

Exhibit JMB-16

Hearing Transcripts Georgia Third Party
Test Hearing May 8, 2001

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of: :
 :
Investigation into Development of :
Electronic Interfaces for BellSouth's: Docket No. 8354-U
OPERATIONAL SUPPORT SYSTEMS :
 :

Hearing Room 110
244 Washington Street
Atlanta, Georgia

Tuesday, May 8, 2001

The above-entitled matter came on for hearing
pursuant to Notice at 10:00 a.m.

BEFORE:

LAUREN MCDONALD, JR., Chairman
STAN WISE, Vice Chairman
ROBERT BAKER, Commissioner
ROBERT DURDEN, Commissioner
DAVID BURGESS, Commissioner

* * *

APPEARANCES:

On behalf of the Commission Staff:

DANIEL WALSH, Attorney
Assistant Attorney General
State Law Department
40 Capitol Square
Atlanta, Georgia 30334

On behalf of the Consumers' Utility Counsel:

KEALIN CULBREATH, Attorney
Consumers' Utility Counsel Division
Balcony Level, 2 MLK Jr. Drive
Atlanta, Georgia 30334

On behalf of AT&T Communications of the Southern States, Inc.:

SUZANNE OCKLEBERRY, Attorney
AT&T Communications of the Southern States, Inc.
1200 Peachtree Street, Suite 8100
Atlanta, Georgia 30309

-and-

THOMAS A. LEMMER, Attorney
TAMI LYN AZORSKY, Attorney
McKenna & Cuneo, L.L.P.
Washington, D.C. 20006-1108
Denver, Colorado 80202-1370

-and-

TIMOTHY G. BARBER, Attorney
Womble, Carlyle, Sandridge & Rice
3300 One First Union Center
301 South College Street
Charlotte, North Carolina 28202-6025

On behalf of BellSouth Telecommunications, Inc.:

BENNETT ROSS, Attorney
FRED MCCALLUM, Attorney
BellSouth Telecommunications, Inc.
125 Perimeter Center West, Room 376
Atlanta, Georgia 30346

APPEARANCES (Continued)

On behalf of Covad Communications Company:

CATHERINE F. BOONE, Attorney
Covad Communications Company
Suite 650, 10 Glenlake Parkway
Atlanta, Georgia 30328

On behalf of Sprint Communications Company, L.P.:

WILLIAM R. ATKINSON, Attorney
STEPHEN H. KUKTA, Attorney
Sprint Communications
3100 Cumberland Circle
Atlanta, Georgia 30339

On behalf of KPMG Consulting:

WILLIAM B. HILL, JR., Attorney
Paul, Hasting, Janofsky & Walker L.L.P.
600 Peachtree Street, Suite 2400
Atlanta, Georgia 30308-2222

I N D E X

<u>WITNESSES:</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RE-CROSS</u>
David Frey				
Mike Weeks				
By Mr. Barber	--	14	--	--
By Ms. Azorsky	--	51	--	--
By Mr. Ross	--	83	--	--
By Ms. Boone	--	86	--	--
By Mr. Atkinson	--	143	--	--
By Ms. Azorsky	--	159	--	--
By Mr. Lemmer	--	167	--	--
By Mr. Ross	--	179	--	--
By Ms. Boone	--	183	--	--
By Mr. Lemmer	--	185	--	--
By Mr. Lemmer	--	205	--	--
By Mr. Barber	--	208	--	--
By Mr. McCallum	--	230	--	--
By Ms. Boone	--	236	--	--
By Mr. Atkinson	--	238	--	--

<u>EXHIBITS:</u>	<u>FOR IDENTIFICATION</u>	<u>IN EVIDENCE</u>
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AT&T:

1 - October Flow-Through Verification	172	185
2 - October 2000 Flow-Through Verification	175	185

1 use, the ones they would have to rely on from BellSouth,
2 BellSouth set up an entirely separate system called RSIMMS,
3 isn't that right?

4 A (Witness Weeks) Well RSIMMS existed prior to the
5 notion of a volume test. It was actually used by BellSouth,
6 as I understand it, to do certain other testing of their
7 own, and the decision was made to execute the normal and
8 peak tests in the RSIMMS environment as opposed to the
9 Encore environment.

10 Q So when you say that, the normal and peak volume
11 tests were run in RSIMMS and not in the regular production
12 system, Encore?

13 A (Witness Weeks) That's a correct statement.

14 Q Can we agree that this will be called a test
15 system as opposed to a production system?

16 A (Witness Weeks) That's fine.

17 Q Who designed RSIMMS?

18 A (Witness Weeks) BellSouth -- I assume. BellSouth
19 or their contractors.

20 Q Do you know why BellSouth wanted the volume test
21 runs in RSIMMS instead of in Encore?

22 A (Witness Weeks) It was the representation
23 BellSouth made to us that they did not have the computing
24 capacity in the production environment to sustain the
25 workloads 18 months to two years hence.

Exhibit JMB-17

Interface Capacity and Outages

BellSouth's OSS Lack Capacity

Year-end CLEC 2001 Volume Forecast Used in Georgia Third Party Test

Pre-ordering forecast	11,800 transactions per hour
Ordering forecast	3,500 orders per hour

BellSouth's Stated In-Place System Capacity in August 2000

Pre-ordering	6,000 transactions per hour
Ordering	1,800 orders per hour

Shortfall Between Stated Capacity and Year-end 2001 Forecast

Pre-ordering	5,800 transactions per hour
Ordering	1,700 orders per hour

Conclusion

The In-Place August 2000 Systems Capacity Must Double to Meet Year-end 2001 Forecasts

BellSouth's Efforts to Expand the Capacity of its Systems are Increasing Their Instability

There have been more than 63 reported outages of the LENS interface this year, including more than 22 since April 1.

There have been more than 30 reported outages of the EDI interface this year, including more than 22 since April 1.

There have been more than 55 reported outages of the TAG interface this year, including more than 16 since April 1.

BellSouth Self-Reported Type I System Outages
as Posted on BS' Change Control Site

Month & Year	BS EDI System		BS LENS System		BS TAG System	
	# Outages	Duration Range	# Outages	Duration Range	TAG	Duration of Outages
Aug-00	1	62 hours	4	1 hour	7	40 min - 4.5 hours
Sep-00			2	50 min		
Oct-00	1	2 hours	16	30 min - 9 hours	5	40 min - 5.5 hours
Nov-00	1	3 days	15	30 min - 7 hours	4	1 hour - 7 hours
Dec-00			26	30 min - 11 hours	5	30 min - 1 hour
Jan-01			14	30 min - 5 days	8	10 min - 7 hours
Feb-01	3	12 - 18 hours	17	30 min - 7 hours	17	10 min - 5 hours
Mar-01	5	4 - 63 hours	15	30 min - 8 hours	13	20 min - 2.5 hours
Apr-01	5	30 min - 28 hours	10	30 min - 6 hours	11	1 min - 16 hours
May-01	16	30 min - 10 days	11	30 min - 22 hours	2	10 min - 1 hour
Jun-01	3	4 - 69 hours (LNP related)	14	10 min - 23 hour 3 min	8	19 min - 69 hours (LNP related)
OTAL for 11 Months	35		144		80	
See BS Type I Systems Outage URL: http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp_so.html						

Exhibit JMB-18

Carrier Notification Letter re LENS
Infrastructure Capacity Issue
January 11, 2001

BellSouth Interconnection Services

675 West Peachtree Street
Atlanta, Georgia 30375

**Carrier Notification
SN91082158**

Date: January 11, 2001

To: Competitive Local Exchange Carriers (CLECs)

Subject: CLECs – Local Exchange Navigation System (LENS) Infrastructure Capacity Issue during the week of December 4, 2000

This is to advise that during the week of December 4, 2000, the Local Exchange Navigation System (LENS) experienced an infrastructure capacity issue problem. This was attributed primarily to the sunset of the LENS Version 5.x Platform on December 1, 2000. Local Service Requests (LSRs) previously processed via the LENS Version 5.x Platform prior to December 1, 2000, are now processed via the current LENS Platform (LENS Version 7.1 Platform.) This created a server capacity issue for the Operations Support Systems (OSSs) since the LSRs were being rerouted to different servers.

With the continuous growth in the CLEC Community and to resolve the capacity issue problems with LENS, BellSouth authorized and installed a new Telecommunication Access Gateway (TAG) Security Server on December 7, 2000. The additional server capacity will allow the CLECs to experience improvements with the LENS Interface.

BellSouth is working diligently to continuously enhance its OSSs. Numerous upgrades and systems enhancements are scheduled throughout 2001 to optimize the CLEC experience. BellSouth apologizes for any inconvenience the recent problems may have caused your company.

If you have any questions please contact your BellSouth account team representative.

Sincerely,

ORIGINAL SIGNED BY JIM BRINKLEY

Jim Brinkley – Senior Director
BellSouth Interconnection Services

Exhibit JMB-19

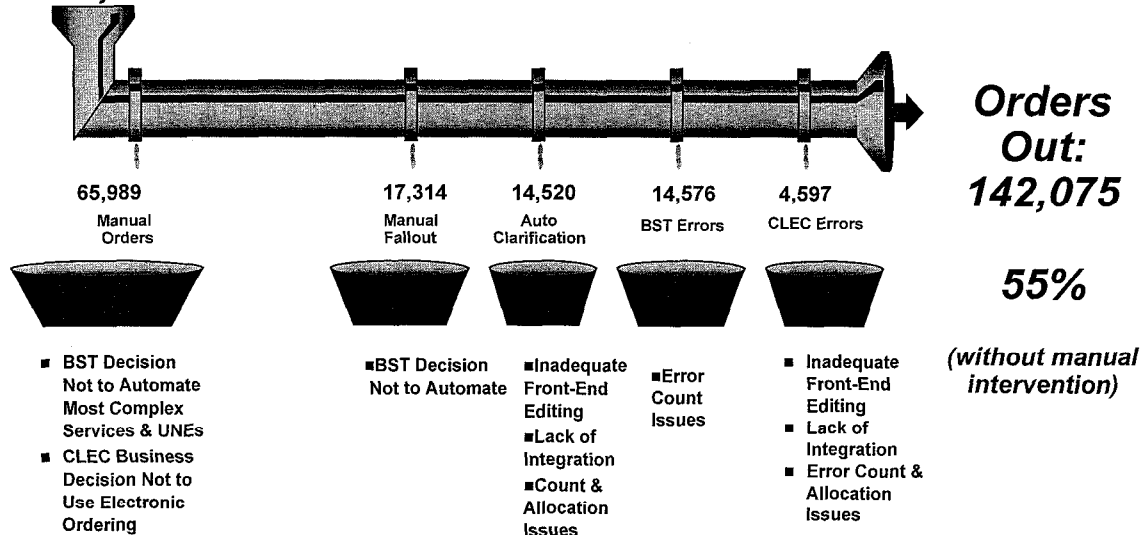
Comparison of Total CLEC LSR Processing
March 2000 and March 2001

BellSouth Flow-Through

CLEC Local Service Requests in March 2000

**LSRs In:
= 259,071**

Leaky Pipe Analysis

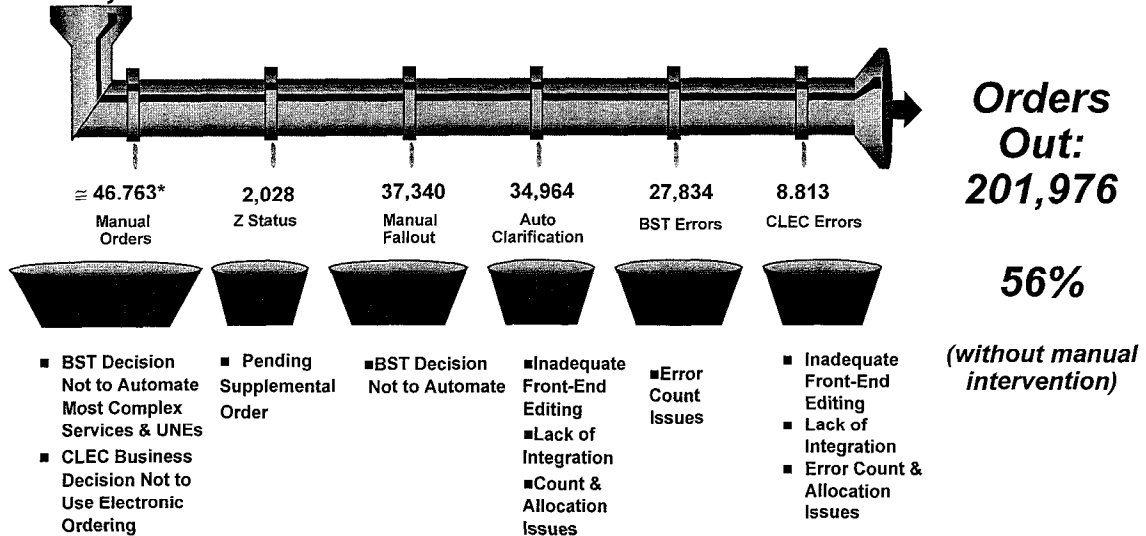


BellSouth Flow-Through

CLEC Local Service Requests in March 2001

LSRs In:
 $\approx 359,718$

Leaky Pipe Analysis



Sources – BellSouth Exhibit OSS-45 and monthly Flow-Through Reports filed with the Alabama PSC

* Estimated using the average ratio of electronic/total LSRs from October – December 2000

Exhibit JMB-20

Comparison of Mechanized CLEC LSR
Processing March 1999 and March 2001

Mechanized CLEC LSR Disposition

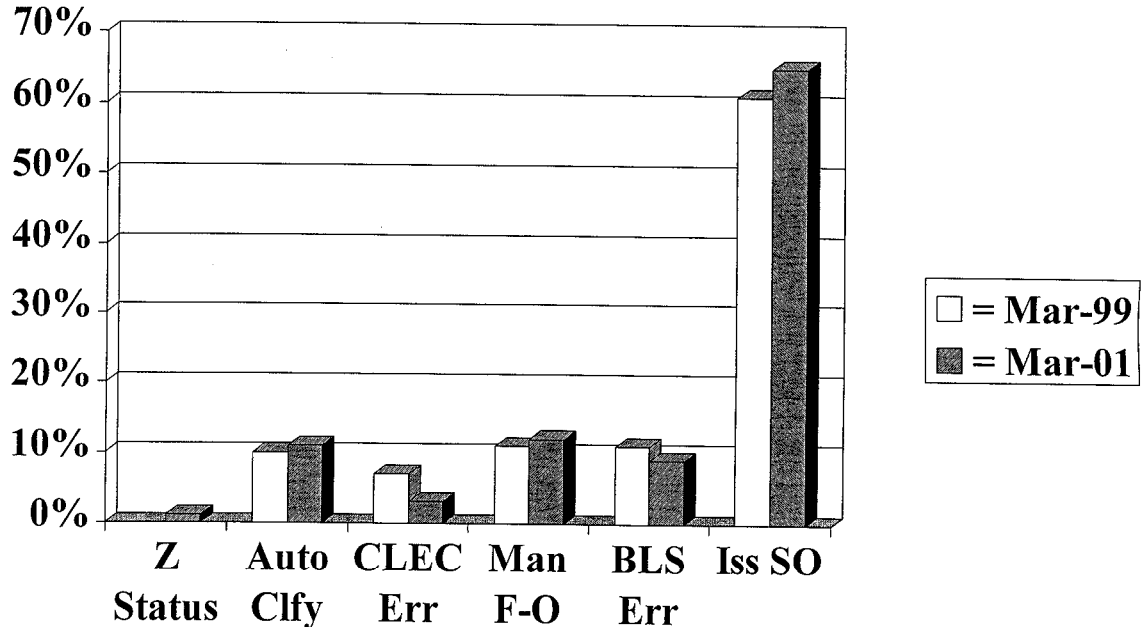


Exhibit JMB-21

FCC Staff Letter to BellSouth Dated
February 10, 1999



Federal Communications Commission
Washington, D.C. 20554

February 10, 1999

Mr. Sid Boren
Executive Staff Officer
BellSouth Corporation
1155 Peachtree St., N.E., Room 2004
Atlanta, GA 30309

Dear Mr. Boren:

On December 15, 1998, members of the Common Carrier Bureau Staff ("Bureau Staff") met with representatives of BellSouth to discuss interpretations of the Commission's October 13, 1998, BellSouth Louisiana II Order as it might be applied in other states in which section 271 applications might be filed.¹ A summary of the discussion is described below. The Bureau Staff indicated that additional information from BellSouth and interested parties would be useful in order for the Bureau Staff to engage in further discussion. The Bureau Staff also indicated that its views were based on information developed since the issuance of the BellSouth Louisiana II order. The Bureau Staff stated that its views on any of these issues were in no way binding on the Commission, and that no conclusive determination could be made outside the context of an actual Section 271 application and record.

