WHITE PAPER CONTRASTING THE FLORIDA AND GEORGIA OSS TESTING

INTRODUCTION

Nondiscriminatory access to BellSouth's OSS is essential to the development of competition, and thus is an essential requirement of Section 271.[1] The Federal Communications Commission ("FCC") has stated that OSS consist of at least five functions: (1) preordering; (2) ordering; (3) provisioning; (4) maintenance and repair and (5) billing. The FCC "consistently has found that nondiscriminatory access to these systems, data bases and personnel is integral to the ability of competing carriers to enter the local exchange market and compete with the incumbent LEC."[2]

It is difficult to assess whether the OSS in a particular state truly allows nondiscriminatory access to other potential carriers. There are hundreds of discrete occurrences, any one of which can adversely affect a consumer's satisfaction with the service. Minor delays at various points can aggregate and place a CLEC at a competitive disadvantage, thereby undermining the intent of the system. Independent third party testing has become the most utilized means to determine the adequacy of and access to OSS. Unfortunately, third party testing is not uniform across the states. The extent to which a commission should rely on a third party test is directly related to the circumstances under which the testing was performed. As the FCC has noted:

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[1] OSS are the computer systems intended to enable CLECs to gain nondiscriminatory access to BellSouth's network in order to obtain retail services and unbundled network elements ("UNEs") for sale. OSS also include all related processes, information, and personnel resources needed for BellSouth to provide CLECs with nondiscriminatory access to its network.

[2] Memorandum Opinion and Order, *In the Matter of Application of BellSouth Corp. et al., for Provision of In-Region InterLATA Services in Louisiana,* CC Docket No. 98-121 (October 13, 1998), Paragraph 83.

> [t]he persuasiveness of a third party review, however, is dependent upon the qualifications, experience and independence of the third party and the conditions and scope of the review itself. (footnote omitted) If the review is limited in scope or depth or is not independent and blind, we will give it minimal weight.[3]

In the BellSouth region, there are third party tests currently underway in Florida and in Georgia.[4] There are dramatic differences, however, in the structure, scope and depth of the testing in the two states.

This paper will discuss and contrast the tests conducted in Florida and in Georgia.

I. THE FLORIDA TEST IS COMPREHENSIVE.

As the FCC noted above, third party testing that is limited in scope and depth should be accorded minimal weight. The Florida Test as it is currently structured is comprehensive in its scope.

A. The Florida Test evaluates parity.

A test should be designed not only to objectively and accurately capture and analyze BellSouth's performance in providing service to CLECs, but also to compare that performance to the service it provides itself and its affiliates. Evaluation of BellSouth's parity performance is critical because OSS test data will likely be cited as evidence of non-discriminatory support in BellSouth's 271 proceedings. A thorough assessment and comparison of BellSouth's retail and wholesale OSS is necessary to evaluate whether CLECs are treated the same as BellSouth treats itself.

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[3] Memorandum Opinion and Order, *Application by SBC Communications Inc., Southwestern Bell Telephone Company and Southwestern Bell Communications Services Inc. dba Southwestern Bell Long Distance pursuant to Section 271 of the Telecommunications Act of 1996 to provide in-region interLATA services in Texas,* CC Docket No. 00-217, January 22, 2001, Paragraph 102.

[4] The test in Georgia is being conducted under Georgia Master Test Plan 4.2 ("GMTP") and Georgia Supplemental Test Plan 2.1 ("GSTP").

Despite the vital importance of parity considerations, the Georgia OSS Test contains only two areas of parity reviews: the Maintenance and Repair Process Evaluation, (Test M&R-10 of the GMTP) and xDSL Process Parity Evaluation, (Test PO&P 16 of the GSTP). In contrast, the Florida Test contains nine additional tests for process parity, which are listed in Attachment 1.

