

**BEFORE THE COMMONWEALTH OF KENTUCKY**  
**PUBLIC SERVICE COMMISSION**  
**REBUTTAL TESTIMONY OF SHARON E. NORRIS**  
**ON BEHALF OF**  
**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL**  
**STATES, INC.**  
**AND TCG OHIO, INC.**  
**CASE NO. 2001-105**  
**JULY 9, 2001**

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. I am Sharon Norris and my business address is P.O. Box 658, Loganville, Georgia  
3 30052.  
4

5 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL**  
6 **BACKGROUND AND EXPERIENCE.**

7 A. My education and relevant work experience are as follows. I received a degree in  
8 Distributive Education from DeKalb College in 1972. I have been employed in  
9 the telecommunications industry for over twenty-seven years. I began my career  
10 with Southern Bell in 1973, in one of its Commercial Business offices in Atlanta,  
11 Georgia. From 1973 until 1983, I held various positions in Southern Bell's  
12 business offices, business marketing organizations, retail stores, and support staff  
13 organizations. In 1983, at the time of the Bell Telephone breakup, I chose to  
14 move from Southern Bell to AT&T, where I worked in the Consumer Sales  
15 Division of American Bell and later AT&T Information Systems. From 1985  
16 until 1991, I worked in the Human Resources department of AT&T. In 1991, I

1 transferred to AT&T's Law and Government Affairs Division. Initially, I served  
2 as a loan executive to the Governor's Efficiency Commission for the State of  
3 Georgia. In this capacity, I examined current government practices and policies  
4 designed to increase government efficiency. In 1995, I became AT&T's  
5 representative to the Georgia Public Service Commission ("Georgia Commission"  
6 or "GPSC"). In this role, I advocated AT&T's position on regulations and issues  
7 regarding opening local exchange markets to competition. I continued in this role  
8 until 1997, when I also began to monitor and analyze BellSouth's compliance  
9 with its obligations to provide AT&T nondiscriminatory access to BellSouth's  
10 Operational Support Systems ("OSS") throughout its nine-state territory. I retired  
11 from AT&T in 1998, and am now a consultant with SEN Consulting, Inc. In this  
12 capacity, I continue to monitor and analyze BellSouth's compliance with its  
13 obligations to provide AT&T nondiscriminatory access to BellSouth's OSS.  
14

15 **Q. PLEASE DESCRIBE YOUR CURRENT EMPLOYMENT AND THE**  
16 **SCOPE OF YOUR RESPONSIBILITIES.**

17 A. I am a consultant with SEN Consulting, Inc.

18 **Q. HAVE YOU PREVIOUSLY PARTICIPATED IN OTHER PROCEEDINGS**  
19 **THAT RELATE TO THIS PROCEEDING?**

20 A. Yes. I have appeared in state workshops in Alabama, Florida, Georgia, Kentucky,  
21 Louisiana, North Carolina, South Carolina, and Tennessee that covered a wide  
22 range of topics including: OSS, performance measures, and third-party testing. I  
23 also testified before the Alabama Public Service Commission last month. I have  
24 participated in meetings with the Federal Communications Commission ("FCC")  
25 and the Department of Justice ("DOJ") on these same issues. I also filed an

1 affidavit with the FCC on behalf of AT&T in Docket 97-231 and have filed  
2 affidavits and testimony with other state commissions.

3 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

4 A. I am testifying on behalf of AT&T Communications of the Southern States, Inc.  
5 and TCG Ohio, Inc. to summarize the Georgia third-party test of BellSouth's OSS  
6 and demonstrate why this Commission cannot rely on those results. The results of  
7 the completed portion of the Georgia OSS test are summarized in the *Master Test*  
8 *Plan Final Report*, *Supplemental Test Plan Final Report* and *Flow-Through*  
9 *Evaluation* ("Final Report") submitted to the Georgia Commission on March 20,  
10 2001, by KPMG Consulting, Inc. ("KCI"). The Georgia Commission held a  
11 hearing on that report on May 8, 2001. I have reviewed the Final Report in detail  
12 and I attended the depositions and hearing relating to the evaluation of the Report.

13 **Q. HOW IS YOUR TESTIMONY ORGANIZED?**

14 A. I have organized my testimony as follows:

15 I. STRUCTURE AND SCOPE OF THE GEORGIA TEST

- 16 A. Limitations of the Georgia Test  
17  
18 B. BellSouth's Role In The Georgia Test  
19  
20 C. CLEC Involvement in the Georgia Test  
21  
22

23 II. THE GEORGIA TEST RESULTS

- 24 A. Volume Testing  
25  
26 B. Domain Results  
27  
28 C. The Georgia Test Is Not Complete  
29  
30  
31

1 **Q. IS KCI'S REVIEW OF BELL SOUTH'S OSS IN GEORGIA PERSUASIVE**  
2 **EVIDENCE THAT BELL SOUTH'S OSS WILL PROVIDE**  
3 **NONDISCRIMINATORY SUPPORT FOR CLECS IN THE REAL**  
4 **WORLD?**

5 A. No, it is not for the following reasons:

- 6 • KCI did not evaluate important areas of BellSouth's OSS, including the  
7 currently used interfaces, relationship management, manual systems or  
8 LNP metrics.
- 9 • A more comprehensive investigation would have revealed additional  
10 deficiencies.
- 11 • KCI was not sufficiently independent of BellSouth in the Georgia test.
- 12 • KCI did not test whether BellSouth's existing system can handle real-  
13 world CLEC volumes.
- 14 • KCI found BellSouth had *not satisfied* test criteria in areas that have a  
15 materially adverse impact on competition.
- 16 • KCI's subjective determinations that BellSouth *satisfied* certain tests is  
17 undercut by the performance deficiencies KCI identified.
- 18 • KCI's conclusions that BellSouth *satisfied* many of the tests with objective  
19 criteria are questionable.
- 20 • KCI masked poor performance for certain service types, *e.g.*, number  
21 portability, by aggregating test results among service types to reach a  
22 conclusion of *satisfied*.
- 23 • KCI masked the performance of BellSouth's back-end pre-ordering  
24 systems by including data that did not represent the performance of those  
25 systems.
- 26 • KCI skewed the test results with inappropriate statistical analysis to reach  
27 *satisfied* conclusions.

