-testing activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 128.

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:

Kristy R. Holley, Division Director
Consumers' Utility Counsel
47 Trinity Avenue, S.W.
4th Floor
Atlanta, GA 30334-4600
404-656-3982 (o)

Newton M. Galloway
Smith, Galloway, Lyndall & Fuchs
Suite 400 First Union Bank Tower
100 South Hill Street
Griffin, GA 30229
770-233-6230 (o)

Charles A. Hudak
Gerry, Friend & Sapronov, LLP
Three Ravinia Drive
Suite 1450
Atlanta, GA 30346-2131
770-399-9500 (o)

Kent F. Heyman
Sr. VP and General Counsel
Mpower Communications Corp.
171 Sully's Trail, Suite 300
Pittsford, NY 14534
716-218-6551 (o)

Suzanne W. Ockleberry
AT&T
1200 Peachtree Street, NE
Suite 8100
Atlanta, GA 30309
404-810-7175 (o)

Charles V. Gerkin Jr.
Smith, Gambrell & Russell, LLP
Promenade II, Suite 3100
1230 Peachtree Street, N.E.
Atlanta, GA 30309-3592
404-815-3716 (o)

Frank B. Strickland
Holland & Knight LLP
One Atlantic Center, Suite 2000
1201 West Peachtree Street
Atlanta, GA 30309-3400
404-817-8484 (o)

Jeremy D. Marcus
Blumenfeld & Cohen
Co-Counsel for Rhythm, aka ACI Corp.
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036
202-955-6300 (o)

Scott A. Sapperstein
Sr. Policy Counsel
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619
813-829-4093 (o)

John P. Silk
Georgia Telephone Association
1900 Century Boulevard, Suite 8
Atlanta, GA 30345
404-321-5368 (o)

Eric J. Branfman
Richard M. Rindler
Swidler & Berlin
3000 K Street, NW, Suite 300
Washington, DC 20007
202-945-6940 (o)

Robert A. Ganton
Regulatory Law Office
Dept. Army
Suite 700
901 N. Stuart Street
Arlington, VA 22203-1837
703-696-1645 (o)

Peter C. Canfield
Dow Lohnes & Albertson
One Ravinia Drive, Suite 1600
Atlanta, GA 30346
770-901-8800 (o)

James M. Tennant
Low Tech Designs, Inc.
1204 Saville Street
Georgetown, SC 29440
803-527-4485 (o)

Mark Brown
Director of Legal and Government Affairs
MediaOne, Inc.
2925 Courtyards Drive
Norcross, GA 30071
770-559-2000 (o)

Daniel S. Walsh
Attorney General Office
Department of Law—State of Georgia
40 Capitol Square, S.W.
Atlanta, GA 30334-1330
404-657-2204 (o)

Harris R. Anthony
BellSouth Long Distance
400 Perimeter Center Terrace
Suite 350 – North Terraces
Atlanta, GA 30346
(770) 352-3116 (o)

Charles F. Palmer
Troutman Sanders LLP
5200 NationsBank Plaza
600 Peachtree Street, NE
Atlanta, GA 30308-2216
404-885-3402 (o)

Judith A. Holiber
Morgenstein & Jubelirer
One Market
Spear Street Tower, 32nd Floor
San Francisco, CA 94105
415-901-8700 (o)

Nanette S. Edwards
Regulatory Attorney
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802
256-382-3856 (o)

Peyton S. Hawes Jr.
127 Peachtree Street, N.E.
Suite 1100
Atlanta, GA 30303-1810
404-577-6200 (o)

Jeffrey Blumenfeld
Elise P. W. Kiely
Blumenfeld & Cohen
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036
202-955-6300 (o)

James A. Schendt
Regulatory Affairs Manager
Interpath Communications, Inc.
P. O. box 13961
Durham, NC 27709-3961
919-253-6265 (o)

William R. Atkinson
Sprint Communications Co. L.P.
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339
404-649-6221 (o)

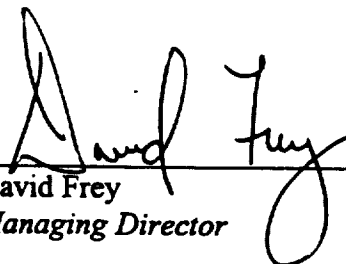
Nancy Krabill
Director of Regulatory Affairs
1300 W. Mockingbird Lane
Suite 200
Dallas, TX 75247
678-444-4444 (o)

Dana R. Shaffer
Legal Counsel
105 Molloy Street
Suite 300
Nashville, TN 37201
615-777-7700 (o)

Anne E. Franklin
Arnall Golden & Gregory, LLP
2800 One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309
404-873-8536 (o)

Glenn A. Harris
Lori Anne Dolquest
NorthPointe Communications, Inc.
303 Second Street, South Tower
San Francisco, CA 94107
415-403-4003 (o)

This 20th day of April, 2001.



David Frey
Managing Director

KPMG Consulting, Inc.
1835 Market St, 24th Floor
Philadelphia, PA 19103
(215) 405-6880

(03/21/01)



1600 Market Street
Philadelphia, PA 19103-7279

Telephone 215 299 1400

Fax 215 299 3150

5/8

May 8, 2001

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334

RECEIVED

MAY 08 2001

**EXECUTIVE SECRETARY
G.P.S.C.**

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

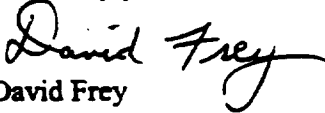
Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of the following responses from BellSouth to KPMG Consulting, Inc.'s exceptions: Exception 129 BLS 2nd Amended Response; Exception 131 BLS Amended Response; and Exception 137 BLS Amended Response. Please also find closure reports for Exceptions: 38, 47, 108, 116, 118 and 133.

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 SECOND AMENDED RESPONSE TO
EXCEPTION 129**



RECEIVED

Date: May 1, 2001

MAY 08 2001

EXECUTIVE SECRETARY
G.P.S.C.

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.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 129

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 (Fully Mechanized)	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. 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 the 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 the 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 the 4GL code to make the code consistent with the business rules.	10/27/00	Closed	11/8/00
24	Held Order Interval for CLEC UTT and BellSouth DS1/DS3	BellSouth values and KCI generated values do not match due to code changes.	10/31/00	Closed	11/6/00
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

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27	Total Service Order Cycle Time	Step 4 of the May 15, 2000 (version 2.0.4) of the Raw Data User Manual is incorrect. Instead of using the service order number (so_nbr) only to identify duplicates the combination of service order number (so_nbr) and issu_dt (the date when the service order is issued) should be used.	10/5/00	Closed	10/13/00
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
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

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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
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 UIT 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

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Item	Exception	Response	Resolution Date	Status	Resolution Date
71	Customer Trouble Report 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 due to duplicate records.	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 due to duplicate records	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 for July 2000. KCI can match BellSouth values using January 2001 data.	12/4/00	Closed	3/6/00
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	
83	Reject Interval for electronically submitted service requests	The depicted benchmark is inconsistent with the June 6 th 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 th Order.	1/10/00	Open	
85	LNP Disconnect Timeliness	The depicted benchmark is inconsistent with the June 6 th 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 th 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 th 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 th 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 th 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	
91	TSOCT for ISDN Loop	This Total Service Order Cycle Time (TSOCT) measure was calculated as an Order Completion Interval (OCI) measure. BellSouth changed to code to add the Firm Order Confirmation (FOC) interval to the TSOCT measure.	02/13/2001	Closed	02/27/2001
92	Reject Interval for Trunks and % Rejected Service Requests for Trunks	The October 2000 data includes other products than local interconnection trunks. This problem is fixed starting with December 2000 data	12/21/2000	Closed	02/15/2001

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		The definition should be more explicit in stating that non-coordinated cuts (work_type_id = 3) are included in this measure.			
93	- Coordinated Customer Conversions -% Provisioning Troubles Received Within 7 Days of a Completed Service Order	The last sentence in the business rule section states the that "...are calculated searching in the <u>prior report period</u> ... following 30 days after the completion..." The statement should say "...are calculated searching in the <u>current report period</u> ... following 7 days after the completion..."	02/15/2001	Open	
94	- Coordinated Customer Conversions -% Provisioning Troubles Received Within 7 Days of a Completed Service Order	Step 3 of the computational instructions in the October version of the Raw Data User Manual states that if the LATE_FLAG_GT_30 is 1 then the cutover began <u>more than 15 minutes but less than 31 minutes</u> after the Scheduled Cut Start Time. The statement should say that if the LATE_FLAG_GT_30 is 1 then the cutover <u>began more than 30 minutes</u> after the scheduled cut start time.	02/15/2001	Open	
95	- Coordinated Customer Conversions -% Provisioning Troubles Received Within 7 Days of a Completed Service Order	The description of the denominator is imprecise in the Calculation section of the SQM document. The denominator is the total number of service order circuits completed during the <u>current reporting month</u> and not service order circuits completed during the <u>previous month</u> .	02/15/2001	Open	
96	Total Service Order Cycle Time	The SQM documentation states that the Total Service Order Cycle Time is the combination of Firm Order Confirmation and Average Order Completion Interval. For some products like UNE xDSL Loop, the total service order cycle time (TSOCT) is measured by the time interval from the time a service inquiry is received to the time when a service order is completed which is an addition of three time intervals, the 1) service inquiry interval (SI); 2) the firm order confirmation (FOC); and 3) the order completion interval (OCI). This has not been properly documented in the <i>Georgia SQM Plan</i> .	02/15/2001	Open	
97	LNP - Percent Missed Installation	The denominator for this measure should be the number of service orders <u>completed</u> during the reporting period and not the number of service orders <u>confirmed</u> in the reporting period.	02/15/2001	Open	
98	LNP-Firm Order Confirmation Timeliness	The calculation formula for average firm order confirmation is mistakenly labeled as "Average Reject Interval".	02/15/2001	Open	
99	LNP-Firm Order Confirmation Timeliness	The last sentence in the business rules section describes the denominator as the number of orders completed whereas it should state the number of service requests confirmed.	02/15/2001	Open	
100	Service Inquiry with Firm Order	BRITE currently cannot handle characters like '-' (dash) in the Purchase Order Number (PON) field. Since the CLEC determines the PON this incapability may result in not being able to enter the PON in BRITE correctly.	02/15/2001	Open	
101	Flow Through	The June 6 th Order prescribes a benchmark of 95% for Residence, 90% for Business and 85% for UNE products. However, BellSouth did not apply these benchmarks.	02/15/2001	Open	
102	Average Jeopardy Notice Interval	Values for 2w Analog Loop with INP Design, 2w Analog Loop with INP Non Design, 2w Analog Loop with LNP Design, 2w Analog Loop with LNP Non Design, INP Standalone, LNP Standalone, Local Interconnection Trunks, for Average Jeopardy Notice Interval & Percent Jeopardies are reported in the June 6, Docket, but not provided by BLS.	02/15/2001	Open	
103	Average Completion Notice Interval	Values for Local Interconnection Trunks, INP (Standalone), LNP (Standalone), 2w Analog Loop with INP Design, 2w Analog Loop with INP Non-Design, 2w Analog Loop with LNP Design & 2w Analog Loop with LNP Non-Design products have been requested in the June 6 Order, but not provided by BLS.	02/15/2001	Open	
104	Percent Missed Installation	The "UNE Loops w/LNP" product is listed in the June 6 th Order but no charts are produced.	02/15/2001	Open	
105	Total Service Order Cycle Time	The "UNE Loops w/LNP" product is listed in the June 6 th Order but no charts are produced.	02/15/2001	Open	
106	Total Service Order Cycle Time - Offered	The "UNE Loops w/LNP" product is listed in the June 6 th Order but no charts are produced.	02/15/2001	Open	
107	Collocation	BellSouth used the benchmark of 75 calendar days for Virtual and 130 calendar days for Physical Collocation which corresponds to the benchmark for Extra-Ordinary in the June 6 th Order. BellSouth did not apply the benchmarks listed as Ordinary.	02/15/2001	Open	
108	Held Orders	Changes made to ICAIS table to be investigated	02/15/2001	Open	

