

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:

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.

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. 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 states 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. Electronic ordering for xDSL was not tested in Georgia and only one form of xDSL (ADSL) was subjected to any testing.

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 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 was performed using volumes that were only 50% of the forecast capacity requirement. 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 more 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.

⁶ See MTP Version 4.0, page A-4.

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;
- 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 CLEC results.

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.

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'

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

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 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:

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.

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 in 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.

EXHIBIT 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 PPR13 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

EXHIBIT 2

Support Processes Evaluated in Florida

Support Process	Test ID	Brief Description
Account Establishment and Management Verification and Review	Test PPR-2	<p>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.</p>
OSS Interface Help Desk Functional Review	Test PPR-3	<p>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.</p>

<p>CLEC Training Verification and Validation Review</p>	<p>Test PPR-4</p>	<p>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.</p>
<p>Collocation and Network Design Verification and Validation Review</p>	<p>Test PPR6</p>	<p>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.</p>
<p>Manual Order Process</p>	<p>Test PPR-7</p>	<p>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.</p>

<p>Work Center Support Evaluation</p>	<p>Test PPR-8</p>	<p>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.</p>
<p>Provisioning Process Evaluation</p>	<p>Test PPR-9</p>	<p>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.</p>

<p>Billing Work Center Evaluation</p>	<p>Test PPR-10</p>	<p>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.</p>
<p>Maintenance and Repair Work Center Support Evaluation</p>	<p>Test PPR-15</p>	<p>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.</p>
<p>Network Surveillance Support Evaluation</p>	<p>Test PPR-16</p>	<p>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.</p>

**ATTACHMENT E, EXHIBIT 3
 SUMMARY OF FLORIDA OSS TEST OBSERVATIONS AND EXCEPTIONS
 COMPARED TO GEORGIA OSS TEST**

1. Florida-identified deficiencies in test areas that were not included in Georgia Test.

# Found	Observations	Exceptions
14 Obs.	14, 38, 39, 43, 46, 47, 48, 49, 52, 53,	1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 16, 17,
30 Exc.	54, 55, 58, 60	18, 19, 20, 21, 22, 24, 25, 28, 32, 34,
44 Total		37, 39, 40, 42, 45, 46, 48

2. Florida identified deficiencies in which same test area did not reveal a deficiency in Georgia.

# Found	Observations	Exceptions
9 Obs.	10, 23, 28, 31, 40, 44, 45, 56, 59	5, 12, 26, 29, 30, 35, 44, 47
8 Exc.		
17 Total		

3. Florida identified deficiencies which also occurred in Georgia and were deemed satisfied in Georgia.

# Found	Observations	Exceptions
17 Obs.	2, 3, 4, 5, 7, 8, 9, 13, 17, 18, 19, 20,	13, 23, 27, 31, 33, 36, 38, 41, 43
9 Exc.	22, 29, 30, 42, 57	
26 Total		

4. Observations that were closed in Florida and escalated to exceptions.

#	Observations	Exceptions
19 Obs. to Exc.	1, 6, 11, 12, 15, 16, 21, 25, 26, 27, 32, 33, 34, 35, 36, 37, 41, 50, and 51	N/A

5. Total observations and exceptions (Not listed above are Observation 24 which maps to an open exception in Georgia and Exception 15 which is state specific).

#	Observations	Exceptions
Total	60	48

**ATTACHMENT E, EXHIBIT 3
 SUMMARY OF FLORIDA OSS TEST OBSERVATIONS AND EXCEPTIONS
 COMPARED TO GEORGIA OSS TEST**

1. Florida-identified deficiencies in test areas that were not included in Georgia Test.

# Found	Observations	Exceptions
14 Obs.	14, 38, 39, 43, 46, 47, 48, 49, 52, 53,	1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 14, 16, 17,
30 Exc.	54, 55, 58, 60	18, 19, 20, 21, 22, 24, 25, 28, 32, 34,
44 Total		37, 39, 40, 42, 45, 46, 48