- 1           • KCI used its professional judgment to override Commission-established  
2 standards to reach *satisfied* conclusions.

3 **Q. WHEN SHOULD A THIRD-PARTY TEST BE CONSIDERED**  
4 **PERSUASIVE EVIDENCE OF THE PERFORMANCE OF AN**  
5 **INCUMBENT LOCAL EXCHANGE CARRIER'S OSS?**

- 6 A. The FCC has provided guidance on when a third-party test should be considered  
7 persuasive evidence of the performance of an incumbent local exchange carrier's  
8 ("ILEC's") OSS. "[T]he persuasiveness of a third-party test is dependent on the  
9 conditions and scope of the review."<sup>1</sup> "[T]hird-party reviews should encompass  
10 the entire obligation of the incumbent LEC to provide nondiscriminatory access,  
11 and, where applicable, should consider the ability of actual competing carriers in  
12 the market to conduct business utilizing the incumbent's OSS access." *Id.* Third-  
13 party tests that are not comprehensive, not independent, and not blind are not  
14 persuasive evidence in assessing the real world impact of an incumbent's OSS on  
15 competing carriers.<sup>2</sup>

17 **I. STRUCTURE AND SCOPE OF THE GEORGIA TEST**

18  
19 **A. Limitations of the Georgia test**  
20

21 **Q. ARE YOU FAMILIAR WITH THE THIRD-PARTY TESTING OF**  
22 **BELLSOUTH'S OSS IN GEORGIA AND FLORIDA?**

- 23 A. Yes, I am.

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<sup>1</sup> Memorandum and Order, *In the Matter of Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, As Amended, to Provide In-Region, InterLATA Services in Michigan*, 15 FCC Rcd. 20,543 ¶ 216 (F.C.C. August 19, 1997) (No. CC 97-137, FCC 97-298) ("*Ameritech Michigan Order*").

<sup>2</sup> Memorandum and Order, *In the Matter of Application By Bell Atlantic New York for Authorization under Section 271 of the Communication Act to Provide In-Region, InterLATA Service in the State of New York*, 15 FCC Rcd. 3953 ¶ 100 (F.C.C. Dec. 22, 1999) (No. CC 99-295, FCC 99-404) ("*Bell Atlantic New York Order*").

1 **Q. ARE THE GEORGIA AND FLORIDA OSS TESTS COMPARABLE?**

2 A. No. The Georgia test by design did not include all areas of testing that have been  
3 included in other states. A comparison of KCI's third-party testing activities in  
4 Georgia and Florida establishes that KCI did not evaluate several specific areas of  
5 BellSouth's OSS that are being evaluated in Florida. Among the areas that KCI  
6 did not evaluate are: parity of performance; CLEC interfaces development; areas  
7 of performance measurements; and manual support systems. Because KCI has  
8 not yet fully tested BellSouth's OSS, the current Georgia test results cannot  
9 demonstrate to the Commission that BellSouth's OSS provide nondiscriminatory  
10 access as required by Section 271.  
11

12 **Q. HAS THE FLORIDA TEST IDENTIFIED DEFICIENCIES THAT WERE**  
13 **NOT IDENTIFIED IN THE GEORGIA TEST?**

14 A. Yes. Significantly, ongoing testing of BellSouth's OSS in Florida has already  
15 identified numerous deficiencies described by KCI in 70 observations and 75  
16 exceptions<sup>3</sup> posted on the Florida PSC web-site. To date, KCI's testing in Florida  
17 has produced 49 exceptions and 27 observations in areas that were not tested in  
18 the Georgia test. Many of these exceptions concern local number portability  
19 ("LNP"), ordering issues, and CLEC-BellSouth relationship management issues.  
20 The Florida OSS test also has identified 21 observations and 12 exceptions in  
21 areas that the Georgia test addresses but in which the Georgia test did not show  
22 deficiencies. Finally, the Florida OSS test has identified some of the same  
23 deficiencies KCI identified, and supposedly resolved, in the Georgia OSS test.  
24 Indeed, KCI opened 22 observations and 14 exceptions for test areas KCI has

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<sup>3</sup> KCI has actually issued 89 observations. However, 19 were re-classified as exceptions. KCI has issued 78 exceptions, but three, Exceptions 19, 52 and 53 were withdrawn.

