

ATTACHMENT 23

3RD AMENDED EXCEPTION 10
BellSouth Florida OSS Testing Evaluation

Date: February 11, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR5).

Exception:

KPMG Consulting has found that BellSouth's implemented metrics calculations for the "Ordering: Local Number Portability (LNP) – Reject Interval" Service Quality Measurement report (May 2000) are inconsistent with the documented metrics calculations. (PMR5)

Background:

Service Quality Measurements (SQMs) are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida. BellSouth also publishes the monthly processed data¹ (PMAP raw data²) used to create these reports.³

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting is attempting to replicate these reports using BellSouth's published PMAP Raw Data User Manual, where applicable, the corresponding raw data, supported by technical assistance from BellSouth.

When KPMG Consulting was unable to replicate the BellSouth reported values for the "Ordering: LNP – Reject Interval" SQM, KPMG Consulting discovered during the investigation of Observation 12, that BellSouth's implemented metrics calculations are inconsistent with the documented metrics calculations.

¹ The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data".

² *The PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed 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. KPMG Consulting relied on the May 15, 2000 version of the Manual.

³ These reports and PMAP raw data may be delivered in hard copy or via the PMAP Web site.

3RD AMENDED EXCEPTION 10
BellSouth Florida OSS Testing Evaluation

In the BellSouth Response to Observation 12, BellSouth informed KPMG Consulting that the reported interval distributions do not reflect necessarily the intervals (levels of disaggregation) identified in *BellSouth Service Quality Measurements (SQM Manual)*.

The primary difference in calculation lies within the methods of calculation used, i.e., Informix-4GL utilized by BellSouth vs. Microsoft Excel utilized by KPMG. Interval calculations within PMAP using Informix-4GL are carried only to the nearest minute, while interval calculations using Microsoft Excel are carried to the millisecond by default (this setting depends on the user's choices). This difference in precision results in various intervals being categorized into the wrong "buckets".⁴

Using BellSouth's interval example, BellSouth would report inaccurately intervals of 4 minutes and 33 seconds in the "0 to 4 min" category, instead of the "4-8 min" as prescribed by rules documented in the SQM definition.

The discrepancies, originally identified in Observation 12, are listed in the following table.

	Measurement	Category	KPMG- Calculated Numerator	KPMG- Calculated Denominator	KPMG- Calculated Value	BellSouth Reported Value
1	Total Mech; UNE Loop w/LNP	0-4 min	28	830	3.37%	3.49%
2	Total Mech; UNE Loop w/LNP	4-8 min	3	830	0.36%	0.24%
3	Total Mech; UNE Loop w/LNP	1-8 hrs	62	830	7.47%	8.07%
4	Total Mech; UNE Loop w/LNP	8-24 hrs	30	830	3.61%	3.01%
5	Total Mech; LNP	0-4 min	0	155	0.00%	0.64%
6	Total Mech; LNP	4-8 min	1	155	0.65%	0.64%
7	Total Mech; LNP	12-60 min	4	155	2.58%	2.56%

⁴ Florida OSS BellSouth's Response to Observation 12, November 15, 2000. Page 3.

3RD AMENDED EXCEPTION 10
BellSouth Florida OSS Testing Evaluation

	Measurement	Category	KPMG- Calculated Numerator	KPMG- Calculated Denominator	KPMG- Calculated Value	BellSouth Reported Value
8	Total Mech; LNP	0-1 hrs	5	155	3.23%	3.85%
9	Total Mech; LNP	1-8 hrs	17	155	10.97%	13.46%
10	Total Mech; LNP	8-24 hrs	11	155	7.10%	4.49%
11	Total Mech; LNP	24 hrs+	122	155	78.71%	78.21%
12	Total Mech; LNP	Avg Int Hour	456394.3	155	49.07 ⁵	48.76
13	Partial Mech; UNE Loop w/LNP	0-4 min	5	806	0.62%	0.74%
14	Partial Mech; UNE Loop w/LNP	4-8 min	2	806	0.25%	0.12%
15	Partial Mech; UNE Loop w/LNP	1-8 hrs	62	806	7.69%	8.31%
16	Partial Mech; UNE Loop w/LNP	8-24 hrs	30	806	3.72%	3.10%
17	Partial Mech; LNP	0-4 min	0	155	0.00%	0.64%

Amendment – In accordance with BellSouth’s response to Exception 10, KPMG Consulting re-tested using December 2000 data. However, KPMG Consulting continues to be unable to replicate the BellSouth reported values for the “Ordering: LNP – Reject Interval” SQM. The discrepancies found during the re-test are listed in the following table.

⁵ The KPMG Consulting calculated value is derived as follows: (numerator/denominator)/60

3RD AMENDED EXCEPTION 10
BellSouth Florida OSS Testing Evaluation

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
1	Total Mech	UNE Loop w/LNP; 1-<8 hrs	13	122	10.66%	20.49%
2	Total Mech	UNE Loop w/LNP; 8-<24 hrs	64	122	52.46%	42.62%
3	Total Mech	LNP; 0-<4 min	97	862	11.25%	11.37%
4	Total Mech	LNP; 4-<8 min	42	862	4.87%	4.76%
5	Total Mech	LNP; 1-<8 hrs	213	862	24.71%	46.87%
6	Total Mech	LNP; 8-<24 hrs	258	862	29.93%	7.77%
7	Total Mech	LNP; Avg Int Hour	442700.22	862	8.56 ⁵	8.55
8	Fully Mech	UNE Loop w/LNP; Avg Int Hour	2.45	1	0.04 ⁵	0.03
9	Fully Mech	LNP; Avg Int Hour	151.53	36	0.07 ⁵	0.06
10	Partial Mech	UNE Loop w/LNP; 1-<8 hrs	13	121	10.74%	20.66%

3RD AMENDED EXCEPTION 10
BellSouth Florida OSS Testing Evaluation

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
11	Partial Mech	UNE Loop w/LNP; 8-<24 hrs	64	121	52.89%	42.98%
12	Partial Mech	UNE Loop w/LNP; Avg Int Hour	218674.75	121	30.12 ⁶	30.11
13	Partial Mech	LNP; 0-<4 min	74	826	8.96%	9.08%
14	Partial Mech	LNP; 4-<8 min	39	826	4.72%	4.60%
15	Partial Mech	LNP; 1-<8 hrs	213	826	25.79%	48.91%
16	Partial Mech	LNP; 8-<24 hrs	258	826	31.23%	8.11%
17	Partial Mech	LNP; Avg Int Hour	442548.68	826	8.93 ⁶	8.92

2nd Amendment – In accordance with BellSouth’s Amended Response to Exception 10,⁷ which stated that coding changes would be made to the time buckets, KPMG Consulting attempted to replicate May 2001 data. However, KPMG Consulting discovered that the data file appeared to contain only Non-Mechanized transactions (where mechztn_id = 2). BellSouth reported at the Fully, Partially, Total and Non-Mechanized levels for May 2001 data. When KPMG Consulting requested clarification, BellSouth stated that the data had been inadvertently hard-coded and that the issue had been resolved effective for June 2001 data.⁸ When KPMG Consulting re-tested using July 2001 data, KPMG Consulting discovered that the data set still appeared to contain only Non-Mechanized transactions.

Without the proper data set, KPMG Consulting is unable to re-test the “Ordering: LNP-Reject Interval” SQM.

⁶ The KPMG Consulting calculated value is derived as follows: (numerator/denominator)/60

⁷ Florida OSS BellSouth’s Amended Response to Exception 10, 5/7/01.

⁸ KPMG Consulting received BellSouth’s response to its clarification question on 8/2/01.