2. Florida identified deficiencies in which same test area did not reveal a deficiency in Georgia.

# Found	Observations	Exceptions
9 Obs.	10, 23, 28, 31, 40, 44, 45, 56, 59	5, 12, 26, 29, 30, 35, 44, 47
8 Exc.		
17 Total		

3. Florida identified deficiencies which also occurred in Georgia and were deemed satisfied in Georgia.

# Found	Observations	Exceptions
17 Obs.	2, 3, 4, 5, 7, 8, 9, 13, 17, 18, 19, 20,	13, 23, 27, 31, 33, 36, 38, 41, 43
9 Exc.	22, 29, 30, 42, 57	
26 Total		

4. Observations that were closed in Florida and escalated to exceptions.

#	Observations	Exceptions
19 Obs. to Exc.	1, 6, 11, 12, 15, 16, 21, 25, 26, 27, 32, 33, 34, 35, 36, 37, 41, 50, and 51	N/A

5. Total observations and exceptions (Not listed above are Observation 24 which maps to an open exception in Georgia and Exception 15 which is state specific).

#	Observations	Exceptions
Total	60	48

**EXHIBIT 4
 FLORIDA OSS TEST OBSERVATIONS AND EXCEPTIONS
 COMPARED TO GEORGIA OSS TEST**

Performance Measures

Obs	Test #	Description	Comments
2	PMR-5 (7/25/00 to 8/23/00)	KPMG cannot replicate the values in the % rejected service requests (5/00).	Test area included in Georgia Test. See Georgia exception 45 (3/31/00 to 8/2/00). Exception 46 (4/6/00 to 12/14/00). Exception 52 (4/12/00 to 12/14/00).
3	PMR-5 (8/8/00 to 8/23/00)	KPMG cannot replicate the values in the reject interval for non-trunks (5/00).	Test area included in Georgia Test. See Georgia exception 45 (3/31/00 to 8/2/00). Exception 46 (4/6/00 to 12/14/00). Exception 52 (4/12/00 to 12/14/00).
4	PMR-5 (8/8/00 to 8/23/00)	KPMG cannot replicate the values in the Ordering FOC timeliness for non-trunks (5/00).	Test area included in Georgia Test. See Georgia exception 23 (2/11/00 to 1/5/01). Exception 46 (4/6/00 to 12/14/00). Exception 52 (4/12/00 to 1/5/01). Exception 62 (4/26/00 to 11/14/00). Exception 90 (5/30/00 to 12/14/00). Exception 110 (8/8/00 to 1/5/01).
5	PMR-5 (8/29/00 to 10/25/00)	KPMG cannot replicate the values in the Average Completion Interval /Distribution (5/00).	Test area included in Georgia Test. See Georgia exception 46 (4/6/00 to 12/14/00). Exception 62 (4/26/00 to 11/14/00). Exception 86 (5/8/00 to open). Exception 90 (5/30/00 to 12/14/00).
6	PMR-4 8/30/00 to 3/28/01)	BST does not properly construct the processed data used to validate certain ordering service quality measurements—systematically excludes the entire weekend.	See Exception 36 below.
7	PMR-5 (9/7/00 to 12/14/00)	KPMG cannot replicate the values in Average Completion Notice Interval (5/00).	Test area included in Georgia Test. See Georgia exception 86 (5/8/00 to open). Exception 110 (8/8/00 to 1/5/01).
8	PMR-5 9/19/00 to 10/18/00)	KPMG cannot replicate the values in E911 (5/00).	Test area included in Georgia Test. See Georgia exception 52 (4/12/00 to 12/14/00).
9	PMR 4&5 (9/21/00	KPMG does not properly construct the processed data used to validate the total service order cycle time (5/00).	Test area included in Georgia Test. Exception 46 (4/6/00 to 12/14/00).