1 determined were “satisfied” in the Georgia OSS testing. A chart summarizing the  
2 Florida observations and exceptions is attached as SEN3PT-1.  
3

4 **Q. DID KCI MEASURE BELL SOUTH’S PARITY OF PERFORMANCE IN**  
5 **THE GEORGIA TEST?**

6 A. No. The Georgia third-party test did not objectively and accurately analyze  
7 BellSouth’s OSS performance in providing service to CLECs and compare that  
8 performance to the service BellSouth provides itself and its affiliates. Evaluation  
9 of BellSouth’s parity of performance is critical as an indicator of whether  
10 BellSouth provides non-discriminatory access to its OSS to CLECs. The FCC has  
11 stated parity measures are critical to assure BellSouth provides access that permits  
12 “[CLECs] to perform [OSS] functions in ‘substantially the same time and  
13 manner’” as OSS functions used by BellSouth or its affiliates.<sup>4</sup> KCI, however,  
14 only tested parity in two areas in Georgia: Maintenance and Repair Process  
15 Evaluation (Test M&R10 of the GMTP) and xDSL Process Parity Evaluation  
16 (Test PO&P 16 of the GSTP).  
17

18 **Q. DOES THE FLORIDA OSS TEST EVALUATE ADDITIONAL PARITY**  
19 **MEASURES?**

20 A. Yes, the Florida third-party test evaluates nine additional process parity tests:  
21 Order Flow-Through (Test TVV3); Account Management (Test PPR2); Training  
22 (Test PPR4); Provisioning Process; (Test PPR9); Billing Work Center (Test PPR  
23 10); Bill Production (Test PPR11); and Functional Review of Pre-Order,

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<sup>4</sup> Memorandum Opinion and Order, *In the Matter of Joint Application by SBC Communications Inc., Southwestern Bell Tel. Co., and Southwestern Bell Communications Services, Inc. (d/b/a Southwestern Bell Long Distance) for Provision of In-Region, InterLATA Services in Kansas and Oklahoma*, FCC 01-29 CC Docket No. 00-217 ¶ 104 (rel. January 22, 2001) (“SWBT Kansas Oklahoma Order”). See also *Bell Atlantic New York Order* ¶ 83.

1           Ordering, and Provisioning (Test TVV1); Manual Processing of Orders (PPR7);  
2           and Capacity Management. These nine process parity tests being conducted in  
3           Florida include areas that go to the heart of CLECs' ability to complete. Because  
4           KCI did not test these areas in Georgia, this Commission cannot make an  
5           informed evaluation of whether BellSouth's OSS grant CLECs nondiscriminatory  
6           access by relying on the Georgia test.  
7

8           **Q.    DID KCI TEST CURRENT INTERFACES USED BY CLECS?**

9           A.    No. KCI failed to test current interfaces used by CLECS. KCI also failed to  
10           evaluate the current production version of certain ordering interfaces, e.g. OSS99  
11           version of the Electronic Data Interchange ("EDI") and Telecommunications  
12           Access Gateway ("TAG"). Over eighty percent (80%) of current CLEC  
13           transactions are conducted using OSS99 software. Nor did KCI evaluate any  
14           versions of other interfaces, e.g., LENS which is currently the most popular  
15           interface<sup>5</sup>, and Robo-TAG, which combines TAG with a front-end Graphical User  
16           Interface ("GUI"). KCI's test, therefore does not reflect the real world of CLEC  
17           competition.  
18

19           **Q.    IS THE FLORIDA TEST EVALUATING BELL SOUTH'S CURRENT**  
20           **INTERFACES?**

21           A.    Yes. Florida is testing OSS99 and other upgrades that were not tested in Georgia.

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<sup>5</sup> According to BellSouth's May flow-through report, LENS (one of the interfaces not tested) accounted for 65% of the total of all electronic Local Service Requests submitted in the region.



1 **Q. DID KCI EVALUATE CLECS' ABILITY TO BUILD INTERFACES**  
2 **BASED ON BELL SOUTH'S DOCUMENTATION?**

3 A. No. KCI did not evaluate the adequacy of BellSouth's documentation for  
4 designing and building OSS interfaces in Georgia. A meaningful OSS test must  
5 evaluate: (a) whether BellSouth provides CLECs with the necessary  
6 documentation to design, develop and maintain OSS that can interface with  
7 BellSouth's OSS; and (b) the functionality of BellSouth's OSS interfaces used in  
8 commercial production.

9 **Q. DOES THE FLORIDA OSS TEST INCLUDE A REVIEW OF CLECS'**  
10 **ABILITY TO BUILD INTERFACES?**

11 A. Yes, the Florida Public Service Commission required KCI to build interfaces  
12 based on interface documentation from BellSouth intended for the CLEC  
13 community – just like real world CLECs must build them. New York also tested  
14 whether CLECs could build interfaces using the ILEC's instructions and support.  
15 (*See Bell Atlantic New York Order ¶¶ 134-135.*)

16 **Q. DID KCI TEST UNES SUFFICIENTLY?**

17 A. No. BellSouth claims that it offers CLECs over eighty UNES.<sup>6</sup> KCI, however,  
18 evaluated only six UNES for ordering, provisioning, and billing activities.<sup>7</sup> Key  
19 UNES omitted from these tests include digital UNES, Enhanced Extended Links  
20 ("EELs"), customized routing of Operator Services and Directory Assistance, and  
21 line-sharing.

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<sup>6</sup> See *Georgia Master Test Plan*, Version 4.0 at A-4.

<sup>7</sup> xDSL was added in the Supplemental Test Plan.

1                   UNE billing testing in Georgia, moreover, was limited to those few order  
2 types that had been part of the ordering and provisioning tests. The billing  
3 evaluation did not mirror the experiences of actual CLECs because the testing did  
4 not rely on the results of actual pre-ordering, ordering and provisioning activities.  
5 Accordingly, the Georgia test provides information about only a small portion of  
6 BellSouth's activities.