1. Flow-Through.

Issue. Whether BellSouth can exclude complex orders from its flow-through calculations and what level of disaggregation of flow-through is necessary to demonstrate nondiscriminatory access.

Bureau Staff Response The Bureau Staff stated its view that, in principle, complex orders that are manually processed for BellSouth's retail customers could be excluded from flow-through calculations. The Bureau Staff also stated its view that, to the extent BellSouth excludes complex orders from its flow-through calculations, the following information should accompany a future Section 271 application: (1) a clear definition of complex orders for CLECs and BellSouth; (2) a demonstration of how BellSouth handles complex orders for its retail customers and CLRCs; (3) evidence that complex orders are processed in a nondiscriminatory manner (i.e., performance results and analysis).

¹ Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-region, IntraLATA Services in Louisiana, CC Docket No. 98-121, Memorandum Opinion and Order, FCC 98-271 (BellSouth Louisiana II 271 Order).

The Bureau Staff also stated its view that BellSouth could exclude from its flow-through calculation orders submitted by CLECs that contained CLEC-caused errors. The Bureau Staff stated its view that the flow-through calculation could be adjusted to exclude CLEC errors, if, in a future Section 271 application, BellSouth (1) defines more clearly what constitutes a CLEC error; and (2) verifies the cause of the errors as being CLEC errors (e.g., through an independent audit).

In response to questions about the appropriate level of disaggregation the Bureau Staff indicated its view that the proposed levels of disaggregation listed in the *QSS Model Rules NPRM*² were appropriate.

2. TAFI Integration

Issue: (1) Whether BellSouth must provide a machine-to-machine repair and maintenance interface in order to meet the nondiscrimination requirement. (2) Absent a machine-to-machine repair and maintenance interface, what evidence is necessary to demonstrate nondiscriminatory access.

Bureau Staff Response: The Bureau Staff stated its view that it did not believe that machine-to-machine repair and maintenance interface is *per se* required. The Bureau Staff noted that the Louisiana II Order found that a lack of machine-to-machine interface for repair and maintenance was not *per se* discriminatory. The Bureau Staff stated its view that, absent a machine-to-machine repair and maintenance interface, BellSouth must demonstrate that the interfaces offered to CLECs provide nondiscriminatory access. The Bureau Staff also stated that additional information was needed to assess the competitive impact that results from a lack of a machine-to-machine interface for repair and maintenance. In order to obtain such information, the Bureau Staff indicated that it would schedule additional meetings with interested parties.

The Bureau Staff stated its view that the following information would assist in evaluating in a future application whether BellSouth's repair and maintenance interface provide nondiscriminatory access: (1) a detailed description of the systems and functionality BellSouth utilizes itself for both designed and nondesigned services; (2) a detailed description of the systems and functionality BellSouth offers to competing carriers; (3) a discussion of what interface functionality competing carriers have requested through the change control process and the status of such request, if any; and (4) performance results for resold services and UNEs by interface type.

² See *Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance*, CC Docket No. 98-56, Notice of Proposed Rulemaking, 13 FCC Red 12817 (1998).

3. Retail Analogues/Performance Standards/Statistical Measurements.

Issue. Methods of evaluating whether BellSouth's OSS performance meets the nondiscrimination requirement.

Bureau Staff Response. The Bureau Staff asked BellSouth to propose a framework for evaluating whether it is providing nondiscriminatory access to OSS functions and suggested that BellSouth include the following criteria:

- Relevant performance measurements;
- Identification of retail analogues, including level of disaggregation;
- Identification of a benchmark or performance standard where no retail analogue exists (e.g., based on state approved intervals, engineering studies, or other standards);
- A statistical methodology which is used to compare actual performance results to retail analogues or benchmarks;
- A threshold for determining whether differences in performance are competitively significant and whether analysis of the underlying cause for the difference is needed;
- An open process for analyzing the underlying cause for differences of performance;
- Meaningful penalty amounts to prevent "backsliding."

The Bureau Staff also indicated that it would seek industry comment of any framework for evaluating OSS performance proposed by BellSouth.

4. Complex Ordering/Partial Migration Orders.

Issue. Whether partial migration and directory listing need to be ordered electronically.

Bureau Staff Response. The Bureau Staff stated its view that there is no retail analog for partial migration orders, and that electronic ordering capability is not required at this time. The Bureau Staff stated its view that BellSouth must demonstrate that the ordering process for complex/partial migration orders meets the nondiscrimination requirement (e.g., provides an efficient competitor a meaningful opportunity to compete). The Bureau Staff also stated its

Mr. Boren

4

view that BellSouth should continue upgrading its OSS ordering interface through the change control process.

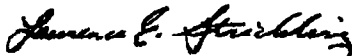
5. **Third-Party Testing - Demonstration of Operational Readiness.**

Issue. In cases where there is little or no commercial usage of an interface, whether BellSouth must engage in third-party testing at the level implemented by Bell Atlantic in New York.

Bureau Staff Response The Bureau Staff noted that, in its view, internal testing cannot overcome evidence from commercial usage demonstrating inferior service to CLECs. The Bureau Staff stated its view that, where there is no commercial usage or inconclusive commercial usage exists, some form of testing is necessary to demonstrate that the BOC's OSS is operationally ready. The Bureau Staff indicated its view that, while it could not conclude, in the absence of a factual record, whether some forms of internal testing or carrier to carrier testing could demonstrate operational readiness, a third party test would serve as a reasonable "safe harbor." The Bureau Staff noted as two examples of such tests underway in New York and Texas. The Bureau Staff stressed the importance, in its view, of a test plan that included input from interested parties and includes meaningful independent review (e.g., State Commission oversight).

For information purposes, a copy of this letter will be placed in all open section 271 dockets.

Sincerely,



Lawrence E. Strickling, Chief
Common Carrier Bureau
Federal Communications Commission

cc: Ms. Magalie Roman Salas
Secretary
Federal Communications Commission

Exhibit JMB-22

AT&T Ex Parte Letter to FCC
January 18, 1999



Robert W. Quinn, Jr.
Director - Federal Government Affairs

Suite 1000
1120 20th St., NW
Washington, DC 20036
202 457-3851
FAX 202 457-2545

February 18, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW, Room TWB-204
Washington, DC 20554

Re: Notice of Ex Parte meeting
Second Application of BellSouth Corporation, BellSouth Telecommunications,
Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA
Services in Louisiana, CC Docket No. 98-121

Dear Ms. Roman Salas:

On Wednesday, February 17, 1999, Jay Bradbury, David Eppsteiner, and I, of AT&T, Michael Hou of Community Network, and Karen Reidy and Bryan Greene of MCI, met with Claudia Fox, Jake Jennings, Andrea Kearney, and Claudia Pabo of the Common Carrier Bureau. At the request of Commission staff, the parties reviewed their position of record in this proceeding with an emphasis on the need for a nondiscriminatory machine-to-machine interface for maintenance and repair using the enclosed materials. In sum, we emphasized the dual entry issues (increased errors and cost) imposed with the lack of a machine-to-machine interface that were previously identified by the Commission as the reason machine-to-machine interfaces are required for pre-ordering/ordering functions.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

Sincerely,

Attachment

cc: Claudia Fox
Jake Jennings
Andrea Kearney
Claudia Pabo



Recycled Paper

RECEIVED
FEB 18 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Need For A Machine-to-
Machine Maintenance and Repair
Interface



The Competitive Impact

- If CLECs Hope to Compete With Incumbents, They Must Provide Better Customer Service and Lower Prices
 - All Customer Needs Must Addressed On Each Customer Contact
 - A CLEC Must Be Able To Efficiently Access All of An Individual Customer's Data On Every Call
 - Therefore, CLECs Must Be Able to Access Their Data As Well As ILEC Data

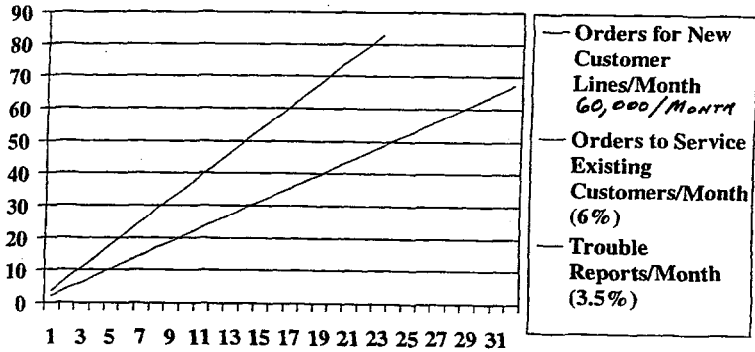
Why A Machine-to-Machine Repair Interface Is Necessary

- Billing Data
 - Recurring Repairs Require Customer Credits
- Existing Services
 - Must Be Able to Add/Change Services
 - Must Be Able to Adjust Existing Calling Plans
- CSR Data
 - Necessary to Keep Contact Information Up-to-Date

Why A Machine-to-Machine Repair Interface Is Necessary

- Maintenance and Repair Volumes Will Quickly Equal New Order Volumes
 - Approximately 4% Of Lines Are Treated Monthly
 - 20%-30% of “Non-Migration” Accounts Are Treated Initially
 - Within 2 1/2 Years, Most CLECs Will Be At 1/3 Maintenance and Repair Calls; 1/3 Change Order Calls; and 1/3 New Service Calls

Hypothetical CLEC Business Plan (7% Penetration of a 25M Line ILEC in 30 Months)



Why A Machine-to-Machine Repair Interface Is Necessary

- M & R Performance Information Is Essential
 - Real Time Access to Call Volume and Connect Time Data is Required for Efficient Staffing
 - CLEC Created Interval and Response Data Necessary to Ensure Parity
 - Without a CLEC's Own Database, CLECs are Left With Monthly RBOC Reports

Additional Cost Incurred Due to Dual Entry

- Lack of Machine-to-Machine Requires CLEC to Engage in Dual Entry
 - Dual Entry Must Occur While Customer Is On-Line for CLEC to Provide Efficient Customer Service Which Incumbent Representative Does Not
 - Dual Entry Is More Time Consuming And Results In More Mistakes, Requiring More Service Representatives

Exhibit JMB-23

Florida OSS Test Open Observations and
Exceptions Related to CLEC Support

**FLORIDA OSS TEST OPEN OBSERVATIONS AND EXCEPTIONS
RELATED TO CLEC SUPPORT**

Interface Development

Obs.	Test #	Description
53	PPR-5 (3/20/01 to open)	BST does not appear to have EDI interface documentation available re batch size transmission.
54	PPR-5 (3/20/01 to open)	BST does not appear to have some TAG documentation available.

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

FLORIDA OSS TEST OPEN OBSERVATIONS AND EXCEPTIONS RELATED TO CLEC SUPPORT

Pre-Order, Order, and Provisioning

Obs. #	Test #	Description
48	TVV-1 (3/8/01 to open)	Business rules do not offer instructions for submitting an order for DS1 with number portability.
56	TVV-1 (4/5/01 to open)	BST implemented business rule updates prior to the release of the business rules.
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.
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.
67	PPR 8&9 (5/15/01 to open)	The hours of operation for BellSouth's retail business offices and whole LCSC are not at parity.
79	TVV-1 (5/21 to open)	BellSouth Pre-order Business Rules Issue 11.0, does not define required fields for Loop Makeup Data on Working Loops Query (LMU-WL) and for Loop Makeup Data on Spare Facility Query (LMU_SF)

Except. #	Test #	Description
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.
32	TVV1 (3/12/01 to open)	OSS99 business rules for ordering provides information inconsistent with the system responses being generated.
33	TVV3 (3/12/01 to open)	BST flow-through documentation is incomplete and inconsistent.
40	TVV1 (4/3/01 to open)	The LENs interface does not appropriately implement the business rules for ordering ISDN UNE loops.
41	TVV1 (4/3/01 to open)	BST does not consistently apply its USOC business rules to requests for UNE switched combinations.
42	TVV1 (4/4/01 to open)	The TAG interface does not accurately implement the End User information requirements contained in OSS99 business rules.
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.

**FLORIDA OSS TEST OPEN OBSERVATIONS AND EXCEPTIONS
RELATED TO CLEC SUPPORT**

Except. #	Test #	Description
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.
48	PPR-9	BellSouth does not have formal, documented processes for capacity management in the WMC, AFIG, CO_FWG, CWINS, and NISC work centers.
50	TVV1 (4/24/01 to open)	The BellSouth Business Rules for Local Ordering-OSS 9 does not accurately define the method for successfully completing a Local Service Request for a Directly Listing (REQTYP J) with ACTN or ACT R.
55	TVV1 (5/10/01 to open)	Loop conversions via LENS interface are receiving errors that are inconsistent with BellSouth Business Rules for Local Ordering – OSS99
57	PPR-8 (5/18/01 to open))	BellSouth does not have detailed guidelines for CLEC interaction with the Complex Resale Support Group (CSRG) during the ordering process.
64	TVV1 (5/24/01 to open)	BellSouth Business Rules for Local Ordering – OSS99, Issue 9M, contains inconsistent instructions necessary for Competitive Local Exchange Carriers (CLECs) to access and use BellSouth's systems.