	to 10/18/00)		Exception 62 (4/26/00 to 11/14/00). Exception 86 (5/8/00 to open). Exception 111 (9/11/00 to 1/5/01).
11	PMR-5 10/25/00 to 3/21/00; escalated to exception)	KPMG cannot replicate LNP - % rejected service requests metric (5/00).	Not included in Georgia Test.
12	PMR-5 10/25/00 to 12/6/00; escalated to exception)	KPMG cannot replicate LNP – reject interval metric (5/00).	See Exception 10 below.
13	PMR-3 (11/3/00 to 12/14/00)	BST does not notify CLECs when they make changes to historical performance reports a/d or raw data.	Included in Georgia Test. <i>See Georgia exception 3 which was closed, re-opened and closed again. (12/15/99 to 2/10/00) and (3/29/00 to 6/16/00).</i>
14	PMR-5 (11/3/00 to open)	KPMG cannot replicate LNP – missed appointments metric (5/00).	Not included in Georgia Test.
15	PMR-5 (11/14/00 to 3/21/00; escalated to exception)	KPMG cannot replicate LNP-Disconnect Timeliness metric (5/00).	Not included in Georgia Test.
16	PMR-5 (11/14/00 to 12/6/00; escalated to exception)	KPMG cannot replicate LNP FOC Timeliness (5/00).	Not included in Georgia Test.
17	PMR-5 (11/30/00	KPMG cannot replicate % missed appointments (5/00).	Test area included in Georgia Test. <i>See exception 86 (5/8/00 to open).</i>

	to 2/7/01)		
18	PMR-5 11/30/00 to 2/7/01)	KPMG cannot replicate M&R customer trouble report rate (5/00).	Test area included in Georgia Test. See exception 86 (5/8/00 to open).
19	PMR-5 (11/30/00 to 1/24/01)	KPMG cannot replicate Average Jeopardy Notice metric (5/00).	Test area included in Georgia Test. See Georgia exception 110. (8/8/00 to 1/5/01).
20	PMR-5 (11/30/00 to 1/24/01)	KPMG cannot replicate Mean Held Order Interval metric (5/00).	Test area included in Georgia Test. See Georgia exception 23 (2/11/00 to 1/5/01). Exception 52 (4/12/00 to 12/14/00).
22	PMR-5 (12/15/00 to 4/11/01)	KPMG cannot replicate Coordinated Cutovers metric (9/00).	Test area included in Georgia Test. See Georgia exception 52 (4/12/00 to 12/14/00). Exception 90 (5/30/00 to 12/14/00). Exception 100 (7/5/00 to 10/30/00).
23	PMR-5 (12/15/00 to 2/28/01)	KPMG cannot replicate Reject Interval – Trunks metric (10/00).	Test area included in Georgia Test. No exceptions issued.
24	PMR-5 (12/15/00 to 3/7/01)	KPMG cannot replicate Provisioning Troubles (Trunks) within 30 days metrics (5/00).	Test area included in Georgia Test. See Georgia exception 86 (5/8/00 to open).
25	PMR-5 1/9/01 to 3/21/01; escalated to exception)	KPMG cannot replicate LNP Total Service Order Cycle Time (5/00).	Not included in Georgia Test.
28	PMR-5 (1/17/01 to 1/31/01)	KPMG cannot replicate OS/DA speed to answer metric (5/00).	Test area included in Georgia Test. No exception issued.
31	PMR-5 (1/22/01 to 3/7/01)	KPMG cannot replicate 3 collocation measures (5/00).	Test area included in Georgia Test. No exception issued.
32	PMR-5 (1/24/01 to 3/27/01;	KPMG cannot replicate Provisioning Troubles (non-Trunks) within 30 days metrics (5/00).	See exception 27 below.

	escalated to exception		
57	PMR-5 (4/12/01 to open)	KPMG cannot replicate the values in the Total Service Order Cycle Time report for January 2001.	Test area included in Georgia Test. <i>See</i> Georgia exception 46 (4/6/00 to 12/14/00). Exception 62 (4/26/00 to 11/14/00). Exception No. 86 (5/8/00 to open). Exception No. 111 (9/11/00 to 1/5/01).