7  
8 **Q. DID KCI ADEQUATELY TEST PERFORMANCE MEASURES?**

9 A. No. The Georgia OSS Test includes as part of the supplemental test plan an  
10 evaluation of metrics, or performance measures. This analysis, however, does not  
11 include the following important elements:

- 12                   • local number portability measures;
- 13                   • Processes for developing SQM definitions and standards;
- 14                   • Data integrity assessment of CLEC and retail transactions end-to-end  
15 through the data filtering process;
- 16                   • Analysis of the adequacy and appropriateness of BellSouth-provided  
17 measures;
- 18                   • Test metrics based upon collaborative process with a series of comments  
19 and workshops; and
- 20                   • Comparison of test metrics results to CLEC results.
- 21
- 22
- 23
- 24
- 25
- 26
- 27

28 **Q. DID KCI TEST BELLSOUTH'S MANUAL SUPPORT SYSTEMS?**

29 A. No. OSS consist of both automated and manual systems and processes. KCI  
30 focused on BellSouth's automated systems and disregarded critical manual  
31 processes that support and complement the automated systems.

1 Q. PLEASE GIVE EXAMPLES OF THE MANUAL PROCESSES KCI  
2 FAILED TO TEST.

3 A. KCI failed to test BellSouth's:

- 4 • Account Establishment and Management Verification and Review
- 5 • OSS Interface Help Desk Functional Review
- 6 • CLEC Training Verification and Validation Review
- 7 • Collocation and Network Design Verification and Validation Review
- 8 • Manual Order Process
- 9 • Work Center Support Evaluation
- 10 • Provisioning Process Evaluation
- 11 • Billing Work Center Evaluation
- 12 • Maintenance and Repair Work Center Support Evaluation
- 13 • Network Surveillance Support Evaluation.

14 The OSS test in Florida evaluates all of these key areas.

15

16 Q. IS A REVIEW OF MANUAL PROCESSES NECESSARY FOR A THIRD-  
17 PARTY TEST TO BE PERSUASIVE EVIDENCE FOR A SECTION 271  
18 PROCEEDING?

19 A. Yes. In order to demonstrate that it provides nondiscriminatory access to its OSS,  
20 BellSouth "must first demonstrate that it 'has deployed the necessary systems and  
21 personnel to provide sufficient access to each of the necessary OSS functions  
22 and... is adequately assisting competing carriers to understand how to  
23 implement and use all of the OSS functions available to them'" (*Bell Atlantic*  
24 *New York Order* ¶ 126 (citations omitted).)

25 The failure to evaluate BellSouth's manual support systems is an  
26 especially critical flaw for this proceeding. For two of the areas in which KCI  
27 concluded that BellSouth did not satisfy the test—accuracy of rejects and  
28 clarifications and accuracy of switch translations—BellSouth blamed errors by

1 personnel in the Local Carrier Service Centers (“LCSCs”) for the not satisfied  
2 results. (See Direct Testimony of Ronald M. Pate, May 18, 2001 (“Pate”) at 164-  
3 174.)

4 **Q. DID THE GEORGIA TEST ADEQUATELY EVALUATE BELLSOUTH’S**  
5 **RELATIONSHIP MANAGEMENT PRACTICES?**

6 A. No, relationship management was not part of the test. Despite BellSouth’s  
7 representations to the contrary this is unlike the New York third-party test that the  
8 FCC found to be persuasive. In that test, KPMG evaluated “[a]ll stages of the  
9 relationship between Bell Atlantic and competing carriers . . . , from establishing  
10 the initial relationship, to performing daily operations, to maintaining the  
11 relationship.” (*Bell Atlantic New York Order* ¶ 97)  
12

13 **Q. DOES THE FLORIDA TEST EVALUATE BELLSOUTH’S**  
14 **RELATIONSHIP MANAGEMENT PRACTICES?**

15 A. Yes. Indeed, the Florida OSS testing identified exceptions that concern the  
16 business relationship between BellSouth and CLECs. For example, Florida Test  
17 PPR2 evaluates BellSouth’s policies and practices for establishing and managing  
18 CLEC account relationships. KCI is evaluating these relationships to determine  
19 their adequacy, completeness, and compliance with stated BellSouth policies and  
20 procedures. Additionally, to the extent specific retail analogs were identified, the  
21 test is designed to compare BellSouth’s wholesale and retail performance for  
22 parity. KCI currently has three open exceptions regarding Test PPR2.  
23

24 **Q. WHY DO CLECS NEED TO HAVE DOCUMENTED PROCEDURES IN**  
25 **THESE AND OTHER AREAS?**

26 A. CLECs cannot be sure that the information it receives from BellSouth is  
27 consistent and repeatable throughout the BellSouth organization without  
28 documented procedures in these and other areas. Every CLEC is required to go

1 through the start-up procedures to establish an account with BellSouth as well as  
2 depend on the account team for a myriad of day-to-day activities. CLECs may be  
3 hindered in their ability to establish their accounts promptly and efficiently  
4 because of inconsistent and contradictory information provided by BellSouth.  
5 KCI evaluated none of these relationships in the Georgia test.  
6

7 **Q. DID KCI TEST LOCAL NUMBER PORTABILITY (“LNP”) METRICS IN**  
8 **THE GEORGIA THIRD-PARTY TEST?**

9 A. No. KCI’s testing was limited and did not include any metrics evaluations for  
10 LNP activities.  
11

12 **Q. IS KCI TESTING LNP METRICS IN THE FLORIDA TEST?**

13 A. Yes.  
14

15 **Q. PLEASE DESCRIBE THE LNP METRICS DEFICIENCIES KCI HAS**  
16 **IDENTIFIED IN THE FLORIDA TEST.**

17 A. To date, KCI has issued at least six exceptions regarding the accuracy of  
18 BellSouth’s LNP metrics calculations and its ability to verify metrics reports.<sup>8</sup>  
19 (Test PMR5.) For example, Exception 10 notes that for May 2000, BellSouth’s  
20 metrics calculations for its Ordering: LNP—reject interval in the SQM reports  
21 were inconsistent with how the SQM documentation said they should be  
22 calculated. Moreover, KCI identified twenty-four discrepancies where BellSouth  
23 reported time intervals using a method other than that defined in its SQM. Failure  
24 to calculate performance measures using the defined methodology seriously

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<sup>8</sup> Exceptions 10, 11, 14, 21-22, and 24 all concern various aspects of KCI’s LNP testing of metrics calculation and verification review.