**FLORIDA OSS TEST OPEN OBSERVATIONS AND EXCEPTIONS
RELATED TO CLEC SUPPORT**

Maintenance and Repair

Obs. #	Test #	Description
62	PPR14 (4/24/01 to open)	KPMG found that with respect to the trouble reporting process, info about network outages or service impacting conditions is not provided to CLECs as it is to retail customers.
63	TVV9 (4/24/01 to open)	KPMG observed that the BSTcustomer whole interconnect network service (CWINS) center trouble receipt process restricts a CLEC from reporting more than 3 troubles on a single call
71	PPR15 (5/16/01 to open)	BellSouth has no documented procedures for help desk assistance at the CWINS centers for CLECs reporting troubles using TAFI.
75	PPR-14 5/18/01 to open)	KPMG Consulting observed areas in the Work Management Center (WMC) process that appear to lack safeguards that would ensure that wholesale service is afforded the same considerations and priorities as retail service.
78	TVV9 (5/21/01 to open)	KPMG Consulting observed that the BellSouth Customer Wholesale Interconnect Network Service (CWINS) Center does not always provide CLECs with an appointment or estimated time to repair when trouble reports are opened

Except. #	Test #	Description
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.

**FLORIDA OSS TEST OPEN OBSERVATIONS AND EXCEPTIONS
RELATED TO CLEC SUPPORT**

Other Processes

Observ. #	Test #	Description
66	PPR- 6 (5/14/01 to open)	BellSouth does not have a documented process to guide CLECs through completing CLEC Selective Routing Ordering Documents for Resale Flat Rate Line Class Codes.

Except. #	Test #	Description
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.
65	PPR-2 (5/31/01 to open)	The BellSouth Account Management Team does not have processes or documentation relating to CLEC Collocation.

Exhibit JMB-24

BellSouth Change Control Process
Compliance

BellSouth Change Control Process Compliance

1999 CLEC Change Request Disposition at Year End 2000

Submitted	Implemented	Cancelled	Pending	Scheduled
14	5	2	2	5 (Release 9.4, June 30, 2001)

In 1999 BellSouth officially recognized only 14 CLEC change requests. Many areas, including defects were outside the scope of the process. BellSouth submitted no change requests in 1999, however it implemented numerous changes to the interfaces. The two pending change requests (Customer Service Record parsing and an electronic process for correcting dropped 411 listings) were submitted on September 12, 1999, and have still not been implemented.

Year 2000 Change Request Disposition at Year End

	Submitted	Implemented	Cancelled	Pending	Scheduled	"New"	Defect
Total	243 (259)	85	69	32	15	25	17
BellSouth	99	45	20	15	6	4	9
CLECs	144 (160)	40	49	17	9	21	8

BellSouth's Change Request Logs do not reconcile. In this analysis 16 change requests not summarized in the logs are attributed to CLECs without further classification.

BellSouth Change Control Process Compliance

OLD "NEW" CHANGE REQUESTS

Change Request (Type - Status)	Request	Date Submitted	Status
ORD030200 001 (5 - N)	Ordering of UNEs on ASRs	3/1/00	Remains open at request of originators following denial and appeal
CR0012 (5 - N)	TAFI Functionality via ECTA	4/18/00	Remains open at request of originator following denial
CR0100 (4 - N)	DD calculation on deny/restore	7/7/00	Submitted as a defect, reclassified as a feature
CR0105 (5 - N)	RES ID requirement on xDSL orders	7/21/00	Conference calls being held with originator
CR0132 (5 - N)	Fielded Completion Notice	8/9/00	E-mails being exchanged
CR0166 (5 - N)	Cable ID Defect	9/20/00	Submitted as a defect, reclassified as a feature
CR0171 (5 - N)	CCP Document Changes	9/20/00	Version 2.1 published 2/9/01. Second ballot 3/1/00
CR0198 (5 - N)	Transaction size limit	10/11/00	Submitted as a defect, reclassified as a feature
CR0222 (5 - N)	Unknown USOCs	11/13/00	Awaiting BellSouth correction of CSR programming
CR0234 (5 - N)	Connect Direct fix	11/29/00	Awaiting BellSouth
CR0245 (5 - N)	Manual/Mech Flag	12/15/00	Appeal
CR0248 (5 - N)	Reqtype B for UNE-UNE Migration	12/15/00	Awaiting confirmation of claim that functionality exists.
CR0151 (5 - P)	Error Code Defect	9/1/00	Submitted as a defect, reclassified as a feature

BellSouth Change Control Process Compliance

CR0177 (5 – P)	"D" as a valid response	9/25/00	Denied, appealed, became pending 12/11/00
CR0184 (5 – P)	View CLEC CSRs	9/28/00	Legal issue
CR0049 (6 – PC)	TNs on LENS bulk orders (BLS)	5/19/00	Open to BellSouth originator
CR0079 (6 – N)	TAG requires INIT on ReqType A (BLS)	6/12/00	Rejected – open to BellSouth originator
CR0080 (6 – N)	LESOG failing loop/port orders (BLS)	6/13/00	Validated, then rejected – open to BellSouth originator
CR0098 (6 – N)	DD intervals (BLS)	7/5/00	Rejected – open to BellSouth originator
CR0099 (6 – N)	MA'd SO's being dropped (BLS)	7/5/00	Not a defect – open investigation as feature
CR0210 (6 – N)	LENS error LNA=G with OTN (CLEC)	11/1/00	Validated – to be corrected in future release
CR0213 (6 – N)	Directory errors (CLEC)	11/2/00	Partially rejected – open investigation
CR0227 (6 – V)	Auto clarify in error (BLS)	11/21/00	Validated – to be corrected in future release
CR0237 (6 – V)	DD calculation for ReqType M (BLS)	12/8/00	Validated – to be corrected in future release

BellSouth Change Control Process Compliance

BELLSOUTH-INITIATED "OUT OF PROCESS" CHANGE REQUESTS IMPLEMENTED

Change Request (Type - Status)	Request	Date Submitted	Status
CR0313 (4 - I)	Port/Loop DD interval change	2/12/01	Implemented on 2/25/01 as "expedited feature"
CR0279 (4 - I)	Additional LMU information	1/12/01	Implemented on 1/27/01
CR0247 (4 - I)	Reduce SL1 interval	12/15/00	Implemented 1/27/01
CR0226 (6 - I)	DD intervals (BLS)	11/20/00	Determined not to be a defect - implemented on 12/16 as "expedited feature"
CR0219 (4 - I)	Interval change for LNP loop	11/13/00	Implemented on 12/10/00
CR0216 (4 - I)	NP Order date for FOC	11/13/00	Implemented on 12/10/00
CR0203 (6 - I)	LESOG should allow manual handling instead of auto-clarify (BLS)	10/18/00	Determined not to be a defect - implemented on 11/18/00
CR0193 (4 - I)	TAG upgrade to UNIX 11.0	10/6/00	Implemented on 12/16/00
CR0191 (6 - I)	Suppress the premise visit indicator (BLS)	10/5/00	Determined to be a feature and was implemented on 10/9/00
CR0183 (4 - I)	TAG needs to display "TTRA"	9/28/00	Implemented on 1/6/01
CR0167 (6 - I)	Incorrect circuit number on FOC (BLS)	9/20/00	Determined to be a feature and was implemented on 10/14/00 and 10/21/00
CR0153 (2 - I)	Line Sharing	9/8/00	Implemented on 9/30/00
CR0116 (4 - I)	Premise visit indicator	7/28/00	Implemented on 9/30/00
CR0115 (4 - I)	Partial pre-order Query DDC	7/28/00	Implemented on 9/30/00

BellSouth Change Control Process Compliance

BellSouth's Change Control Process Lacks Required Attributes

FCC Guidance	Status
CLEC Participation	CLECs have input however BellSouth retains a veto power over all decisions.
Procedure Documentation for <ul style="list-style-type: none"> •Operational Changes •Technology Changes •Additional Functionality •Regulatory Mandates •Defect Correction 	CCP Document addresses each area however BellSouth's internal processes are being revised and will require revision of the CCP. BellSouth has not proactively provided CLECs with information on the changes to its internal processes or sought CLEC input for use in developing its new processes.
Prioritization and Stratification of Changes	The CCP contains an Outage Notification Process and 5 Change Request stratifications. CLEC prioritizations are overridden by BellSouth
Schedules for Notifications and Publication of Documentation	Currently in state of flux as BellSouth revises its internal processes. Intervals do not meet CLEC business needs. Confusion exists between "notification" and "documentation" schedule requirements.
A Testing Environment and Minimum 30 Day Test Window for New Releases	Does not exist in BellSouth. Development is underway for use with Release 9.4 scheduled for 6/30/01.
A Go/No Go Decision Process to Preclude Premature Implementation by the BOC	Process does not exist in BellSouth.
Versioning of Releases	Included in BellSouth process.
Memorialization of the Process, Including a Means by Which the Process can be Modified	The current CCP Document is Version 2.1.A. An update is expected on March 26. BellSouth retains and exercises veto power over CLEC consensus decisions to modify the process and implements modifications it desires unilaterally.
Dispute Resolution Process for CLECs, Specific to Change Management Disputes	The CCP Document contains a dispute resolution process however no regulatory body has adopted the document or established any specific processes to handle such disputes.
Followed Consistently Over Time	BellSouth regularly ignores CCP requirements.
Subject to Regulatory Oversight and Enforcement.	No regulatory authority in any BellSouth state has taken recognition of the CCP Document. The Georgia PSC Performance Plan contains penalties for late notifications and documentation but they cannot be executed as written.

Exhibit JMB-25

January 18, 2001 CLEC Test Environment
User Requirements Meeting Minutes

**CLEC Test Environment-User Requirements
MEETING MINUTES**

<small>MEETING TITLE</small>	<small>MEETING PREPARED BY</small>	<small>DATE PREPARED</small>
CLEC Test Environment – User Requirements (CR#ED1030300_001)	Cheryl Storey – Change Control Team	1-18-01

Participants/Attendees

<small>PARTICIPANT</small>	<small>COMPANY</small>	<small>PARTICIPANT</small>	<small>COMPANY</small>
Tammy Burkhart	First Choice Comm	Tyra Hush	WorldCom
Valerie Cottingham	BST - CCP	Joan Wilwerding	Birch Telecom
Cheryl Storey	BST - CCP	Bill Wahl	KPMG
Jay Bradbury	AT&T	Torrance Sanford	BST
Doree Rana	WorldCom	Michelle Woods	KPMG
Rich Bobak	AT&T		

Meeting Information History

<small>DATE</small>	<small>START TIME</small>	<small>END TIME</small>
1/18/01	1:00 PM EST	2:30 PM EST

Conf. Bridge

MEETING PURPOSE

- Provide status of project
- Review/discuss user requirements

CLEC Test Environment-User Requirements

MEETING MINUTES

MEETING MINUTES

Agenda Items	Discussion
1. Overview/Scope	Torry Sanford, Project Manager, stated that BellSouth has been working on incorporating CLEC concerns into the scope and User Requirements for the test bed effort. The scope of the project is to allow CLECs to test against BellSouth's internal applications.

CLEC Test Environment-User Requirements

MEETING MINUTES

Agenda Items	Discussion
<p>2. Review of User Requirements</p>	<p>Torry led the review of the User Requirements. Jay (AT&T) raised the question on Assumption 5.5 regarding why LENS was not included. The response provided was that LENS is a presentation layer developed by BST. LENS will be reproduced in the test environment for BellSouth internal use only. Joan (Birch Telecom) also requested that RobotAG be supported. SEE ACTION ITEM 1.</p> <p>Tyra (WorldCom) questioned if the testing period had been established. The response provided was that the test bed will support CLEC testing of a release 30 days prior to implementation into production and 60 days after production. The testing duration may vary for each CLEC depending upon what level of complexity needs to be tested.</p> <p>Jay (AT&T) questioned Assumption 5.8 – BellSouth will do connectivity testing with each CLEC/Vendor in this test bed at the beginning of the test window. Is the CLEC test bed the vehicle for the initial connectivity for a new CLEC/Vendor? SEE ACTION ITEM 2.</p> <p>Jay (AT&T) questioned Assumption 5.10 – hours of operation. The hours of operations in the User Requirements state 9AM to 5PM EST. In the Issues Log, No. 1031-12, it states 8AM to 5PM EST for test bed support. SEE ACTION ITEM 3.</p> <p>Tyra (WorldCom) questioned Assumption 5.11 regarding certification. Clarification was requested. SEE ACTION ITEM 4.</p> <p>Jay (AT&T) questioned Assumption 5.20 regarding LSRs that are designed to fallout will they route to the LCSC. The response provided was yes; LSRs that are designed to fallout will follow the normal process in the test environment.</p> <p>Jay (AT&T) questioned Assumption 5.21 regarding profiles. The assumption reads: "Normal service rep profile capability will be provided in the test environment. New profiles will need to be established as desired in this environment. Existing production profiles will not function in this environment." Clarification on this assumption was requested. SEE ACTION ITEM 5.</p> <p>Jay (AT&T) questioned Requirement #11 – define "New Solutions". The response provided was products/services (ex: XDSL) that route through another ordering system will be rejected by the processing systems and an error message returned to the CLEC. "New Solutions" refers to the new Telcordia architecture.</p>

January 18, 2001

CLEC Test Environment-User Requirements

MEETING MINUTES

Agenda Items	Discussion
3. Target Implementation Date	<p>The target implementation date for the CLEC Test Bed is the end of 1st quarter, 3/31/01. BellSouth plans to have tested with a CLEC by this date also.</p> <p>Tyra (WorldCom) requested a schedule/timeline. Torry advised BellSouth is currently in the process of developing a test plan, which will provide this information. The test plan should be available once the test bed is implemented. BellSouth will also be providing test accounts.</p>
4. Other Questions/Issues	<p>It was recommended that CLECs submit any questions/issues regarding the CLEC Test Bed through Change Control. SEE ACTION ITEM 6.</p>
5. New Action Items	<ol style="list-style-type: none"> <li data-bbox="467 386 900 428">1. Assumption 5.5 – Address the exclusion of I.FNS and RoboTAG being supported by the CLEC Test Bed. (BellSouth) <li data-bbox="467 428 900 484">2. Assumption 5.8 – Provide clarification on whether the CLEC Test Bed will be the vehicle for the initial connectivity for a new CLEC. (BellSouth) <li data-bbox="467 484 900 526">3. Assumption 5.10 – Address the reason for the change in hours from 8AM to 9AM for test bed support. (BellSouth) <li data-bbox="467 526 900 596">4. Assumption 5.11 – Provide clarification on what certification must be completed before use of the CLEC test bed. Also provide information on when BellSouth quality assurance testing is complete before moving to the test bed environment. (BellSouth) <li data-bbox="467 596 900 638">5. Assumption 5.21 – Provide clarification regarding the profiles. (BellSouth) <li data-bbox="467 638 900 680">6. CLEC community should submit any questions/issues regarding the CLEC Test bed to Change Control (CLEC Community)