3RD AMENDED EXCEPTION 10

BellSouth Florida OSS Testing Evaluation

3rd Amendment – KPMG Consulting reviewed BellSouth’s Response to 2nd Amended Exception 10⁷ and attempted to replicate using August 2001 data. KPMG Consulting sent several clarification questions to BellSouth regarding the raw data file, specifically the start time, stop time, and duration fields.

In several instances, KPMG Consulting found that the start and stop time fields were blank and that the duration field was populated with a zero. KPMG Consulting asked for clarification regarding the inclusion or exclusion of these records.

BellSouth stated in its response to the clarification questions⁸ that:

“If an order is rejected (rej_ind = Y), the start and stop time is populated and the duration is calculated. If the order is not rejected, there is no start and stop time populated and the duration is not calculated. If the start time or stop time is not populated and the rej_ind is Y, then the record is not used. If the stop time is before the start time, the record is not used.”

Following the clarification, the Raw Data User’s Manual (RDUM) was updated as part of the 2.2.01 release. However, the following exclusions are still not listed:

If the stop time is before the start time, the record is not used.

If the start time or stop time is not populated and the rej_ind is Y, then the record is not used

Furthermore, KPMG Consulting is unclear under what circumstances the stop time would occur before the start time.

The 2.2.01 version of the RDUM also listed an exclusion for records with a fatal_ind=“N.” However, in the data set for August 2001, this field is not populated.

Based on BellSouth’s clarification, KPMG Consulting cannot replicate the reported values for the “Ordering: LNP-Reject Interval” SQM. The discrepancies are listed in the table below.

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
1	Fully Mech	LNP; 0-<4 min	41	107	38.32%	45.53%
2	Fully Mech	LNP; 4-<8 min	15	107	14.02%	16.26%
3	Fully Mech	LNP; 8-<12 min	24	107	22.43%	21.14%
4	Fully Mech	LNP; 12-<60 min	27	107	25.23%	17.07%
5	Fully Mech	LNP; Avg Int Min	13.31667	107	7.47	6.75

⁷ FL OSS BellSouth’s Response to Second Amended Exception 10, 9/27/01.

⁸ KPMG Consulting received BellSouth’s response to clarification questions on 12/13/01.

3RD AMENDED EXCEPTION 10

BellSouth Florida OSS Testing Evaluation

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
6	Fully Mech	UNE Loop w/LNP; 0-<4 min	120	162	74.07%	80.72%
7	Fully Mech	UNE Loop w/LNP; 4-<8 min	6	162	3.70%	3.14%
8	Fully Mech	UNE Loop w/LNP; 8-<12 min	5	162	3.09%	1.79%
9	Fully Mech	UNE Loop w/LNP; 12-<60 min	19	162	11.73%	8.07%
10	Fully Mech	UNE Loop w/LNP; 0-<1 hrs	150	162	92.59%	93.72%
11	Fully Mech	UNE Loop w/LNP; 1-<4 hrs	4	162	2.47%	2.24%
12	Fully Mech	UNE Loop w/LNP; 4-<8 hrs	1	162	0.62%	0.45%
13	Fully Mech	UNE Loop w/LNP; 8-<12 hrs	3	162	1.85%	1.79%
14	Fully Mech	UNE Loop w/LNP; 12-<16 hrs	1	162	0.62%	0.45%
15	Fully Mech	UNE Loop w/LNP; 20-<24 hrs	2	162	1.23%	0.90%
16	Fully Mech	UNE Loop w/LNP; >24 hrs	1	162	0.62%	0.45%
17	Fully Mech	UNE Loop w/LNP; Avg Int Min	150.45	162	55.72	43.79
18	Partial Mech	LNP; 0-<1 hrs	118	523	22.56%	22.24%
19	Partial Mech	LNP; 1-<4 hrs	177	523	33.84%	36.21%
20	Partial Mech	LNP; 4-<8 hrs	142	523	27.15%	26.38%
21	Partial Mech	LNP; 8-<10 hrs	36	523	6.88%	6.55%
22	Partial Mech	LNP; 0-<10 hrs	473	523	90.44%	91.38%
23	Partial Mech	LNP; 10-<18 hrs	34	523	6.50%	5.86%
24	Partial Mech	LNP; 0-<18 hrs	507	523	96.94%	97.24%
25	Partial Mech	LNP; 18-<24 hrs	6	523	1.15%	1.03%
26	Partial Mech	LNP; >24 hrs	10	523	1.91%	1.72%
27	Partial Mech	LNP; Avg Int Hrs.	2512.033	523	4.80	4.61
28	Partial Mech	UNE Loop w/LNP; 0-<1 hrs	211	1,478	14.28%	13.72%
29	Partial Mech	UNE Loop w/LNP; 1-<4 hrs	442	1,478	29.91%	31.71%
30	Partial Mech	UNE Loop w/LNP; 4-<8 hrs	408	1,478	27.60%	28.18%
31	Partial Mech	UNE Loop w/LNP; 8-<10 hrs	171	1,478	11.57%	11.19%
32	Partial Mech	UNE Loop w/LNP; 0-<10 hrs	1,232	1,478	83.36%	84.80%
33	Partial Mech	UNE Loop w/LNP; 10-<18 hrs	141	1,478	9.54%	8.71%

3RD AMENDED EXCEPTION 10
BellSouth Florida OSS Testing Evaluation

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
34	Partial Mech	UNE Loop w/LNP; 0-<18 hrs	1,373	1,478	92.90%	93.51%
35	Partial Mech	UNE Loop w/LNP; 18-<24 hrs	34	1,478	2.30%	2.10%
36	Partial Mech	UNE Loop w/LNP; >24 hrs	71	1,478	4.80%	4.39%
37	Partial Mech	UNE Loop w/LNP; Avg Int Hrs.	10856.58	1,478	7.35	7.04
38	Total Mech	LNP; 0-<1 hrs	225	630	35.71%	35.85%
39	Total Mech	LNP; 1-<4 hrs	177	630	28.10%	29.87%
40	Total Mech	LNP; 4-<8 hrs	142	630	22.54%	21.76%
41	Total Mech	LNP; 8-<10 hrs	36	630	5.71%	5.41%
42	Total Mech	LNP; 0-<10 hrs	580	630	92.06%	92.89%
43	Total Mech	LNP; 10-<18 hrs	34	630	5.40%	4.84%
44	Total Mech	LNP; 0-<18 hrs	614	630	97.46%	97.72%
45	Total Mech	LNP; 18-<24 hrs	6	630	0.95%	0.85%
46	Total Mech	LNP; >24 hrs	10	630	1.59%	1.42%
47	Total Mech	LNP; Avg Int Hrs.	2525.35	630	4.01	3.82
48	Total Mech	UNE Loop w/LNP; 0-<1 hrs	361	1,640	22.01%	23.41%
49	Total Mech	UNE Loop w/LNP; 1-<4 hrs	446	1,640	27.20%	28.14%
50	Total Mech	UNE Loop w/LNP; 4-<8 hrs	409	1,640	24.94%	24.82%
51	Total Mech	UNE Loop w/LNP; 8-<10 hrs	174	1,640	10.61%	10.05%
52	Total Mech	UNE Loop w/LNP; 0-<10 hrs	1,390	1,640	84.76%	86.42%
53	Total Mech	UNE Loop w/LNP; 10-<18 hrs	142	1,640	8.66%	7.71%
54	Total Mech	UNE Loop w/LNP; 0-<18 hrs	1,532	1,640	93.41%	94.13%
55	Total Mech	UNE Loop w/LNP; 18-<24 hrs	36	1,640	2.20%	1.96%
56	Total Mech	UNE Loop w/LNP; >24 hrs	72	1,640	4.39%	3.91%
57	Total Mech	UNE Loop w/LNP; Avg Int Hrs.	11007.03	1,640	6.71	6.27
58	Non Mech	LNP; 0-<1 hrs	34	588	5.78%	5.43%
59	Non Mech	LNP; 1-<4 hrs	228	588	38.78%	37.99%
60	Non Mech	LNP; 4-<8 hrs	225	588	38.27%	39.31%
61	Non Mech	LNP; 8-<12 hrs	43	588	7.31%	7.73%
62	Non Mech	LNP; 12-<16 hrs	6	588	1.02%	0.99%
63	Non Mech	LNP; 16-<20 hrs	4	588	0.68%	0.66%
64	Non Mech	LNP; 20-<24 hrs	1	588	0.17%	0.16%
65	Non Mech	LNP; 0-<24 hrs	541	588	92.01%	92.27%
66	Non Mech	LNP; >24 hrs	47	588	7.99%	7.73%