1 impacts the integrity of the data provided to CLECs and this Commission  
2 regarding BellSouth's response to LNP orders.

3 Similarly, Exception 11 states that BellSouth's May 2000, SQM report  
4 metrics calculations for LNP-FOC timeliness are inconsistent with how the SQM  
5 documentation said they should be calculated. Exception 11 sets forth seventeen  
6 discrepancies where BellSouth reported time intervals using a method other than  
7 that defined in its SQM.

8 **Q. WHY ARE LNP METRICS IMPORTANT?**

9 A. LNP is essential for CLECs to meaningfully compete in the local exchange  
10 market. LNP allows consumers to keep their own telephone numbers when  
11 switching carriers. Many local service orders, therefore, include LNP.  
12 Accordingly, evaluating BellSouth's ability to provide ordering and provisioning  
13 of LNP is essential to evaluating whether CLECs have a meaningful opportunity  
14 to compete. CLECs use BellSouth's SQMs to evaluate whether the service  
15 provided by BellSouth to CLECs is nondiscriminatory. If BellSouth's data is  
16 inaccurate, CLECs and this Commission are prevented from receiving an accurate  
17 measure of BellSouth's performance. These deficiencies identified in Florida call  
18 into serious question BellSouth's reporting of its performance on orders involving  
19 LNP.  
20

21 **Q. DID THE GEORGIA THIRD-PARTY TEST ADEQUATELY EVALUATE**  
22 **BILLING?**

23 A. As discussed later in this testimony, KCI concluded that BellSouth had satisfied  
24 billing tests even though KCI identified problems with billing. Although KCI  
25 opened a number of exceptions in Georgia billing tests, KCI ultimately concluded  
26 in Georgia that BellSouth had satisfied those tests. As this Commission is aware,

1 the ability to receive accurate and timely billing information is essential for  
2 CLECs to provide good service to their end-user customers. However, in spite of  
3 KCI's determination in Georgia that BellSouth has satisfied all its billing tests,  
4 problems in some areas KCI deemed resolved in Georgia subsequently occurred  
5 in the Florida tests. KCI currently has two open observations and ten open  
6 exceptions in the area of billing.  
7

8 **Q. PLEASE GIVE EXAMPLES OF THOSE PROBLEMS.**

9 A. Florida Exception 43 and Georgia Exception 103 both address the issue that  
10 BellSouth bills fail to reflect usage charges. The Georgia exception was closed on  
11 March 23, 2001, and the Florida exception was opened on April 4, 2001.  
12 Similarly, Florida Exception 13 and Georgia Exception 29 both address  
13 BellSouth's lack of timely delivery of daily usage records to CLECs. The  
14 Georgia exception was closed on August 4, 2000, and the Florida exception was  
15 opened February 27, 2001. Florida Exception 31 and Georgia Exception 28 both  
16 identify BellSouth's failure to deliver usage file records to CLECs. The Georgia  
17 exception was closed on March 7, 2001, approximately two weeks before the  
18 Florida exception was created. Most recently, on May 23, 2001, Florida  
19 Exception 62 was created due to BellSouth's incorrect charges for mechanized  
20 service ordering. This same rate had been part of Georgia Exceptions 16 and 24.  
21 Georgia Exception 16 and Exception 24 were closed on April 6, 2001. If  
22 BellSouth's processes are all satisfactory, as KCI's subjective assessment  
23 indicated, BellSouth should not experience these recurring billing problems.  
24

25 **Q. DID KCI ADEQUATELY EVALUATE CHANGE MANAGEMENT IN**  
26 **GEORGIA?**

1 A. No. KCI made a subjective determination that BellSouth's change management  
2 procedures were adequate. These subjective conclusions do not provide  
3 persuasive evidence that BellSouth is offering other carriers a meaningful  
4 opportunity to compete.  
5

6 **Q. PLEASE EXPLAIN WHY KCI'S CHANGE MANAGEMENT TESTING**  
7 **WAS INADEQUATE.**

8 A. KCI's testing in Georgia did not evaluate key areas such as compliance with  
9 notification and documentation intervals in the change management process, the  
10 existence of a cooperative testing environment for changes, and demonstrated  
11 cooperation with CLECs in implementing change. Instead, KCI's evaluation  
12 process focused on the existence of documentation describing the process, not on  
13 the appropriateness or adequacy of the process or on the timeliness and adequacy  
14 of implementation. (See Transcript of Hearing Before Georgia Public Service  
15 Commission, Docket No. 8354-U, dated May 8, 2001 at 205:10-20 (Excerpts  
16 attached as SEN3PT-2).) Moreover, KCI used no input from CLECs during its  
17 evaluation under CM-1<sup>9</sup> or during its evaluation of the implementation of OSS99  
18 under CM-2. AT&T requested the opportunity to present its view of problems  
19 with the implementation of OSS99, but was told KCI would not be interviewing  
20 any CLECs.