Exhibit JMB-26

Defect Change Requests Associated with
Mechanized Loop Makeup Software
Changes



Change Request Form

Internal Reference # _____ (1) Date Change Request Submitted 01/31/01 (2) TYPE 5 (CLEC) TYPE 4 (BST) TYPE 3 (INDUSTRY) TYPE 2 (REGULATORY) (3) TYPE 6 (DEFECT) _____ (3A)Company Name BellSouth _____ (4)CCM Cheryl Storey _____ (5) Phone 205-321-2113 _____ (6)CCM Email Address Change.Control@bridge.bellsouth.com Fax 205-321-5160 _____ (8)

Alternate CCM _____ (9) Alt Phone # _____ (10)

Originator's Name Lianne Griffin _____ (11) Phone 404-927-7060 _____ (12)Title of Change Mechanized Loop Makeup Defect – New Fields not being Returned _____ (13)**Category** Add New Functionality Change Existing (14) Desired Due Date 3/30/01 (15)Originating CCM assessment of impact Major Minor None expected (16)Originating CCM assessment of priority Urgent High Medium Low (17)**Interfaces Impacted** (18)

<input checked="" type="checkbox"/> Pre-Ordering <input checked="" type="checkbox"/> LENS <input checked="" type="checkbox"/> TAG <input type="checkbox"/> CSOTS	<input type="checkbox"/> Ordering <input type="checkbox"/> EDI <input type="checkbox"/> LENS <input type="checkbox"/> TAG	<input type="checkbox"/> Maintenance <input type="checkbox"/> TAFI <input type="checkbox"/> EC-TA Local	<input type="checkbox"/> Manual
---	--	---	---------------------------------

Type Of Change - Check one or more, as applicable (19)

<input type="checkbox"/> Software	<input type="checkbox"/> Hardware	<input type="checkbox"/> Industry Standards	<input checked="" type="checkbox"/> Defect
<input type="checkbox"/> Product & Services	<input type="checkbox"/> New or Revised Edits	<input type="checkbox"/> Process	
<input type="checkbox"/> Documentation	<input type="checkbox"/> Regulatory	<input type="checkbox"/> Other	

Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20)

The new fields that are to be returned in the mechanized Loop Makeup Inquiry per ENC10533.0040, implemented in R9.0.1 on 1/27/01, returns the new data field tags shown below, but does not return associated data that resides in LFACS:

- RZ (Resistance Zone)
- CZ (Carrier Zone)
- RLA (Remote Terminal Location Address)
- TLM (Telemetry Indicators)
- RLC (Remote Term CLLI Code)
- LTS (Line Term Status)
- IFITL Information (Cable/pair name)
- ONU Type

Known dependencies (21)

_ LFACS R27.0 or later must be implemented in a production environment to enable this functionality.Additional Information Yes No (22)

List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable) _____



Change Request Form

This Section to be completed by BCCM only.

Change Request Log # CR0299 (23) Clarification Yes No (24)

Clarification Request Sent / / (25) Clarification Response Due / / (26)

Status V (27)

Change Request Review Date / / (28) Target Implementation Date (29)

Last Modified By (30) Date Modified (31)

Change Review Meeting Results (32)

Canceled Change Request Duplicate Training Clarification Not Received

Cancellation by BellSouth (33)

Cancellation Acknowledgment CLEC BST Date / / (34)

Request Appeal Yes No (35)

Appeal Considerations (36)

Agreed Release Date / / (37)

CMVC # (38)

DDTS# (39)



Change Request Form

This section to be completed by BellSouth – Internal Validation of Defect Change Request

Defect Validation Results: (40)

_LFACS 27.0 or higher must be implemented into production to return the new data. This has been confirmed as a defect and will be corrected as soon as possible. A tentative schedule has been developed. First office application is tentatively scheduled for 2/24/01, with a staggered implementation through 3/30/01. Specifics of the proposed implementation will be provided to the CLECs when plans are finalized.

Clarification Needed Yes No

Defect Feature Duplicate Training Issue Cancel

Defect/Feature Impacts Other CLECs? Yes No

Interfaces Impacted by defect/feature: EDI TAG LNP LENS
 TCIF 7 TCIF 9

Target Implementation Date: _____



Change Request Form

Internal Reference # _____ (1) Date Change Request Submitted 02/02/01 (2)

TYPE 5 (CLEC) TYPE 4 (BST) TYPE 3 (INDUSTRY) TYPE 2 (REGULATORY) (3)

TYPE 6 (DEFECT) _____ (3A)

Company Name BellSouth _____ (4)

CCM Cheryl Storey _____ (5) Phone 205-321-2113 _____ (6)

CCM Email Address Change.Control@bridge.bellsouth.com Fax 205-321-5160 _____ (8)

Alternate CCM _____ (9) Alt Phone # _____ (10)

Originator's Name Lianne Griffin _____ (11) Phone 404-927-7060 _____ (12)

Title of Change **Mech Loop Makeup Defect - SSC Indicator populated Incorrectly** (13)

Category Add New Functionality Change Existing (14) Desired Due Date ASAP (15)

Originating CCM assessment of impact Major Minor None expected (16)

Originating CCM assessment of priority Urgent High Medium Low (17)

Interfaces Impacted (18)			
<input checked="" type="checkbox"/> Pre-Ordering	<input type="checkbox"/> Ordering	<input type="checkbox"/> Maintenance	<input type="checkbox"/> Manual
<input checked="" type="checkbox"/> LENS	<input type="checkbox"/> EDI <input type="checkbox"/> LNP	<input type="checkbox"/> TAFI	
<input checked="" type="checkbox"/> TAG	<input type="checkbox"/> LENS	<input type="checkbox"/> EC-TA Local	
<input type="checkbox"/> CSOTS	<input type="checkbox"/> TAG		

Type Of Change - Check one or more, as applicable (19)			
<input type="checkbox"/> Software	<input type="checkbox"/> Hardware	<input type="checkbox"/> Industry Standards	<input checked="" type="checkbox"/> Defect
<input type="checkbox"/> Product & Services	<input type="checkbox"/> New or Revised Edits	<input type="checkbox"/> Process	
<input type="checkbox"/> Documentation	<input type="checkbox"/> Regulatory	<input type="checkbox"/> Other	

Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20)

When requesting Loop Makeup via LENS for working facilities, the SSC Indicator field is populated incorrectly. This is supposed to be returned per ENC7762.0021. I ran LMU in the GA Columbia Drive WC (LEAD=atingacd, LFACS=GCD), address 3517 Misty Valley Rd., Decatur, GA 30032. I requested LMU for working loop on the following numbers -
 404-286-4672 (physical) - shows SSC=P in LFACS and LEAD
 404-286-3040 (derived) - shows SSC=D in LFACS and LEAD
 Both show in the returned LMU Detail in LENS as SSC=P. 404-286-3040 should show SSC=D.

Known dependencies (21)

Additional Information Yes No (22)

Jointly Developed by the Change Control Sub-team comprised of BellSouth and CLEC Representatives



Change Request Form

List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable) _____

This Section to be completed by BCCM only.

Change Request Log # ___ CR0307 _____ (23) Clarification Yes No (24)

Clarification Request Sent ___/___/___ (25) Clarification Response Due ___/___/___ (26)

Status ___ S _____ (27)

Change Request Review Date ___/___/___ (28) Target Implementation Date _____ (29)

Last Modified By _____ (30) Date Modified _____ (31)

Change Review Meeting Results (32)

Canceled Change Request Duplicate Training Clarification Not Received

Cancellation by BellSouth (33) _____

Cancellation Acknowledgment CLEC _____ BST _____ Date ___/___/___ (34)

Request Appeal Yes No (35)

Appeal Considerations (36)

Agreed Release Date ___/___/___ (37)

CMVC # _____ (38)

DDTS# _____ (39)



Change Request Form

This section to be completed by BellSouth – Internal Validation of Defect Change Request

Defect Validation Results: (40)

2/2/01 – BellSouth has determined that this is a defect and affects both LENS and TAG users. This defect will be corrected in a software release (TBD).
Workaround: NONE.

04/12/01 – This correction is scheduled for an LFACS 27.0.0.2 release in the following schedule:

04/13 midnight Friday night, effective 4/16 – KY

04/27 midnight Friday night, effective 4/30 – AL, LA, MS, and TN

05/05 midnight Saturday night, effective 05/07 – ATL, Out State GA, NC, NFL, SC, SFL

Clarification Needed Yes No

Defect Feature Duplicate Training Issue Cancel

Defect/Feature Impacts Other CLECs? Yes No

Interfaces Impacted by defect/feature: EDI TAG LNP LENS

TCIF 7 TCIF 9

Target Implementation Date: _____ Staggered Schedule _____

Exhibit JMB-27

Florida OSS Test Exceptions Related to
CCP

Date: February 14, 2001

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the Documentation Review of the Change Management Process (PPR1).

Exception:

BellSouth does not adhere to the procedures for System Outages (Type 1) established in the BellSouth Change Control Process, version 2.0 (PPR1).

Background:

The BellSouth Change Control Process, version 2.0 includes the following process flow for Type 1 Changes (System Outages):¹

- If a System Outage is not resolved within 20 minutes, a notification will be sent to CLECs via email and posted to the BellSouth Interconnection Website within one hour.
- If a System Outage is not resolved, a status update will be posted on the BellSouth Interconnection Website every two to four hours until resolution.
- The final resolution notice is posted to the BellSouth Interconnection Website upon resolution of the System Outage.

Issue:

During the review of the BellSouth Change Management Activities, KPMG Consulting has found that BellSouth is not adhering to the System Outage procedures as established in the BellSouth Change Control Process, version 2.0. Specifically, BellSouth does not adhere to the following procedures:

1. Email notifications were not sent to CLECs involved in the Change Control Process when System Outages last longer than 20 minutes.²
2. Email notifications were not sent to CLECs involved in the Change Control Process within one hour of the outage.³

¹ BellSouth Change Control Process, v. 2.0, http://www.interconnection.bellsouth.com/inarkets/lec/ccp_live/docs/bccp/CCP8_23.pdf, August 23, 2000. Section 4.0, Pages 16-18.

² See Appendix A, Outages without email notice.

³ See Appendix B, Outages with email notice.

EXCEPTION 12
BellSouth OSS Testing Evaluation

3. Accurate updates were not posted to the website of the current status and final resolution of each outage.⁴

Impact:

Without proper notification of System Outages, CLECs may not be aware of the potential problems that may arise from the outage. CLECs may be unable to assess and resolve the situation resulting in potentially increased costs, decreased revenue and/or reduced customer service.

Appendix A

Outages without email notice

The following outages were reported by the BellSouth Interconnection website and KPMG Consulting, in their role as a pseudo CLEC, did not receive email notification of the outage as described in the Change Control Process, Table 4-2, Step 2, page 16. These 81 cases represent 61 % of the outages that occurred between 05/15/2000 and 01/18/2001.

Item #	Type	Date	Outage #	Item #	Type	Date	Outage #
1	CSOTS	01/03/2000	1493	42	LENS	10/14/2000	1298
2	CSOTS	06/15/2000	NA	43	LENS	10/13/2000	1297
3	EDI	10/10/2000	3233	44	LENS	10/12/2000	1295
4	EDI	08/11/2000	NA	45	LENS	10/04/2000	1284
5	LENS	01/08/2001	1499	46	LENS	09/12/2000	1257
6	LENS	12/26/2000	1476	47	LENS	09/07/2000	1250
7	LENS	12/22/2000	1474	48	LENS	08/24/2000	1232
8	LENS	12/22/2000	1473	49	LENS	08/22/2000	1227
9	LENS	12/19/2000	1465	50	LENS	08/14/2000	1220
10	LENS	12/18/2000	1460	51	LENS	07/27/2000	1196
11	LENS	12/18/2000	1457	52	LENS	07/19/2000	1193
12	LENS	12/15/2000	1454	53	LENS	07/19/2000	1192
13	LENS	12/14/2000	1446	54	LENS	07/10/2000	1184
14	LENS	12/13/2000	1443	55	LENS	06/16/2000	1155
15	LENS	12/12/2000	1440	56	LENS	06/07/2000	1133
16	LENS	12/11/2000	1439	57	LENS	06/06/2000	1130
17	LENS	12/08/2000	1422	58	LENS	05/23/2000	1114
18	LENS	12/07/2000	1417	59	LENS	05/19/2000	1106
19	LENS	12/07/2000	1415	60	LENS	05/17/2000	1100
20	LENS	12/07/2000	1412	61	LENS	05/17/2000	1098

⁴ See Appendix I, Outages without accurate status.

EXCEPTION 12
BellSouth OSS Testing Evaluation

21	LENS	12/04/2000	1400	62	LENS	05/15/2000	1094
22	LENS	11/28/2000	1389	63	TAG	01/05/2001	1498
23	LENS	11/15/2000	1375	64	TAG	01/03/2001	1495
24	LENS	11/14/2000	1372	65	TAG	12/07/2000	1414
25	LENS	11/13/2000	1369	66	TAG	12/01/2000	1397
26	LENS	11/12/2000	1367	67	TAG	11/17/2000	1380
27	LENS	11/11/2000	1366	68	TAG	11/05/2000	1352
28	LENS	11/09/2000	162	69	TAG	10/25/2000	1318
29	LENS	11/08/2000	1359	70	TAG	10/22/2000	1313
30	LENS	11/06/2000	1355	71	TAG	10/19/2000	1304
31	LENS	11/04/2000	1351	72	TAG	10/18/2000	1301
32	LENS	11/03/2000	1350	73	TAG	10/11/2000	1293
33	LENS	11/02/2000	1346	74	TAG	08/25/2000	1235
34	LENS	11/01/2000	1342	75	TAG	08/22/2000	1228
35	LENS	10/29/2000	1331	76	TAG	07/28/2000	1201
36	LENS	10/27/2000	1326	77	TAG	05/31/2000	1122
37	LENS	10/25/2000	1320	78	TAG	05/25/2000	1118
38	LENS	10/24/2000	1315	79	TAG	05/25/2000	1117
39	LENS	10/23/2000	1311	80	TAG	05/19/2000	1105
40	LENS	10/22/2000	1310	81	TAG	05/15/2000	1094
41	LENS	10/18/2000	1302				

EXCEPTION 12
 BellSouth OSS Testing Evaluation

Appendix B

Outages with email notice

The following outages were reported by the BellSouth Interconnection website and KPMG Consulting, in their role as a pseudo CLEC, received an email notification of the Outage. These 15 cases represent 11 % of the outages that occurred between 05/15/2000 and 01/18/2001. In each case the 1 hour notification interval was not met as described in the Change Control Process, Table 4-2, Step 2, page 16.