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109	Total Service Order Cycle Time for Trunks	BLS reported SQM values do not agree with KCI-calculated values for May, June and July 2000. BellSouth reran their values and matches with KCI calculated values after the rerun.	10/18/00	Closed	11/22/00
110	Reject Interval for Trunks and %Rejected Service Requests for Trunks	The numerator for "%Rejected Service Requests for Trunks" is inconsistent with the denominator for "Reject Interval for Trunks" measure for May, June and July, 2000.	11/9/2000	Closed	12/6/2000
111	Reject Interval for Trunks and %Rejected Service Requests for Trunks	BellSouth used the "site" field to identify the state which is inaccurate because there are 5 site and 9 states. Also, the holiday and weekend time is subtracted from the reject interval duration. These problems have been fixed starting with October 2000 data.	11/30/2000	Closed	12/6/2000
112	Hot Cuts Timeliness	KCI found that the "SFDT" field (scheduled cut start time) contains records with a datestamp but not a timestamp in June, July and August raw data. These records should have been excluded from the SQM calculation. This problem is fixed starting with October 2000 data.	10/20/2000	Closed	11/15/2000
113	Held Order Interval	KCI cannot replicate the values for July 2000. BellSouth clarified that the field circuit_cnt_id should be used to identify the number of circuits instead of using the field num_items_worked_on. Given this clarification KCI was able to replicate the July 2000 values.	10/25/2000	Closed	12/4/2000

Impact:

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

BellSouth Response:

Item 77:

Measurement: Hot Cuts – Provisioning Troubles within 7 Days

Issue: BellSouth does not retain historical data and therefore the SQM values cannot be reproduced.

Response: Effective with April reporting, 271 charts will begin using the mechanized data process to develop the charts.

Item 78:

Measurement: Provisioning Troubles in 30 Days

Issue: Missing Data Elements Required for Calculations/User Manual Update

Response: The graphical charts for Provisioning Troubles in 30 Days will be accurate when the issues involving GA Exception 86.1 are resolved.

Item 81:

Measurement: Average Answer Time In Repair Centers

Issue: KCL calculated values and BellSouth reported values do not match.

Response: Conversations were going on in the different centers for a couple of months. It happens that the months KPMG selected were effected. The conversions were completed by the end of September so any month after that is ok to use.

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Item 82:

Measurement: Service Inquiry with Firm Order

Issue: 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.

Response: BellSouth's Complex Resale Support Group (CRSG) has revised the BRITE database to accept the PON numbers exactly as received from the CLEC. This eliminated data entry restrictions that contributed to mismatches of PONs between BRITE (entered by the CRSB) and LON (entered by the LCSC).

Item 83:

Measurement: Reject Interval for electronically submitted service requests

Issue: 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 one hour.

Response: The correction to this chart has been made and was reflected in the January 2001 data run in February 2001.

Item 84:

Measurement: Average Jeopardy Notice Interval

Issue: The depicted benchmark is inconsistent with the June 6, 2000 order.

Response: Corrections have been provided to the chart development group. A chart entitled "% Jeopardy Notice within 48 hours" is replacing this chart. This correction will be reflected in 271 charts produced in June 2001, using May 2001 data and will have a benchmark of 95%.

Item 85:

Measurement: LNP Disconnect Timeliness

Issue: 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.

Response: BellSouth has entered a change request to correct the benchmark. This correction is currently reflected in the 271 charts produced in April 2001, using March 2001 data. This correction is covered in Team Connection number 1139.

Item 86:

Measurement: Held Orders

Issue: 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.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 129

Response: The correction is in progress and should be reflected in the April 2001 charts for March 2001 data.

Item 87:

Measurement: Order completion Interval for LNP Standalone

Issue: These products are listed in the June 6, 2000 order but no charts are produced for these products.

Response: The correction is in progress and should be reflected in the April 2001 charts for March 2001 data.

Item 88:

Measurement: Held Order Interval for LNP Standalone

Issue: These products are listed in the June 6, 2000 order but no charts are produced for these products.

Response: For Held Order Interval for LNP Standalone, BellSouth is currently producing 6 charts in chart series B.2.3.17.

Item 89:

Measurement: Provisioning Troubles within 30 days for LNP Standalone

Issue: These products are listed in the June 6, 2000 order but no charts are produced for these products.

Response: These products do not exist after the numbers are ported. Therefore, no charts are produced. This was in the original GA order but was removed in later versions.

Item 90:

Measurement: Reject Interval and % Rejected Service Requests

Issue: 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.

Response: In the calculation for the Percent Rejected Service Requests report, BellSouth includes LSRs that are not received and rejected within the same reporting period. The opportunity exists for an LSR to be received and rejected in different months. BellSouth does not exclude these cases in order to capture all LSRs submitted and rejected. In these cases, the LSR is counted in the month in which it is received and the Reject is counted in the month in which it was returned. For the Reject Interval report, LSRs are counted in the month they are rejected.

Item 93:

Measurement: Coordinated Customer Conversions - %

Issue: The definition should be more explicit in stating that non-coordinated cuts (work_type_id = 3) are included in this measure. The last sentence in the business rule section states "...are calculated searching in the prior report period ... following 30 days

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 129

after completion..." The statement should say, "...are calculated searching in the current report period ... following 7 days after the completion..."

Response: All SQMs are in the process of being updated to reflect that data in this report will contain coordinated and non-coordinated hot cut conversion information. SQMs were updated in November to reflect 7 days after completion as opposed to 30 days after completion.

Item 94:

Measurement: Coordinated Customer Conversions - %

Issue: Step 3 of the computational instructions in the October version of the Raw Data User Manual states that if the LATE_FLAG_GT30 is 1 then the cutover began more than 15 minutes but less than 31 minutes after the Scheduled Cut Start Time. The statement should say that if the LATE_FLAG_GT_30 is 1 then the cutover began more than 30 minutes after the scheduled cut start time.

Response: Raw Data User Guide for this report will be available with April 15th PMAP Website Update.

Item 95:

Measurement: Coordinated Customer Conversions - %

Issue: The description of the denominator is imprecise in the Calculation section of the SQM Document. The denominator is the total number of service order circuits completed during the current reporting month and not service order circuits completed during the previous month.

Response: SQM states circuits completed during the previous month. This is correct and follows along the same guidelines as the Troubles Within 30 day report.

Item 96:

Measurement: Total Service Order Cycle Time

Issue: The SQM documentation states that the Total Service Order Cycle Time is the combination of Firm Order Confirmation and Average Order Completion Interval. For some products like UNExDSL Loop, the total service order time (TSOCT) is measured by the time interval from the time a service inquiry is received to the time when a service order is completed which is an addition of three time intervals, the 1) service inquiry interval (SI); 2) the firm order confirmation (FOC); and 3) the order completion interval (OCI). This has not been properly documented in the *Georgia SQM Plan*,

Response: The correction is in progress and should be reflected in the June 2001 charts for May 2001 data. It will read as follows: For UNE XDSL Loop, this measurement combines Service Inquiry Interval (SI), FOC Timeliness, Average Completion Interval, and Average Completion Notice Interval. (Note: The TSOCT measurement combines three reports: FOC Timeliness, Average Order Completion Interval and Average Completion Notice Interval.)

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Item 97:

Measurement: LNP – Percent Missed Installation

Issue: The denominator for this measure should be the number of service orders completed during the reporting period and not the number of service orders confirmed in the reporting period.

Response: Wording on SQM and 271 charts have been verified to be correct. The LNP PMI instructions document has been updated.

Item 98:

Measurement: LNP – Firm Order Confirmation Timeliness

Issue: The calculation formula for average firm order confirmation is mistakenly labeled as "Average Reject Interval".

Response: Corrections to the wording on the SQMs have been submitted.

Item 99:

Measurement: LNP – Firm Order Confirmation Timeliness

Issue: The last sentence in the business rules section describes the denominator as the number of orders completed whereas it should state the number of service requests confirmed.

Response: Corrections to the wording on the SQMs have been submitted.

Item 100:

Measurement: Service Inquiry with Firm Order

Issue: BRITE currently cannot handle characters like '-' (dash) in the Purchase Order Number (PON) field. Since the CLEC determines the PON this incapability may result in not being able to enter the PON in BRITE correctly.

Response: BellSouth's Complex Resale Support Group (CRSG) has revised the BRITE database to accept the PON numbers exactly as received from the CLEC.

Item 101:

Measurement: Flow Through

Issue: The June 6th Order prescribes a benchmark of 95% for Residence, 90% for Business and 85% for UNE products. However, BellSouth did not apply these benchmarks.

Response: BellSouth is establishing four charts that will reflect the 1-16-01 GPSC ordered benchmarks that will be available with the March, 2001 data.

Item 102:

Measurement: Average Jeopardy Notice Interval

Issue: Values for 2w Analog Loop with INP Design, 2w Analog Loop with INP Non Design, 2w Analog Loop with LNP Design, 2w Analog Loop with LNP Non Design, INP

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Standalone, LNP Standalone, Local Interconnection Trunks, for Average Jeopardy Notice Interval & Percent Jeopardies are reported in the June 6, Docket, but not provided by BLS.

Response: These charts will be available June 15, 2001.

Item 103:

Measurement: Average Completion Notice Interval

Issue: Values for Local Interconnection Trunks, INP (Standalone), 2w Analog Loop with INP Design, 2w Analog Loop with INP Non-Design, 2w Analog Loop with LNP Design & 2w Analog Loop with LNP Non-Design products have been requested in the June 6 Order, but not provided by BLS.

Response: These charts will be available June 15, 2001.

Item 104:

Measurement: Percent Missed Installation

Issue: The "UNE Loops w/LNP" product is listed in the June 6th Order, but no charts are produced.

Response: This product level was eliminated with the 1-16-01 GPSC order currently being added to the 271 charts.

Item 105:

Measurement: Total Service Order Cycle Time

Issue: The "UNE Loops w/LNP" product is listed in the June 6th Order, but no charts are produced.

Response: This product level was eliminated with the 1-16-01 GPSC order currently being added to the 271 charts.

Item 106:

Measurement: Total Service Order Cycle Time – Offered

Issue: The "UNE Loops w/LNP" product is listed in the June 6th Order, but no charts are produced.

Response: This product level was eliminated with the 1-16-01 GPSC order currently being added to the 271 charts.

Item 107:

Measurement: Collocation

Issue: BellSouth used the benchmark of 75 calendar days for Virtual and 130 calendar days for Physical Collocation which corresponds to the benchmark for Extra-Ordinary in the June 6th Order. BellSouth did not apply the benchmarks listed as Ordinary.

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Response: Will be corrected with the new 271 charts being developed and should be reflected in the April 2001 charts for March 2001 data.

Item 108:

Measurement: Held Orders - Changes made to ICAIS table to be investigated.

Issue: Changes made to ICAIS table to be investigated

Response: BellSouth has not implemented the changes discussed with KPMG in November 2000. The decision has been made to take a different approach to resolve the problem. Instead of deleting or modifying records with incorrect status, a work request has been submitted to correct the source data and thereby preventing the records from having incorrect status in the ICAIS database.

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Date: April 30, 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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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.

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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.