3RD AMENDED EXCEPTION 10
BellSouth Florida OSS Testing Evaluation

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
67	Non Mech	LNP; Avg Int Hrs.	7347.83	588	12.50	12.27
68	Non Mech	UNE Loop w/LNP; 0-<1 hrs	14	369	3.79%	3.85%
69	Non Mech	UNE Loop w/LNP; 1-<4 hrs	126	369	34.15%	31.87%
70	Non Mech	UNE Loop w/LNP; 4-<8 hrs	147	369	39.84%	42.03%
71	Non Mech	UNE Loop w/LNP; 8-<12 hrs	34	369	9.21%	9.89%
72	Non Mech	UNE Loop w/LNP; 16-<20 hrs	3	369	0.81%	0.55%
73	Non Mech	UNE Loop w/LNP; 20-<24 hrs	2	369	0.54%	0.55%
74	Non Mech	UNE Loop w/LNP; 0-<24 hrs	327	369	88.62%	89.01%
75	Non Mech	UNE Loop w/LNP; >24 hrs	42	369	11.38%	10.99%
76	Non Mech	UNE Loop w/LNP; Avg Int Hrs.	5905.767	369	16.00	15.82

Amended Impact:

KPMG Consulting’s inability to replicate report values signifies that the accuracy of BellSouth’s calculation for the “Ordering: LNP – Reject Interval” SQM may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

ATTACHMENT 24

EXCEPTION 132
BellSouth Florida OSS Testing Evaluation

Date: January 03, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR5). This exception was originally issued as Observation 149.

Exception:

KPMG Consulting cannot replicate the values in the "Ordering: Local Number Portability (LNP) - Firm Order Confirmation (FOC) Timeliness Interval Distribution & Firm Order Confirmation Average Interval" Service Quality Measurement (SQM) report for the CLEC Aggregate (July 2001). (PMR5)

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. The Florida Public Service Commission mandates that BellSouth publish monthly performance measurement reports of SQM values for the Competitive Local Exchange Carriers (CLECs) engaged in business activity with BellSouth in the State of Florida.¹ BellSouth provides CLEC Aggregate processed data² (PMAP raw data³) as requested to KPMG Consulting.

Issue:

KPMG Consulting was unable to replicate the BellSouth reported values for the "Ordering: LNP-FOC Timeliness Interval Distribution & Firm Order Confirmation Average Interval" SQM. The discrepancies are listed in the following table.

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
1	LNP Standalone – Fully Mech	>15-<=30 min	487	1563	31.16%	31.14%

¹ These reports are posted on the PMAP Web site.

² The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data."

³ The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed 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. KPMG Consulting relied on the August 28, 2001 version 2.1.08 of the Manual.

EXCEPTION 132
BellSouth Florida OSS Testing Evaluation

	Measurement	Category	KPMG Consulting- Calculated Numerator	KPMG Consulting- Calculated Denominator	KPMG Consulting- Calculated Value	BellSouth Reported Value
2	LNP Standalone - Partial Mech	0-<=4 hrs	786	1052	74.71%	74.76%
3	LNP Standalone - Partial Mech	>4-<=8 hrs	168	1052	15.97%	15.94%
4	LNP Standalone - Partial Mech	>8-<=10 hrs	55	1052	5.23%	5.22%
5	LNP Standalone - Partial Mech	>0-<=10 hrs	1009	1052	95.91%	95.92%
6	LNP Standalone - Partial Mech	>10-<=18 hrs	35	1052	3.33%	3.32%
7	LNP Standalone - Partial Mech	>18-<=24 hrs	1	1052	0.10%	.09%
8	LNP Standalone - Partial Mech	0-<=24 hrs	1045	1052	99.33%	99.34%
9	LNP Standalone - Partial Mech	>24-<=48 hrs	5	1052	0.48%	0.47%
10	LNP Standalone - Partial Mech	>48 hrs	2	1052	0.19%	N/A
11	UNE Loop w/LNP - Partial Mech	0-<=4 hrs	833	1797	46.36%	46.44%
12	UNE Loop w/LNP - Partial Mech	>4-<=8 hrs	539	1797	29.99%	29.94%
13	UNE Loop w/LNP - Partial Mech	>8-<=10 hrs	238	1797	13.24%	13.22%
14	UNE Loop w/LNP - Partial Mech	>0-<=10 hrs	1610	1797	89.59%	89.61%

EXCEPTION 132

BellSouth Florida OSS Testing Evaluation

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
15	UNE Loop w/LNP – Partial Mech	>10-<=18 hrs	156	1797	8.68%	8.67%
16	UNE Loop w/LNP – Partial Mech	>0 - <=18 hrs	1766	1797	98.27%	98.28%
17	UNE Loop w/LNP – Partial Mech	>48 hrs	5	1797	.28%	N/A%
18	UNE Loop w/LNP – Partial Mech	Average Interval (hh:mm)	9649.15	1797	5:22 ⁴	5:21
19	LNP Standalone – Total Mech	0-<=4 hrs	2346	2615	89.71%	89.72%
20	LNP Standalone – Total Mech	>48 hrs	2	2615	.08%	N/A
21	LNP Standalone – Total Mech	Average Interval (hh:mm)	3606.05	2615	1:23	1:22
22	UNE Loop w/LNP – Total Mech	0-<=4 hrs	902	1866	48.34%	48.42%
23	UNE Loop w/LNP – Total Mech	>4-<=8 hrs	539	1866	28.89%	28.84%
24	UNE Loop w/LNP – Total Mech	>8-<=10 hrs	238	1866	12.75%	12.73%
25	UNE Loop w/LNP – Total Mech	>0-<=10 hrs	1679	1866	89.98%	89.99%
26	UNE Loop w/LNP – Total Mech	>10-<=18 hrs	156	1866	8.36%	8.35%

⁴ The KPMG Consulting-calculated value is derived as follows: (numerator/denominator)/60. The decimal is converted to minutes.