Item #	Type	Date	Outage #	Time of Outage	Time of Notification	Elapsed Time
1	CSOTS	09/21/2000	1273	14:00	15:11	1:11
2	LENS	12/05/2000	1406	9:36	11:35	1:59
3	LENS	11/02/2000	1344	9:45	11:44	1:59
4	LENS	11/02/2000	1345	11:42	13:43	2:01
5	LENS	10/23/2000	1311	8:00	9:38	1:38
6	LENS	10/10/2000	1306	12:17	14:21	2:04
7	LENS	10/02/2000	1282	14:15	16:20	2:05
8	LENS	07/28/2000	1202	13:35	17:15	3:40
9	LENS	07/28/2000	1204	14:50	17:15	2:25
10	LENS	07/10/2000	1184	8:45	9:57	1:15
11	TAG	11/07/2000	1358	13:50	14:51	1:01
12	TAG	08/29/2000	1237	9:05	10:06	1:01
13	TAG	08/23/2000	1229	9:00	11:57	2:57
14	TAG	08/23/2000	1230	11:10	12:31	1:21
15	TAG	08/01/2000	1208	21:00	8/2/00 at 10:33	13:33

EXCEPTION 12
BellSouth OSS Testing Evaluation

Appendix C

Outages posted without accurate status

The following outages were reported by the BellSouth Interconnection Website but were not accurately updated. These 11 cases represent 8% of the outages that occurred between 05/15/2000 and 01/18/2001. In each case, the outage did not have a Final Resolution Notification posted on the Website as described in the Change Control Process, Table 4-2, Step 5, page 17-18.

Item #	Type	Date	Outage #	Description
1	CSOTS	09/21/2000	1273	Final Resolution Notification not posted on Website
2	CSOTS	06/15/2000	NA	Final Resolution Notification not posted on Website
3	LENS	12/18/2000	1460	Final Resolution Notification not posted on Website
4	LENS	12/15/2000	1454	Final Resolution Notification not posted on Website
5	LENS	12/12/2000	1440	Final Resolution Notification not posted on Website
6	LENS	09/07/2000	1250	Final Resolution Notification not posted on Website
7	LENS	08/24/2000	1232	Final Resolution Notification not posted on Website
8	LENS	08/22/2000	1227	Final Resolution Notification not posted on Website
9	LENS	07/19/2000	1193	Final Resolution Notification not posted on Website
10	LENS	06/22/2000	1162	Final Resolution Notification not posted on Website
11	TAG	11/28/2000	1389	Final Resolution Notification not posted on Website

FLORIDA OSS BELL SOUTH'S RESPONSE TO EXCEPTION 12



Date: February 22, 2001
Exception # 12

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the Documentation Review of the Change Management Process (PPR1).

Exception:

BellSouth does not adhere to the procedures for System Outages (Type 1) established in the BellSouth Change Control Process, version 2.0 (PPR1).

Background:

The BellSouth Change Control Process, version 2.0 includes the following process flow for Type 1 Changes (System Outages):¹

- If a System Outage is not resolved within 20 minutes, a notification will be sent to CLECs via email and posted to the BellSouth Interconnection Website within one hour.
- If a System Outage is not resolved, a status update will be posted on the BellSouth Interconnection Website every two to four hours until resolution.
- The final resolution notice is posted to the BellSouth Interconnection Website upon resolution of the System Outage.

Issue:

During the review of the BellSouth Change Management Activities, KPMG Consulting has found that BellSouth is not adhering to the System Outage procedures as established in the BellSouth Change Control Process, version 2.0. Specifically, BellSouth does not adhere to the following procedures:

1. Email notifications were not sent to CLECs involved in the Change Control Process when System Outages last longer than 20 minutes.²
2. Email notifications were not sent to CLECs involved in the Change Control Process within one hour of the outage.³

¹ BellSouth Change Control Process, v. 2.0, http://www.interconnection.bellsouth.com/markets/lec/ccp_live/docs/bccp/CCPR_23.pdf, August 23, 2000, Section 4.0, Pages 16-18.

² See Appendix A, Outages without email notice.

³ See Appendix B, Outages with email notice.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 12

3. Accurate updates were not posted to the website of the current status and final resolution of each outage.⁴

Impact:

Without proper notification of System Outages, CLECs may not be aware of the potential problems that may arise from the outage. CLECs may be unable to assess and resolve the situation resulting in potentially increased costs, decreased revenue and/or reduced customer service.

Appendix A

Outages without email notice

The following outages were reported by the BellSouth Interconnection website and KPMG Consulting, in their role as a pseudo CLEC, did not receive email notification of the outage as described in the Change Control Process, Table 4-2, Step 2, page 16. These 81 cases represent 61 % of the outages that occurred between 05/15/2000 and 01/18/2001.

Item #	Type	Date	Outage #	Item #	Type	Date	Outage #
1	CSOTS	01/03/2000	1493	42	LENS	10/14/2000	1298
2	CSOTS	06/15/2000	NA	43	LENS	10/13/2000	1297
3	EDI	10/10/2000	3233	44	LENS	10/12/2000	1295
4	EDI	08/11/2000	NA	45	LENS	10/04/2000	1284
5	LENS	01/08/2001	1499	46	LENS	09/12/2000	1257
6	LENS	12/26/2000	1476	47	LENS	09/07/2000	1250
7	LENS	12/22/2000	1474	48	LENS	08/24/2000	1232
8	LENS	12/22/2000	1473	49	LENS	08/22/2000	1227
9	LENS	12/19/2000	1465	50	LENS	08/14/2000	1220
10	LENS	12/18/2000	1460	51	LENS	07/27/2000	1196
11	LENS	12/18/2000	1457	52	LENS	07/19/2000	1193
12	LENS	12/15/2000	1454	53	LENS	07/19/2000	1192
13	LENS	12/14/2000	1446	54	LENS	07/10/2000	1184
14	LENS	12/13/2000	1443	55	LENS	06/16/2000	1155
15	LENS	12/12/2000	1440	56	LENS	06/07/2000	1133
16	LENS	12/11/2000	1439	57	LENS	06/06/2000	1130
17	LENS	12/08/2000	1422	58	LENS	05/23/2000	1114
18	LENS	12/07/2000	1417	59	LENS	05/19/2000	1106
19	LENS	12/07/2000	1415	60	LENS	05/17/2000	1100
20	LENS	12/07/2000	1412	61	LENS	05/17/2000	1098

⁴ See Appendix 1, Outages without accurate status.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 12

21	LENS	12/04/2000	1400	62	LENS	05/15/2000	1094
22	LENS	11/28/2000	1389	63	TAG	01/05/2001	1498
23	LENS	11/15/2000	1375	64	TAG	01/03/2001	1495
24	LENS	11/14/2000	1372	65	TAG	12/07/2000	1414
25	LENS	11/13/2000	1369	66	TAG	12/01/2000	1397
26	LENS	11/12/2000	1367	67	TAG	11/17/2000	1380
27	LENS	11/11/2000	1366	68	TAG	11/05/2000	1352
28	LENS	11/09/2000	162	69	TAG	10/25/2000	1318
29	LENS	11/08/2000	1359	70	TAG	10/22/2000	1313
30	LENS	11/06/2000	1355	71	TAG	10/19/2000	1304
31	LENS	11/04/2000	1351	72	TAG	10/18/2000	1301
32	LENS	11/03/2000	1350	73	TAG	10/11/2000	1293
33	LENS	11/02/2000	1346	74	TAG	08/25/2000	1235
34	LENS	11/01/2000	1342	75	TAG	08/22/2000	1228
35	LENS	10/29/2000	1331	76	TAG	07/28/2000	1201
36	LENS	10/27/2000	1326	77	TAG	05/31/2000	1122
37	LENS	10/25/2000	1320	78	TAG	05/25/2000	1118
38	LENS	10/24/2000	1315	79	TAG	05/25/2000	1117
39	LENS	10/23/2000	1311	80	TAG	05/19/2000	1105
40	LENS	10/22/2000	1310	81	TAG	05/15/2000	1094
41	LENS	10/18/2000	1302				

Appendix B

Outages with email notice

The following outages were reported by the BellSouth Interconnection website and KPMG Consulting, in their role as a pseudo CLEC, received an email notification of the Outage. These 15 cases represent 11 % of the outages that occurred between 05/15/2000 and 01/18/2001. In each case the 1 hour notification interval was not met as described in the Change Control Process, Table 4-2, Step 2, page 16.

Item #	Type	Date	Outage #	Time of Outage	Time of Notification	Elapsed Time
1	CSOTS	09/21/2000	1273	14:00	15:11	1:11
2	LENS	12/05/2000	1406	9:36	11:35	1:59
3	LENS	11/02/2000	1344	9:45	11:44	1:59
4	LENS	11/02/2000	1345	11:42	13:43	2:01
5	LENS	10/23/2000	1311	8:00	9:38	1:38

FLORIDA OSS BELL SOUTH'S RESPONSE TO EXCEPTION 12

6	LENS	10/10/2000	1306	12:17	14:21	2:04
7	LENS	10/02/2000	1282	14:15	16:20	2:05
8	LENS	07/28/2000	1202	13:35	17:15	3:40
9	LENS	07/28/2000	1204	14:50	17:15	2:25
10	LENS	07/10/2000	1184	8:45	9:57	1:15
11	TAG	11/07/2000	1358	13:50	14:51	1:01
12	TAG	08/29/2000	1237	9:05	10:06	1:01
13	TAG	08/23/2000	1229	9:00	11:57	2:57
14	TAG	08/23/2000	1230	11:10	12:31	1:21
15	TAG	08/01/2000	1208	21:00	8/2/00 at 10:33	13:33

Appendix C

Outages posted without accurate status

The following outages were reported by the BellSouth Interconnection Website but were not accurately updated. These 11 cases represent 8% of the outages that occurred between 05/15/2000 and 01/18/2001. In each case, the outage did not have a Final Resolution Notification posted on the Website as described in the Change Control Process, Table 4-2, Step 5, page 17-18.

Item #	Type	Date	Outage #	Description
1	CSOTS	09/21/2000	1273	Final Resolution Notification not posted on Website
2	CSOTS	06/15/2000	NA	Final Resolution Notification not posted on Website
3	LENS	12/18/2000	1460	Final Resolution Notification not posted on Website
4	LENS	12/15/2000	1454	Final Resolution Notification not posted on Website
5	LENS	12/12/2000	1440	Final Resolution Notification not posted on Website

FLORIDA OSS BELLSouth'S RESPONSE TO EXCEPTION 12

6	LENS	09/07/2000	1250	Final Resolution Notification not posted on Website
7	LENS	08/24/2000	1232	Final Resolution Notification not posted on Website
8	LENS	08/22/2000	1227	Final Resolution Notification not posted on Website
9	LENS	07/19/2000	1193	Final Resolution Notification not posted on Website
10	LENS	06/22/2000	1162	Final Resolution Notification not posted on Website
11	TAG	11/28/2000	1389	Final Resolution Notification not posted on Website

BellSouth's Response

Issue 1: Email notifications were not sent to CLECs involved in the Change Control Process when System Outages last longer than 20 minutes.

Response:

BellSouth acknowledges there may be times the e-mails were not sent out successfully. This is due to 2 factors:

- 1) Error messages coming back to the originating group advising there was a problem with delivery. These error messages usually come well after the fact, when the outage is over. The group decided against trying to resend, since the purpose of the e-mail is to notify the recipients an outage has occurred. BellSouth will resend any emails returned.
- 2) Human error in not sending some e-mails, which has been corrected.

Corrective Action: See Overall Summary below.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 12

Issue 2: Email notifications were not sent to CLECs involved in the Change Control Process within 1 hour of the outage.

Response:

BellSouth agrees that some of the e-mails were not sent within 1 hour of the outage. Others appear to have been sent within 1 hour of the outage. See table below for data according to BellSouth's records. Times are Central Standard Time.

Item	Outage #	Time of Outage	Time Email Sent	Comments
1	1273			BellSouth can't locate email records
2	1406	8:36 AM	9:40 AM	Not sent within 1 hour
3	1344	8:45 AM	9:12 AM	Sent within 1 hour
4	1345	10:42 AM	11:38 AM	Sent within 1 hour
5	1311	7:00 AM	7:30 AM	Sent within 1 hour
6	1306			BellSouth can't locate email records
7	1282	1:15 PM	2:22 PM	Not sent within 1 hour
8	1202	12:35 PM	3:23 PM	Not sent within 1 hour
9	1204	1:50 PM	3:23 PM	Not sent within 1 hour
10	1184	7:45 AM	7:53 AM	Sent within 1 hour
11	1358	12:50 PM	1:41 PM	Sent within 1 hour
12	1237	8:05 AM	8:06 AM	Sent within 1 hour
13	1229			BellSouth can't locate email records
14	1230	10:10 AM	10:31 AM	Sent within 1 hour
15	1208	9:00 PM	9:00 AM	Not sent within 1 hour

Corrective Action: See Overall Summary at the below.

Issue 3: Accurate updates were not posted to the website of the current status and final resolution of each outage.

Response:

BellSouth agrees with findings on 9 of the 11 items in Appendix C. There are 2 items where BellSouth disagrees:

Item 3 – Outage # 1460. The Web posting did include final resolution. The exact text as it appears on the internet is:

Outage # 1460. Problem began at 10:15 AM CDT. Users are receiving "Nav 4055 Sync Contract Failure" error messages. Problem resolved at 11:45 AM CDT. Outage caused by communication problems with backend systems.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 12

Item 5 – Outage # 1440. The final resolution was stated, but the time the problem cleared was not indicated. However, if the CLEC reads what was posted and sees that the problem has been cleared, they know the system is available for use. As soon as they see the following text, they know they can immediately log in and use system. The exact text as it appears on the internet is:

Outage # 1440. Outage began at 3:45 p.m. CDT. Users receiving 'Backend resource limitation error TGW0102COM'. TAG was bounced to correct the problem.

Corrective Action: See Overall Summary at the below.

Overall Summary:

BellSouth agrees with some of the findings as described above. BellSouth has implemented the following items to ensure our compliance with the Web Posting and E-mail notification.

1. All administrative responsibilities associated with this process have been placed with one member of EC Support. This individual and a back-up resource have been trained on this process.
2. Identifying a template of what the Web Posting and E-mail items should contain and providing this to all members of EC Support, particularly the Administrator with overall responsibility for Web Posting will be complete by 3/1/01.
3. The Administrator with primary responsibility for Web Posting and E-mail notification will positively report to Manager of EC Support on a daily basis that all postings and E-mails were sent as described in the procedure.
4. Each e-mail delivery error will be investigated and an attempt to resend the e-mail will be made, regardless of whether or not the outage has already cleared. Text will be added to the resent E-mail identifying it as a resend.

FLORIDA OSS BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 12



Exception 12

April 3, 2001

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the Documentation Review of the Change Management Process (PPR1).

Exception:

BellSouth does not adhere to the procedures for System Outages (Type 1) established in the BellSouth Change Control Process, version 2.0 (PPR1).