B. The Florida Test is reviewing interfaces currently used by CLECs.

A critical area of evaluation is BellSouth's methods and procedures for designing and building OSS interfaces, and the testing of its current interfaces. In Florida, the test includes OSS '99 and other upgrades to BellSouth's existing interfaces. OSS '99 is BellSouth's "state of the art" upgrade to its pre-ordering and ordering interface. It is the interface that BellSouth claimed in the late nineties would provide a "solution to its OSS problems," and it is the interface that most closely complies with industry standards. The Georgia OSS Test was initiated several months before OSS '99 was available.[5]

Moreover, the Georgia OSS Test did not evaluate any versions of other interfaces, *e.g.*, LENS, which is currently the most widely-used interface, accounting for 69% of all electronic Local Service Requests submitted in the region. Nor did it test Robo-TAG, which combines TAG with a front-end graphical user interface. In short, the Florida Test, because it was initiated later than the Georgia Test and it incorporates areas of testing not included in the Georgia OSS Test, more thoroughly reflects the real world of CLEC competition.

[5] Indeed, KPMG in Georgia continued testing the old version of EDI and TAG that predate OSS '99, even after OSS '99 was in place.

C. The Florida Test includes manual processes and key support functions.

OSS consist of both automated and manual systems and processes. BellSouth processes all of its retail orders electronically but does not provide this capability to the CLECs. At present, approximately 12% of all orders are submitted manually and 22% of accurate and complete CLEC orders submitted electronically to BellSouth end up being handled manually. The Georgia Test does not test manual order processing while the Florida test does. Taken together, 33% of all CLEC orders receive manual handling in BellSouth Local Carrier Service Centers using processes that were not tested in Georgia. The Florida Commission ordered KPMG Consulting, Inc. ("KCI" or "KPMG") to test BellSouth's manual processing of orders. Additionally, the Florida Test includes many other support processes critical to the business relationship between CLECs and BellSouth. Attachment 2 summarizes some of the processes that the Georgia Test did not include.

Furthermore, because it tests only automated systems, the Georgia test does not consider potential bottlenecks caused by inadequate procedures or staffing at work centers. This is a critical piece of any third party test, given the large percentage of orders that BellSouth processes manually.

D. The Florida Test includes review of the ability of CLECs to build interfaces.

In Florida, the Commission required that KPMG build the interfaces -- just like the CLECs build them -- based only on interface documentation from BellSouth intended for the CLEC community. There was no BellSouth involvement in building interfaces in Florida because BellSouth does not help build interfaces for real world CLECs -- rather the CLECs are left at the mercy of BellSouth's documentation to build their interfaces --

and this documentation is frequently incomplete or out of date. The Georgia Test did not address the adequacy of BellSouth's documentation or support to CLEC interface implementation.

E. Georgia tests only six out of eighty UNEs.

BellSouth claims that it offers over eighty UNEs to CLECs.[6] The Georgia Test, however, evaluates only six UNEs for ordering, provisioning, and billing activities. Key UNEs omitted from these tests include digital UNEs, Enhanced Extended Links (EELs), customized routing of Operator Services and Directory Assistance, and line-sharing. UNE billing testing in Georgia, moreover, was limited to those orders that had been part of the ordering and provisioning tests and did not include multiple bill cycles. The limited UNE billing testing in Georgia fails to ensure whether customers will receive bills that are accurate.

F. Florida conducts realistic volume and stress testing.

The goal of nondiscriminatory access to OSS is to encourage CLEC use of the systems. This necessarily contemplates increased usage of the systems as competition grows. Accordingly, it does no good to test a system without regard for how the system will function under anticipated increased usage. Therefore, a key element of testing is the evaluation of whether OSS will remain stable and function efficiently as CLEC volumes grow, and in times of stress. A robust test will include additional volumes above those anticipated during the duration of the test. Although the Georgia Test includes some volume testing, the volume tests are less robust and less comprehensive than those in Florida, because (1) they were tested on a special testing database rather than in a

[6] See MTP Version 4.0, page A-4.

production environment, (2) they were not conducted across all interfaces and product lines, and (3) no stress testing was conducted. In Florida, stress testing includes 250% of the normal volume test.