Ex.	Test #	Description	Comments
10	PMR-5 (12/4/00 to open)	KPMG has found that BST's metrics calculations for LNP reject intervals are inconsistent with the documented metrics calculations (formerly observation 12).	Not included in Georgia Test.
11	PMR-5 (12/4/00 to open)	KPMG has found that BST's metrics calculations for LNP FOC intervals are inconsistent with the documented metrics calculations	Not included in Georgia Test.
14	PMR-1 (2/27/01 to open)	BST has inconsistent retention periods of the unprocessed data that is required to calculate the LNP measurements.	Not included in Georgia Test.
15	PMR-5 (3/5/01 to open)	KPMG cannot determine whether BST is producing complete SQM reports (conflicting metrics ordered vs SQM).	Florida-specific issue.
21	PMR-5 (3/12/01 to open)	KPMG cannot replicate the values of LNP Percent Rejected Service Requests measure.	Not included in Georgia Test.
22	PMR-5 (3/12/01 to open)	KPMG cannot replicate the values of LNP Disconnect Timeliness measure.	Not included in Georgia Test.
24	PMR-5 3/12/01 to open)	KPMG cannot replicate the values of LNP Total Service Order Cycle Time measure.	Not included in Georgia Test.
27	PMR-5 (3/12/01 to open)	KPMG cannot replicate the values of the Provisioning Troubles within 30 days of Provisioning measure. (former observation-32).	Test area included in Georgia Test. <i>See</i> Georgia exception 23 (2/11/00 to 1/5/01). Exception 86 (5/8/00 to open). Exception 123 (2/18/00 to 3/9/01).
36	PMR4 (3/21/01 to open)	BST does not properly construct the processed data used to validate FOC and rejection timeliness (former observation-6).	Test area included in Georgia Test. Related to exception 87 (5/23/00 to 1/5/01).

Interface Development

Obs.	Test #	Description	Comments
1	PPR-5 (7/18/00 to 3/21/01; escalated to exception)	BST does not appear to have public documentation available for CLECs to establish connectivity for TAG.	Not included in Georgia Test.
26	PPR-5 (1/9/01 to 3/21/01; escalated to exception)	No documentation for CLECS to correlate the available versions of TAG to business rules.	Not included in Georgia Test.
53	PPR-5 (3/20/01 to open)	BST does not appear to have EDI interface documentation available re batch size transmission.	Not included in Georgia Test.
54	PPR-5 (3/20/01 to open)	BST does not appear to have some TAG documentation available.	Not included in Georgia Test.

Exception	Test #	Description	Comments
1	PPR-5 (7/26/00 to 11/9/00)	BST's electronic EDI test environment is inadequate for testing of a CLEC's EDI interface (LNP).	Not included in Georgia Test.
2	PPR-5 (8/2/00 to 2/8/01)	Inconsistencies and omissions in the EDI Specs and OSS99 business rules prevent the development of an EDI interface between BST and a CLEC.	Not included in Georgia Test.
3	PPR-5 (8/4/00 to 11/9/00)	The test cases BST provides a CLEC for EDI end-to-end testing are either incomplete or incorrect.	Not included in Georgia Test.
6	PPR-5 (9/21/00 to open)	BST lacks an appropriate process, methodology and a robust test environment for testing of the EDI interface.	Not included in Georgia Test.
7	PPR-5 (10/3/00 to open)	BST does not have sufficient publicly available information that provides information to a CLEC—physical connectivity ECTA.	Not included in Georgia Test.
8	PPR-5 (10/10/00 to open)	BST lacks a consistent and documented process to enable a CLEC to independently develop an ECTA interface.	Not included in Georgia Test.

20	PPR-5 (3/12/01 to open)	BST does not appear to have public documentation available for CLECs to establish connectivity to TAG.	Not included in Georgia Test.
25	PPR-5 (3/12/01 to open)	BST does not have public documentation available to correlate available versions of TAG with business rules.	Not included in Georgia Test.

