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November 29, 1999

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Guy M. Hicks
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NOV 29 PM 3 59

EXECUTIVE SECRETARY

VIA HAND DELIVERY

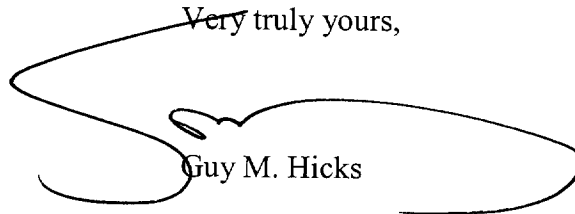
Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37245

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

Dear Mr. Waddell:

Enclosed please find fourteen copies of KPMG, LLP's November 19, 1999 filing of its Interim Status Report with the Georgia Public Service Commission. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,



Guy M. Hicks

GMH:ch

Enclosure

FILE



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

November 19, 1999

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

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

Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG LLP's November 19, 1999 Interim Status Report for filing in the above referenced matter.

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

Thank you for your assistance in this regard.

Very truly yours,

David Frey
Manager

Enclosures

cc: Parties of Record



FILE



**BellSouth-GA OSS Testing Evaluation
Interim Status Report
November 19, 1999**

1.0 Document Objective

In this document, KPMG provides an interim summary status report on developments related to the BellSouth-GA OSS Testing Project. A brief overview of key developments is provided in section 2.0. Key upcoming activities are summarized in Section 3.0. A more detailed report on specific test items is provided in the table in section 4.0. Each item presented in the table in section 4.0 includes a reference number that identifies the item from a previous status report, where applicable.

2.0 Key Developments

- **Business Processes:** BellSouth's CLEC Advisory Team visited KPMG on November 2-3, 1999 to answer test team questions related to Pre-Order, Order, Billing, and Maintenance & Repair functions.
- **Maintenance and Repair interface connectivity:** KPMG has established connectivity for TAFI dial-up and LAN-to-LAN access. ECTA connectivity via EC-CPM dial-up and via the BST Test Interface are scheduled for completion on November 19 and 24, 1999, respectively.
- **Maintenance and Repair testing:** TAFI functional transaction testing began November 18, 1999. ECTA functional testing is scheduled to begin November 29, 1999.
- **Billing:** KPMG's validation of the test bed used for functional billing and usage tests has been completed. BellSouth provisioned telephone numbers with UNE and line features to support the test scenarios required for usage testing.
- **Order transaction testing:** KPMG has commenced EDI and TAG functional testing for all UNE order types with the exception of UNE-LNP.
- **Metrics:** KPMG completed the first stage of replicating the Service Quality Measures (SQMs) calculated by PMAP. KPMG independently calculated SQM values for an individual CLEC and compared them with the values reported for that CLEC in August. The purpose is to prepare for validating the SQM values that will be reported for the test transactions.
- **Metrics:** KPMG determined which raw data actually enters into the PMAP calculations and is mapping the data elements KPMG will collect to the raw data elements. The purpose is to prepare for comparing the SQM-related data collected during the transaction tests with the raw data used in the SQM calculations.



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3.0 Key Upcoming Activities

- KPMG will file the next interim status report during the week of December 20, 1999.



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4.0 Specific Item Status

Ref	Item	Status	Issues	Next Step/Resolution
I-2	Test Bed Development	- Provisioning and validation of the order/pre-order functional test bed is 70% complete. - KPMG has re-issued volume test bed specifications to BST based on volume forecasts, system requirements, and test case coverage. Test bed is currently being provisioned by BST. - Provisioning of the M&R test bed is nearing completion.	- Test bed is not yet fully provisioned. A sufficient quantity of lines have been provisioned to allow for initiation of order transaction testing. - None.	- KPMG and BST are working to achieve complete and accurate provisioning of test bed (estimated 11/30/99). - As part of the initial stages of the functional evaluation of EDI and TAG, KPMG will validate transactions to be used in the volume test for syntax and ability to flow through. Test bed provisioning is expected to be completed by 11/30/99. - BST is currently working to improve the process for obtaining access to HP sites.
I-6	EDI Functional Testing	- KPMG must complete four pre-test phases for each product family prior to the initiation of functional testing on the EDI LAN-to-LAN interface. This testing is in progress for Resale and LNP. - KPMG has begun EDI functional testing for all UNE order types with the exception of UNE-LNP.	- None. - KPMG has requested modifications to the HP TAG pre-order interface for compatibility with the KPMG order management tool. EDI functional testing will be limited until full pre-ordering functionality has been established.	- KPMG is scheduled to complete Resale and LNP interface testing by 11/22/99. - HP will complete TAG interface development for pre-order.