In Georgia, the volume test was conducted in a test environment, on a special high-capacity database, not in the production environment where actual CLEC orders are processed. Although BellSouth subsequently tried to remedy this deficiency by adding a production volume test to its plan, these steps were futile because the additional test utilized only 21% of the volume of orders used in the normal volume test and 17% of the volume of orders used in its peak volume test. These modest testing volumes do not provide a true assessment of the ability of BellSouth's OSS to process orders at future projected volumes.

Moreover, the Georgia OSS Test did not assess volume processing of partially mechanized and manual orders, it did not include the GUI interfaces (LENs and Robo-TAG) or the repair interface (TAFI), and it did not include all order and product types. Each of these areas is addressed in the Florida Test. Accordingly, while the Georgia Test contained some volume testing, it was less robust than that called for in the Florida Test, and it did not evaluate whether BellSouth's production systems could handle future projected volumes of the types of orders projected to be submitted by CLECs in the future.

G. The Florida Test includes end-to-end testing.

The Florida Test includes more testing of end-to-end processes than the Georgia Test. The analogy to manufacturing a car is appropriate. If you build all the individual car parts and test them "individually" for strength and workmanship, you have not determined that the car will run when the components are combined.

Moreover, delays and other problems which KCI determined were not statistically significant or had no adverse effects on competition when tested in isolation may have a cumulative or amplified effect that would be highly significant in an end-to-end analysis. The Georgia Test will not uncover such a deficiency – one which could adversely affect the Commission's 271 determination.

KPMG affirmed the wisdom of the Florida approach while touting its test in New York:

> In essence, our approach was to evaluate Bell Atlantic's performance by doing what CLECs have to do to operate competitively in the local market place. In doing so, we operated as a CLEC and were able to complete a very thorough evaluation of both the breadth and depth of Bell Atlanta's OSS in New York.

KPMG Consulting, Inc.'s web page: www.kpmgconsulting.com/kpmgsite/pressanalyst/newsmore/bellatlantic.html (April 20, 2001).

KPMG followed the same approach in Florida.

H. Georgia failed to consider important performance measures testing.[7]

The Georgia Test includes an evaluation of metrics. This analysis, however, does not include the following important elements, which are part of the Florida Test:

- Local number portability ("LNP") measures;
- Processes for developing SQM definitions and standards;
- Data integrity assessment of CLEC and retail transactions end-to-end through the data filtering process;

[7] The Georgia Commission, in addition to the test, has requested that KPMG conduct a review of BellSouth's compliance with its January 12, 2001, Order on performance measures. This review will not be completed until August or September, 2001.

- Analysis of the adequacy and appropriateness of BellSouth-provided measures;

- Test metrics based upon collaborative process with a series of comments and workshops; and

- Comparison of test metrics results to BST retail metrics and, in some cases, to CLEC results.

I. The Florida Test is uncovering OSS deficiencies.

The Florida Test has already uncovered numerous problems not found in the Georgia Test. In Florida, KPMG also has continued to find problems that BellSouth said it had fixed in the Georgia Test. Attachments 3 and 4 summarize this conclusion.

II. THE STRUCTURE OF THE FLORIDA TEST IS MORE CONSISTENT WITH TESTER INDEPENDENCE.

Regardless of its scope and depth, no test is reliable if it is structured in a manner that undercuts the independence of the tester. The Florida Public Service Commission took steps to assure the independence of its tester, thereby bolstering the reliability of the testing in that state. There are several structural differences between the testing being conducted in Florida and that in Georgia.

A. The Florida Test contract was with the Commission.

In Georgia, BellSouth is the contracting party and directs KPMG's testing efforts. In Florida, the Commission is the contracting party with KPMG and directs KPMG's testing efforts.

B. The Florida Test includes significant CLEC participation.

CLECs are allowed more and better participation in Florida, thus, they have had an impact on ensuring the test addresses their needs and issues. This is a factor the

Department of Justice stressed in a recent statement in connection with the New York tests performed by KPMG:

> The NY-PSC and KPMG created an open testing environment – consulting with all interested parties, disclosing contacts with Bell Atlantic, issuing draft plans and reports, and reporting in detail on issues of serious concern.