Change Management

Obs. #	Test #	Description	Comments
10	PPR-1 (10/12/00 to 2/22/01)	BST does not follow its documented process of providing proper notifications when software interfaces are being retired.	Within scope of Georgia Test, no exception issued.
21	PPR-1 (12/13/00 to 3/21/01; escalated to exception)	The distribution of carrier notification info associated with change control process is not adequate. Also significant information is not included in the notice. (See exception 23).	Within scope of Georgia Test. Related to Georgia exception 2 (11/12/99 to 7/21/00).
27	PPR-1 (1/9/01 to 3/21/01; escalated to exception)	BST does not have a clearly defined process for addressing documentation defects. (See exception 26).	Within scope of Georgia Test, no exception issued.

Except. #	Test #	Description	Comments
5	PPR-1 (8/17/00 to 1/18/01)	BST does not follow their documented process of providing proper time intervals when posting documentation changes.	Within scope of Georgia Test, no exception issued.
12	PPR-1 (2/14/01 to open)	BST does not adhere to the procedures for System Outage established in the BST change control process.	Within scope of Georgia Test, no exception issued.
23	PPR-1 (3/12/01 to open)	Carrier notification deficiencies associated with Change Control Process. (See observation 23).	Within scope of Georgia Test. Related to Georgia exception 2 (11/12/99 to 7/21/00).
26	PPR-1 3/12/01 to open)	BST does not have a clearly defined process for addressing the expedited release of BellSouth documentation defects. (See observation 27).	Within scope of Georgia Test, no exception issued.

Pre-Order, Order, and Provisioning

Obs. #	Test #	Description	Comments
29	TVV-4 (1/18/01 to 2/28/01)	BST failed to meet the frame due time on commercial CLEC loop migrations.	Included in Georgia Test. See exception 106 (8/10/00 to 3/9/01).
30	TVV-4 (1/22/01 to open)	BST UNE center does not make hot cut related calls.	Included in Georgia Test. (See Georgia exception 58 (3/30/00 to 8/4/00). Exception 82 (5/10/00 to 8/25/00).
33	TVV1 (2/1/01 to 3/21/01; escalated to exception)	BST business rules (9K) provides ambiguous information.	Not included in Georgia Test --OSS99 not tested.
37	TVV1 (2/14/01 to 3/21/01; escalated to exception)	BST business rules for ordering provides information inconsistent with system responses.	Not included in Georgia Test --OSS99 not tested.
38	TVV-4 (2/14/01 to open)	BST issued a FOC on a XDSL/line sharing order when the loop could not support DSL service.	Not included in Georgia Test—line sharing not tested.
39	TVV-4 (2/15/01 to open)	BST did not provision the CO splitter equipment assigned to a line share order on the FOC date.	Not included in Georgia Test—line sharing not tested.
40	TVV-4 (2/15/01 to 3/7/01)	Inconsistencies in BST's process and technical documents with regard to allowable foreign voltage parameter established for xDSL loops.	Within scope of Georgia Test—FO&P 13 and 14.
41	TVV3 (2/15/01 to 3/21/01; escalated to exception)	BST flow-through documentation is incomplete and inconsistent.	Not included in Georgia Test --OSS99 not tested.
43	TVV1 (3/2/01 to open)	KPMG is unable to complete several orders using EDI interface.	Not included in Georgia Test --OSS99 not tested.
45	TVV-4 (3/6/01 to	BST returned FOC frame due times that do not match the regular hours for provisioning.	In scope of Georgia Test, no exception issued.