EXCEPTION 132

BellSouth Florida OSS Testing Evaluation

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
27	UNE Loop w/LNP – Total Mech	>48 hrs	5	1866	0.27%	N/A
28	UNE Loop w/LNP – Total Mech	Average Interval (hh:mm)	9658.717	1866	5:11	5:10
29	LNP Standalone – Non-Mech	0-<=4 hrs	166	900	18.44%	18.38%
30	LNP Standalone – Non-Mech	>4-<=8 hrs	416	900	46.22%	46.4%
31	LNP Standalone – Non-Mech	>8-<=12 hrs	223	900	24.78%	24.7%
32	LNP Standalone – Non-Mech	>12-<=16 hrs	95	900	10.56%	1.77%
33	LNP Standalone – Non-Mech	>16-<=20 hrs	79	900	8.78%	1.22%
34	LNP Standalone – Non-Mech	0-<=36 hrs	862	900	95.78%	95.79%
35	LNP Standalone – Non-Mech	>48 hrs	27	900	3.00%	N/A
36	LNP Standalone – Non-Mech	Average Interval (hh:mm)	12053.65	900	13:24	13:22
37	UNE Loop w/LNP – Non-Mech	0-<=4 hrs	77	714	10.78%	10.77%
38	UNE Loop w/LNP – Non-Mech	>4-<=8 hrs	326	714	45.66%	45.59%
39	UNE Loop w/LNP – Non-Mech	>8-<=12 hrs	225	714	31.51%	31.61%

EXCEPTION 132

BellSouth Florida OSS Testing Evaluation

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
40	UNE Loop w/LNP – Non-Mech	>12-<=16 hrs	86	714	12.04%	3.64%
41	UNE Loop w/LNP – Non-Mech	>16-<=20 hrs	60	714	8.40%	1.82%
42	UNE Loop w/LNP – Non-Mech	>48 hrs	20	714	2.80%	N/A

KPMG Consulting reviewed BellSouth's Response to Observation 149.⁵ BellSouth's Response to Observation 149 stated that:

The LNP FOC Timeliness end report does not reflect any data in the > 48 Hour bucket. Those records that have a duration of greater than 48 hours are reflected in the average interval calculations, but are not reflected in the >48 Hour bucket. This issue is being addressed with TestDirector Defect #51, and will be fixed beginning with November 2001 data.

Based on BellSouth's response, which states that a system fix must be implemented to resolve the discrepancies, KPMG Consulting escalates Observation 149 to Exception status.

Impact:

KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the "Ordering: Local Number Portability (LNP)-Firm Order Confirmation (FOC) Timeliness Interval Distribution & Firm Order Confirmation Average Interval" SQM may be in question. Without accurate SQMs, CLECs might not be able to assess the quality of service received or plan for future business activities reliably.

⁵ Florida OSS BellSouth's Response to Observation 149, 12/17/01.

ATTACHMENT 25

EXCEPTION 135

BellSouth Florida OSS Testing Evaluation

Date: January 08, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR5). This exception was originally issued as Observation 143.

Exception:

KPMG Consulting cannot replicate the values in the “Provisioning: Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices” Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001). (PMR5)

Background:

SQMs are calculated to illustrate BellSouth’s Operational Support System (OSS) performance. The Florida Public Service Commission mandates that BellSouth publish monthly performance measurement reports of SQM values for the Competitive Local Exchange Carriers (CLECs) engaged in business activity with BellSouth in the State of Florida.¹ BellSouth provides CLEC Aggregate processed data² (PMAP raw data³) as requested to KPMG Consulting.

Issue:

KPMG Consulting attempted to replicate BellSouth reported values for the “Provisioning: Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices” SQM using the RDUM instructions. However, the jeopardy duration (jpdy_dur) field that is used to calculate the average jeopardy duration in hours is populated with negative values for some of the records. Furthermore, KPMG Consulting has also found that the mechanization identification (mech_id) field is populated with blanks for many of the records.

Without accurate and complete data, KPMG Consulting is unable to replicate metrics values for this SQM.

¹ These reports are posted on the PMAP Web site.

² The term “processed data” refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term “PMAP raw data.”

³ *The PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed 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. KPMG Consulting relied on the October, 2001 version 2.1.10 of the Manual.

EXCEPTION 135

BellSouth Florida OSS Testing Evaluation

KPMG Consulting reviewed BellSouth's Response to Observation 143⁴, which includes the following:

A time interval error is being corrected changing the interval from "<48 hours" to ">=48 hours". The Florida Redline SQM states that the measure will encompass % Jeopardy Notices ">=48 Hours". Any term utilizing the expression "within 48 hours" is incorrect.

Based on BellSouth's response, which implies that a system fix must be implemented to resolve the discrepancies, KPMG Consulting escalated Observation 143 to Exception status.

Impact:

KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the "Provisioning: Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices" SQM may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

⁴ Florida OSS BellSouth's Response to Observation 143, 11/30/01.

ATTACHMENT 26

OBSERVATION 161
BellSouth Florida OSS Testing Evaluation

Date: January 28, 2002

OBSERVATION REPORT

An observation has been identified as a result of test activities associated with the Metrics Definitions and Standards Development and Documentation Verification & Validation Review. (PMR2)

Observation:

BellSouth's ability to identify and manually notify BellSouth and CLEC customers separately is inconsistent with the "Parity by Design" benchmark as documented in the "Maintenance and Repair: Mean Time to Notify CLEC of Network Outages" SQM. (PMR2)

Background:

Service Quality Measurements (SQMs) are calculated to illustrate BellSouth's Operations Support System (OSS) performance. The Florida Public Service Commission (FPSC) mandates that BellSouth publish monthly performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the state of Florida.

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting is assessing the consistency between BellSouth's documented process and the FPSC-ordered benchmarks.

The "Parity by Design" benchmark is intended to measure *parity* - or equal service as rendered to BellSouth and CLEC customers. The process is *designed* so that no distinction can be made between BellSouth and CLEC customers.

KPMG Consulting conducted an interview with BellSouth's "Maintenance and Repair"¹ Subject Matter Experts (SMEs) and found that CLEC customers and BellSouth's internal customers are manually notified by BellSouth's Network Management Center (NMC) via e-mail of major network outages. The NMC maintains CLEC and BellSouth notification distribution lists and notifies CLEC customers first, and its internal customers thereafter. However, the "parity by design" benchmark suggests that both CLEC and BellSouth customers should be notified without distinction and/or simultaneously.

¹ KPMG Consulting conducted an interview with BellSouth Maintenance and Repair SMEs on Thursday, December 20, 2001 via conference call.

OBSERVATION 161
BellSouth Florida OSS Testing Evaluation

Impact:

CLECs rely on BellSouth's performance measurements to gauge the level of service provided to them by BellSouth. BellSouth's ability to manually notify BellSouth and CLEC customers separately is inconsistent with the documented benchmark ordered by the FPSC.

ATTACHMENT 27

Date: September 6, 2001

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Metrics Change Management Verification and Validation Review (PMR-3).

Observation:

KPMG Consulting has discovered that BellSouth has no documented process or control group for monitoring open change requests in TeamConnection. (PMR3)

Background:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting is reviewing the adequacy and completeness of key procedures for developing, conducting, monitoring, and publicizing change management for the set of tested performance metrics. KPMG Consulting is also evaluating the extent to which BellSouth adheres to its documented procedures for managing performance metrics.

Issue:

KPMG Consulting reviewed TeamConnection reports for open change requests dating back to October, 2000. KPMG Consulting discovered that BellSouth has one TeamConnection change for a Defect with the highest Defect priority setting. KPMG Consulting also discovered that the Defect change has remained open for over seven months. BellSouth's documentation states that Defect changes with the highest priority setting should be worked continuously until resolved. The fact that a Defect with the highest priority setting has remained open for over seven months indicates that BellSouth is either not tracking the closure of the change, is not working continuously to resolve the Defect as required in the change control manual, or has incorrectly assigned the priority setting.

KPMG Consulting also discovered that BellSouth has six TeamConnection changes for Features with the highest Feature priority setting that have been open for over seven months. BellSouth's documentation indicates that the highest Feature priority setting should be assigned to changes such as those mandated by regulatory orders. The fact that Features with the highest priority setting have remained open for over seven months indicates that BellSouth is either not tracking the closure of the changes, is not working appropriately to resolve the changes, or has incorrectly assigned the priority setting.