The tests being conducted in Florida benefit from the same open structure. In the Florida Test, CLECs are provided the following opportunities for participation in Florida beyond those provided in the Georgia Test:

- Workshops to provide input into the test plan and the interim metrics used in the test;
- Access to observations and exceptions at the same time as BellSouth;
- Weekly calls to observe and participate in discussions of observations and exceptions;
- Timely access to documentation associated with the test, e.g., observation and exception responses and disposition, status reports, detailed project plans, etc., which facilitates more effective CLEC participation in the test; and
- Opportunity to provide test scenarios.

In addition, the Florida Staff supervising the test routinely solicits input from CLECs and uses that input in conducting the test. All in all, the Florida Commission

actively seeks and encourages CLEC participation in multiple test areas.[8] This openness bolsters the credibility of the Florida Test and the reliability of its results. In addition, the supplemental information CLECs provide is available for consideration during the performance of the test and will potentially improve both the test and the results. In the Georgia Test, however, KPMG and BellSouth do not draw extensively from the CLECs' experience. CLECs participate only on weekly status calls,[9] and test planning and administration decisions were not open to CLECs.

C. The Florida OSS Test Plan was developed by the FPSC Staff.

The designer of a test plan can have a substantial effect on the results. By controlling the scope, structure, and basic assumptions of the test, the test plan designer can tailor the test to target specific elements or even entire categories of areas while avoiding others entirely. Moreover, the designer of the test plan establishes test parameters and standards for success.

The Georgia OSS Test Plan was drafted by BellSouth. Indeed, in its final test report for Georgia, KPMG attempts to distance itself from the Georgia OSS Test plan development by disclaiming responsibility for work KCI received from BellSouth and Hewlett Packard:[10]

> The original Master Test Plan (MTP) governing much of the testing work at BellSouth-Georgia was not authored or developed by KCI. On September 9, 1999, KCI inherited a MTP and certain associated work-in-progress that had been performed by two third parties. Therefore, KCI makes no

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[8] *See* KPMG Consulting LLC, BellSouth-FL OSS Testing Evaluation CLEC Participation Update (Oct. 17, 2000) (attached as Attachment 5).

[9] Initially, CLECs were only allowed to file comments on interim status reports. In February 2000, nine months into test implementation, a single weekly status call in which CLECs could participate was added to the Georgia Test.

[10] In Georgia, Hewlett Packard originally was retained as the test manager. When KCI became the test manager, KCI inherited the test plan and work-in-progress from Hewlett Packard and BellSouth.

> representations or warranties as to the contents of this MTP or the testing work that had been done prior to September 9, 1999. Furthermore, KCI has not independently verified the accuracy or completeness of the work product provided by these third parties; accordingly KCI expresses no opinion on nor bear any responsibility for this information and work product.

The Florida Commission rejected this approach in its August 9, 1999 Order establishing a process for third-party testing in Florida:

> while BellSouth has advocated that we rely on the testing being conducted in Georgia, we are hesitant to do so because we have some concerns about the independence of that testing process. Instead, we believe that the process used in New York and in Pennsylvania is more appropriate for use in Florida. Under the New York DPS OSS testing "model," the state commission independently selects the third party tester and is the client I the engagement. Once the tester is selected, the state commission and the third party tester jointly develop the master test plan. The commission staff also played a strong role in monitoring and controlling the testing, which is vital to ensure independence and objectivity of the test. In contrast, BellSouth selected the third party tester and serves as the client in the Georgia engagement. It also developed or guided the development of the master test plan.

The Florida Test was developed based on a template created by the Commission Staff.

CONCLUSION

An accurate assessment of whether CLECs will be afforded nondiscriminatory access to an OSS is only possible where there is (a) comprehensive testing (b) performed by a truly independent tester. KPMG acknowledges this on its web page, when it quotes the U.S. Dept. of Justice regarding the test performed in New York:

> From the information that is available, it appears that an independent process of this type, along with the corresponding reports and related documentation, is much

> more likely to develop and present evidence that will demonstrate the efficiency, effectiveness and adequacy of the wholesale support process under review.