	open)		
46	TVV-1 (3/7/01 to open)	Business rules do not accurately describe the process for submitting orders for resale ISDN service.	Not included in Georgia Test--OSS99 not tested.
47	TVV-1 (3/7/01 to 3/28/01)	KPMG Consulting is unable to receive documents using the EDI interface.	Not included in Georgia Test --OSS99 not tested.
48	TVV-1 (3/8/01 to open)	Business rules do not offer instructions for submitting an order for DS1 with number portability.	Not included in Georgia Test --OSS99 not tested, digital UNE ordering not tested.
49	TVV-1 (3/13/01 to open; escalating to exception)	BST does not provide time stamps for LSRs for clarifications and completion notices via LENS.	Not included in Georgia Test --OSS99 not tested, LENS not tested.
52	TVV-1 (3/20/01 to open)	BST does not provide time stamps for status notices via RoboTAG.	Not included in Georgia Test— OSS99 not tested, Robo-TAG not tested.
55	TVV-1 (3/29/01 to open)	KPMG is unable to receive responses using the EDI interface.	Not included in Georgia Test --OSS99 not tested.
56	TVV-1 (4/5/01 to open)	BST implemented business rule updates prior to the release of the business rules.	In scope of Georgia Test, no exception issued.
58	TVV-1 (4/12/01 to open)	BST business rules do not allow CLECs to submit a local service request manually a SUP to an electronically submitted order.	Not included in Georgia Test --OSS99 not tested, manual ordering, other than xSDL, not tested.
59	TVV-4 (4/12/01 to open)	BellSouth does not have a documented process to reconcile a mismatch between a CLEC telephone and the Bellsouth telephone number on coordinate conversions with LNP.	In scope in Georgia Test, no exception issued.
60	TVV-1 (4/12/01 to open)	The RoboTAG interface fails to provide Miscellaneous Account Numbers (MANs) for all cities in Florida.	Not included in Georgia Test— Robo-TAG not tested. Also a state/geographic specific issue.

Except. #	Test #	Description	Comments
16	TVV-1 (3/5/01 to open)	BST business rules for ordering (9K) do not offer the ability to submit an order for the partial migration of customer's UNE loops.	Not included in Georgia Test --OSS99 not tested.

17	TVV-1 (3/6/01 to open)	BST does not offer CLECs the ability to migrate a retail customer to a CLEC using an EEL.	Not included in Georgia Test—EEL ordering not tested.
19	TVV-1 (3/12/01 to 3/22/01)	Exception withdrawn by KPMG.	Issue was outside scope of Georgia Test—involved LCSC personnel practices.
28	TVV1 (3/12/01 to open)	BST's business rules for OSS99 provide ambiguous information on use of conditional field.	Not included in Georgia Test --OSS99 not tested.
32	TVV1 (3/12/01 to open)	OSS99 business rules for ordering provides information inconsistent with the system responses being generated.	Not included in Georgia Test --OSS99 not tested.
33	TVV3 (3/12/01 to open)	BST flow-through documentation is incomplete and inconsistent.	In scope of Georgia Test. See Georgia exception 41 (3/21/00 to 8/25/00).
34	PPR8 (3/13/01 to open)	BST does not have detailed and fully documented guidelines for Customer Support Manager interaction with CLECs.	Not included in Georgia Test.
39	TVV1 (3/29/01 to open)	A field required by the business rules for ordering loop/port combinations is not provided in LENSs.	Not included in Georgia Test --LENS not tested.
40	TVV1 (4/3/01 to open)	The LENSs interface does not appropriately implement the business rules for ordering ISDN UNE loops.	Not included in Georgia Test --LENS not tested.
41	TVV1 (4/3/01 to open)	BST does not consistently apply its USOC business rules to requests for UNE switched combinations.	Within scope of Georgia Test. See Georgia exception 18 (2/15/00 to 10/5/00).
42	TVV1 (4/4/01 to open)	The TAG interface does not accurately implement the End User information requirements contained in OSS99 business rules.	Not included in Georgia Test --OSS99 not tested.
45	TVV1 (4/12/01 to open)	BellSouth Business rules for Local Ordering – OSS99, Issue 9L, contains inconsistent and incomplete instructions necessary for CLECs to access and use BellSouth's systems.	Not included in Georgia Test --OSS99 not tested.
46	TVV1 (4/12/01 to open)	Neither TAG interface, nor the EDI interface, accurately applies the business rules for directory listings forms found in the BellSouth Business Rules for Local Ordering –OSS99, Issue 9L.	Not included in Georgia Test --OSS99 not tested
48	PPR-9	BellSouth does not have formal, documented processes for capacity management in the WMC, AFIG, CO_FWG, CWINS, and NISC work centers.	Not included in Georgia Test—No work center capacity management other than xDSL.