KPMG Consulting also found, by attending an internal BellSouth Change Control Board meeting for changes to metrics,¹ that the Change Control Board reviews only current changes that will be included in the next release of Barney and PMAP, but does not

¹ KPMG Consulting attended the Change Control Board meeting on August 14, 2001.

review other open change requests. This review process suggests that BellSouth does not have a documented process for tracking open changes, ensuring that they are completed, and assigning the correct priority to a change request.

Impact:

Without a process to track and/or monitor TeamConnection changes, BellSouth cannot ensure approved changes are being given the correct attention. This impedes BellSouth's ability to ensure true changes of the highest priority are given the proper attention to be worked in a timely manner. Other changes may become forgotten and never addressed or closed.

ATTACHMENT 28

Date: October 23, 2001

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Metrics Change Management Verification and Validation Review (PMR3).

Observation:

KPMG Consulting has discovered that BellSouth posted raw data to the PMAP Web site without simultaneously posting the corresponding release of the Raw Data User's Manual (RDUM)

Background:

As part of the PMR3 test, KPMG Consulting reviewed BellSouth's internal process for determining when changes are made to the Raw Data User's Manual (RDUM) and the process for validating and implementing those changes. The RDUM provides information about downloadable raw data that is provided to the Competitive Local Exchange Carriers (CLECs) each month on the PMAP Web site. The RDUM also defines how the CLECs can filter the data to produce metric reports. BellSouth informed KPMG Consulting in an interview on August 20, 2001 that the RDUM and the raw data are scheduled to be posted to the PMAP website on the 20th of each month.

Issue:

In the process of conducting the PMR5 (Metrics Calculations Verification and Validation Review) test, KPMG Consulting was unable to use the indicator BellSouth used for fully mechanized, partially mechanized and non-mechanized orders for LNP-FOC Timeliness. Upon further investigation, KPMG Consulting discovered that the version 2.1.06 RDUM available for the May data/June report was not correct for the posted raw data. The RDUM showed values of 0,1,2 for fully mechanized, partially mechanized, and non-mechanized orders respectively, but the raw data was using 1,2,3. BellSouth responded to KPMG Consulting's inquiry about the discrepancy by stating that the corrections were made in the version 2.1.08 RDUM available for the July data/August report.

In another instance, the raw data for the July data/August report was posted to the PMAP website on August 23, 2001 while the corresponding RDUM was not posted until August 28, 2001. As a result of the lapse in time, the CLECs did not have access to the correct version of the RDUM needed to calculate and filter their July raw data for five days.

Impact:

If the correct RDUM is not available on the same day as the raw data the CLECs may be using incorrect information for processing their raw data.

ATTACHMENT 29

OBSERVATION 158
BellSouth Florida OSS Testing Evaluation

Date: January 08, 2002

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR5).

Observation:

KPMG Consulting found that BellSouth's instructions in the Raw Data User Manual (RDUM) regarding the usage of the prod_desc (product description) field are insufficient for calculating the metrics values. (PMR5)

Background:

Service Quality Measurements (SQMs) are calculated to illustrate BellSouth's Operational Support System performance. The Florida Public Service Commission mandates that Bellsouth publish monthly performance measurement reports of SQM values for the Competitive Local Exchange Carriers (CLECs) engaged in business activity with BellSouth in the State of Florida.¹

Issue:

BellSouth publishes performance measurement reports of SQM values for the CLECs. The levels of disaggregation listed in each SQM report are listed in the *Florida Interim Performance Metrics*, Version 3.00, mandated by the Florida Public Service Commission.

BellSouth publishes the Raw Data User Manual (RDUM) on a monthly basis. The RDUM states the following:

Using this document the user will be able to:

- Download raw data files.
- Import raw data files into Microsoft Excel.
- Manipulate raw data to recreate any number in the Performance Measurement reports supported by raw data.

Many of the metrics that appear in the RDUM have the following instruction:

To find data for a particular product description, filter data to include only the desired description in the **prod_desc**.

¹ These reports are posted on the PMAP Web site.

OBSERVATION 158

BellSouth Florida OSS Testing Evaluation

The stated objective of the RDUM is to allow CLECs to “recreate any number in the Performance Measurement reports using raw data.” KPMG Consulting discovered that some of the product descriptions do not correspond to any of the levels of disaggregation listed in the *Florida Interim Performance Metrics*, Version 3.00.

For example, one of the product descriptions is “ISDN Basic Rate Business Non-Design.” This product description does not correspond to any of the levels of disaggregation listed in the *Florida Interim Performance Metrics*, Version 3.00.

If the RDUM does not provide documentation that allows CLECs to match a product description with a corresponding level of disaggregation, CLECs may be unable to complete the replication process.

Impact:

BellSouth’s insufficient documentation prevents CLECs from calculating the metrics values. Without accurate documentation, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

ATTACHMENT 30

OBSERVATION 137
BellSouth Florida OSS Testing Evaluation

Date: November 12, 2001

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5).

Observation:

KPMG Consulting cannot replicate the values in the "Ordering: Firm Order Confirmation (FOC) & Reject Response Completeness" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2001). KPMG Consulting found that BellSouth's instructions in the Raw Data User Manual are insufficient for calculating the metrics values for this SQM. (PMR5)

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the Competitive Local Exchange Carriers (CLECs) engaged in business activity with BellSouth in the State of Florida.¹ BellSouth provides CLEC Aggregate processed data² (PMAP raw data³) as requested by KPMG Consulting.

Issue:

KPMG Consulting attempted to replicate BellSouth reported values for the "Ordering: FOC and Reject Response Completeness" SQM using the instructions found in the Raw Data User Manual (RDUM) for this SQM.⁴ However, BellSouth informed KPMG Consulting that the RDUM instructions for "Ordering: Firm Order Completion (FOC) and Reject Response Completeness" should be combined with the RDUM instructions for the "Ordering: Service Inquiry + Firm Order Confirmation (FOC) (Average Response

¹These reports are posted on the PMAP Web site.

² The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data."

³ *The PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed 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. KPMG Consulting relied on the July 25, 2001 version 2.1.06 of the Manual.

⁴ KPMG Consulting used the instructions found in Appendix A, Section A – Process: Ordering, Part 5 of the RDUM.

OBSERVATION 137

BellSouth Florida OSS Testing Evaluation

Time)" SQM⁵ in order to replicate values for the "Ordering: FOC and Reject Response Completeness" SQM. The existence of two sets of instructions implies the existence of two unique SQMs, when in fact, both sets of instructions must be used in order to create values for one SQM. Without adequate instructions, KPMG Consulting is unable to replicate the "Ordering: Firm Order Confirmation (FOC) and Reject Response Completeness" metrics values for this SQM.

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the "Ordering: Firm Order Confirmation (FOC) and Reject Response Completeness" SQM may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

⁵ KPMG Consulting used the instructions found Section III – Process: Ordering, Part 7, Page 20 of the RDUM.

ATTACHMENT 31

**BellSouth-Florida OSS Testing Evaluation
Status Meeting Minutes
February 13, 2002**

Meeting Location: Conference Call: 610-769-3325 Pass code: 86140#
CLEC Status Call: Wednesday 10:00 AM, Observation Call: Wednesday at 11:00 AM
Exception Call: Thursday at 1:30 PM

Meeting Attendees	Organization
Sharon Norris Bernadette Seigler Jay Bradbury	AT&T
Sherri Lichtenberg Donna McNulty	MCI WorldCom
Andy Klein	KMC Telecom, Inc.
James David Smith	DOJ
Milton McElroy Clayton Lindsey Mary Rose Sirianni	BellSouth
Dave Wirsching Linda Blockus Linda Gray Adina Brownstein MaryBeth Keane Graham Watkins Jeff Goldstein Bob McCrone Maxwell Massaquoi John Cacopardo Jon Gena Jeff Johnson Jack Sheehan Bill Wahl Juliet Ntabgoba	KPMG Consulting
Lisa Harvey John Duffey Jerry Hallenstein Mary Ann Kelley Rodney Wallace	FPSC

**BellSouth-Florida OSS Testing Evaluation
Status Meeting Minutes
February 13, 2002**

Meeting Summary:

Old Business:

"L" coded orders update

Data Integrity validates the accuracy and completeness of the transformation of records from the Legacy Systems into the Reporting System; therefore, Data Integrity would identify transactions missing from the reporting database. Data Integrity does not validate whether an order is coded correctly. Replication validates whether the reporting has been calculated correctly by following the rules in the RDUM. Replication does not validate whether an order is coded correctly. Because of the lack of CLEC specific data for validating order specific fields, this type of validation cannot be done. Metrics is not at a transaction level. That level of validation only occurs if we observe the originating order at the CLEC and follow the path of that order throughout BellSouth's Legacy Systems into the System.