21 **Q. IS KCI TESTING CHANGE MANAGEMENT IN FLORIDA?**

22 A. Yes, and KCI has identified deficiencies in BellSouth's change control processes.

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<sup>9</sup> One AT&T employee was interviewed regarding change control in the fall of 1999. That interview, however, is not reflected in KCI's data sources which suggests that KCI did not consider it in reaching conclusions.



1 **Q. PLEASE IDENTIFY AND DESCRIBE CHANGE MANAGEMENT**  
2 **DEFICIENCIES KCI HAS DISCOVERED IN THE FLORIDA TEST.**

3 A. Florida test PPR1 is designed to evaluate the adequacy and completeness of  
4 procedures for developing, publicizing, conducting, and monitoring change  
5 management. KCI found that the distribution of Carrier Notification information  
6 associated with the BellSouth Change Control Process is not adequate and that  
7 significant information is not included in the Carrier Notifications. Additionally,  
8 KCI has found that BellSouth does not adhere to the procedures for system  
9 outages established in the Change Control Process. KCI has also found that  
10 BellSouth does not provide all prioritized change management requests to the  
11 appropriate BellSouth personnel for development and implementation.

12 **Q. WHY IS A THOROUGH EVALUATION OF CHANGE MANAGEMENT**  
13 **NECESSARY?**

14 A. Adequate change control procedures are necessary to ensure CLECs have  
15 sufficient time to adapt their systems to BellSouth's changes. Unexpected  
16 changes to documentation can temporarily halt testing, slow the development  
17 process, and in some instances, prevent a CLEC from being able to do business  
18 with BellSouth. Competing carriers need information about and specifications for  
19 an incumbent's systems and interfaces in order to develop and modify their  
20 systems and procedures to access the incumbent's OSS functions. Accordingly,  
21 in considering an incumbent's evidence that it offers an efficient competitor a  
22 meaningful opportunity to compete, "the Commission will give substantial  
23 consideration to the existence of an adequate change management process and  
24 evidence that the BOC has adhered to this process over time." (*Bell Atlantic New*  
25 *York Order* ¶ 102.) Indeed, the FCC has recognized that "change management  
26 problems can impair a competing carrier's ability to obtain nondiscriminatory

1 access to UNEs, and hence a BOC's compliance with § 271(c)(2)(B)(ii)." (*Id.* at  
2 103.)

3 The importance of a strong change management capability was  
4 highlighted when Bell Atlantic-New York's ("BA-NY") OSS "crashed" in early  
5 2000 because of inadequate mechanisms to permit OSS changes to be fully  
6 implemented on a timely and coordinated basis. Despite extensive (and  
7 expensive) work-arounds, CLECs simply could not compensate for this massive  
8 problem, and tens of thousands of customers' orders were lost or delayed,  
9 including 40,000 AT&T orders.

10 **Q. WHAT WOULD KCI HAVE DISCOVERED IF IT HAD PERFORMED A**  
11 **THOROUGH REVIEW OF BELL SOUTH'S CHANGE MANAGEMENT**  
12 **PROCESSES?**

13 A. A complete review of BellSouth's change management practices in Georgia  
14 would have revealed that BellSouth's change management system allows  
15 BellSouth veto power over any change, even if all other carriers support the  
16 change; it allows BellSouth to implement changes regardless of industry dissent;  
17 and it allows BellSouth to schedule changes unilaterally without adequate notice  
18 to CLECs. The testimony of Jay Bradbury filed today discusses in detail the  
19 inadequacies of BellSouth's change management process.

20 **Q. BELL SOUTH'S MR. PATE RELIES ON KCI'S DETERMINATION THAT**  
21 **BELL SOUTH SATISFIED CHANGE MANAGEMENT TESTS IN THE**  
22 **GEORGIA THIRD-PARTY TEST TO ARGUE THAT BELL SOUTH HAS**  
23 **ADEQUATE CHANGE MANAGEMENT PROCEDURES. DO YOU**  
24 **AGREE WITH MR. PATE?**

25 A. No. The third-party testing in Florida currently has one open observation and two  
26 open exceptions in the change management area. Accordingly, KCI's subjective  
27 determination that BellSouth's change management in Georgia is adequate is

1 suspect. Further testing is necessary because critical problems with BellSouth's  
2 change management process still exist.

3 **Q. CAN THIS COMMISSION BE ASSURED THAT BELL SOUTH'S CLEC**  
4 **APPLICATION VERIFICATION ENVIRONMENT WILL PREVENT**  
5 **THE PROBLEMS AN INADEQUATE CHANGE MANAGEMENT**  
6 **PROCEDURE CREATE?**

7 A. No, this Commission cannot assume that BellSouth's new test environment,  
8 CLEC Application Verification Environment ("CAVE"), which is described in  
9 Mr. Pate's testimony will prevent the problems an inadequate change  
10 management procedure creates. (See *Pate* at 67-71.) This environment was not  
11 tested in Georgia because it was outside the scope of the test. Moreover, there is  
12 an open exception in the Florida third-party test because of the lack of an  
13 adequate test environment.

14 **Q. CAN THIS COMMISSION BE CONFIDENT IN THE RESULTS OF THE**  
15 **GEORGIA OSS TEST WHEN THE FLORIDA OSS TEST HAS**  
16 **IDENTIFIED DEFICIENCIES THE GEORGIA TEST FAILED TO**  
17 **IDENTIFY?**

18 A. That the Florida testing uncovered exceptions in test areas that the Georgia test  
19 did not, indicates that CLECs and the Commission cannot have confidence that  
20 BellSouth's OSS provide nondiscriminatory access based on KCI's test results.  
21 BellSouth has the burden of demonstrating that it has met the requirements of  
22 Section 271 including that it provides nondiscriminatory access to its OSS  
23 functions.<sup>10</sup> The results that KCI has published thus far in the Georgia third-party  
24 test do not provide persuasive evidence on which BellSouth and this Commission  
25 can rely.