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Ref	Item	Status	Issues	Next Step/Resolution
I-7	TAG functional testing	- KPMG must complete four pre-test phases for each product family prior to the initiation of functional testing on the TAG interface. This testing is in progress for Resale and LNP. - KPMG has begun TAG functional testing for all UNE order types with the exception of UNE-LNP. - During pre-test activities, KPMG/HP received error messages indicating system processing limitations when 40 simultaneous communication sessions are running. HP has documented the problem to BST. BST has responded.	- None. - KPMG has requested modifications to the HP TAG pre-order interface for compatibility with the KPMG order management tool. TAG functional testing will be limited until full pre-ordering functionality has been established. - KPMG/HP and BST have been investigating the issue to determine if the source of issue is a problem with BST documentation or the KMPG/HP interface.	- KPMG is scheduled to complete Resale and LNP interface testing by 11/22/99. - HP will complete TAG interface development for pre-order. - KPMG is analyzing the issue and BST response.
I-8	CRIS/CABS Invoicing Functional Test	Process testing began on 11/5/99 with interviews of BST subject matter experts to evaluate the quality and timeliness of internal processes supporting production and distribution of CLEC bills.	None.	N/A.
II-1	Performance Measure Evaluation (Metrics)	KPMG has replicated the calculation of PMAP-generated SQM values for an individual CLEC in BST's 8/99 report, except for two SQMs.	Apparent discrepancies need to be reconciled with BST and reported if confirmed. Additional clarification is required on the change control process.	KPMG and BST are in the process of reconciling apparent discrepancies. BST is in the process of providing data for the two remaining SQMs.



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		KPMG is in the process of replicating the calculation of non-PMAP-generated SQM values for an individual CLEC in BST's 8/99 report.	KPMG needs additional raw data and algorithmic instructions from BST to complete these replications. BST has not provided raw data for two SQMs: Average Jeopardy Interval & Average Completion Notice Interval.	KPMG will continue to meet with BST SMEs to obtain data and instructions.
II-4	Volume Test	- KPMG is creating and testing base test cases that will be used as templates for volume transactions. - LNP functionality is not currently present in the RSIMMS environment. BST implementation of LNP functionality is currently scheduled for the beginning of December.	- None. - LNP functionality is required in the RSIMMS environment prior to commencement of volume tests.	- N/A. - BST will implement LNP functionality during the beginning of December.
II-5	Change Management	KPMG formally commenced the Change Management Practices Review on 11/5/99. Test activities to-date include BST personnel interviews (with Encore Systems, Change Control, OSS Product Support and LEO Implementation Guide managers) and document reviews.	None.	KPMG will continue with BST personnel interviews and document reviews.
III-1	Flow-Through Evaluation	KPMG and BST agreed to change the months for which the flow-through report will be evaluated to September, October and November.	None.	KPMG will first validate September and October flow through reports against raw data.



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		• KPMG has reviewed available flow-through business rules, documentation and program source code. • KPMG interviewed the BST flow-through report development team. Observed October report preparation and received September and October reports and report preparation work papers from BST. KPMG obtained access to the raw data used to develop the September and October reports.	• None. • None.	• N/A. • N/A.
		• KPMG requested documentation, business rules and access to the LCSC to review the BST process for determining the source of order errors.	• None.	• Review procedures and business rules for determining error cause (BST versus CLEC). Interview personnel responsible for error cause determination and observe determination process.
III-2	CLEC Participation – Ordering	• Four CLECs (AT&T, ITC Deltacom, NextLink and MCG Communications) have responded to KPMG's letter and provided KPMG with facilities and company information for LNP and CLEC-to-CLEC migration orders.	• KPMG requires facilities and account information from CLECs to generate order transactions to migrate fictitious BST customers to the CLECs (LNP and CLEC-to CLEC). KPMG cannot process these order types as a virtual CLEC without a switch.	• KPMG will use facilities and account information from CLECs to generate order transactions.
III-3	Capacity Management	• Requests for capacity management system and process documentation and interviewee lists were submitted to BST on 10/19/99.	• BST has not yet provided billing systems technical documentation. BST is in the process of identifying billing and mid-range system technical interviewees to KPMG.	• KPMG is awaiting receipt of documentation and identification of interviewees from BST.