MCI WorldCom We are happy to provide data needed. Would this allow KPMG Consulting to test this?

KPMG Consulting We have to determine if this is in scope. We would need to discuss this with the FPSC.

FPSC We agree that this is not in scope. If MCI WorldCom would like the FPSC to consider adding this to the existing scope, you will need to submit a request to the FPSC to modify the MTP.

AT&T We understood from a comparison of the GA, FLA, LA audit that there would be a sample of orders followed from end to end as part of the Florida test.

KPMG Consulting This is being done for test CLEC orders.

AT&T Have you experienced instances where BellSouth has assigned an "L" code and excluded the order from the measure? Would data integrity address this?

KPMG Consulting We take the test CLEC transactions that were transmitted to BellSouth and we verify that all transactions have been received. KPMG Consulting compares the transaction as it moves from one point in the process to another point in the process to ensure that the data stays consistent and that all transactions did go through the process; we do not confirm that specific fields are coded correctly.

AT&T At what point does BellSouth assign an "L" code?

AT&T If the order is flow through, then it is electronically assigned, if it is non flow, through then it is assigned manually. Data integrity will not pick this up.

**BellSouth-Florida OSS Testing Evaluation
Status Meeting Minutes
February 13, 2002**

MCI WorldCom We have a specific concern that what comes out of the EDI translator is not accurate. Using test orders is not random; this will not give us what we are looking for.

CAVE Pre-Order Testing Update

Pre-order functionality is available in CAVE. KPMG Consulting will be conducting interviews with CLECs who are sending pre-orders through CAVE as part of the PPR5 process evaluation.

AT&T Will you be discussing Exception 128 again, or waiting to conduct interviews first?

KPMG Consulting We plan to conduct interviews with CLECs before bringing up on the exceptions call again.

Project Management

- **Dave Wirsching (KPMG Consulting)**
 - KPMG Consulting published the January monthly status report and project plan last week. This information is available on the FPSC website.

Lead Updates

- **CLEC Relations: Jeff Johnson (KPMG Consulting)**
 - Next week there will be a change in the schedule of calls. The Exceptions call will be held on Wednesday February 20th following the Observations call. There will be no Exceptions call held on Thursday February 21st.
 - KPMG Consulting received the following documents from BellSouth:
 - Response to Amended Observation 162, the Second Amended Response to Amended Observation 133, the Response to Amended Observation 137, the Amended Response to Amended Observation 137, and the Response to 2nd Amended Observation 137.
 - KPMG Consulting also received the BellSouth Response to Exception 141, 143, 144, 145, 146, 147, the Response to Second Amended Exception 116, the Response to Second Amended Exception 112, the Response to Second Amended Exception 38, the Response to Exception 136, the Response to Amended Exception 120, and the Response to Third Amended Exception 96.
 - Items to be discussed on the 2/13/02 Observation call will include Observations 105, 124, 138, 145, 146 and 152. KPMG Consulting will be introducing Observation 163. Observations 45, 86, 108, 134, 144, 151, 153 and 160 will be closing.
 - Items to be discussed on the 2/14/02 Exception call will include Exceptions 6, 22, 42, 49, 133, 140, 141 and 142. KPMG Consulting

**BellSouth-Florida OSS Testing Evaluation
Status Meeting Minutes
February 13, 2002**

will be introducing Exceptions 146, 147, 148 and 149. Exceptions 27, 43, 54, 83, 106, 125, 127, and 137 will be closing.

- **Billing: Jon Gena and John Cacopardo (KPMG Consulting):**
 - KPMG Consulting began preparation for next TVV10 DUF retest.
 - KPMG Consulting validated baseline test cases for the UNE billing upgrade, evaluated a new interconnection agreement and evaluated resale billing invoices for TVV11.
 - KPMG Consulting is compiling work papers for PPR10.
 - KPMG Consulting completed interview summaries and has no planned activity this week for PPR12.
 - KPMG Consulting reviewed BellSouth documentation and is conducting interviews regarding the new billing upgrade (2/12 and 2/13) for PPR13.

- **Repair, Provisioning & Maintenance (RPM): Bob McCrone (KPMG Consulting):**
 - KPMG Consulting continues retesting of Directory Listings, Switch Translations, CSRs and Intercept Messaging and is testing Line Loss reporting for TVV4.
 - KPMG Consulting is compiling work papers for TVV5.
 - KPMG Consulting is planning for TVV6 retest after confirmation of BellSouth fix on 2/8/02.
 - KPMG Consulting is compiling work papers for TVV7.
 - KPMG Consulting is planning retest activities related to Exception 38 for TVV8.
 - KPMG Consulting is compiling work papers for TVV9.
 - KPMG Consulting issued a documentation request on 2/4/02, has received the documentation and is reviewing it this week for PPR6.
 - KPMG Consulting has 7 refresh interviews scheduled this week for PPR9.
 - KPMG Consulting is scheduling retest activities for PPR14.
 - KPMG Consulting is compiling work papers for PPR15.
 - KPMG Consulting is compiling work papers for PPR16.

MCI WorldCom On the BellSouth website, it is difficult to read the line loss reports. We have asked BellSouth for clarification on various categories in the line loss report and have not received this detail. Has KPMG Consulting experienced the same thing? Are you using these reports?

KPMG Consulting We are using the report on the website and are still in the process of evaluating so we cannot comment at this time.

MCI WorldCom BellSouth has stated that they will not provide us with this information until they finish ERT.

BellSouth-Florida OSS Testing Evaluation
Status Meeting Minutes
February 13, 2002

FPSC Please advise us when you receive a response.

- **Order Management: Mary Beth Keane and Jeff Goldstein (KPMG Consulting):**
 - KPMG Consulting is continuing to monitor receipt of FOCs and CNs for EDI, TAG, and manual orders. OM is working with the IS team to coordinate the TAG upgrade. KPMG Consulting is also coordinating the 2nd retest with Billing, RPM, and Systems Engineering and working to resolve open exceptions and observations. The final test bed specifications were provided to BellSouth on Friday. Test progress is listed below:

	% Planned Instances Submitted	% Instances in FOC	% Instances in CN
EDI Re-test	100	94	84
TAG Re-test	99	93	85
RoboTAG	79	70	55
LENs Re-test	92	92	82
Manual Re-test	99	94	86

- KPMG Consulting is upgrading TAG to 7.7.1.3; once completed, peak volume testing for TVV2 will be conducted.
- KPMG Consulting continues to evaluate flow-through performance on retest LSRs, is preparing for 2nd retest and is working to resolve open observations and exceptions for TVV3.
- KPMG Consulting continues to monitor TVV1 test issues, has refresh interviews scheduled in the Fleming Island LCSC and is working to address open Observation 130 for PPR7.
- KPMG Consulting continues to monitor TVV1 test issues, has refresh interviews scheduled at the Fleming Island LCSC and is compiling work papers for PPR8.