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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

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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:

$LSR_FOC_DUR = NOTES_TS (CONFIRMED_TIMESTAMP^7) - CREATE_TS.$

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

```

10/16/2001  TDA LEO MGMT SYSTEM - WORKING SCREEN (A001)  PHL PPMY1
RESR/CC: 3730 PPM:  YPR: 00 STP: 00 JUMP TO: 0
LSR/CC: 373020001010000003  TIF: ***9  BIE DATE: 10/18/2000
AM:  - - -  AIN: 229-838-4185  THIS LSR:  -  NEXT LSR:  -
DATE  TIME  TYPE  HISTORY  LINK
10/16/2000 08.58.53 0801 LSR PROCESSED AS NON-CPLX(01)
10/16/2000 08.58.54 0810 LSR LOADED AS MECHANIZED
10/16/2000 08.58.54 0865 LSR HAS BEEN SENT TO LES00
10/16/2000 08.59.53 ERR ORDER ERR: MPM4GF4 LA LIST 013 LID SEE SGR DOC
08835 16000136 IDENTIFICATION! ILA 13 ANN L*I*B*T*R*T*Y S-T
10/16/2000 00.59.53 0300 SERVICE ORDER UPDATE PLACED BY LES00
10/16/2000 00.59.53 SENT 00020300 INSERTED TO TSIGNOUT
10/16/2000 08.59.53 0380 ERROR WITH PENDING ORDER PLACED BY LES00

PF5=XRVIEW List  PF8=XJump  PF9=XListn  PF22=XPrint Page  PF23=XPrint Page
  
```

TA
B02 C07J

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

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

10/17/2000 08.43.47 ERRC ORDER ERR: NPCM03F4 LA LIST 013 LIN SEE SOER DOC
G8825 LSG00136 UPENTATION! ILA 13 -ARM L*I*B*E*R*T*Y S*T
10/17/2000 08.43.59 ISS NPCM03F4 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

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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      IDA LEO AUDIT SYSTEM - BROWSE SCREEN (AUD)      PNLFPMY1
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 INI
8820      LSG 0135 S ORD TYPE
10/16/2000 15.00.39 C380 PARTIAL ORDER GENERATED AND CANCELLED
88950      LSG00177
10/16/2000 15.00.39 C380 INFO-ORDER D04N4HY3 CANCELLED
87470      LSG00281
10/16/2000 15.00.39 SENT DB02C380 INSERTED TO TSIGNOUT
10/16/2000 15.00.39 C380 LSR IN "ERROR" STATUS PLACED BY LESOG

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10/26/2000 08.21.28 CLM LSR Claimed By CUID - BLQWBRQ
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, D0003557, N04JM
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

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10/26/2000 08.42.28 TAGR PON POSTED AS ACKNOWLEDGED

10/30/2000 17.45.59 C280 865 COMPLETION STAGED FOR ISR, 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

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BellSouth Response to Additional KPMG Questions:

KPMG submitted 46 unique PONs and 42 unique ASRs to BellSouth for testing purposes. BellSouth's response is divided into two parts. The first part responds to the data questions concerning the 46 submitted unique PONs, and the second part responds to the discrepancies regarding the 42 submitted unique ASRs.

Data Questions

KPMG submitted a total of 46 unique PONs with data questions to BellSouth for testing. These questions were answered by the following three responses:

1. In order to be classified with an s_rq_stat_type_id of 17, the LSR must contain the notes "clarifications returned/posted" and "claimed by." This affected seven of the PONs submitted.
2. An LSR may have an s_rq_stat_type_id field value of 17 in the Reject Interval file and a value of 5 in the FOC Timeliness file due to service representative error. If a CLEC calls the service representative to correct an error that caused the LSR to be clarified, the service representative can correct it without increasing the version number, and subsequently FOC the LSR. This affected one of the PONs submitted
3. For the remaining 38 discrepancies having to do with FOC durations, BellSouth has the following two responses:
 - FOC durations are calculated with second precision, but when this value is converted to hours, it is truncated to only include hours and minutes. If the interval is less than one minute, this results in an FOC duration of zero. Thirty-six of the 38 FOC duration discrepancies were answered by this calculation explanation.
 - PMAP did not report FOC durations for two of the LSRs in error. This was due to the fact that the February 2001 Barney snapshot was taken a day early. This caused the snapshot to contain incomplete data from LEO, which is where PMAP determines FOC data. The job that takes the snapshot is scheduled to be run on the correct day again and, moving forward, the snapshots will be complete.

Discrepancies

KPMG submitted a total of 42 unique ASRs to BellSouth for testing that were excluded from PMAP raw data. Each of these 42 ASRs was excluded from raw data due to valid BellSouth business rules.

The 42 ASRs were excluded from the Georgia FOC trunk raw data because they did not meet the following criteria:

Business Rule	Description of Business Rule	Number of unique ASRs submitted by KPMG excluded
Requisition Type of a message trunk (stag_exact_seg1.reqtyp[1,1] = 'M') and the Trunk Indicator is of Local Interconnection Trunk stag_exact_seg2.trk_mod[1,1] = 'J'	Only include records where requisition type is message trunk and trunk indicator is local interconnection trunk	23
acna > 'BSO'	Company code of BSO indicates	11

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	BellSouth buying reciprocal trunks from the CLEC. Records with this company code are excluded.	
d_rec <= d_cnf	Only include records where the received date is less than or equal to the FOC date.	1
trk_loca[5,2] = 'GA'	Records can be filtered to include certain states.	7

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Date: May 1, 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 KPMG Consulting, Inc. (KCI) Test CLEC raw data values for three types of time stamps do not match the KCI-collected values, for certain Purchase Order numbers and Version Numbers, for three Ordering SQMs.

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. KCI compared 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 Hewlett Packard (HP), for October and November 2000.

KCI found that the BellSouth-reported timestamps in the files mentioned above (Firm Order Confirmation, Local Service Request Sent/Received, Reject/Clarification Requested timestamps) did not match within a reasonable interval 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 of 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).

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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 and BellSouth clocks;
- 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.

KCI also included an additional two minutes leeway for the TAG and EDI interfaces to account for problems not related to BellSouth's operations before listing the values in the tables below. Additionally, any time taken by BellSouth to review the transactions submitted by HP (for Firm Order Confirmation) is reflected in the time stamps recorded by BellSouth and reported in the PMAP raw data.

Tables 1, 2, and 3 show the specific discrepancies for Local Service Request Sent/Received, Firm Order Confirmation, and Reject/Clarification Requested time stamps, respectively.

Table 1: Local Service Request Sent/received Timestamp

PON	VER	METHOD	MONTH	BELLSOUTH- REPORTED VALUE	KCI -REPORTED ⁵ VALUE
302R312PEF000006	0	EDI	October	10/13/00 7:45	10/12/00 15:35
309R122PTH001001	1	TAG	October	10/2/00 10:06	10/2/00 10:36
320R212PTH102017	3	TAG	October	10/20/00 11:22	10/20/00 11:03
317R122PEH001002	0	EDI	November	11/9/00 13:15	11/13/00 16:34 ⁶
309R122PEH002002	0	EDI	November	11/10/00 12:30	11/13/00 16:38 ⁷

⁵ KCI-reported values are provided by HP.

⁶ Note that the KCI-reported time value is after the BLS reported time value, even though a local service request is sent out by the Test CLEC.

⁷ Note that the KCI-reported time value is after the BLS reported time value, even though a local service request is sent out by the Test CLEC.

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Table 2: Firm Order Confirmation Time Stamp

PON	VER	METHOD	MONTH	BELLSOUTH-REPORTED VALUE	KCI -REPORTED ⁸ VALUE
302R312PEH000003	0	EDI	October	10/10/00 17:41	10/11/00 16:55
301R112PEF000001	2	EDI	October	10/9/00 16:30	10/10/00 11:43
305R112PTF102002	6	EDI	October	10/10/00 8:00	10/10/00 11:43
409R223PEM101001	0	EDI	October	10/11/00 10:47	10/11/00 16:55
404R223PTM102001	0	TAG	October	10/11/00 9:02	10/12/00 6:16
302R312PTH001002	6	TAG	November	11/30/00 14:50	12/1/00 13:15
303R222PTH000011	1	TAG	November	11/30/00 15:07	12/1/00 7:29

Table 3: Reject/Clarification Requested Time Stamp

PON	VER	METHOD	MONTH	BELLSOUTH-REPORTED VALUE	KCI -REPORTED ⁹ VALUE
319R122PTH002004	0	TAG	October	10/17/00 13:38	10/17/00 15:15
320R212PTH101017	0	TAG	October	10/17/00 13:30	10/17/00 15:15
320R212PTH102017	0	TAG	October	10/18/00 17:21	10/19/00 6:48
320R212PTF100008	0	TAG	October	10/23/00 10:47	10/23/00 11:50
454R126PTF001002	0	TAG	October	10/26/00 6:27	10/25/00 11:47
307R222PTH100009	0	TAG	October	10/25/00 4:32	10/25/00 11:47
318R112PEH101007	0	EDI	November	11/10/00 8:55	11/10/00 7:21

Amendment:

BellSouth-reported KCI Test CLEC raw data values for the aforementioned types of time stamps do not match the KCI-collected values, for certain Purchase Order numbers and Version Numbers, for three Ordering SQMs, for the months of January and February 2001.

Tables 4, 5, and 6 show the specific discrepancies for the Local Service Request Sent/Received, Firm Order Confirmation, and Reject/Clarification Requested time stamps, respectively.

⁸ KCI-reported values are provided by HP.

⁹ KCI-reported values are provided by HP.

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Table 4: Local Service Request Sent/received Timestamp

PON	VER	METHOD	MONTH	BELLSOUTH - REPORTED VALUE	KCI - REPORTED VALUE
305S112PEH100006	0	EDI	January	1/19/2001 14:15	1/19/2001 12:55
305S112PEH100007	0	EDI	January	1/19/2001 14:15	1/19/2001 13:07
305S112PEH100009	0	EDI	January	1/23/2001 17:00	1/23/2001 16:46
305S222PEH100003	0	EDI	January	1/23/2001 18:00	1/23/2001 17:03
307S122PEH100002	0	EDI	January	1/19/2001 15:15	1/19/2001 13:35
307S122PEH100003	0	EDI	January	1/19/2001 14:16	1/19/2001 13:22
307S122PTH100012	0	EDI	January	1/24/2001 13:00	1/24/2001 11:22
323S122PEH100003	0	EDI	January	1/24/2001 11:01	1/24/2001 10:31
323S122PEH101001	0	EDI	January	1/18/2001 14:15	1/18/2001 15:48
323S122PEH102001	0	EDI	January	1/19/2001 13:30	1/19/2001 11:50
422S114PEJ100001	0	EDI	January	1/19/2001 13:15	1/19/2001 10:10
422S114PEJ100007	0	EDI	January	1/22/2001 14:15	1/19/2001 13:25
422S114PEJ100007	0	EDI	January	1/22/2001 14:15	1/22/2001 11:36
422S114PTJ100002	0	TAG	January	1/23/2001 8:33	1/23/2001 9:28
422S114PTJ100008	0	TAG	January	1/23/2001 8:08	1/23/2001 9:03
432S214PEJ100001	0	EDI	January	1/22/2001 14:30	1/22/2001 12:38
615S122PEH100001	0	EDI	January	1/23/2001 18:00	1/19/2001 12:17
615S122PEH100001	0	EDI	January	1/23/2001 18:00	1/23/2001 17:14
615S122PEH100003	0	EDI	January	1/24/2001 10:45	1/24/2001 10:04
901S114PEJ100004	0	EDI	January	1/25/2001 15:00	1/25/2001 12:35
902S214PEJ100001	0	EDI	January	1/19/2001 14:45	1/19/2001 10:20
902S214PEJ100008	0	EDI	January	1/26/2001 10:45	1/25/2001 16:47
RS01A22PEN100001	0	EDI	January	1/23/2001 15:31	1/19/2001 12:18
RS01A22PEN100001	0	EDI	January	1/23/2001 15:31	1/23/2001 13:08
RS01A22PEN100002	0	EDI	January	1/19/2001 13:00	1/19/2001 12:21
RS01A11PTN100004	0	TAG	January	1/23/2001 11:49	1/23/2001 12:34
RS01A22PEN100004	0	EDI	January	1/24/2001 10:30	1/24/2001 9:14
RS05A12PEN100001	0	EDI	January	1/19/2001 12:45	1/19/2001 11:23
RS11B21PEN100001	0	EDI	January	1/19/2001 13:00	1/19/2001 11:30
RS11B21PEN100003	0	EDI	January	1/24/2001 10:30	1/24/2001 8:53
RS11B21PEN100004	0	EDI	January	1/25/2001 12:30	1/25/2001 12:19
RS13H12PEN100001	0	EDI	January	1/19/2001 12:45	1/19/2001 11:02
RS13H12PEN100004	0	EDI	January	1/24/2001 10:30	1/24/2001 8:54
RS15A12PEN100001	0	EDI	January	1/22/2001 14:15	1/19/2001 10:34
RS15A12PEN100001	0	EDI	January	1/22/2001 14:15	1/19/2001 15:02
RS15A12PEN100001	0	EDI	January	1/22/2001 14:15	1/22/2001 13:19
RS15A12PEN100014	0	EDI	January	1/26/2001 12:30	1/26/2001 11:38
RS15A21PEN100001	0	EDI	January	1/22/2001 13:45	1/19/2001 12:02