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<sup>10</sup> See *Ameritech Michigan Order* ¶¶ 43 & 158.

1           **B.     BellSouth’s Role In The Georgia Test**

2   **Q.    YOU HAVE DISCUSSED THE DIFFERENCES IN SCOPE BETWEEN**  
3   **THE TESTS AND DEFICIENCIES IDENTIFIED IN FLORIDA THAT**  
4   **WERE NOT IDENTIFIED IN GEORGIA. DO YOU HAVE ANY OTHER**  
5   **CONCERNS REGARDING THE GEORGIA TEST?**

6   A.    Yes, in Georgia KCI is not truly independent from BellSouth. One way of  
7   controlling potential bias is the use of an independent third-party in the design and  
8   implementation of the test. The third-party’s role is to prepare and conduct an  
9   objective test without undue influence from the party being evaluated and without  
10   an interest in the outcome of the test. An independent third-party tester removes  
11   the party being evaluated from test design and administration thus minimizing the  
12   ability of the interested party to skew the test results.

13           As a threshold matter, the use of a third-party tester is meaningless if that  
14   third party cannot maintain its independence. In Georgia, KCI is not an  
15   independent tester. KCI works for BellSouth. In fact, KCI had a direct reporting  
16   relationship with BellSouth. The Statement of Limiting Conditions in the Final  
17   Report in Georgia, notes: “This report is provided pursuant to the terms and  
18   conditions of the consulting contract between KPMG Consulting Inc. and  
19   BellSouth-Georgia.” (BellSouth Telecommunications, Inc. OSS Evaluation—  
20   Georgia, Final Report, Statement of Limitations. (“Statement of Limitations”).)

21

22   **Q.    SHOULD THIS FACTOR BE CONSIDERED IN EVALUATING KCI’S**  
23   **RESULTS?**

24   A.    Yes. The FCC has recognized that a test administrator’s independence, blindness,  
25   and ability to behave like a market participant are significant factors in the  
26   reliability of the third-party test results. (*See Bell Atlantic New York Order* ¶ 96-  
27   100.) An analysis of these factors in connection with the Georgia OSS test

1 reveals KCI cannot meet any of these criteria. Instead, the test design and  
2 execution reveal BellSouth exercised substantially more control over the test and  
3 CLECs participated substantially less than in other states in which KCI performed  
4 third-party tests. Accordingly, this Commission must consider BellSouth's  
5 influence over KCI when evaluating the results of the Georgia OSS test. (*See Bell*  
6 *Atlantic New York Order* ¶ 100.)  
7

8 **Q. HAVE ANY STATE COMMISSIONS COMMENTED ON THE EXTENT**  
9 **OF KCI'S INDEPENDENCE IN GEORGIA?**

10 A. Yes, the Florida Commission found

11  
12 [w]hile BellSouth has advocated that we rely on the testing  
13 being conducted in Georgia, we are hesitant to do so  
14 because we have some concerns about the independence of  
15 that testing process. Instead, we believe that the process  
16 used in New York and in Pennsylvania is more appropriate  
17 for use in Florida. Under the New York DPS OSS testing  
18 "model," the state commission independently selects the  
19 third party tester and is the client in the engagement. Once  
20 the tester is selected, the state commission and the third  
21 party tester jointly develop the master test plan. The  
22 commission staff also play a strong role in monitoring and  
23 controlling the testing, which is vital to ensure  
24 independence and objectivity of the test. In contrast,  
25 BellSouth selected the third party tester and serves as the  
26 client in the Georgia engagement. It also developed or  
27 guided the development of the master test plan.

28 *Notice of Proposed Agency Action Order on Process for Third Party Testing,*  
29 *Florida Public Service Commission, In re: Consideration of BellSouth*  
30 *Telecommunications, Inc.'s entry into interLATA services pursuant to Section 271*  
31 *of the Federal Telecommunications Act of 1996, Docket No. 960786-IL at 7*  
32 *(Aug. 9, 1999).*

1 **Q. WAS KCI INDEPENDENT FROM BELL-ATLANTIC IN THE NEW**  
2 **YORK TEST?**

3 A. Yes. In stark contrast to Georgia, the OSS testers in New York had no direct  
4 reporting relationship with BA-NY. Thus, the testers did not work at the direction  
5 of BA-NY nor did they receive any information from BA-NY that was not  
6 publicly available to all competing carriers. (*See Bell Atlantic New York Order* ¶¶  
7 99 & 100.)  
8

9 **Q. WAS THE GEORGIA OSS TEST PLAN DRAFTED BY AN**  
10 **INDEPENDENT, OBJECTIVE THIRD-PARTY?**

11 A. No, it was drafted by BellSouth. Indeed, in its final test report for Georgia, KCI  
12 does not describe any measures it took to prevent influence by BellSouth over test  
13 design. Instead, KCI attempts to distance itself from the Georgia OSS Test by  
14 disclaiming responsibility for work KCI received from BellSouth and Hewlett  
15 Packard:

16  
17 The original Master Test Plan (MTP) governing much of  
18 the testing work at BellSouth—Georgia was not authored  
19 or developed by KCI. On September 9, 1999, KCI  
20 inherited a MTP and certain associated work-in-progress  
21 that had been performed by two third parties. Therefore,  
22 KCI makes no representations or warranties as to the  
23 contents of this MTP or the testing work that had been done  
24 prior to September 9, 1999. Furthermore, KCI has not  
25 independently verified the accuracy or completeness of the  
26 work product provided by these third parties; accordingly  
27 KCI expresses no opinion on nor bear any responsibility for  
28 this information and work product.