Background:

The BellSouth Change Control Process, version 2.0 includes the following process flow for Type 1 Changes (System Outages):¹

- If a System Outage is not resolved within 20 minutes, a notification will be sent to CLECs via email and posted to the BellSouth Interconnection Website within one hour.
- If a System Outage is not resolved, a status update will be posted on the BellSouth Interconnection Website every two to four hours until resolution.
- The final resolution notice is posted to the BellSouth Interconnection Website upon resolution of the System Outage.

Issue:

During the review of the BellSouth Change Management Activities, KPMG Consulting has found that BellSouth is not adhering to the System Outage procedures as established in the BellSouth Change Control Process, version 2.0. Specifically, BellSouth does not adhere to the following procedures:

1. Email notifications were not sent to CLECs involved in the Change Control Process when System Outages last longer than 20 minutes.²
2. Email notifications were not sent to CLECs involved in the Change Control Process within one hour of the outage.³
3. Accurate updates were not posted to the website of the current status and final resolution of each outage.⁴

¹ BellSouth Change Control Process, v. 2.0, http://www.interconnection.bellsouth.com/markets/lec/ccp_live/docs/bccp/CCP8_23.pdf, August 23, 2000, Section 4.0, Pages 16-18.

² See Appendix A, Outages without email notice.

³ See Appendix B, Outages with email notice.

FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO EXCEPTION 12

Impact:

Without proper notification of System Outages, CLECs may not be aware of the potential problems that may arise from the outage. CLECs may be unable to assess and resolve the situation resulting in potentially increased costs, decreased revenue and/or reduced customer service.

Appendix A

Outages Without E-mail Notice

The following outages were reported by the BellSouth Interconnection website and KPMG Consulting, in their role as a pseudo CLEC, did not receive email notification of the outage as described in the Change Control Process, Table 4-2, Step 2, page 16. These 81 cases represent 61 % of the outages that occurred between 05/15/2000 and 01/18/2001.

Item #	Type	Date	Outage #	Item #	Type	Date	Outage #
1	CSOTS	01/03/2000	1493	42	LENS	10/14/2000	1298
2	CSOTS	06/15/2000	NA	43	LENS	10/13/2000	1297
3	EDI	10/10/2000	3233	44	LENS	10/12/2000	1295
4	EDI	08/11/2000	NA	45	LENS	10/04/2000	1284
5	LENS	01/08/2001	1499	46	LENS	09/12/2000	1257
6	LENS	12/26/2000	1476	47	LENS	09/07/2000	1250
7	LENS	12/22/2000	1474	48	LENS	08/24/2000	1232
8	LENS	12/22/2000	1473	49	LENS	08/22/2000	1227
9	LENS	12/19/2000	1465	50	LENS	08/14/2000	1220
10	LENS	12/18/2000	1460	51	LENS	07/27/2000	1196
11	LENS	12/18/2000	1457	52	LENS	07/19/2000	1193
12	LENS	12/15/2000	1454	53	LENS	07/19/2000	1192
13	LENS	12/14/2000	1446	54	LENS	07/10/2000	1184
14	LENS	12/13/2000	1443	55	LENS	06/16/2000	1155
15	LENS	12/12/2000	1440	56	LENS	06/07/2000	1133
16	LENS	12/11/2000	1439	57	LENS	06/06/2000	1130
17	LENS	12/08/2000	1422	58	LENS	05/23/2000	1114
18	LENS	12/07/2000	1417	59	LENS	05/19/2000	1106
19	LENS	12/07/2000	1415	60	LENS	05/17/2000	1100
20	LENS	12/07/2000	1412	61	LENS	05/17/2000	1098
21	LENS	12/04/2000	1400	62	LENS	05/15/2000	1094
22	LENS	11/28/2000	1389	63	TAG	01/05/2001	1498
23	LENS	11/15/2000	1375	64	TAG	01/03/2001	1495
24	LENS	11/14/2000	1372	65	TAG	12/07/2000	1414
25	LENS	11/13/2000	1369	66	TAG	12/01/2000	1397
26	LENS	11/12/2000	1367	67	TAG	11/17/2000	1380

⁴ See Appendix 1, Outages without accurate status.

FLORIDA OSS BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 12

27	LENS	11/11/2000	1366	68	TAG	11/05/2000	1352
28	LENS	11/09/2000	162	69	TAG	10/25/2000	1318
29	LENS	11/08/2000	1359	70	TAG	10/22/2000	1313
30	LENS	11/06/2000	1355	71	TAG	10/19/2000	1304
31	LENS	11/04/2000	1351	72	TAG	10/18/2000	1301
32	LENS	11/03/2000	1350	73	TAG	10/11/2000	1293
33	LENS	11/02/2000	1346	74	TAG	08/25/2000	1235
34	LENS	11/01/2000	1342	75	TAG	08/22/2000	1228
35	LENS	10/29/2000	1331	76	TAG	07/28/2000	1201
36	LENS	10/27/2000	1326	77	TAG	05/31/2000	1122
37	LENS	10/25/2000	1320	78	TAG	05/25/2000	1118
38	LENS	10/24/2000	1315	79	TAG	05/25/2000	1117
39	LENS	10/23/2000	1311	80	TAG	05/19/2000	1105
40	LENS	10/22/2000	1310	81	TAG	05/15/2000	1094
41	LENS	10/18/2000	1302				

Appendix B

Outages With E-mail Notice

The following outages were reported by the BellSouth Interconnection website and KPMG Consulting, in their role as a pseudo CLEC, received an email notification of the Outage. These 15 cases represent 11 % of the outages that occurred between 05/15/2000 and 01/18/2001. In each case the 1 hour notification interval was not met as described in the Change Control Process, Table 4-2, Step 2, page 16.

Item #	Type	Date	Outage #	Time of Outage	Time of Notification	Elapsed Time
1	CSOTS	09/21/2000	1273	14:00	15:11	1:11
2	LENS	12/05/2000	1406	9:36	11:35	1:59
3	LENS	11/02/2000	1344	9:45	11:44	1:59
4	LENS	11/02/2000	1345	11:42	13:43	2:01
5	LENS	10/23/2000	1311	8:00	9:38	1:38
6	LENS	10/10/2000	1306	12:17	14:21	2:04
7	LENS	10/02/2000	1282	14:15	16:20	2:05
8	LENS	07/28/2000	1202	13:35	17:15	3:40
9	LENS	07/28/2000	1204	14:50	17:15	2:25
10	LENS	07/10/2000	1184	8:45	9:57	1:15
11	TAG	11/07/2000	1358	13:50	14:51	1:01
12	TAG	08/29/2000	1237	9:05	10:06	1:01

**FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO
EXCEPTION 12**

13	TAG	08/23/2000	1229	9:00	11:57	2:57
14	TAG	08/23/2000	1230	11:10	12:31	1:21
15	TAG	08/01/2000	1208	21:00	8/2/00 at 10:33	13:33

Appendix C

Outages posted without accurate status

The following outages were reported by the BellSouth Interconnection Website but were not accurately updated. These 11 cases represent 8% of the outages that occurred between 05/15/2000 and 01/18/2001. In each case, the outage did not have a Final Resolution Notification posted on the Website as described in the Change Control Process, Table 4-2, Step 5, page 17-18.

Item #	Type	Date	Outage #	Description
1	CSOTS	09/21/2000	1273	Final Resolution Notification not posted on Website
2	CSOTS	06/15/2000	NA	Final Resolution Notification not posted on Website
3	LENS	12/18/2000	1460	Final Resolution Notification not posted on Website
4	LENS	12/15/2000	1454	Final Resolution Notification not posted on Website
5	LENS	12/12/2000	1440	Final Resolution Notification not posted on Website
6	LENS	09/07/2000	1250	Final Resolution Notification not posted on Website
7	LENS	08/24/2000	1232	Final Resolution Notification not posted on Website
8	LENS	08/22/2000	1227	Final Resolution Notification not posted on Website
9	LENS	07/19/2000	1193	Final Resolution Notification not posted on Website
10	LENS	06/22/2000	1162	Final Resolution Notification not posted on Website

FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO EXCEPTION 12

11	TAG	11/28/2000	1389	Final Resolution Notification not posted on Website
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BellSouth Response

Issue 1: Email notifications were not sent to CLECs involved in the Change Control Process when System Outages last longer than 20 minutes.

Response:

BellSouth acknowledges there may be times the e-mails were not sent out successfully.

This is due to 2 factors:

- 1) Error messages coming back to the originating group advising there was a problem with delivery. These error messages usually come well after the fact, when the outage is over. The group decided against trying to resend, since the purpose of the e-mail is to notify the recipients an outage has occurred. BellSouth will resend any emails returned.
- 2) Human error in not sending some e-mails, which has been corrected.

Corrective Action: See Overall Summary below.

Issue 2: Email notifications were not sent to CLECs involved in the Change Control Process within 1 hour of the outage.

Response:

BellSouth agrees that some of the e-mails were not sent within 1 hour of the outage.

Others appear to have been sent within 1 hour of the outage. See table below for data according to BellSouth's records. Times are Central Standard Time.

Item	Outage #	Time of Outage	Time Email Sent	Comments
1	1273			BellSouth can't locate email records
2	1406	8:36 AM	9:40 AM	Not sent within 1 hour
3	1344	8:45 AM	9:12 AM	Sent within 1 hour
4	1345	10:42 AM	11:38 AM	Sent within 1 hour
5	1311	7:00 AM	7:30 AM	Sent within 1 hour
6	1306			BellSouth can't locate email records
7	1282	1:15 PM	2:22 PM	Not sent within 1 hour
8	1202	12:35 PM	3:23 PM	Not sent within 1 hour
9	1204	1:50 PM	3:23 PM	Not sent within 1 hour
10	1184	7:45 AM	7:53 AM	Sent within 1 hour
11	1358	12:50 PM	1:41 PM	Sent within 1 hour
12	1237	8:05 AM	8:06 AM	Sent within 1 hour
13	1229			BellSouth can't locate email records
14	1230	10:10 AM	10:31 AM	Sent within 1 hour
15	1208	9:00 PM	9:00 AM	Not sent within 1 hour

FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO EXCEPTION 12

Corrective Action: See Overall Summary at the below.

Issue 3: Accurate updates were not posted to the website of the current status and final resolution of each outage.

Response:

BellSouth agrees with findings on 9 of the 11 items in Appendix C. There are 2 items where BellSouth disagrees:

Item 3 – Outage # 1460. The Web posting did include final resolution. The exact text as it appears on the internet is:

*Outage # 1460. Problem began at 10:15 AM CDT. Users are receiving "Nav 4055 Sync Contract Failure" error messages. Problem resolved at 11:45 AM CDT.
Outage caused by communication problems with backend systems.*

Item 5 – Outage # 1440. The final resolution was stated, but the time the problem cleared was not indicated. However, if the CLEC reads what was posted and sees that the problem has been cleared, they know the system is available for use. As soon as they see the following text, they know they can immediately log in and use system. The exact text as it appears on the internet is:

Outage # 1440. Outage began at 3:45 p.m. CDT. Users receiving 'Backend resource limitation error TGW0102COM'. TAG was bounced to correct the problem.

Corrective Action: See Overall Summary at the below.

Overall Summary:

BellSouth agrees with some of the findings as described above. BellSouth has implemented the following items to ensure our compliance with the Web Posting and E-mail notification.

1. All administrative responsibilities associated with this process have been placed with one member of EC Support. This individual and a back-up resource have been trained on this process.
2. Identifying a template of what the Web Posting and E-mail items should contain and providing this to all members of EC Support, particularly the Administrator with overall responsibility for Web Posting will be complete by 3/1/01.
3. The Administrator with primary responsibility for Web Posting and E-mail notification will positively report to Manager of EC Support on a daily basis that all postings and E-mails were sent as described in the procedure.
4. Each e-mail delivery error will be investigated and an attempt to resend the e-mail will be made, regardless of whether or not the outage has already cleared. Text will be added to the resent E-mail identifying it as a resend.

FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO EXCEPTION 12

BellSouth Amended Response

KPMG notified BellSouth on the 3/22/01 exception call of four additional instances observed where system outage notification did not comply with the standard for email notification.

BellSouth published new guidelines for posting Type 1 system outages to the Interconnection website, and for providing e-mail notification to the CLECs, in Version 2.2 of the CCP document. They read:

“BellSouth will provide email notification to the CLECs via Change Control of Type 1 system outages within 15 minutes of the outage verification. In addition, BellSouth will continue to post the outage information on the CCP website.”

Utilizing these newly adopted guidelines, BellSouth investigated the four instances provided by KPMG and found the following:

EDI Outage 5106

BellSouth EDI verified (qualified and quantified) the problem at 4:00 PM CST and notified EC Support of this outage at 4:10 PM CST. The email notification and web posting were completed by 4:20 PM CST. BellSouth did not meet its commitment to the new Guidelines in this instance.

LENS Outage 1680

BellSouth IT notified EC Support at 7:15 AM CST that there might be a problem. No users called to report a problem. EC Support joined conference call where discussion lasted until 8:00 AM CST. It was verified at the completion of this call at 8:00 AM CST that a problem had occurred and the actual problem times were 4:00 – 7:15 AM CST. EC Support posted the Web site and sent the email, completing this by 8:22 AM CST. No users called to report this problem so EC Support did not even know a potential problem existed. BellSouth did not meet its commitment to the new Guidelines in this instance.

LENS Outage 1683

The date on this email notification was incorrect. The outage began at 2:13 PM CST on March 19, 2001, not March 12, 2001. EC Support attempted to send the email at 2:45 PM CST, but later received feedback that the e-mail did not go out properly. The email was resent at approximately 3:20 PM CST. The email notification was received by CLEC's on the Outage distribution list by 3:24 PM CST. BellSouth did not meet its commitment to the new Guidelines in this instance.

TAG Outage 1686

BellSouth EC Support received a call after hours from only one CLEC. No other CLEC was having a problem so this did not appear to be a BellSouth problem. A defect was never identified with this System Ticket. However, in order to help the CLEC, BellSouth bounced the application and the customer started working again. Upon discussion the following morning with the entire EC Support Group it was decided to post this because

FLORIDA OSS BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 12

there was a possibility a problem had existed on BellSouth's side. The posting and email were completed by 8:30 AM CST. It was not posted the previous evening because BellSouth had not verified a problem existed. The posting and email occurred within 15 minutes of the group verifying a potential problem had occurred. BellSouth met its commitment to the new Guidelines in this instance.

In addition to investigating the above four instances, EC Support reviewed every outage instance in March. The review indicated that BellSouth met its commitment for 90% of the outages. EC Support is now conducting daily reviews to track results and insure BellSouth is meeting its outage commitment going forward. BellSouth is ready for retesting to begin.

AMENDED EXCEPTION 12
BellSouth Florida OSS Testing Evaluation

Date: May 23, 2001

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the Documentation Review of the Change Management Process (PPR1).