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PON	VER	METHOD	MONTH	BELLSOUTH - REPORTED VALUE	KCI - REPORTED VALUE
RS15A21PEN100001	0	EDI	January	1/22/2001 13:45	1/19/2001 15:07
RS15A21PEN100001	0	EDI	January	1/22/2001 13:45	1/22/2001 13:27
RS15A21PEN100003	0	EDI	January	1/25/2001 15:15	1/25/2001 9:37
RS17H12PEN101002	0	EDI	January	1/18/2001 15:30	1/18/2001 16:53
RS25X11PEN100003	0	EDI	January	1/25/2001 10:45	1/24/2001 11:36
RS25X11PEN101001	0	EDI	January	1/22/2001 13:30	1/23/2001 11:04
RS27H12PEN100001	0	EDI	January	1/24/2001 10:30	1/24/2001 9:02
RS28A21PEN100003	0	EDI	January	1/24/2001 10:30	1/24/2001 9:02
RS40A21PEN100001	0	EDI	January	1/19/2001 12:30	1/19/2001 10:41
RS40A21PEN100011	0	EDI	January	1/25/2001 12:45	1/25/2001 12:24
307S122PEH100013	0	EDI	February	2/1/2001 16:15	2/1/2001 14:30
422S114PTJ100004	0	TAG	February	2/1/2001 14:52	2/1/2001 15:42
422S114PTJ100010	0	TAG	February	2/1/2001 14:54	2/1/2001 15:47
RS40A21PEN100026	0	EDI	February	2/6/2001 11:30	2/6/2001 9:59
RS41A12PEN100023	1	EDI	February	2/7/2001 8:45	2/7/2001 10:13
RS41B21PEN100019	0	EDI	February	2/7/2001 14:35	2/7/2001 14:21
RS15A21PEN100005	0	EDI	February	2/7/2001 17:00	2/7/2001 16:14
RS41B21PEN100025	0	EDI	February	2/8/2001 9:00	2/7/2001 17:52
RS41B21PEN100025	0	EDI	February	2/8/2001 9:00	2/7/2001 19:03
RS05A22PEN100003	1	EDI	February	2/7/2001 19:15	2/7/2001 18:52
RS11B21PEN100030	1	EDI	February	2/7/2001 19:15	2/7/2001 18:54
RS11C22PEN100017	1	EDI	February	2/7/2001 20:58	2/7/2001 18:57
901S114PEJ100003	0	EDI	February	2/7/2001 20:58	2/7/2001 19:30
901S114PEJ100001	0	EDI	February	2/7/2001 12:45	2/9/2001 13:03
901S114PEJ100001	0	EDI	February	2/7/2001 12:45	2/9/2001 13:45
903S224PEJ101003	0	EDI	February	2/8/2001 16:30	2/9/2001 13:06
903S224PEJ101003	0	EDI	February	2/8/2001 16:30	2/9/2001 13:49
RS02A21PEN100020	2	EDI	February	2/9/2001 14:00	2/9/2001 13:46
RS25X11PEN100015	0	EDI	February	2/13/2001 7:30	2/12/2001 19:16
RS11B21PEN100029	0	EDI	February	2/13/2001 11:16	2/13/2001 10:52
RS13H12PEN100028	0	EDI	February	2/13/2001 11:30	2/13/2001 10:57
441S214PTJ001002	0	TAG	February	2/15/2001 8:59	2/15/2001 10:08
903S224PTJ101002	0	TAG	February	2/15/2001 9:23	2/15/2001 10:18
307S122PTH101006	0	TAG	February	2/15/2001 9:24	2/15/2001 10:19
422S114PTJ102010	0	TAG	February	2/15/2001 9:39	2/15/2001 10:29
307S122PTH101005	0	TAG	February	2/15/2001 9:39	2/15/2001 10:32
602S214PTJ101003	0	TAG	February	2/15/2001 9:39	2/15/2001 10:35

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Table 5: Firm Order Confirmation Time Stamp

PON	VER	METHOD	MONTH	BELLSOUTH - REPORTED VALUE	KCI - REPORTED VALUE
305S112PTH100016	0	TAG	January	1/22/2001 17:11	1/22/2001 19:15
307S122PTH100005	0	TAG	January	1/22/2001 17:32	1/22/2001 19:15
307S122PTH100006	0	TAG	January	1/22/2001 17:41	1/22/2001 19:15
323S122PTH100002	0	TAG	January	1/22/2001 16:44	1/23/2001 6:15
423S114PEJ100001	0	EDI	January	1/18/2001 9:30	1/18/2001 13:53
RS01A22PTN100003	0	TAG	January	1/22/2001 13:06	1/22/2001 19:44
RS05A12PTN100003	0	TAG	January	1/22/2001 13:08	1/22/2001 19:44
RS11B21PTN100002	0	TAG	January	1/22/2001 14:38	1/23/2001 6:15
RS13H12PTN100003	0	TAG	January	1/22/2001 13:13	1/22/2001 20:14
RS17H12PEN100002	1	EDI	January	1/18/2001 10:01	1/18/2001 15:50
RS28A21PTN100002	0	TAG	January	1/22/2001 13:15	1/22/2001 20:14
615S122PTH100004	1	TAG	February	2/3/2001 11:09	2/3/2001 13:14
RS05A22PEN100003	1	EDI	February	2/7/2001 19:17	2/7/2001 22:02
RS11B21PEN100030	1	EDI	February	2/7/2001 19:16	2/7/2001 22:02

Table 6: Reject/Clarification Requested Time Stamp

PON	VER	METHOD	MONTH	BELLSOUTH - REPORTED VALUE	KCI - REPORTED VALUE
305S112PTH100008	0	TAG	January	1/22/2001 17:02	1/22/2001 19:15
305S222PTH100005	0	TAG	January	1/22/2001 10:46	1/23/2001 6:15
435S114PTJ000001	0	TAG	January	1/23/2001 11:43	1/23/2001 12:36
RS25X11PEN100003	0	EDI	January	1/25/2001 14:18	1/25/2001 8:29
RS41A12PTN100005	0	TAG	January	1/22/2001 13:47	1/22/2001 20:44
444S214PEJ100003	0	EDI	February	2/7/2001 11:46	2/21/2001 15:46
423S114PTJ100012	0	TAG	February	2/13/2001 17:49	2/13/2001 18:56
422S114PTJ103004	0	TAG	February	2/15/2001 9:49	2/15/2001 10:51
307S122PTH101007	3	TAG	February	2/15/2001 11:03	2/15/2001 12:05

Additionally, KCI found Purchase Order Numbers and Version Numbers that exist in the KCI-collected data, but are not found in the BellSouth-reported raw data files.

Table 7 shows these Purchase Order Numbers and Version Numbers.

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Table 7: KCI-Collected PON/VERs missing from the BellSouth-reported data

PON	VER	METHOD	MONTH
444S214PTJ100002	0	TAG	January
RS05A22PEN100001	5	EDI	January
RS25X11PEN100001	0	EDI	January
RS25X11PTN100002	0	TAG	January
RS27H12PTN100008	0	TAG	January
RS41A12PEN100010	0	EDI	January
444S214PTJ102002	0	TAG	February
444S214PTJ103002	0	TAG	February
444S214PTJ104002	0	TAG	February
444S214PTJ105002	0	TAG	February
444S214PTJ106002	0	TAG	February
444S214PTJ107002	0	TAG	February
444S214PTJ108002	0	TAG	February
RS05A22PEN101001	0	EDI	February

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

The following table lists the KCI discrepancies pertaining to received timestamps.

Table 4: Local Service Request Sent/received Timestamp

PON	VER	METHOD	MONTH	BELLSOUTH - REPORTED VALUE	KCI - REPORTED VALUE
305S112PEH100006	0	EDI	January	1/19/2001 14:15	1/19/2001 12:55
305S112PEH100007	0	EDI	January	1/19/2001 14:15	1/19/2001 13:07
305S112PEH100009	0	EDI	January	1/23/2001 17:00	1/23/2001 16:46
305S222PEH100003	0	EDI	January	1/23/2001 18:00	1/23/2001 17:03
307S122PEH100002	0	EDI	January	1/19/2001 15:15	1/19/2001 13:35
307S122PEH100003	0	EDI	January	1/19/2001 14:16	1/19/2001 13:22

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PON	VER	METHOD	MONTH	BELLSOUTH - REPORTED VALUE	KCI - REPORTED VALUE
307S122PTH100012	0	EDI	January	1/24/2001 13:00	1/24/2001 11:22
323S122PEH100003	0	EDI	January	1/24/2001 11:01	1/24/2001 10:31
323S122PEH101001	0	EDI	January	1/18/2001 14:15	1/18/2001 15:48
323S122PEH102001	0	EDI	January	1/19/2001 13:30	1/19/2001 11:50
422S114PEJ100001	0	EDI	January	1/19/2001 13:15	1/19/2001 10:10
422S114PEJ100007	0	EDI	January	1/22/2001 14:15	1/19/2001 13:25
422S114PEJ100007	0	EDI	January	1/22/2001 14:15	1/22/2001 11:36
422S114PTJ100002	0	TAG	January	1/23/2001 8:33	1/23/2001 9:28
422S114PTJ100008	0	TAG	January	1/23/2001 8:08	1/23/2001 9:03
432S214PEJ100001	0	EDI	January	1/22/2001 14:30	1/22/2001 12:38
615S122PEH100001	0	EDI	January	1/23/2001 18:00	1/19/2001 12:17
615S122PEH100001	0	EDI	January	1/23/2001 18:00	1/23/2001 17:14
615S122PEH100003	0	EDI	January	1/24/2001 10:45	1/24/2001 10:04
901S114PEJ100004	0	EDI	January	1/25/2001 15:00	1/25/2001 12:35
902S214PEJ100001	0	EDI	January	1/19/2001 14:45	1/19/2001 10:20
902S214PEJ100008	0	EDI	January	1/26/2001 10:45	1/25/2001 16:47
RS01A22PEN100001	0	EDI	January	1/23/2001 15:31	1/19/2001 12:18
RS01A22PEN100001	0	EDI	January	1/23/2001 15:31	1/23/2001 13:08
RS01A22PEN100002	0	EDI	January	1/19/2001 13:00	1/19/2001 12:21
RS01A11PTN100004	0	TAG	January	1/23/2001 11:49	1/23/2001 12:34
RS01A22PEN100004	0	EDI	January	1/24/2001 10:30	1/24/2001 9:14
RS05A12PEN100001	0	EDI	January	1/19/2001 12:45	1/19/2001 11:23
RS11B21PEN100001	0	EDI	January	1/19/2001 13:00	1/19/2001 11:30
RS11B21PEN100003	0	EDI	January	1/24/2001 10:30	1/24/2001 8:53
RS11B21PEN100004	0	EDI	January	1/25/2001 12:30	1/25/2001 12:19
RS13H12PEN100001	0	EDI	January	1/19/2001 12:45	1/19/2001 11:02
RS13H12PEN100004	0	EDI	January	1/24/2001 10:30	1/24/2001 8:54
RS15A12PEN100001	0	EDI	January	1/22/2001 14:15	1/19/2001 10:34
RS15A12PEN100001	0	EDI	January	1/22/2001 14:15	1/19/2001 15:02
RS15A12PEN100001	0	EDI	January	1/22/2001 14:15	1/22/2001 13:19
RS15A12PEN100014	0	EDI	January	1/26/2001 12:30	1/26/2001 11:38
RS15A21PEN100001	0	EDI	January	1/22/2001 13:45	1/19/2001 12:02
RS15A21PEN100001	0	EDI	January	1/22/2001 13:45	1/19/2001 15:07
RS15A21PEN100001	0	EDI	January	1/22/2001 13:45	1/22/2001 13:27
RS15A21PEN100003	0	EDI	January	1/25/2001 15:15	1/25/2001 9:37
RS17H12PEN101002	0	EDI	January	1/18/2001 15:30	1/18/2001 16:53
RS25X11PEN100003	0	EDI	January	1/25/2001 10:45	1/24/2001 11:36
RS25X11PEN101001	0	EDI	January	1/22/2001 13:30	1/23/2001 11:04
RS27H12PEN100001	0	EDI	January	1/24/2001 10:30	1/24/2001 9:02
RS28A21PEN100003	0	EDI	January	1/24/2001 10:30	1/24/2001 9:02