Billing

Obs. #	Test #	Description	Comments
34	TVV10 (2/6/01 to 3/21/01; escalated to exception)	BST improperly populates "ToNumber" Field in DUF files— 611 calls—reclassified as exception 29.	See exception 29 below.
35	TVV10 (2/6/01 to 3/21/01; escalated to exception)	BST improperly populates "ToNumber" Field in ADUF files— LD calls-- reclassified as exception 30.	See exception 30 below.
36	TVV10 (2/6/01 to 3/21/01; escalated to exception)	BST failed to deliver daily usage files (DUF) records for toll-free calls—reclassified as exception 31.	See exception 30 below.
42	TVV10 (2/21/01 to open)	BST failed to deliver Daily Usage File (DUF) records for a variety of completed calls.	Included in Georgia Test. See Georgia exception 28 (2/14/00 to 3/7/01).
50	TVV-10 (3/14/01 to 4/11/01; escalating to exception)	BST incorrectly billed for unbundled usage for various call types. (Now exception 44).	See exception 44 below.
51	TVV-10 (3/15/01 to 4/11/01; escalating to exception)	BST incorrectly billed for resale usage for various call types (Now exception 43).	See exception 43 below.

Except. #	Test #	Description	Comments
13	TVV-10 (2/27/01 to open)	BST failed to deliver at least 95% of DUF records within 6 calendar days.	Included in Georgia Test. See Georgia exception 29 (2/15/00 to 8/4/00).
29	TVV10 (3/12/01 to open)	BST has improperly populated "ToNumber" field in the usage records for 611 calls in the 407 area code-- formerly observation 34.	Included in Georgia Test, no exception issued, state specific issue.

30	TVV10 (3/12/01 to open)	BST has improperly populated "ToNumber" field in the usage records for certain long distance calls. Formerly observation 35.	Included in Georgia Test, no exception issued, state specific issue.
31	TVV10 (3/12/01 to open)	BST failed to deliver daily usage file records for toll free calls-- formerly observation 36.	Within scope of Georgia Test. See Georgia exception 28 (2/14/00 to 3/7/01).
37	PPR10 (3/22/01 to open)	BST's billing work center lacks a formal process for identifying and planning for variations in work load.	Not included in Georgia Test.
43	TVV11 (4/4/01 to open)	BST resale bills fail to reflect usage charges.	Within scope of Georgia Test. See Georgia exception 103 (7/27/00 to 3/23/01).
44	TVV11 (4/4/01 to open)	BST issued CABs bills which reflect incorrect quantities of switching and transport usage.	Included in Georgia Test, no exception issued.
47	TVV11 (4/12/01 to open)	KPMG CLEC bills do not reflect unbundled transport shared usage for calls made to points greater than 35 miles from the originating central office.	Included in Georgia Test, no exception issued.

Maintenance and Repair

Obs. #	Test #	Description	Comments
44	PPR-14 (3/6/01 to open)	BST does not meet the stated intervals and target objectives for maintenance for UNE Non-Designed (SL1) loops.	Appears to be included in Georgia Test. (M&R-10). No exception issued.
Except. #	Test #	Description	Comments
18	PPR-16 (3/12/01 to open)	BST network reliability center fails to provide proactive notification of network outages.	Not included in Georgia Test.
35	PPR14 (3/21/01 to open)	BST processes for responding to customer requests for earlier appointments differs between retail and wholesale centers, resulting in disparity of service.	Included in Georgia Test. (M&R-10). No exception issued.
38	TVV8 (3/27/01 to open)	BellSouth's ECTA system failed to process correctly following an outage and re-initialization.	Included in Georgia Test. (M&R-2). Potentially related to Georgia exception 20 (2/14/00 to 3/07/00).