AT&T Are you waiting to finalize the TAG upgrade to move onto the Peak Volume test?

KPMG Consulting That is correct.

- **RMI: Graham Watkins and Bill Wahl (KPMG Consulting):**
 - KPMG Consulting continues to monitor the change control process and attended CCP subcommittee meeting yesterday for PPR1.
 - KPMG Consulting continues to review documentation, review of new Account Team procedures, and continues to work on CKS and account team issues for PPR2.

**BellSouth-Florida OSS Testing Evaluation
Status Meeting Minutes
February 13, 2002**

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- KPMG Consulting continues the PPR3 review of the ECS Help Desk, analyzing Help Desk logs, and reviewing data provided from the BellSouth EC Support group and is preparing for retest of observation 132.
 - KPMG Consulting has no planned activities for this week for PPR4.
 - KPMG Consulting continues to review BellSouth interface development process documentation, monitor the BellSouth Release Management process – release 10.3.1, and monitor development of the CAVE testing environment and BellSouth release management (release 10.2 and parsed CSRs) for PPR5. Information has been requested from CLECs regarding parsed CSR testing.

AT&T KPMG Consulting recently talked about an observation regarding the Account Team. Is there anything that allows us to look at the timeliness of response provided through the account team?

KPMG Consulting We can comment on the accuracy of response that we received.

AT&T Timeliness of response is excluded from the test?

KPMG Consulting We do not measure timeliness as part of this test.

- **Metrics: Linda Gray (KPMG Consulting)**

- KPMG Consulting continues PMR1 Data Collection and Storage analysis, conducted interviews and completed summaries for RADS.
- KPMG Consulting continues review of two metrics pending closure of observations 129 and 159 for PMR2.
- KPMG Consulting continues to monitor adherence to procedure, conducted refresh interviews for TestDirector, and continues to update the verification summary tables with new data for PMR3.
- KPMG Consulting continues retesting data analysis for ordering, provisioning, and the M&R domains. KPMG Consulting also continues testing of manual metrics and billing testing for PMR4.
- KPMG Consulting planned to work on 29 metrics last week and worked on 16 (16 matched, 6 replicated – not matched, 5 in process, 2 in retest and 1 pending data requests and clarification) and is currently working on 10 metrics for PMR5 this week.

New Business

AT&T Observation 124 Question: It appears that KPMG Consulting has observed a pattern – the first instance being related to API documentation and the second instance being related to corrections/clarifications to the BBRLO. AT&T has provided information regarding two similar events. 1) BellSouth carrier notification letter concerning errant API posting and 2)

**BellSouth-Florida OSS Testing Evaluation
Status Meeting Minutes
February 13, 2002**

email from AT&T to BellSouth providing an analysis of "undocumented" changes included in the most recent BBRLO.

KPMG Consulting We will take this information under advisement. If KPMG Consulting determines that something has not been addressed as part of our evaluation or if we find anything additional, we will amend the exception.

MCI WorldCom Are you looking at all notices?

KPMG Consulting We look at all notifications during the course of testing.

FPSC If CLECs provide information that you have not found, then will you review and amend if necessary?

KPMG Consulting Yes. However, we do not use the CLEC data as part of the observation or exception. We take that information under advisement and conduct further analysis as appropriate. Based upon our analysis, KPMG Consulting will review its current results to determine whether the same situation exists with the KPMG CLEC data. As testing progresses, KPMG Consulting will watch for these types of notification situations.

BellSouth PMAP 4.0 Upgrade

BellSouth is upgrading its Performance Measurement & Analysis Platform (PMAP) to Version 4.0 from Version 2.6. This is a normal sequence in our data processing methodology intended to better meet the needs of our customers and the demands of the business. (PSC, FCC, and CLECs)

The fundamental process of reporting, i.e. sourcing of data, application of business rules, the production of reports and output distribution is substantially unchanged.

Some history of the evolution of PMAP:

- PMAP 1.03/99
- PMAP 2.010/99
- PMAP 2.x Various Periodic Updates
- PMAP 2.6 Current version implemented on 8/01
- PMAP 4.0 Scheduled to make a full production run in parallel with PMAP 2.6 with the March 2002 processing cycle of February 2002 data.

There is minimal upgrade impact:

1. Data sourced from same systems
2. RADS processor replaces BARNEY as the feeder or acquisition source for the warehouse model
3. Business Rule application mirrored between current and new 4.0 version of PMAP

**BellSouth-Florida OSS Testing Evaluation
Status Meeting Minutes
February 13, 2002**

4. Output process configured to utilize same delivery process (i.e. 271 Charts, MSS, Web based SQM)

The key advantages are:

1. Improved data acquisition processors – scaling, redundancy, modern hardware
2. Simplified code – easier to maintain, processes data faster

This is quite simply a system upgrade. KPMG will integrate this upgrade into the metrics test.

MCI WorldCom What does BellSouth mean by not substantially different?

BellSouth There will be no difference from an external viewpoint. There are systems differences in how data is moved from the legacy systems into reports.

MCI WorldCom How will KPMG Consulting test the new upgrade?

KPMG Consulting KPMG Consulting will retest using the same methodology for all processes.

FPSC Can you talk about how this will be done from a replication perspective?

KPMG Consulting From the Replication perspective and for the Metrics which are currently Matched for 3 Months, we will review BellSouth's testing work papers and compare reports generated from the current process and the new process to determine if the validation process can be audited. Once that is determined, then the decision will be made as to whether 1 month of replication would be sufficient or if 3 months are required. For all Metrics, In Progress, Not Started, or Non-Matched, 3 Months of Replication will be done.

AT&T BellSouth said that they are going to implement this in parallel, is KPMG Consulting going to do a thorough audit comparing output from the new system to the existing system?

KPMG Consulting Yes, we will be doing a comparison.

AT&T What does RADS stand for?

KPMG Consulting Regulatory Ad Hoc Database System

AT&T If 3 months of replication has already been completed, will you do another month?

KPMG Consulting We have not determined this yet. For the metrics where we have not completed 3 months of replication, we will complete 3 months.

ATTACHMENT 32

Status of "Key" Measures

"Key" Measure	Status of Audit III	Other Issues relating to Measure
Pre-Order Response Interval	Report says that data integrity not addressed in audit II and was completed in Audit II—status unclear	Georgia Exception E-89 (Data Integrity)
System Availability –Pre-Order/Order	Data Integrity -Not started Replication- <i>Matched</i>	
Loop Make-Up Response Time	Data Integrity-Not started Replication -Not started	
Acknowledgement Timeliness	Data Integrity (report indicates complete but KPMG advised that acknowledgement completeness was in progress) Replication -Not Matched	Florida Exception-109 Georgia Exception 141 AT&T missing data issue.
% Rejected Service Requests	Data Integrity—In progress Replication—Not Matched (LNP not started)	Florida Exceptions 120 and 143
FOC Timeliness	Data Integrity—In progress Replication—Re-test	Florida Exceptions, 132, 36, 114, 145, and 150 Georgia Exceptions 122, 136, 137
Reject Interval	Data Integrity—In progress Replication—Not-matched	Florida Exceptions 10, 36, 144
Flow-Through	Data Integrity—In progress Replication—Re-test (LNP non-matched)	Georgia Exceptions 122, 136, 137 Florida Exceptions 124 and 113.
Missed Appointments	Data Integrity—Not started Replication—Non-matched (month 2) (LNP no values published)	Florida Observation 125
Average Completion Notice Interval	Data Integrity—Not started (Status report also describes a draft exception)	Numerous AT&T issues