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PON	VER	METHOD	MONTH	BELLSOUTH - REPORTED VALUE	KCI - REPORTED VALUE
RS40A21PEN100001	0	EDI	January	1/19/2001 12:30	1/19/2001 10:41
RS40A21PEN100011	0	EDI	January	1/25/2001 12:45	1/25/2001 12:24
307S122PEH100013	0	EDI	February	2/1/2001 16:15	2/1/2001 14:30
422S114PTJ100004	0	TAG	February	2/1/2001 14:52	2/1/2001 15:42
422S114PTJ100010	0	TAG	February	2/1/2001 14:54	2/1/2001 15:47
RS40A21PEN100026	0	EDI	February	2/6/2001 11:30	2/6/2001 9:59
RS41A12PEN100023	1	EDI	February	2/7/2001 8:45	2/7/2001 10:13
RS41B21PEN100019	0	EDI	February	2/7/2001 14:35	2/7/2001 14:21
RS15A21PEN100005	0	EDI	February	2/7/2001 17:00	2/7/2001 16:14
RS41B21PEN100025	0	EDI	February	2/8/2001 9:00	2/7/2001 17:52
RS41B21PEN100025	0	EDI	February	2/8/2001 9:00	2/7/2001 19:03
RS05A22PEN100003	1	EDI	February	2/7/2001 19:15	2/7/2001 18:52
RS11B21PEN100030	1	EDI	February	2/7/2001 19:15	2/7/2001 18:54
RS11C22PEN100017	1	EDI	February	2/7/2001 20:58	2/7/2001 18:57
901S114PEJ100003	0	EDI	February	2/7/2001 20:58	2/7/2001 19:30
901S114PEJ100001	0	EDI	February	2/7/2001 12:45	2/9/2001 13:03
901S114PEJ100001	0	EDI	February	2/7/2001 12:45	2/9/2001 13:45
903S224PEJ101003	0	EDI	February	2/8/2001 16:30	2/9/2001 13:06
903S224PEJ101003	0	EDI	February	2/8/2001 16:30	2/9/2001 13:49
RS02A21PEN100020	2	EDI	February	2/9/2001 14:00	2/9/2001 13:46
RS25X11PEN100015	0	EDI	February	2/13/2001 7:30	2/12/2001 19:16
RS11B21PEN100029	0	EDI	February	2/13/2001 11:16	2/13/2001 10:52
RS13H12PEN100028	0	EDI	February	2/13/2001 11:30	2/13/2001 10:57
441S214PTJ001002	0	TAG	February	2/15/2001 8:59	2/15/2001 10:08
903S224PTJ101002	0	TAG	February	2/15/2001 9:23	2/15/2001 10:18
307S122PTH101006	0	TAG	February	2/15/2001 9:24	2/15/2001 10:19
422S114PTJ102010	0	TAG	February	2/15/2001 9:39	2/15/2001 10:29
307S122PTH101005	0	TAG	February	2/15/2001 9:39	2/15/2001 10:32
602S214PTJ101003	0	TAG	February	2/15/2001 9:39	2/15/2001 10:35

Multiple instances of the following PON/version combinations were submitted to BellSouth. BellSouth can only accept and process one instance of a PON/version combination. The KCI timestamps indicate fatally rejected instances of these PON/version combinations, while the BellSouth timestamps reflect a separate instance of each of these PON/version combinations which was accepted and processed. The following table shows the fatally rejected timestamps that correspond to the KCI reported timestamps. If a PON/VER combination was fatally rejected more than once, then all of the fatal reject timestamps are listed in the table.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 137

Fatal Reject Timestamp
1/19/01 at 12:30
1/19/01 at 12:46
1/23/01 at 16:33
1/23/01 at 16:46
1/19/01 at 13:30
1/19/01 at 13:01
1/24/01 at 11:04 and 2/15/01 at 14:17
1/24/01 at 10:19
1/18/01 at 15:34
1/19/01 at 11:31
1/19/01 at 10:19
1/19/01 at 13:01 and 1/22/01 at 11:15
1/22/01 at 12:15
1/19/01 at 11:45 and 1/23/01 at 16:46
1/24/01 at 9:48
1/25/01 at 12:17
1/19/01 at 10:19
1/25/01 at 16:30
1/19/01 at 11:45 and 1/23/01 at 12:45
1/19/01 at 12:15
1/24/01 at 9:00
1/19/01 at 11:01
1/19/01 at 11:16
1/24/01 at 8:45
1/25/01 at 12:00
1/19/01 at 10:31
1/24/01 at 8:45
1/19/01 at 10:19, 1/19/01 at 14:46, and 1/22/01 at 13:01
1/26/01 at 11:16
1/19/01 at 11:31, 1/19/01 at 14:46, and 1/22/01 at 13:15
1/25/01 at 9:15
1/18/01 at 16:31
1/23/01 at 11:05
1/24/01 at 8:45
1/24/01 at 8:45
1/19/01 at 10:19
1/25/01 at 12:00
2/1/01 at 14:31
2/6/01 at 19:34
2/7/01 at 9:49
2/7/01 at 17:21, 2/7/01 at 21:02, and 2/8/01 at 8:02
2/9/01 at 12:31 and 2/9/01 at 13:15
2/9/01 at 12:31 and 2/9/01 at 13:15
2/12/01 at 18:49
2/13/01 at 10:29
2/13/01 at 10:29

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 137

The following table lists explanations for the remainder of the PONs shown in Table 4.

	Explanation
	This PON/VER combination was submitted with an invalid OCN code, which caused it to be clarified. The KCI timestamp reflects this first submission. It was then resubmitted with a valid OCN code, and subsequently clarified. The BellSouth reported timestamp reflects this second submission.
	The log files for TAG are kept for 45 days on a rolling basis. BellSouth no longer has the log files pertaining to this PON.
	The log files for TAG are kept for 45 days on a rolling basis. BellSouth no longer has the log files pertaining to this PON.
	The log files for TAG are kept for 45 days on a rolling basis. BellSouth no longer has the log files pertaining to this PON.
	The log files for TAG are kept for 45 days on a rolling basis. BellSouth no longer has the log files pertaining to this PON.
	The log files for TAG are kept for 45 days on a rolling basis. BellSouth no longer has the log files pertaining to this PON.
	There was a problem with the file being erroneously routed to the Harbinger translator instead of the Mercator translator, resulting in a delay. The problem has been resolved.
	This order was processed by EDI at 15:15 on 2/7/01. When this processing finishes, orders are passed on to LEO in batches, where the timestamp shows a received value of 17:00. It is unusual for the transfer of orders from EDI to LEO take this long, but BellSouth no longer has the historical data to explain why this occurred.
	On 2/7/01 at 18:00, there was a backup in the queue of jobs waiting to be processed. The job that sent this EDI data to LEO was among those delayed in the queue. The job processing resumed at 19:00:00 and jobs began to run in the sequence in which they were waiting. The BellSouth reported timestamp reflects the time LEO received this LSR.
	On 2/7/01 at 18:00, there was a backup in the queue of jobs waiting to be processed. The job that sent this EDI data to LEO was among those delayed in the queue. The job processing resumed at 19:00:00 and jobs began to run in the sequence in which they were waiting. The BellSouth reported timestamp reflects the time LEO received this LSR.
	On 2/7/01 at 18:00, there was a backup in the queue of jobs waiting to be processed. The job that sent this

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 137

	EDI data to LEO was among those delayed in the queue. The job processing resumed at 19:00:00 and jobs began to run in the sequence in which they were waiting. The BellSouth reported timestamp reflects the time LEO received this LSR.
	On 2/7/01 at 18:00, there was a backup in the queue of jobs waiting to be processed. The job that sent this EDI data to LEO was among those delayed in the queue. The job processing resumed at 19:00:00 and jobs began to run in the sequence in which they were waiting. The BellSouth reported timestamp reflects the time LEO received this LSR.
	There was a problem with the file being erroneously routed to the Harbinger translator instead of the Mercator translator, resulting in a delay. The problem has been resolved.
	The log files for TAG are kept for 45 days on a rolling basis. BellSouth no longer has the log files pertaining to this PON.
	The log files for TAG are kept for 45 days on a rolling basis. BellSouth no longer has the log files pertaining to this PON.
	The log files for TAG are kept for 45 days on a rolling basis. BellSouth no longer has the log files pertaining to this PON.
	The log files for TAG are kept for 45 days on a rolling basis. BellSouth no longer has the log files pertaining to this PON.
	The log files for TAG are kept for 45 days on a rolling basis. BellSouth no longer has the log files pertaining to this PON.

The following three tables list the KCI discrepancies and explanations of those discrepancies pertaining to FOC timestamps.

Table 5: Firm Order Confirmation Time Stamp

PON	VER	METHOD	MONTH	BELLSOUTH - REPORTED VALUE	KCI - REPORTED VALUE
305S112PTH100016	0	TAG	January	1/22/2001 17:11	1/22/2001 19:15
307S122PTH100005	0	TAG	January	1/22/2001 17:32	1/22/2001 19:15
307S122PTH100006	0	TAG	January	1/22/2001 17:41	1/22/2001 19:15
323S122PTH100002	0	TAG	January	1/22/2001 16:44	1/23/2001 6:15
423S114PEJ100001	0	EDI	January	1/18/2001 9:30	1/18/2001 13:53

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 137

PON	VER	METHOD	MONTH	BELLSOUTH - REPORTED VALUE	KCI - REPORTED VALUE
RS01A22PTN100003	0	TAG	January	1/22/2001 13:06	1/22/2001 19:44
RS05A12PTN100003	0	TAG	January	1/22/2001 13:08	1/22/2001 19:44
RS11B21PTN100002	0	TAG	January	1/22/2001 14:38	1/23/2001 6:15
RS13H12PTN100003	0	TAG	January	1/22/2001 13:13	1/22/2001 20:14
RS17H12PEN100002	1	EDI	January	1/18/2001 10:01	1/18/2001 15:50
RS28A21PTN100002	0	TAG	January	1/22/2001 13:15	1/22/2001 20:14
615S122PTH100004	1	TAG	February	2/3/2001 11:09	2/3/2001 13:14
RS05A22PEN100003	1	EDI	February	2/7/2001 19:17	2/7/2001 22:02
RS11B21PEN100030	1	EDI	February	2/7/2001 19:16	2/7/2001 22:02

For each of the TAG PONs above, the BST times reported are the times that BellSouth made the FOCs initially available for the user (KCI). Since the user's listener was not up and available for data receipt from BellSouth, the system attempted to resend the FOC before the user was available to receive data. The KCI reported times show the times that the resend was actually received by the user. The following table shows the number of resent attempts for each of the above TAG PONs.