Other Processes

Except. #	Date Issued	Description	Comments
4	PPR-2 (8/8/00 to open)	BST does not have documented procedures for interaction with CLECs during the account establishment and management process.	Not included in Georgia Test.
9	PPR-4 (11/14/00 to 4/5/01)	BST does not have documented procedures for CLEC training management practices and program administration.	Not included in Georgia Test.

This document is an update to the tables first provided in the June 7, 2000 Interim Status Report. The update identifies the CLECs that have participated in tests to this point.

- X indicates a CLEC volunteered for a test.
- ✓ indicates a CLEC participated in the test.

Test	PPR Tests (brief title)	AT&T	BlueStar	COVAD	Florida Digital	TTC	DeltaCom	MCI Worldcom	MTower	NewSouth	Rhodyns NetCom	Supra Telecom	TCCF	Z-level
PPR1	Change Management	X ✓				X ✓	X ✓	X ✓	X ✓	X		X ✓		
PPR2	Account Establishment & Management	X ✓							X ✓					X ✓
PPR3	OSS Interface Help Desk	X ✓							X ✓	X				X ✓
PPR4	CLEC Training	X ✓							X ✓					X
PPR5	OSS Interface Development (SEE NOTE 2)	X ✓	X	X ✓	✓	X ✓				X	X ✓	X ✓		X
PPR6	Collocation and Network Design	X ✓	x	X ✓	X ✓	X ✓		✓			X ✓	X ✓		
PPR7	POP Manual Order	X							X				X	
PPR8	POP Work Center/Help Desk	X	X						X				X	X
PPR9	Provisioning	X ✓	X	X ✓	X ✓	X ✓	X ✓	X ✓	X ✓		X ✓	✓	X ✓	
PPR10	Billing Work Center/Help Desk								X					
PPR11	Daily Usage Feed (DUF) Returns	X								X				
PPR12	Daily Usage Feed Production and Distribution	X ✓												
PPR13	Billing Production and Distribution													
PPR14	End-to-End Maintenance and Repair (M&R)	✓			X ✓				X ✓					
PPR15	M&R Work Center	X ✓			✓				✓					
PPR16	Network Surveillance	✓			✓				X ✓					

- NOTE 1: BlueStar was bought by COVAD.
- NOTE 2: Network One also participated in *PPR 5 Interface Development*.

- X indicates a CLEC volunteered for a test.
- ✓ indicates a CLEC participated in the test.

Test #	TVV Tests (brief title)	AT&T	BlueStar	COVAD	Florida Digital	ITC DeltaCom	MCI Worldcom	MPOWER	Newsouth	Rhythms NetCom	Supra Telecom	TCCF	Z-TEL
TVV1	POP Functional Evaluation	X	X										
TVV2	POP Volume Performance Tests (SEE NOTE 2)	X		X		X	X					X	
TVV3	Order "Flow Through"	X											
TVV4	Provisioning Verification and Validation	X ✓	X	X ✓	✓	X ✓	X ✓	✓		X ✓	✓	X ✓	
TVV5	M&R TAFI Functional Evaluation	X ✓						X ✓					
TVV6	M&R ECTA Functional Evaluation	X ✓						✓					
TVV7	M&R TAFI Performance Evaluation	X ✓					X	X ✓					
TVV8	M&R ECTA Performance Evaluation	✓					X	✓					
TVV9	M&R End-to-End Trouble Report Processing	X ✓					X	✓					
TVV10	Billing Functional Usage Evaluation												
TVV11	Functional Carrier Bill Evaluation	X					X						

- NOTE 1: BlueStar was bought by COVAD.
- NOTE 2: 59 CLECs have provided responses to a survey requesting volume forecast data.