KPMG Consulting, Inc.'s web page:

www.kpmgconsulting.com/kmpgsite/industry/cc/news1.html (April 20, 2001).

The tests being conducted in Florida most closely fit this description and represent the most recent and comprehensive tests of BellSouth's OSS.

Attachment 1

Florida Parity Tests

Parity Test	**Test ID**
Order Flow-Through	Test TVV3 of MTP
Account Management	Test PPR2 of MTP
Training	Test PPR4 of MTP
Provisioning Process	Test PPR9 of MTP
Billing Work Center	Test PPR10 of MTP
Bill Production	Test PPR11 of MTP
Functional Review of Pre-Order, Ordering, and Provisioning	Test TVV1 of MTP
Manual Processing of Orders	Test PPR7 of MTP
Capacity Management	Included within tests

Attachment 2
Support Processes Evaluated in Florida

Support Process	Test ID	Brief Description
Account Establishment and Management Verification and Review	Test PPR-2	The objectives of this test are to evaluate the adequacy, completeness, and compliance with procedures for developing, publicizing, conducting, and monitoring account management. As CLECs are heavily dependent on their account team for information, assistance in purchasing services, and escalating problems, it is critical that this area of support is operating efficiently and effectively. KCI has already issued one exception in this area.
OSS Interface Help Desk Functional Review	Test PPR-3	This test is an evaluation of BellSouth's technical and system administration support for its OSS interfaces provided to CLECs. When interfaces go down, or are not performing in such a way as to allow a CLEC's orders to be processed, it is critical that CLECs receive timely and helpful responses from BellSouth.

CLEC Training Verification and Validation Review	Test PPR-4	This test is conducted to determine the existence and functionality of procedures for developing, publicizing, conducting and monitoring CLEC training, and ensuring that CLEC training has effective management oversight. KCI has already issued one exception in this area in Florida.
Collocation and Network Design Verification and Validation Review	Test PPR6	This test is designed to determine whether CLECs have sufficient information and BellSouth technical support to adequately prepare for and implement network designs and collocations. It also evaluates BellSouth's trunk forecasting process.
Manual Order Process	Test PPR-7	This test is a comprehensive review of the methods and procedures used to handle orders that have been manually submitted or require manual intervention by BellSouth during order processing. Processing orders manually adds time and increases the risk of errors in the ordering process. It is critical to CLECs that these orders be processed as efficiently and effectively as possible so that the quality of service to their end-user customer is not negatively impacted.

Work Center Support Evaluation	Test PPR-8	This test is a comprehensive operational analysis of the work center processes to support CLECs with OSS questions, escalations, problems, and issues related to pre-ordering, ordering, and provisioning. CLECs are heavily dependent on such work centers as BellSouth's LCSC and UNE Center for processing and provisioning their orders for service. KCI has already issued one exception in this area.
Provisioning Process Evaluation	Test PPR-9	This test is a parity and evaluative review of the processes, systems, and interfaces that provide provisioning for CLECs. It includes the processes, procedures, and operational environment to support coordinated provisioning with CLECs. It includes activities outlined in the Georgia Provisioning Verification Tests (O&P-5 and PO&P-13), but also includes many other activities not included in the Georgia tests. The Florida provisioning test also includes workflow management, workforce management, service design process, assignment process, and capacity management.

Billing Work Center Evaluation	Test PPR-10	This test is an operational analysis of the work center processes and documentation used to provide support to CLECs with daily usage and/or billing related claims, questions, problems, and issues. This critical area of support, including claims and adjustment processing, was not evaluated in Georgia. KCI has identified an exception in this area.
Maintenance and Repair Work Center Support Evaluation	Test PPR-15	This test is an operational analysis of the work center processes used to provide support to CLECs with questions, problems, and issues related to trouble reporting and repair operations.
Network Surveillance Support Evaluation	Test PPR-16	The objective of this test is to determine the functionality of network surveillance and network outage notification procedures and to assess the performance capabilities of network outage notification procedures for wholesale operations. KCI has issued an exception in this area in Florida.