	Number of resend attempts
	2
	1
	1
	3
	3
	3
	3
	3
	3
	2

The following table lists the explanations for the remaining PONs from Table 5.

	Explanation
	For the time period of 1/17/01 through 1/18/01, EDI was in the process of converting to a new system. As a result of this conversion, there is a delay between the BellSouth reported FOC timestamp and the KCI timestamp.
	For the time period of 1/17/01 through 1/18/01, EDI was in the process of converting to a new system. As a result of this conversion, there is a delay between the BellSouth reported FOC timestamp and the KCI

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 137

	timestamp.
	On 2/7/01 at approximately 5:00 PM, there was a delay in the BellSouth job that moves files from the UNIX environment to the mainframe for pickup by downstream systems. The problem was resolved fairly quickly, but resulted in delays of an hour or more in some cases.
	On 2/7/01 at approximately 5:00 PM, there was a delay in the BellSouth job that moves files from the UNIX environment to the mainframe for pickup by downstream systems. The problem was resolved fairly quickly, but resulted in delays of an hour or more in some cases.
	On 2/7/01 at approximately 5:00 PM, there was a delay in the BellSouth job that moves files from the UNIX environment to the mainframe for pickup by downstream systems. The problem was resolved fairly quickly, but resulted in delays of an hour or more in some cases.

The following three tables list the KCI discrepancies and explanations of those discrepancies pertaining to reject timestamps.

Table 6: Reject/Clarification Requested Time Stamp

PON	VER	METHOD	MONTH	BELLSOUTH - REPORTED VALUE	KCI -REPORTED VALUE
305S112PTH100008	0	TAG	January	1/22/2001 17:02	1/22/2001 19:15
305S222PTH100005	0	TAG	January	1/22/2001 10:46	1/23/2001 6:15
435S114PTJ000001	0	TAG	January	1/23/2001 11:43	1/23/2001 12:36
RS25X11PEN100003	0	EDI	January	1/25/2001 14:18	1/25/2001 8:29
RS41A12PTN100005	0	TAG	January	1/22/2001 13:47	1/22/2001 20:44
444S214PEJ100003	0	EDI	February	2/7/2001 11:46	2/21/2001 15:46
423S114PTJ100012	0	TAG	February	2/13/2001 17:49	2/13/2001 18:56
422S114PTJ103004	0	TAG	February	2/15/2001 9:49	2/15/2001 10:51
307S122PTH101007	3	TAG	February	2/15/2001 11:03	2/15/2001 12:05

For three of the seven TAG PONs above, the BST times reported are the times that BellSouth made the clarifications initially available for the user (KCI). Since the user's listener was not up and available for data receipt from BellSouth, the system attempted to resend the clarifications before the user was available to receive data. The KCI reported times show the times that the resend was actually received by the user. The following table shows the number of resent attempts for these three TAG PONs.

	Number of resend attempts
	2
	4
	3

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 137

The following table lists the explanations for the remaining PONs from Table 6.

	Explanation
	This PON/version combination was rejected twice due to service representative error. The BellSouth timestamp reflects the most recent reject time, while the KCI timestamp reflects the first reject time.
	This PON/VER combination was submitted with an invalid OCN code, which caused it to be clarified. The KCI timestamp reflects this clarification. It was then resubmitted with a valid OCN code, and subsequently clarified. The BellSouth reported timestamp reflects this second clarification.
	BellSouth does not have any data for this PON/VER on or about 2/21/01.
	The log files for TAG are kept for 45 days on a rolling basis. BellSouth no longer has the log files pertaining to this PON.
	The log files for TAG are kept for 45 days on a rolling basis. BellSouth no longer has the log files pertaining to this PON.
	The log files for TAG are kept for 45 days on a rolling basis. BellSouth no longer has the log files pertaining to this PON.

The following three tables list the KCI discrepancies and explanations of those discrepancies pertaining to PON/VERs missing from the BellSouth data.

Table 7: KCI-Collected PON/VERs missing from the BellSouth-reported data

PON	VER	METHOD	MONTH
444S214PTJ100002	0	TAG	January
RS05A22PEN100001	5	EDI	January
RS25X11PEN100001	0	EDI	January
RS25X11PTN100002	0	TAG	January
RS27H12PTN100008	0	TAG	January
RS41A12PEN100010	0	EDI	January
444S214PTJ102002	0	TAG	February
444S214PTJ103002	0	TAG	February
444S214PTJ104002	0	TAG	February
444S214PTJ105002	0	TAG	February
444S214PTJ106002	0	TAG	February
444S214PTJ107002	0	TAG	February
444S214PTJ108002	0	TAG	February
RS05A22PEN101001	0	EDI	February

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 137

Twelve of the fourteen PON/VERs listed above were excluded from raw data because they were submitted with invalid OCN codes. The table below lists the OCN code for each of the PON/VERs.

	OCN
	999X
	999X
	9XXX
	9XXX
	9XXX
	999X
	999X
	999X
	999X
	999X
	999X
	999X

The remaining two PONs and the explanation pertaining to them are listed in the following table.

	Explanation
	BellSouth does not have any data for version 5 of this PON. However, EDI records show version 1 of this PON processed by EDI on 1/22/01 at 11:15, which corresponds to the KCI reported timestamp.
	BellSouth does not have any data for this PON/VER.

BellSouth was unable to answer roughly a quarter of the issues raised in this exception because the log files for TAG are kept for 45 days on a rolling basis. Please send BellSouth test data within a time that would allow for sufficient investigation.

CLOSURE REPORT FOR EXCEPTION 38

BellSouth Georgia OSS Testing Evaluation

Date: May 8, 2001

EXCEPTION CLOSURE REPORT

Exception:

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

Summary of Exception:

When issuing Local Service Requests (LSRs), CLECs are required to input a DDD for service completion. BellSouth offers two sources for obtaining a valid DDD:

1. **Documentation.** BellSouth's *Product and Service Interval Guide* provides CLECs with standard completion intervals for different service types.
2. **Pre-Order Inquiries.** BellSouth's TAG interface offers a Calculate Due Date (CDD) pre-order function, which provides a standard service interval based on user inputs (e.g., order requisition and activity type, quantity of lines). Using the interval provided by the CDD, CLECs can perform an additional pre-order, an Appointment Availability Query (AAQ), to confirm that the desired due date is available according to the associated Central Office's work load management systems.

In response to an error-free LSR, BellSouth delivers a Firm Order Confirmation (FOC). This FOC contains the DD by which BellSouth commits to completing the CLEC's service request. According to the *Interval Guide*, if a CLEC has requested a DDD no shorter than the standard interval, BellSouth will attempt to commit to the same DD¹.

KPMG Consulting, Inc. (KCI) noted a significant number of FOC DDs different from the LSR DDDs during initial UNE and Resale functional testing.

- **Initial UNE Testing:** Approximately 20% of transactions had a FOC DD that differed from the LSR DDD. Fifteen percent (15%) of the FOC DDs were later than the LSR DDD. Five percent (5%) of FOC DDs were earlier than the LSR DDD.

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

- *Initial Resale Testing:* Fifteen percent (15%) of transactions had a FOC DD that differed from the LSR DDD. Five percent (5%) of the FOC DDs were later than the LSR DDD. Nine percent (9%) of FOC DDs were earlier than the LSR DDD.

During initial testing, the majority of transactions receiving FOC DDs different from the LSR DDD obtained desired due dates from BellSouth standard interval documentation.

Summary of BellSouth's Response:

"BellSouth is not required by any Interconnection Agreement to meet the CLEC's Desired Due Date, DDD. However, if the DDD is within the target interval as set forth in BellSouth's Interval Guide and the service order is complete and accurate, BellSouth utilizes best efforts to meet that due date. There are, however, instances where the DDD cannot be met.

All Service Representatives were provided additional training on March 9, 2000 to ensure LSR DDD is used to determine service order DD. In addition, a performance and development process was implemented to provide on job training for service representatives. This training should resolve the issue of FOC DD being earlier than LSR DDD.

BellSouth has a single application that is used to manage customer due dates for both retail, resale and Port/Loop Combination products. Due dates are assigned as a result of error free service orders being submitted to BellSouth. It is possible for a due date to be available during the creation of an LSR and not available when the service order is generated in BellSouth systems.

BellSouth uses the Products & Services Interval Guide on the BellSouth Interconnection website to assign due dates for UNE orders (Loops and Ports). These due dates are assigned on a standard interval as prescribed in the guide.

BellSouth's procedures provide for the use of an Effective Billing Date in order to stop billing on disconnect activity in those instances when the requested disconnect date cannot be met. Feature 5897 which is pending will mechanically populate an effective billing date on the service order when for disconnect activity when the requested disconnect date cannot be met. This feature is going through the Change Control Process to be prioritized and implemented in a future release."

Additional BellSouth Response:

"BellSouth has completed a thorough review of the Products & Services Interval Guide. This Guide will be updated on the BellSouth web site on 12/15/00 with an effective date

of 1/15/01². Process documents used by BellSouth service reps are reviewed and modified as needed to ensure consistency with the Guide. Service reps will be covered on the new Guide prior to the 1/15/01 effective date. Change requests have been opened to ensure electronic pre-order functionality, ordering functionality and the Products & Services Interval Guide are consistent. Implementation will be communicated through the change control process.”

BellSouth also provided comments on each individual PON included in this Exception.

Summary of KCI Re-test Activities:

KCI initiated a UNE functional re-test on August 25, 2000. During this re-test, KCI submitted over 300 transactions and observed BellSouth’s performance with respect to FOC DD accuracy.

KCI Re-test Results:

Of the 287 FOCs³ received during functional re-testing between August 28 and November 15, 2000:

- 23 (8%) contained DDs different than the DDD requested on the LSR.
 - 19 (7%) of DDs were later than the DDD
 - 4 (1%) of DDs were earlier than the DDD.

In addition, 82% of the UNE re-test transactions receiving FOC DDs different than the LSR DDD contained desired due dates obtained from the BellSouth Interval Guide. The remaining 18% of transactions with different FOC DDs contained DDDs obtained through electronic pre-order transactions. To KCI’s knowledge, BellSouth has not indicated any further activities to bring FOC DDs and LSR DDDs more in line with each other.

KCI did not conduct a re-test of Resale FOC DD accuracy.

Currently, a Georgia Service Quality Measurement (SQM) addressing the accuracy of confirmed due dates relative to requested due dates does not exist. In addition, BellSouth does not have an established commitment or guideline for the percentage of confirmed due dates that should equal the requested due date. In the absence of an SQM-related

² A subsequent Carrier Notification indicated that the modified *Interval Guide* would be posted on 12/20/00 and become effective on 1/22/01.

³ This total excludes those FOCs received on KPMG LSRs submitted with Desired Due Dates less than the standard interval (i.e., KPMG errors).

CLOSURE REPORT FOR EXCEPTION 38

BellSouth Georgia OSS Testing Evaluation

benchmark, a BellSouth-defined guideline, or general industry-approved standards or business rule thresholds that can be used for evaluation purposes, KCI will provide the test results for the associated evaluation criteria as diagnostic information only.

KCI is reporting the results of its FOC DD and LSR DDD analysis as diagnostic information. As a result, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 38.

Attachments: None.



CLOSURE REPORT FOR EXCEPTION 47

BellSouth Georgia OSS Testing Evaluation

Date: May 8, 2001

EXCEPTION CLOSURE REPORT

Exception:

BellSouth delivered inaccurate partially-mechanized CLRs.

Summary of Exception¹:

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

- A Fully-mechanized (FM) service request proceeds through the ordering systems to generate a Clarification (CLR) with no manual intervention required along the way.
- A Partially-mechanized (PM) service requests drops out of the ordering systems and requires manual handling by a BellSouth ordering representative prior to the generation of a CLR.