Exception:

BellSouth does not adhere to the procedures for System Outages (Type 1) established in the BellSouth Change Control Process, version 2.0 (PPR1).

Background:

The BellSouth Change Control Process, version 2.0 includes the following process flow for Type 1 Changes (System Outages):¹

- If a System Outage is not resolved within 20 minutes, a notification will be sent to CLECs via email and posted to the BellSouth Interconnection Website within one hour.
- If a System Outage is not resolved, a status update will be posted on the BellSouth Interconnection Website every two to four hours until resolution.
- The final resolution notice is posted to the BellSouth Interconnection Website upon resolution of the System Outage.

Issue:

During the review of the BellSouth Change Management Activities, KPMG Consulting has found that BellSouth is not adhering to the System Outage procedures as established in the BellSouth Change Control Process, version 2.0. Specifically, BellSouth does not adhere to the following procedures:

1. Email notifications were not sent to CLECs involved in the Change Control Process when System Outages last longer than 20 minutes.²
2. Email notifications were not sent to CLECs involved in the Change Control Process within one hour of the outage.³

¹ BellSouth Change Control Process, v. 2.0,
http://www.interconnection.bellsouth.com/markets/lcc/ccp_live/does/bccp/CCP8_23.pdf, August 23, 2000.
Section 4.0, Pages 16-18.

² See Appendix A, Outages without email notice.

³ See Appendix B, Outages with email notice.

AMENDED EXCEPTION 12
BellSouth Florida OSS Testing Evaluation

3. Accurate updates were not posted to the website of the current status and final resolution of each outage.⁴

Amendment:

KPMG Consulting conducted a retest of the BellSouth System Outage Notification Procedures. The retest consisted of a review of BellSouth System Outages beginning March 12, 2001 and ending April 27, 2001. The results are as follows:

1. BellSouth did not provide notification of all system outages that occurred during the retest period. KPMG Consulting received retest information from BellSouth in the form of an outage log that indicated that the following two outages occurred on the date specified. However, KPMG Consulting did not receive any email notification regarding these outages.

<i>Interface</i>	<i>Outage #</i>	<i>Outage Date</i>
LENS	1704	03/26/2001
TAG	1706	03/26/2001

2. BellSouth did not meet the notification standard as published in the Change Control Process, Version 2.2, March 26, 2001. Specifically, BellSouth met the system outage notification standard for 42% of the outages reviewed during the retest period.

<i>Interface</i>	<i>Outage #</i>	<i>Outage Date</i>	<i>Outage Time⁵</i>	<i>Verification Time⁵</i>	<i>Notification Time⁵</i>	<i>Length of Interval</i>	<i>Within Notification Interval</i>
TAG	1672	03/13/2001	11:15	BellSouth could not provide data for this system outage	11:32	:0:17	NO
EDI	5106	03/15/2001	11:34	03/16/2001 17:10	03/16/2001 17:28	0:18	NO
LENS	1680	03/17/2001	5:00	9:00	9:22	0:22	NO
LENS	1681	03/19/2001	9:20	9:20	9:34	0:14	YES
LENS	1682	03/19/2001	12:20	12:20	12:44	0:24	NO
LENS	1683	03/19/2001	15:15	15:13	16:24	1:11	NO
TAG	1686	03/20/2001	17:55	03/21/2001	03/21/2001	0:09	YES

⁴ See Appendix 1, Outages without accurate status.

⁵ All times based on the 24 Hour Clock

AMENDED EXCEPTION 12
BellSouth Florida OSS Testing Evaluation

Interface	Outage #	Outage Date	Outage Time ³	Verification Time ³	Notification Time ³	Length of Interval	Within Notification Interval
				9:30	9:39		
LENS	1692	03/22/2001	15:00	15:00	15:37	0:37	NO
TAG	1693	03/22/2001	15:00	15:00	15:41	0:41	NO
TAG	1694	03/22/2001	17:41	17:41	18:02	0:21	NO
LENS	1695	03/23/2001	9:54	9:54	10:17	0:23	NO
TAG	1696	03/23/2001	9:54	10:25	10:34	0:09	YES
TAG	1699	03/23/2001	15:15	15:15	15:36	0:21	NO
EDI	5172	03/22/2001	13:45	03/23/2001 15:35	03/23/2001 15:52	0:17	NO
LENS	1701	03/23/2001	17:52	17:52	18:22	0:30	NO
EDI	5190	03/23/2001	13:30	16:29	18:45	2:16	NO
LENS	1703	03/25/2001	7:35	7:35	8:08	0:33	NO
TAG	1710	03/27/2001	12:55	12:55	13:18	0:23	NO
TAG	1711	03/27/2001	17:19	17:19	17:35	0:16	NO
LENS	1713	03/28/2001	10:09	10:09	10:27	0:18	NO
LENS	1717	03/29/2001	11:02	11:02	11:22	0:20	NO
TAG	1719	03/29/2001	11:35	11:32	11:48	0:16	NO
TAG	1721	03/29/2001	15:20	15:20	15:35	0:15	YES
TAG	1720	03/29/2001	13:00	13:00	13:18	0:18	NO
LENS	1729	04/02/2001	7:05	8:04	8:20	0:16	NO
LENS	1728	04/01/2001	10:34	10:34	04/02/2001 8:34	22:00	NO
TAG	1730	04/02/2001	8:20	9:55	10:20	0:25	NO
TAG	1732	04/02/2001	14:03	14:25	14:36	0:11	YES
LENS	1737	04/03/2001	10:25	10:45	10:54	0:09	YES
TAG	1743	04/04/2001	16:35	17:00	17:07	0:07	YES
TAG	1745	04/04/2001	17:30	04/05/2001 13:57	04/05/2001 14:15	0:18	NO
LENS	1747	04/05/2001	18:54	18:54	19:14	0:20	NO
LENS	1749	04/06/2001	13:11	13:31	13:30	Notification provided before outage was verified	YES
EDI	1751	04/07/2001	14:30	15:05	16:20	1:15	NO
LENS	1752	04/08/2001	9:30	12:23	12:39	0:16	NO
LENS	1753	04/09/2001	10:23	10:43	10:46	0:03	YES
TAG	1765	04/13/2001	9:20	9:40	9:45	0:05	YES
LENS / TAG	1767	04/13/2001	14:30	14:50	14:56	0:06	YES
LENS	1768	04/13/2001	17:45	19:35	19:40	0:05	YES
TAG	1769	04/16/2001	11:02	11:22	11:26	0:04	YES

AMENDED EXCEPTION 12
 BellSouth Florida OSS Testing Evaluation

Interface	Outage #	Outage Date	Outage Time	Verification Time	Notification Time	Length of Interval	Within Notification Interval
TAG	1777	04/18/2001	10:07	11:27	11:35	0:08	YES
TAG	1778	04/18/2001	11:31	11:51	11:51	0:00	YES
TAG	1792	04/23/2001	18:25	18:45	18:45	0:00	YES
LENS	1796	04/24/2001	11:50	12:10	12:20	0:10	YES
EDI	5572	04/24/2001	BellSouth's notification provided no data for this field	15:30	15:41	0:11	YES
TAG	1802	04/25/2001	12:13	12:33	12:39	0:06	YES
EDI	5581	04/25/2001	15:06	15:30	15:36	0:06	YES
TAG	1804	04/25/2001	17:23	17:43	17:43	0:00	YES
EDI	BellSouth's notification provided no data for this field	04/26/2001	7:15	17:42	18:04	0:22	NO
EDI	5506	04/27/2001	5:08	5:19	8:03	2:44	NO

BellSouth did not meet the system outage notification standard for at least 95% of the outages reviewed during the retest. Based on observed retest performance levels, KPMG Consulting will conduct a second retest.

Impact:

Without proper notification of System Outages, CLECs may not be aware of the potential problems that may arise from the outage. CLECs may be unable to assess and resolve the situation resulting in potentially increased costs, decreased revenue and/or reduced customer service.

Appendix A

Outages without email notice

The following outages were reported by the BellSouth Interconnection website and KPMG Consulting, in their role as a pseudo CLEC, did not receive email notification of the outage as described in the Change Control Process, Table 4-2, Step 2, page 16. These 81 cases represent 61 % of the outages that occurred between 05/15/2000 and 01/18/2001.

AMENDED EXCEPTION 12
BellSouth Florida OSS Testing Evaluation

Item #	Type	Date	Outage #	Item #	Type	Date	Outage #
1	CSOTS	01/03/2000	1493	42	LENS	10/14/2000	1298
2	CSOTS	06/15/2000	NA	43	LENS	10/13/2000	1297
3	EDI	10/10/2000	3233	44	LENS	10/12/2000	1295
4	EDI	08/11/2000	NA	45	LENS	10/04/2000	1284
5	LENS	01/08/2001	1499	46	LENS	09/12/2000	1257
6	LENS	12/26/2000	1476	47	LENS	09/07/2000	1250
7	LENS	12/22/2000	1474	48	LENS	08/24/2000	1232
8	LENS	12/22/2000	1473	49	LENS	08/22/2000	1227
9	LENS	12/19/2000	1465	50	LENS	08/14/2000	1220
10	LENS	12/18/2000	1460	51	LENS	07/27/2000	1196
11	LENS	12/18/2000	1457	52	LENS	07/19/2000	1193
12	LENS	12/15/2000	1454	53	LENS	07/19/2000	1192
13	LENS	12/14/2000	1446	54	LENS	07/10/2000	1184
14	LENS	12/13/2000	1443	55	LENS	06/16/2000	1155
15	LENS	12/12/2000	1440	56	LENS	06/07/2000	1133
16	LENS	12/11/2000	1439	57	LENS	06/06/2000	1130
17	LENS	12/08/2000	1422	58	LENS	05/23/2000	1114
18	LENS	12/07/2000	1417	59	LENS	05/19/2000	1106
19	LENS	12/07/2000	1415	60	LENS	05/17/2000	1100
20	LENS	12/07/2000	1412	61	LENS	05/17/2000	1098
21	LENS	12/04/2000	1400	62	LENS	05/15/2000	1094
22	LENS	11/28/2000	1389	63	TAG	01/05/2001	1498
23	LENS	11/15/2000	1375	64	TAG	01/03/2001	1495
24	LENS	11/14/2000	1372	65	TAG	12/07/2000	1414
25	LENS	11/13/2000	1369	66	TAG	12/01/2000	1397
26	LENS	11/12/2000	1367	67	TAG	11/17/2000	1380
27	LENS	11/11/2000	1366	68	TAG	11/05/2000	1352
28	LENS	11/09/2000	162	69	TAG	10/25/2000	1318
29	LENS	11/08/2000	1359	70	TAG	10/22/2000	1313
30	LENS	11/06/2000	1355	71	TAG	10/19/2000	1304
31	LENS	11/04/2000	1351	72	TAG	10/18/2000	1301
32	LENS	11/03/2000	1350	73	TAG	10/11/2000	1293
33	LENS	11/02/2000	1346	74	TAG	08/25/2000	1235
34	LENS	11/01/2000	1342	75	TAG	08/22/2000	1228
35	LENS	10/29/2000	1331	76	TAG	07/28/2000	1201
36	LENS	10/27/2000	1326	77	TAG	05/31/2000	1122
37	LENS	10/25/2000	1320	78	TAG	05/25/2000	1118
38	LENS	10/24/2000	1315	79	TAG	05/25/2000	1117
39	LENS	10/23/2000	1311	80	TAG	05/19/2000	1105
40	LENS	10/22/2000	1310	81	TAG	05/15/2000	1094

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BellSouth Florida OSS Testing Evaluation

41	LENS	10/18/2000	1302				
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AMENDED EXCEPTION 12
BellSouth Florida OSS Testing Evaluation

Appendix B**Outages with email notice**

The following outages were reported by the BellSouth Interconnection website and KPMG Consulting, in their role as a pseudo CLEC, received an email notification of the Outage. These 15 cases represent 11 % of the outages that occurred between 05/15/2000 and 01/18/2001. In each case the 1 hour notification interval was not met as described in the Change Control Process, Table 4-2, Step 2, page 16.

Item #	Type	Date	Outage #	Time of Outage	Time of Notification	Elapsed Time
1	CSOTS	09/21/2000	1273	14:00	15:11	1:11
2	LENS	12/05/2000	1406	9:36	11:35	1:59
3	LENS	11/02/2000	1344	9:45	11:44	1:59
4	LENS	11/02/2000	1345	11:42	13:43	2:01
5	LENS	10/23/2000	1311	8:00	9:38	1:38
6	LENS	10/10/2000	1306	12:17	14:21	2:04
7	LENS	10/02/2000	1282	14:15	16:20	2:05
8	LENS	07/28/2000	1202	13:35	17:15	3:40
9	LENS	07/28/2000	1204	14:50	17:15	2:25
10	LENS	07/10/2000	1184	8:45	9:57	1:15
11	TAG	11/07/2000	1358	13:50	14:51	1:01
12	TAG	08/29/2000	1237	9:05	10:06	1:01
13	TAG	08/23/2000	1229	9:00	11:57	2:57
14	TAG	08/23/2000	1230	11:10	12:31	1:21
15	TAG	08/01/2000	1208	21:00	8/2/00 at 10:33	13:33

AMENDED EXCEPTION 12
BellSouth Florida OSS Testing Evaluation

Appendix C

Outages posted without accurate status

The following outages were reported by the BellSouth Interconnection Website but were not accurately updated. These 11 cases represent 8% of the outages that occurred between 05/15/2000 and 01/18/2001. In each case, the outage did not have a Final Resolution Notification posted on the Website as described in the Change Control Process, Table 4-2, Step 5, page 17-18.

Item #	Type	Date	Outage #	Description
1	CSOTS	09/21/2000	1273	Final Resolution Notification not posted on Website
2	CSOTS	06/15/2000	NA	Final Resolution Notification not posted on Website
3	LENS	12/18/2000	1460	Final Resolution Notification not posted on Website
4	LENS	12/15/2000	1454	Final Resolution Notification not posted on Website
5	LENS	12/12/2000	1440	Final Resolution Notification not posted on Website
6	LENS	09/07/2000	1250	Final Resolution Notification not posted on Website
7	LENS	08/24/2000	1232	Final Resolution Notification not posted on Website
8	LENS	08/22/2000	1227	Final Resolution Notification not posted on Website
9	LENS	07/19/2000	1193	Final Resolution Notification not posted on Website
10	LENS	06/22/2000	1162	Final Resolution Notification not posted on Website
11	TAG	11/28/2000	1389	Final Resolution Notification not posted on Website

EXCEPTION 23
BellSouth Florida OSS Testing Evaluation

Date: March 12, 2001

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the process verification review for Change Management (PPR1). This exception was originally issued as Observation 21.

Exception:

The distribution of Carrier Notification information associated with the BellSouth Change Control Process is not adequate. Furthermore, in BellSouth's implementation of the process, significant information is not included in the Carrier Notifications (PPR1).