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		• KPMG conducted four interviews of BST personnel with Capacity Management responsibilities for TAFI, ECTA, TAG and billing systems. • BST provided and KPMG reviewed documentation for the TAG, TAFI and ECTA systems and for the <i>Capacity Planning Methodology, Practices and Requirements</i>.	• None. • None.	• KPMG will schedule and conduct additional interviews with BST personnel. • KPMG will continue to review BST documentation as it is received.
IV-1	TAFI Functional Testing	• KPMG's interviews with BST maintenance and repair personnel at the Business Repair Center and Residential Repair Center are complete. • KPMG's interviews with CLEC personnel regarding end-user functionality and documentation began 11/17/99. • KPMG began TAFI functional testing on 11/18/99.	• None. • KPMG needs to identify one additional CLEC for interviewing. • Test bed validation activities at Alpharetta and Dunwoody are not complete. • Installation is taking longer than expected.	• None. • KPMG will work to identify an appropriate CLEC. • Functional testing will proceed at sites where full validation of the test bed is complete. • BST has committed to a completion date of 11/24/99.
IV-2	ECTA Functional Testing	• BST testing environment is being programmed to allow the KPMG CLEC to use the BST test interface to access ECTA. • KPMG will begin ECTA functional testing on 11/29/99. Normal and Peak Volume testing is scheduled to begin on 12/6/99.	• Test bed validation activities at Alpharetta and Dunwoody are not complete.	• KPMG will complete test bed verification.



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IV-3	ODUF/ADUF Usage Functional Test	KPMG began testing on 11/10/99 with interviews of BST subject matter experts to evaluate internal procedures for producing and distributing DUF records.	None.	N/A.
		KPMG began the transaction driven segment of the BLG-2 ODUF/ADUF Usage Functional Test on 11/18/99 with the placement of test calls to evaluate the accuracy and completeness of daily message/usage processing.	KPMG has not been able to access the CLEC demarcation locations in the Dunwoody and Alpharetta HP locations for the purpose of conducting test calls.	The DUF transaction test plan has been modified to remove Dunwoody and Alpharetta as test sites.
		KPMG began evaluation on 11/11/99 with interviews of BST subject matter experts to review the availability, accuracy and completeness of invoicing systems documentation.	None.	N/A.
IV-4	CRIS/CABS Invoicing Documentation Evaluation	BLG-7 ODUF/ADUF Documentation Evaluation began on 11/11/99 with interviews of BST subject matter experts to review the availability, accuracy and completeness of documentation pertaining to the format, content and delivery of DUF records.	None.	N/A.



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Ref ¹	Item	Status	Issues	Next Step/Resolution
IV-5	Exceptions	KPMG filed a Draft Exception², regarding Change Management (CM-1), with BST on 11/12/99.	KPMG believes that BST's change management process does not include clearly defined and reasonable intervals for notifying customers about changes to electronic interfaces and supporting documentation.	BST responded to KPMG's Draft Exception on 11/17/99. KPMG is currently reviewing BST's response.
		KPMG submitted Exception² #1, regarding Pre-ordering (PRE-1, PRE-3) and the BST response to the GA-PSC on 11/19/99.	KPMG believes that BST does not currently provide comprehensive and usable business rule documentation for submitting electronic pre-order transactions via the TAG interface.	The GA-PSC will post the KPMG exception and BST response on their website.

¹ Referencing Methodology: An item referenced as I-n indicates that the item was first discussed in the July 22, 1999 status report. An item referenced as II-n indicates that the item was first referenced in the September 10, 1999 status report. An item referenced as III-n indicates that the item was first referenced in the October 21, 1999 status report. An item referenced as IV-n indicates that the item is new for this report.

² According to the exception process agreed to by KPMG, BellSouth and the Georgia Public Service Commission, when KPMG discovers a potential component defect (e.g., a deficiency in a procedure, system or document) written substantiation is submitted to BellSouth detailing KPMG's findings. BellSouth provides a written response to this finding. KPMG's written substantiation is considered a "Draft Exception" until the potential component defect has been confirmed. If the potential system error is determined not to be material, KPMG will withdraw the Draft Exception. If the issue is substantiated, the Draft Exception and BellSouth response will be submitted to and published by the Commission.

CERTIFICATE OF SERVICE

I hereby certify that on November 29, 1999, a copy of the foregoing document was served on counsel for the petitioner and the entities seeking intervention, via the method indicated, addressed as follows:

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