In response to LSRs submitted via TAG and EDI, BellSouth delivered inaccurate PM CLR responses. KPMG Consulting, Inc. (KCI) believes these LSRs were populated with valid data values in accordance with BellSouth documented Business Rules and should have received Firm Order Confirmations (FOCs).

Summary of BellSouth Response:

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

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

Feature 9252
Feature 9484
Feature 6176

¹ Exception 47 was initially drafted to include examples of inaccurate CLRs and inaccurate FOCs. KCI subsequently removed the references to inaccurate FOCs and placed them in a separate Exception (#95).



CLOSURE REPORT FOR EXCEPTION 47

BellSouth Georgia OSS Testing Evaluation

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

KCI Note - According to information provided by BellSouth, the features identified within BellSouth's exception responses are in the following status. All features were processed through BellSouth's internal electronic interface change control process².

Feature 9484

This feature was designed to clarify service requests when touchtone is added to REQTYPES M (UNE Port-Loop Combination) and F (UNE Port). BellSouth cancelled this feature on 3/16/01 after determining that their systems were clarifying for Port-Loop Combination requests. Since UNE Port requests are currently non-flow through, this system edit is not required. BellSouth expects to add the system requirement for clarifying UNE Port service requests with touch tone in electronic interface release 10.0, tentatively scheduled for 9/1/01.

Feature 9252

This feature has been closed. BellSouth reports that it was worked with Feature 9556, implemented in Electronic interface release 6.4.

Feature 6176

This feature was designed to enable BellSouth back-end ordering systems (LESOG) to support deny and restore requests for UNE Loop-Port Combinations. BellSouth reports that this feature has been closed and that it was included in Release 8.0.

Summary of KCI Re-test Activities:

KCI's re-test activities consisted of three steps:

1. Based on Service Representative training conducted by BellSouth during the course of KCI's initial functional evaluation, KCI reviewed a sample of representative-generated³ CLR's received after April 5, 2000 for accuracy. During this test period, KCI reviewed 61 PM CLR's.
2. KCI initiated a transaction-based functional re-test on August 25, 2000. KCI reviewed the accuracy of PM CLR's received in response to LSR's submitted. During this re-test period, KCI reviewed approximately 125 PM CLR's.
3. KCI reviewed BellSouth's internal change control process document dated July

² All features/defects deemed to be CLEC impacting (e.g., requiring CLEC interface modifications, requiring edits to the Business Rules) are processed through the CLEC Change Control Process. Other changes are handled through BellSouth's internal change control process. Notifications of electronic interface releases (and related changes) are provided via Carrier Notifications posted on BellSouth's interconnection website.

³ KCI reviewed CLR's categorized as 'partially mechanized' (i.e., responses to electronically-submitted LSR's that fell out for manual handling).



19, 2000. KCI examined the Targeted Release Dates and analyzed specific features that BellSouth indicated it will implement to address this exception.

Summary of KCI Re-test Results:

Following BellSouth's training of its ordering Service Representatives (re-test period beginning April 5, 2000), KCI experienced 3 additional occurrences of inaccurate CLR's, representing less than 5% of partially-mechanized CLR's reviewed⁴. BellSouth subsequently generated confirmations for these transactions following a review requested by KCI. This percentage of inaccurate CLR's did not significantly affect KCI's ability to proceed with its ordering processes.

KCI initiated a functional re-test on August 25, 2000. While the re-test was not designed to specifically review CLR accuracy, KCI noted a growing number of inaccurate error messages received during testing. For partially-mechanized clarifications received between August 25 and November 9, 2000, KCI determined approximately 10% were inaccurate.

BellSouth proposed several system modifications to enhance its ability to electronically process service requests, thereby reducing its reliance on manual intervention in certain instances. Based on KCI's judgment, Feature 6176 (LESOG to support Deny/Restore on REQTYPE'S "M" (Port Loop Combo) and "F" (Port) and Feature 9484 (LESOG to clarify when touchtone is added on REQTYPE'S M and F), if properly implemented, would assist in partially addressing the issues identified in Exception 47 by reducing the number of order types which fall out for manual handling. However, the proposed system edits would not address all possible cases of manually-handled service orders, and would not eliminate the potential of errors being made by Service Representatives when issuing CLR's.

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

In the absence of any other planned test activity related to this exception, KCI closes this exception. The associated evaluation criteria will be assigned a result of "Not Satisfied" in the final report. The Georgia Public Service Commission may elect to monitor this issue in the future.

⁴ KCI initially determined 8 CLR's to be inaccurate. Upon further investigation, KCI agreed with BellSouth's assessment of 'disputed' data points and determined that 5 of 8 transactions initially categorized as "inaccurate" were due to KCI error.



Consulting

CLOSURE REPORT FOR EXCEPTION 47

BellSouth Georgia OSS Testing Evaluation

Based on the absence of future re-test activity, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 47.

Attachments: None.

Date: May 8, 2001

EXCEPTION CLOSURE REPORT

Exception:

Parity does not exist between BellSouth's CLEC xDSL ordering process and its retail xDSL ordering process (BellSouth Internet Services).

Summary of Exception:

CLECs are required to follow a manual process to order xDSL qualified loops (e.g., email to Complex Resale Support Group (CRSG), printed out and faxed to the Local Carrier Service Center (LCSC) for entry). By comparison, the BellSouth retail process for ordering ADSL service is mechanized, with a flow-through (i.e., do not require manual order entry by the Digital Subscriber Group (DSG)) rate of over 60%.

CLEC xDSL Ordering Process Overview: To order xDSL service a CLEC must first qualify the particular loop by emailing a Service Inquiry (SI) and a Local Service Request (LSR) form to the CRSG. Once the CLEC receives confirmation that a given loop is qualified to support xDSL service, the CRSG faxes the LSR to the (LCSC) for review and entry into BellSouth's Local Order Number (LON) system for tracking.

If additional information is required from the CLEC, BellSouth will fax a Clarification to the CLEC. Once BellSouth deems that the LSR is error-free, address and customer record information is then validated using the ORION/RSAG and BOCRIS systems, respectively. The LSR information is subsequently entered into the EXACT system, assigned a service order number, and submitted to the SOCS system for processing. Firm Order Confirmations (FOCs) or Clarifications are faxed to CLECs within a targeted interval of 48 hours.

BellSouth xDSL Ordering Process Overview: BellSouth retail operations do not directly provide xDSL services, instead, ADSL service is provided by one of its subsidiaries, BellSouth Internet Services (BellSouth.net). BellSouth.net has, in turn, out-sourced pre-order and order processing to Client Logic, a third-party provider of call center services.

A BellSouth retail customer's order for end-to-end xDSL service is entered into one of three Web front-end systems (Consumer, Small Business and FASS [used by Client Logic]) and flows through to the SOEG system and then into SOCS. Orders that fall out in the DSG for manual processing are entered into the BASS system within 24 hours of receipt. Once cleared of errors, these orders flow from SOCS to the LFACS system and then to the NMS system.

**Summary of BellSouth's Response**

"As a note of clarification: In discussing the CLEC ordering process, KPMG includes the function of submitting a Service Inquiry as part of the *ordering* process. This function is pre-ordering in nature; the point when the CRSG faxes the LSR to the LCSC commences the ordering portion of the provisioning process. BellSouth has addressed pre-ordering functions in the response to KPMG's exception 107.

This exception finding report pertaining to the ordering of BellSouth's xDSL compatible facilities has been remedied with full production and availability to CLECs of mechanized xDSL ordering as of September, 2000. This functionality provides the capability of ordering HDSL/ADSL/UCL electronically through service order generation, treating loop qualification as a function outside this feature. These UNE services are identified by a REQTYP "A" or "B" on the LSR. This ordering functionality has already been loaded onto BellSouth's systems and is currently undergoing beta testing with CLECs. Any CLEC that desires to participate in the beta test for mechanized xDSL ordering should contact its account team representative. Mechanized xDSL ordering will roll out into a full production mode upon the successful completion of beta testing. This conversion to a full production mode is expected to occur on 11/18/00.

For specific details, please refer to the:

ENCORE USER REQUIREMENTS FOR EIO SUPPORT OF THE PROCESSING OF
UNE ADSL, HDSL AND UCL

ENC7694.D0C

DOCUMENT VERSION 5.0

APRIL 14, 2000

This document was shared on Wednesday, May 17 through the Change Control Committee.

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

Summary of KPMG Consulting, Inc.'s (KCI's) Re-test Activities:

KCI's review activities consisted of: 1) an evaluation of BellSouth's response to determine if it adequately addressed the concerns raised by KCI in Exception 108; 2) a review of the documentation referenced in BellSouth's response and additional xDSL documents available through BellSouth's Interconnection Web Site; and 3) a follow-up



visit to the LCSC to directly observe processing electronic xDSL orders with errors that fall out to the center.

The documents entitled *Encore User Requirement for EIO Support of the Processing of UNE ADSL, HDSL and UCL and BellSouth Business Rules-Local Ordering CG-LEOO-009, Issue 9K*, describe the electronic xDSL ordering functionality in the TCIF 9 EIO environment that is now available to all DLEC/CLECs by means of Telecommunications Access Gateway (TAG), Local Exchange Navigation System (LENS), and Electronic Data Interchange (EDI). The *BellSouth Products & Services Interval Guide*, section 5.0, documents the standard and targeted processing intervals for xDSL orders.

KCI revisited the LCSC and interviewed the UNE Operations director, a UNE Subject Matter Expert, and a service representative. KCI observed the representative as he cleared an exception with an electronically submitted xDSL order.

Summary of KCI's Re-test Results:

On February 12, 2001 BellSouth implemented a system change to provide all CLECs the ability to order xDSL capable loops electronically through the TAG, LENS, and EDI interfaces. This system enhancement provides an alternative to the lengthy manual ordering process that was previously required of CLECs for xDSL services. CLEC xDSL orders may now be electronically entered via EDI, TAG, or LENS, and will flow through to SOCS. CLEC orders that require manual attention fall out and are handled in the LCSC.

KCI did not conduct feature/function testing to validate the xDSL electronic ordering system, as such testing for xDSL ordering interfaces was not within the scope of the BellSouth - Georgia OSS Evaluation. KCI's observations indicate that BellSouth has addressed the issues in this exception through the introduction of CLEC electronic ordering capability, based on the functionality described in the BellSouth documentation. KCI's visit to the center that processes the fallout from the mechanized wholesale xDSL order process verified that wholesale xDSL electronic order exceptions are handled in a manner that is non-discriminatory when compared to retail xDSL order exception processing.

As a result, KCI believes that BellSouth has adequately addressed the issues identified in Exception 108.



Based on re-testing activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 108.

Attachments: None.

Date: May 8, 2001

EXCEPTION CLOSURE REPORT

Exception:

Version 2.2.0.11 of BellSouth's TAG pre-order interface does not provide a Calculated Due Date (CDD) for UNE Loop-Port Combination service requests.

Summary of Exception:

BellSouth's CDD pre-order query provides CLECs with the standard service provisioning interval for subsequent orders, based on the order requisition type (e.g., UNE Loop, UNE Port), activity type (e.g., disconnection, migration), quantity of lines, and product category identifier.

KPMG Consulting, Inc. (KCI) attempted to process a CDD for a UNE Loop-Port Combination request via TAG Version 2.2.0.11. Following the procedure outlined in the *Pre-Order Business Rules*, KCI populated the UNE Product Identifier field with a value of "0," representing a "NOTUNETOCALCULATE" entry¹. Since UNE Loop-Port Combinations do not fall under Resale service, KCI entered "NOTRSTOCALCULATE" in the Resale Product Identifier field².

KCI received the following error message via the TAG interface: "ILEC Exception, Invalid Data Exception – Invalid Data element: RSPROD, Error Code: TAG8008VAL, Msg Text: RSPROD REQUIRED."