Issues:

Process—The review of the Carrier Notifications process and related documentation has identified inconsistencies or deficiencies in the change notification process.

1. The *BellSouth Change Control Process*¹ (CCP) document does not clearly define when CLECs are to receive notification of documentation updates, or when they are to receive the actual documentation for system and non-system affecting changes.
2. A unique Carrier Notification is not issued for each instance of documentation updates.
3. Original Carrier Notifications do not remain on the BellSouth Interconnection Web site after revisions have been made.

Implementation—Review of Carrier Notifications revealed that significant information is not included in the Carrier Notifications.

4. Carrier Notifications do not reference Change Request numbers for tracking purposes.
5. Carrier Notifications of documentation updates do not state whether the documentation changes will be system or non-system affecting.

¹ The BellSouth Interim Change Control Process document is located at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/docs/hccp/CCPR_23.pdf.

EXCEPTION 23
BellSouth Florida OSS Testing Evaluation

Although BellSouth did update the CCP document on 02/09, KPMG Consulting has indicated that issue 2 above has not been satisfactorily addressed.² Further, KPMG Consulting would expect documented evidence of the processes outlined in the response.

Impact:

BellSouth alerts the CLEC community of documentation releases through the use of Carrier Notifications. A lack of clarity in the process and the absence of significant information from Carrier Notifications might hamper the ability of CLECs to provide service to their customers and conduct business with BellSouth.

² BellSouth Response to Observation 21, 02/09/01.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 23



Florida OSS Test

Exception #23

EXCEPTION REPORT

Date: March 19, 2001

An exception has been identified as a result of test activities associated with the process verification review for Change Management (PPR1). This exception was originally issued as Observation 21.

Exception:

The distribution of Carrier Notification information associated with the BellSouth Change Control Process is not adequate. Furthermore, in BellSouth's implementation of the process, significant information is not included in the Carrier Notifications (PPR1).

Issues:

Process—The review of the Carrier Notifications process and related documentation has identified inconsistencies or deficiencies in the change notification process.

1. The *BellSouth Change Control Process*¹ (CCP) document does not clearly define when CLECs are to receive notification of documentation updates, or when they are to receive the actual documentation for system and non-system affecting changes.
2. A unique Carrier Notification is not issued for each instance of documentation updates.
3. Original Carrier Notifications do not remain on the BellSouth Interconnection Web site after revisions have been made.

Implementation—Review of Carrier Notifications revealed that significant information is not included in the Carrier Notifications.

4. Carrier Notifications do not reference Change Request numbers for tracking purposes.
5. Carrier Notifications of documentation updates do not state whether the documentation changes will be system or non-system affecting.

Although BellSouth did update the CCP document on 02/09, KPMG Consulting has indicated that issue 2 above has not been satisfactorily addressed.² Further, KPMG Consulting would expect documented evidence of the processes outlined in the response.

¹ The BellSouth Interim Change Control Process document is located at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/docs/bccp/CCP8_23.pdf.

² BellSouth Response to Observation 21, 02/09/01.

FLORIDA OSS BELLSouth'S RESPONSE TO EXCEPTION 23

Impact:

BellSouth alerts the CLEC community of documentation releases through the use of Carrier Notifications. A lack of clarity in the process and the absence of significant information from Carrier Notifications might hamper the ability of CLECs to provide service to their customers and conduct business with BellSouth.

BellSouth Response:

The Pre-Order Business Rules, version 10.0, and the Pre-Order Business Rules – Data Dictionary, version 6.0, both posted on January 26, 2001, were published in conjunction with release 9.0.1 and LNP release 6.0.3 of the electronic interface systems. Carrier Notification SN91082138, posted on January 4, 2001, pertains to those releases. No other CN was published. The individual responsible for pre-order documents has been instructed as to the need for, and in the process of, posting separate Carrier Notifications which specify which documents are being updated.

BellSouth agrees that a Carrier Notification was not posted for the LENS Users Guide, dated 2/9/01. The individual responsible for updates to the LENS Users Guide has been instructed as to the need for, and in the process of, posting separate Carrier Notifications, which specify which documents are being updated. Since these updates are considered system updates, which require a 30 day CLEC Notification, the target implementation date for the change is May 1, 2001.

KPMG requested on 2/22/01 that the information included in BellSouth's response to Issues 2-5 be included in the Change Control Process documentation. Modifications to the Change Control Process will be discussed by BellSouth at the next Change Control Process meeting on March 28, 2001.

EXCEPTION 26

BellSouth Florida OSS Testing Evaluation

Date: March 12, 2001

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the process verification review for Change Management (PPR1). This exception was originally issued as Observation 27.

Exception:

BellSouth does not have a clearly defined process for addressing the expedited release of BellSouth documentation defects. (PPR1).

Background:

The *BellSouth Interim Change Control Process* document,¹ a public document which explains the BellSouth change process to the CLEC community, includes a draft Section 5.0. Section 5.0 describes the process and the types of changes and issues that are deemed to be part of BellSouth's Defect/Expedite Notification Process. BellSouth defines the terms "defect" and "expedite" in the following manner:

- **"Type 6 – CLEC Impacting Defect.** Any non-type 1 change where a BellSouth interface used by a CLEC that is in production and is not working in accordance with the BellSouth baseline business requirements or is not working in accordance with the business rules that BellSouth has published or otherwise provided to the CLECs and is impacting a CLECs ability to exchange transactions with BellSouth. This includes documentation defects."²
- **"Type 6 – CLEC Impacting Expedite.** The ability for a CLEC to process certain types of orders to BellSouth due to a problem on BellSouth's side of the interface. The Change Request for an expedite must provide details of the business impact."³

¹ The BellSouth Interim Change Control Process Version 2.0 document is located at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/docs/bccp/CCP8_23.pdf.

² BellSouth Interim Change Control Process Version 2.0 draft Section 11.0, page 45, http://www.interconnection.bellsouth.com/markets/lec/ccp_live/docs/bccp/CCP8_23.pdf.

³ BellSouth Interim Change Control Process Version 2.0 draft Section 11.0, page 45, http://www.interconnection.bellsouth.com/markets/lec/ccp_live/docs/bccp/CCP8_23.pdf.

EXCEPTION 26

BellSouth Florida OSS Testing Evaluation

Section 5.0, though still draft, is currently being used by BellSouth in its change control management and states:

- “A CLEC/BST identified defect/expedite will enter this process through the Change Management Team as a Type 6⁴ Change Request. If the defect/expedite is validated internally, it will route through this process, and notification will be provided to the CLEC community via e-mail and web posting.”⁵
- “CLEC Notification of documentation updates (non-system changes) will be posted 5 (five) business days in advance of documentation posting date.”⁶

According to the draft process description, Type 6 changes are grouped into one of three Impact Levels based upon the initial categorization of the type of change (defects or expedited feature), the impact of the change (Low, Medium, and High Impact) on critical system functions, and the availability of a workaround solution. All expedited feature changes are considered to be High Impact.

Issue:

There is a lack of clarity for the process of issuing documentation in cases where a documentation defect has been identified, validated and requires expedited release. Specifically, clarification is required for the following issues:

- The circumstances that would require an expedited release of documentation.
- The process for issuing emergency changes to documentation, which may include both Type-I and non Type-I changes, lacks definition.
- The timeline for release of corrected documentation, including when the carrier notifications for future documentation corrections will be issued, when the corrected documentation will be made available, and when the corrected documentation will become effective.
- The definition and criteria for inclusion of documentation changes as they relate to Low, Medium and High impact failures.⁷

⁴ Type 6 has been defined by BellSouth in the Change Control Process document on pages 25 and 45 (as quoted above).

⁵ BellSouth Interim Change Control Process Version 2.0 draft Section 5.0, page 25.
http://www.interconnection.bellsouth.com/markets/lcc/ccp_live/docs/bccp/CCP8_23.pdf.

⁶ BellSouth Interim Change Control Process Version 2.0 draft Section 5.0, page 25.
http://www.interconnection.bellsouth.com/markets/lcc/ccp_live/docs/bccp/CCP8_23.pdf.

⁷ Low, Medium, and High Impact Type 6 Change Requests defined in BellSouth Interim Change Control Process Version 2.0 draft Section 5.0, page 25.

http://www.interconnection.bellsouth.com/markets/lcc/ccp_live/docs/bccp/CCP8_23.pdf.

EXCEPTION 26

BellSouth Florida OSS Testing Evaluation

At a minimum, KPMG Consulting would expect the Change Control Process (CCP) to include the following items with regards to issuing emergency documentation:

1. Criteria to determine what circumstances require the expedited release of emergency documentation defects.
2. Provision for notification of, and documentation changes to, emergency documentation defects (Type-I and non Type-I).⁸
3. Timelines for release of non-system impacting documentation updates, from issue identification to notification to release of documentation.
4. Guidelines for Type 6 notification and scheduled release of documentation fixes associated with different severity levels and issues (e.g., business rules and technical specifications out of sync and interface system unusable verses optional document clarification).

BellSouth's 2nd Amended Response to Observation 27⁹ indicated that changes had been made to the CCP on 02/09 and further revisions were being discussed with the CLECs during 02/21 discussion to determine timelines for additional updates. Additionally, KPMG Consulting addressed their concerns with the current response on the 02/22 observation call.

Impact:

It is important to the CLEC community to receive updates to documentation as soon as possible and to understand the guidelines associated with those changes. A lack of clarity in the current documentation process might unnecessarily delay the timely release of documentation and documentation changes to CLECs, potentially hindering the ability of CLECs to provide service to their customers and conduct business with BellSouth.

⁸ The BellSouth Interim Change Control Process Version 2.0 document, pages 25 and 45, provide a definition of defects (including documentation defects) for non-type I changes only.

⁹ BellSouth 2nd Amended Response to Observation 27, 02/09/01.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 26



Florida OSS Test
Exception 26

May 18, 2001

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the process verification review for Change Management (PPR1). This exception was originally issued as Observation 27.

Exception:

BellSouth does not have a clearly defined process for addressing the expedited release of BellSouth documentation defects. (PPR1).

Background:

The *BellSouth Interim Change Control Process* document,¹ a public document which explains the BellSouth change process to the CLEC community, includes a draft Section 5.0. Section 5.0 describes the process and the types of changes and issues that are deemed to be part of BellSouth's Defect/Expedite Notification Process. BellSouth defines the terms "defect" and "expedite" in the following manner:

- **"Type 6 – CLEC Impacting Defect.** Any non-type 1 change where a BellSouth interface used by a CLEC that is in production and is not working in accordance with the BellSouth baseline business requirements or is not working in accordance with the business rules that BellSouth has published or otherwise provided to the CLECs and is impacting a CLECs ability to exchange transactions with BellSouth. This includes documentation defects."²
- **"Type 6 – CLEC Impacting Expedite.** The ability for a CLEC to process certain types of orders to BellSouth due to a problem on BellSouth's side of the interface. The Change Request for an expedite must provide details of the business impact."³

¹ The BellSouth Interim Change Control Process Version 2.0 document is located at http://www.interconnection.bellsouth.com/markets/lec/cep_live/docs/bcep/CCP8_23.pdf.

² BellSouth Interim Change Control Process Version 2.0 draft Section 11.0, page 45, http://www.interconnection.bellsouth.com/markets/lec/cep_live/docs/bcep/CCP8_23.pdf.

³ BellSouth Interim Change Control Process Version 2.0 draft Section 11.0, page 45, http://www.interconnection.bellsouth.com/markets/lec/cep_live/docs/bcep/CCP8_23.pdf.

FLORIDA OSS BELL SOUTH'S RESPONSE TO EXCEPTION 26

Section 5.0, though still draft, is currently being used by BellSouth in its change control management and states:

- "A CLEC/BST identified defect/expedite will enter this process through the Change Management Team as a Type 6⁴ Change Request. If the defect/expedite is validated internally, it will route through this process, and notification will be provided to the CLEC community via e-mail and web posting."⁵
- "CLEC Notification of documentation updates (non-system changes) will be posted 5 (five) business days in advance of documentation posting date."⁶

According to the draft process description, Type 6 changes are grouped into one of three Impact Levels based upon the initial categorization of the type of change (defects or expedited feature), the impact of the change (Low, Medium, and High Impact) on critical system functions, and the availability of a workaround solution. All expedited feature changes are considered to be High Impact.

Issue:

There is a lack of clarity for the process of issuing documentation in cases where a documentation defect has been identified, validated and requires expedited release. Specifically, clarification is required for the following issues:

- The circumstances that would require an expedited release of documentation.
- The process for issuing emergency changes to documentation, which may include both Type-1 and non Type-1 changes, lacks definition.
- The timeline for release of corrected documentation, including when the carrier notifications for future documentation corrections will be issued, when the corrected documentation will be made available, and when the corrected documentation will become effective.
- The definition and criteria for inclusion of documentation changes as they relate to Low, Medium and High impact failures.⁷

At a minimum, KPMG Consulting would expect the Change Control Process (CCP) to include the following items with regards to issuing emergency documentation:

⁴ Type 6 has been defined by BellSouth in the Change Control Process document on pages 25 and 45 (as quoted above).

⁵ BellSouth Interim Change Control Process Version 2.0 draft Section 5.0, page 25, http://www.interconnection.bellsouth.com/markets/lec/ccp_live/docs/bccp/CCP8_23.pdf.

⁶ BellSouth Interim Change Control Process Version 2.0 draft Section 5.0, page 25, http://www.interconnection.bellsouth.com/markets/lec/ccp_live/docs/bccp/CCP8_23.pdf.

⁷ Low, Medium, and High Impact Type 6 Change Requests defined in BellSouth Interim Change Control Process Version 2.0 draft Section 5.0, page 25, http://www.interconnection.bellsouth.com/markets/lec/ccp_live/docs/bccp/CCP8_23.pdf.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 26

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Impact:

It is important to the CLEC community to receive updates to documentation as soon as possible and to understand the guidelines associated with those changes. A lack of clarity in the current documentation process might unnecessarily delay the timely release of documentation and documentation changes to CLECs, potentially hindering the ability of CLECs to provide service to their customers and conduct business with BellSouth.

BellSouth Response:

At the March 28 CLEC/Change Control meeting, BellSouth presented a proposed process for documentation defects. The process separates documentation defects from other Type 6 requests. Further, it specifies the number of days necessary to test and validate the existence of a defect, to notify CLECs through CCP, and to post a Carrier Notification on the Web.

There was consensus at the April 25 Change Control meeting to place the proposed process on the ballot to determine CLEC support. The ballot was mailed to CLECs on May 2.

⁸ The BellSouth Interim Change Control Process Version 2.0 document, pages 25 and 45, provide a definition of defects (including documentation defects) for non-type 1 changes only.

⁹ BellSouth 2nd Amended Response to Observation 27, 02/09/01.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 26

The proposal was accepted. The documentation defect process has been added to version 2.3 of the CCP Guide, dated May 18, 2001. This updated version is scheduled to be posted to the Web on May 18.