	Replication—Re-test	
% Provisioning Troubles in 30 days	Data Integrity—Not started Replication—Not matched	
% Jeopardies	Data Integrity—Not started Replication—Re-test (draft exception)	Florida Exception E-135 Georgia Exception E-142
Average Order Completion Interval	Data Integrity—Not started Replication—Re-test	
Service Order Accuracy	Data Integrity—In progress Replication—Re-test (November as Month 1)	Numerous KPMG TVV4 observations and exceptions (O-82, E-76, E-84, O-106, E-112, O-152)
Mean Held Order Interval	Data Integrity—Not started Replication— Matched	
Coordinated Customer Conversions	Data Integrity—In progress Replication—Re-test (Draft Ex. 180)	Florida Observation O-142.
M&R Interface Availability	Data Integrity—Not started Replication— Matched	
M&R Response Interval	Data Integrity—Not started Replication— Matched	
Missed Repair Appointments	Data Integrity—Not started Replication—Re-test	
Maintenance Average Duration	Data Integrity—Not started Replication—Re-test	Florida Exception E-147
% Repeat Troubles in 30 days	Data Integrity—Not started Replication—Re-test	
Customer Trouble Report Rate	Data Integrity—Not started Replication—Re-test	
Invoice Accuracy	Data Integrity— Completed in Audit II Replication— Completed in Audit II	
Mean Time To Deliver Invoices	Data Integrity— Completed in Audit II Replication— Completed in Audit II	

Usage Data Accuracy	Data Integrity-- <i>Completed in Audit II</i> Replication-- <i>Completed in Audit II</i>
Usage Data Delivery Timeliness	Data Integrity-- <i>Completed in Audit II</i> Replication-- <i>Completed in Audit II</i>
Usage Data Delivery Completeness	Data Integrity-- <i>Completed in Audit II</i> Replication-- <i>Completed in Audit II</i>
Trunk Group Performance	Data Integrity—Not started Replication—Not Matched
% Due Dates Missed Collocation	Data Integrity-- <i>Completed</i> Replication--- <i>Matched</i>

Thus, of BellSouth's 29 "key" measures, only six or 21% have passed the data integrity evaluation. These six measures have low levels of disaggregation, thus at the sub-metric level the % complete for these "key" metrics is much less. KPMG advised that data integrity test overall less than 10% complete in Georgia. 10 metrics or 35% have passed the metric replication evaluation.

The fourteen metrics noted as completed in Audit II were actually conducted in Audit I. Thirteen were completed as follows: 3 in 8/99, 4 in 10/99, 5 in 1/00 and 1 in 3/00

ATTACHMENT 33

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ATTACHMENT 34



BellSouth Interconnection Services
1960 West Exchange Place
Suite 200
Tucker, GA 30084

AT&T Regional Account Team
770-492-7650
Fax 770-492-8612

September 27, 2001

Mr. Matthew Dennis
AT&T Local Services - Southern Region
Room 12233, Promenade I
1200 Peachtree Street, NE
Atlanta, Georgia 30309

Dear Matthew:

This is in response to your letter of August 2, 2001, regarding potential data discrepancies involving data supplied by BellSouth's Performance Measurement Analysis Platform (PMAP) for the month of May 2001.

AT&T's letter suggests discrepancies between the number of completion notices received by AT&T for both service order and Purchase Order Numbers (PONs). There are three main reasons for the differences between these numbers.

First, BellSouth does not record completion notices in PMAP on orders with post-completion errors that span between two months in the Average Completion Notice Interval (ACNI) report. Service orders with post-completion errors in month A that are corrected in the following month B will not be reported in either month, A or B. In the ACNI reports for month A, these orders are excluded because they do not have a completion notice, and in month B they are excluded because their completion date did not fall within that month. For example, a service order is completed on July 28, 2001, however, the service order has an error that is not corrected until August 4, 2001, at which time the completion notice is released to AT&T. When the July data was captured, the service order in this example did not have a completion notice, therefore the order would not appear with July data. When the August data is captured, the service order will not appear because the completion date is July 28, 2001.

Second, orders with blank/null ntc_intvl (total interval in hours) field are being excluded from the Service Quality Measurement (SQM) reports posted on the PMAP Web site. This exclusion occurs because BellSouth is unable to calculate the interval between the notice of completion and the completion date of the order.

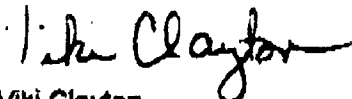
Third, some service orders can be directly entered into BellSouth's Service Order Control System (SOCS) without being submitted through one of the electronic gateways (Partial and Fully Mechanized) or by fax (Non-Mechanized). In this case, an order with no mechanization identifier is currently excluded from the ACNI reports because they do not have a completion notice; however, they are included in the Order Completion Interval (OCI) reports.

For the reasons stated above, the orders that you provided in Attachments I and II were completed, but did not receive a completion notice. Additionally, the Local Service Requests (LSRs) in Attachment IV of AT&T's letter received a completion notice but did not appear in the OCI files.

In Attachment III of AT&T's letter, you state that PONs appeared more than once on the ACNI reports with different SO numbers. More than one SO number can be associated with a PON. For example, if a PON requires a disconnect (D) order and a new connect (N) order to provide service, the two orders would appear with their distinct SO numbers and the same PON. The ACNI and OCI reports record different information and a one to one correlation of service orders and/or PONs is not expected.

I trust this answers your questions. If further discussion is needed, please call me at 770 492-7554.

Sincerely,



Viki Clayton
AT&T Account Team

ATTACHMENT 35

Regional Data-Service Order Accuracy Volumes
 October 2001-January 2002
 Taken from BellSouth Monthly State Summary (MSS Reports)

	Resale	Oct.	Nov.	Dec.	January
1	Residence/<10 circuits/Dispatch/GA(%)	5	65	75	74
2	Residence/<10 circuits/Non-Dispatch/GA(%)	275	140	75	75
3	Residence/>=10 circuits/Dispatch/GA(%)		16	5	11
4	Residence/>=10 circuits/Non-Dispatch/GA(%)	1			
5	Business/<10 circuits/Dispatch/GA(%)	18	70	40	125
6	Business/<10 circuits/Non-Dispatch/GA(%)	262	135	35	74
7	Business/>=10 circuits/Dispatch/GA(%)		23	17	12
8	Business/>=10 circuits/Non-Dispatch/GA(%)	2	31	28	20
9	Design (Specials)/<10 circuits/Dispatch/GA(%)	6	50	63	49
10	Design (Specials)/<10 circuits/Non-Dispatch/GA(%)	2	55	45	76
11	Design (Specials)/>=10 circuits/Dispatch/GA(%)		3	2	
12	Design (Specials)/>=10 circuits/Non-Dispatch/GA(%)		25	6	10
	<i>Total</i>	571	613	391	526

	UNE	Oct.	Nov.	Dec.	Jan.
13	Design (Specials)/<10 circuits/Dispatch/GA(%)	101	200	45	75
14	Design (Specials)/<10 circuits/Non-Dispatch/GA(%)	45	30	48	75
15	Design (Specials)/>=10 circuits/Dispatch/GA(%)		35	19	13
16	Design (Specials)/>=10 circuits/Non-Dispatch/GA(%)	2			
17	Loops Non-Design/<10 circuits/Dispatch/GA(%)	93	35	75	75
18	Loops Non-Design/<10 circuits/Non-Dispatch/GA(%)	289	300	100	75
19	Loops Non-Design/>=10 circuits/Dispatch/GA(%)	7	70	70	115
20	Loops Non-Design/>=10 circuits/Non-Dispatch/GA(%)	15	58	80	114
	<i>Sub-Total</i>	22	128	150	229
	Total	552	728	437	542