The current Business Rules do not adequately explain the requirements for processing UNE Loop-Port Combination CDDs.

Summary of BellSouth's Response:

"Calculate Due Date for PreOrder (Version 2.2.0.11) has two fields:

- RSPROD (Resale product category)
- UNEPROD (UNE product category)

¹ According to Version 7 of the *Pre-Order Business Rules* (p. 258), Loop Port Combinations utilize a UNEPROD indicator of "0."

² The Pre-Order Business Rules did not address requirements for the RSPROD field.

Both have a list of valid values, however, Loop/Port Combo was inadvertently omitted from the UNEPROD product category. Therefore, when submitting a CDD Pre-Order transaction and when entering a "0" (zero) in both fields you will receive the following error:

'ILEC Exception, Invalid Data Exception - Invalid Data element: RSPROD, Error Code: TAG8008VAL, Msg Text: RSPROD REQUIRED.'

On an interim basis, when submitting a calculated due date transaction for REQTYPE M Loop/Port Combo you must populate the RSPROD field with 31 or 32. This is an interim solution that will be communicated to all TAG users via the Change Control Process that may be experiencing the same problem.

BellSouth will submit a Change Request as a feature against the requirements to process REQTYPE M as a UNE Loop/Port Combo. This feature will be submitted via the Change Control Process and scheduled for a future release."

Summary of KCI Re-test Activities:

KCI's re-test activities consisted of submitting four CDD pre-order transactions for UNE Loop-Port Combination customers following the rules outlined in the BellSouth-proposed workaround. In addition, KCI monitored BellSouth Carrier Notifications to ensure that an adequate description of the workaround was distributed to appropriate CLECs.

KCI Re-test Results:

All four re-test transactions were successfully processed by BellSouth's TAG interface Version 2.2.0.11. Utilizing this workaround, BellSouth's pre-order interface adequately provides functionality to process CDD pre-orders for Loop-Port Combination service requests.

BellSouth provided notification of this pre-order workaround to the CLEC community on December 29, 2000. A Change Control request to modify BellSouth code was also submitted through the CLEC Change Control process. CR0237 was released published on December 11, 2001. An implementation date will be established in conjunction with documented Change Control procedures.

CLOSURE REPORT FOR EXCEPTION 116

BellSouth Georgia OSS Testing Evaluation

As a result of re-test activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 116.

Attachments: None.



Date: May 8, 2001

EXCEPTION CLOSURE REPORT

Exception:

BellSouth failed to deliver Completion Notices (CNs) for several KPMG Consulting, Inc. (KCI) Local Service Requests (LSRs).

Summary of Exception:

For 34 LSRs submitted during KCI's initial UNE re-test (initiated on August 25, 2000), BellSouth did not deliver CNs. KCI investigated these orders within BellSouth's web-based CLEC Service Order Tracking System (CSOTS). According to the CSOTS status reports, a number of these LSRs are in CA (Cancelled) status. KCI did not issue orders to cancel the LSRs.

KCI provided BellSouth with PON detail for 34 LSRs¹ affected by this issue.

Summary of BellSouth's Response:

BellSouth provided a response to each individual PON referred in this exception. The responses can be grouped into several categories:

- Following field completion activities, 14 LSRs experienced downstream (directory listing- or billing-related errors). These orders dropped out for handling by a BellSouth error resolution group, where they were subsequently (and erroneously) cancelled.
- An additional 2 orders experienced downstream errors and were erroneously cancelled by BellSouth service representatives.
- BellSouth indicated that 7 LSRs were cancelled due to BellSouth service representative error.
- BellSouth indicated that responses (Completion Notices or Clarifications) were in fact transmitted for 4 PONs. KCI subsequently verified receipt of these responses.
- BellSouth could not locate 7 PONs or related service orders for additional investigation.

¹ KCI's initial exception contained 31 PONs. KCI subsequently added an additional 3 PONs to the list based on BellSouth's response to a Help Desk ticket, which indicated that CNs were not delivered.

Additional BellSouth Response:

"KPMG submitted 13 PONs listed in the above tables with incorrect entries in the LIST (listed name code) field. The PONs flowed through with mechanized service order generation and FOCs were returned to KPMG. The service orders hit down stream errors and appeared on an internal error report. Manual clarification is normally sent to a CLEC when the service order hits down stream errors, a FOC has already been sent and a CLEC clarification is needed. In addition, a change request will be submitted to the change review board to mechanically clarify PONs with an incorrect LIST field entry prior to service order generation.

KPMG additionally submitted 2 PONs listed in the above tables with incorrect Misc. Account numbers. KPMG requested the same Misc. Account numbers for orders submitted as KPMG and as a "friendly CLEC". The PONs flowed through with mechanized service order generation and FOCs were returned to KPMG. The service orders hit down stream errors and were mistakenly cancelled. The service orders were subsequently canceled. Manual clarification is normally sent to a CLEC when the service order hits down stream errors, a FOC has already been sent and a CLEC clarification is needed."

Evaluation Results:

In the absence of any planned test activity focused on the deficiencies identified, KCI closes this exception. The related evaluation criteria in KCI's final report will be assigned a Not Satisfied result.

With no additional re-test activities planned, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 118.

Attachments: None.



Date: May 8, 2001

EXCEPTION CLOSURE REPORT

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)*.

Summary of Exception:

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.



- 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*.

Summary of BellSouth Response:

KCI 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-3) 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.

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
- Established process for monthly reconciliation of CLEC-reported outages and REM-reported outages

Transport failures that can be linked to specific applications will be charged against those applications. Some transport failures, such as failure of a core router, could impact more than one application. A transport failure of that nature would be charged against the router component. If the failure can be linked to specific applications, it will be charged against those applications, as well as the router component. Such failures can be reported by users or by automated alarms.

Summary of KCI Re-Test Activities:

KCI reviewed BellSouth's response listed above. KCI also discussed the issues presented above with BellSouth personnel responsible for different aspects of the metrics, including those who create the SQM reports, those responsible for ensuring that the appropriate linkages and assignment of outages occurs, among others.

KCI also reviewed the OSS Interface Availability SQMs listed in BellSouth's new SQM manual (GA_Ordered_SQM_Docket_7892_U.ZIP), available on April 9, 2001 via the PMAP web site <https://pmap.bellsouth.com>.

KCI Re-Test Results:

Based upon BellSouth's response above, KCI believes that BellSouth has adequately planned and implemented a new process such that the types of exclusions of outages that occurred during the fourth quarter of 2000 will not be repeated. The updated linkages between various systems, coupled with periodic reviews of these linkages, will help ensure that BellSouth's SQMs accurately reflect all relevant outages, regardless of the source of the outage. KCI plans to conduct further data integrity tests of the various systems employed in the new process, in conjunction with its review of the new "Rocket Docket" SQM manual.



KCI conducted an additional Metrics Definition review of this new SQM manual, and determined that the definitions, exclusions, business rules and calculations listed for both the Pre-Ordering and Maintenance and Repair OSS Interface Availability SQMs satisfy our established Metrics Definition test criteria. Of particular note is BellSouth's improved business rules – system outages will now impact the measured system availability, regardless of the number of customers said outages affect.

As a result, KCI believes that BellSouth has adequately addressed the issues identified in Exception 133.

Based on re-testing activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 133.

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:

Kristy R. Holley, Division Director
Consumers' Utility Counsel
47 Trinity Avenue, S.W.
4th Floor
Atlanta, GA 30334-4600
404-656-3982 (o)

Newton M. Galloway
Smith, Galloway, Lyndall & Fuchs
Suite 400 First Union Bank Tower
100 South Hill Street
Griffin, GA 30229
770-233-6230 (o)

Charles A. Hudak
Gerry, Friend & Sapronov, LLP
Three Ravinia Drive
Suite 1450
Atlanta, GA 30346-2131
770-399-9500 (o)

Kent F. Heyman
Sr. VP and General Counsel
Mpower Communications Corp.
171 Sully's Trail, Suite 300
Pittsford, NY 14534
716-218-6551 (o)

Suzanne W. Ockleberry
AT&T
1200 Peachtree Street, NE
Suite 8100
Atlanta, GA 30309
404-810-7175 (o)

Charles V. Gerkin Jr.
Smith, Gambrell & Russell, LLP
Promenade II, Suite 3100
1230 Peachtree Street, N.E.
Atlanta, GA 30309-3592
404-815-3716 (o)

Frank B. Strickland
Holland & Knight LLP
One Atlantic Center, Suite 2000
1201 West Peachtree Street
Atlanta, GA 30309-3400
404-817-8484 (o)

Jeremy D. Marcus
Blumenfeld & Cohen
Co-Counsel for Rhythm, aka ACI Corp.
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036
202-955-6300 (o)

Scott A. Sapperstein
Sr. Policy Counsel
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619
813-829-4093 (o)

John P. Silk
Georgia Telephone Association
1900 Century Boulevard, Suite 8
Atlanta, GA 30345
404-321-5368 (o)

Daniel S. Walsh
Attorney General Office
Department of Law—State of Georgia
40 Capitol Square, S.W.
Atlanta, GA 30334-1330
404-657-2204 (o)

Eric J. Branfman
Richard M. Rindler
Swidler & Berlin
3000 K Street, NW, Suite 300
Washington, DC 20007
202-945-6940 (o)

Harris R. Anthony
BellSouth Long Distance
400 Perimeter Center Terrace
Suite 350 – North Terraces
Atlanta, GA 30346
(770) 352-3116 (o)

Robert A. Ganton
Regulatory Law Office
Dept. Army
Suite 700
901 N. Stuart Street
Arlington, VA 22203-1837
703-696-1645 (o)

Charles F. Palmer
Troutman Sanders LLP
5200 NationsBank Plaza
600 Peachtree Street, NE
Atlanta, GA 30308-2216
404-885-3402 (o)

Peter C. Canfield
Dow Lohnes & Albertson
One Ravinia Drive, Suite 1600
Atlanta, GA 30346
770-901-8800 (o)

Judith A. Holiber
Morgenstein & Jubelirer
One Market
Spear Street Tower, 32nd Floor
San Francisco, CA 94105
415-901-8700 (o)

James M. Tennant
Low Tech Designs, Inc.
1204 Saville Street
Georgetown, SC 29440
803-527-4485 (o)

Nanette S. Edwards
Regulatory Attorney
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802
256-382-3856 (o)

Mark Brown
Director of Legal and Government Affairs
MediaOne, Inc.
2925 Courtyards Drive
Norcross, GA 30071
770-559-2000 (o)

Peyton S. Hawes Jr.
127 Peachtree Street, N.E.
Suite 1100
Atlanta, GA 30303-1810
404-577-6200 (o)

Jeffrey Blumenfeld
Elise P. W. Kiely
Blumenfeld & Cohen
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036
202-955-6300 (o)

James A. Schendt
Regulatory Affairs Manager
Interpath Communications, Inc.
P. O. box 13961
Durham, NC 27709-3961
919-253-6265 (o)

William R. Atkinson
Sprint Communications Co. L.P.
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339
404-649-6221 (o)


Nancy Krabill
Director of Regulatory Affairs
1300 W. Mockingbird Lane
Suite 200
Dallas, TX 75247
678-444-4444 (o)

Dana R. Shaffer
Legal Counsel
105 Molloy Street
Suite 300
Nashville, TN 37201
615-777-7700 (o)

Anne E. Franklin
Arnall Golden & Gregory, LLP
2800 One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309
404-873-8536 (o)

Glenn A. Harris
Lori Anne Dolquest
NorthPointe Communications, Inc.
303 Second Street, South Tower
San Francisco, CA 94107
415-403-4003 (o)

This 8th day of May, 2001.



David Frey
Managing Director

KPMG Consulting, Inc.
1835 Market St, 24th Floor
Philadelphia, PA 19103
(215) 405-6880

(03/21/01)