29 (Statement of Limitations.)<sup>11</sup> Accordingly, the Georgia test report reveals that  
30 BellSouth exercised significant influence over planning decisions regarding what

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<sup>11</sup> KCI continues to distance themselves from the MTP on page II-3 of the Final Report, “KPMG agreed to assume responsibility for execution of the tests stipulated in the MTP, but not for the design of the MTP itself.” (Final Report at II-3.)

1 style of testing to employ and the scope of the testing, including which types of  
2 test scenarios to exclude or to minimize.

3 **Q. DOES IT MATTER WHO DEVELOPS THE TEST PLAN?**

4 A. Yes. The designer of a test plan can have a substantial effect on the results. By  
5 controlling the scope, structure, and basic assumptions of the test, BellSouth was  
6 able to tailor the test to target specific elements or even entire categories of areas  
7 while avoiding others entirely. Moreover, as the designer of the test plan,  
8 BellSouth was able to influence the test parameters and standards used by KCI to  
9 guarantee success.  
10

11 **Q. DID KCI VALIDATE BELLSOUTH'S STATEMENTS BEFORE**  
12 **ACCEPTING THEM?**

13 A. No, KCI was very willing to accept information or explanations from BellSouth  
14 without independent verification of accuracy or completeness. For example, the  
15 Final Report states:

16  
17 Certain information and assumptions (oral and written)  
18 have been provided to KCI by the management of  
19 BellSouth and other third parties. KCI has relied on this  
20 information in our analysis and in the preparation of the  
21 report, and has not independently verified to the accuracy  
22 or completeness of the information provided . . . .

23 (Final Report at I-2-3.) As Michael Weeks, KCI Managing Director, confirmed,  
24 "[i]f we have characterized something as, 'BellSouth has stated,' and didn't follow  
25 that up with some words to we tested or didn't test that, then the absence of that  
26 wording would suggest we just left it." (Transcript of Deposition of Michael  
27 Weeks, Georgia Public Service Commission, Docket No. 8354-U, May 4, 2000  
28 (attached as SEN3PT-3) at 127:2-6.)

1 **Q. IS KCI'S FAILURE TO VERIFY BELL SOUTH'S STATEMENTS OF**  
2 **CONCERN?**

3 A. Yes. Because BellSouth's unverified statements concern the very thing KCI was  
4 to test—performance of BellSouth's OSS systems—this lack of verification is  
5 disturbing, especially with regard to subjective determinations made by KCI. An  
6 independent tester should not rely on assumptions that go to the very heart of its  
7 testing responsibilities. When so much of CLECs' ability to compete effectively  
8 turns on the performance of BellSouth's systems, these systems should be  
9 thoroughly and independently tested as required by the Commission.

10

11 **C. CLEC Involvement in The Georgia Test**

12 **Q. DID KCI CONSIDER CLECS' POINT OF VIEW IN CONDUCTING ITS**  
13 **SUBJECTIVE ANALYSES?**

14 A. No. In conducting its subjective analyses, KCI did not review the adequacy of  
15 BellSouth's processes from a CLEC's point of view. For example, under  
16 BellSouth's held order practice, if a CLEC submits an order on the second day of  
17 the month and the order is held for more than three weeks but closed before the  
18 last day of the month, it is not reported as a held order. Because this practice  
19 conflicted with BellSouth's actual definition of a held order, KCI opened an  
20 exception. KCI closed its exception, however, when BellSouth changed its  
21 definition of the measure to describe its actual practice.

22 KCI never evaluated whether this change was "complete, logical, and  
23 consistent" from a CLEC's point of view. (*See* Supplemental Test Plan report,  
24 dated March 20, 2001 filed with GPSC in Docket No. 8354-U at VIII-B-50  
25 (PMR-2-7-2).) The ability to have orders filled in a timely fashion is critical to a  
26 CLEC's ability to compete. AT&T would much prefer to have BellSouth report



1 all held-order intervals so that AT&T can determine whether it is receiving  
2 discriminatory treatment. Reporting only orders that are open on the last day of  
3 the month reveals nothing about BellSouth's pattern of held orders.  
4

5 **Q. DID KCI'S TEST PROVIDE FOR SUBSTANTIAL CLEC**  
6 **PARTICIPATION?**

7 A. No. Initially, CLECs were only allowed to file comments on status reports. In  
8 February 2000, a single weekly status call in which CLECs could participate was  
9 added to the Georgia test. However, test planning and administration activities  
10 and decisions were made largely in a closed environment.  
11

12 **Q. DID OSS TESTING IN OTHER STATES PROVIDE FOR SUBSTANTIAL**  
13 **CLEC PARTICIPATION?**

14 A. Yes. In other states such as New York where KCI has served as the third-party  
15 tester, CLECs were invited to participate in conference calls between the tester  
16 and BA-NY. As the FCC found, this openness bolsters the credibility and the  
17 reliability of third-party test results.  
18

19 **Q. DOES THE FLORIDA OSS PROVIDE FOR GREATER CLEC**  
20 **PARTICIPATION THAN THE GEORGIA OSS TEST?**

21 A. Yes, the Florida third-party test is much more open and participative than the  
22 Georgia test. Throughout the testing process, CLEC involvement has been  
23 encouraged and utilized. For example, CLECs extensively participated in shaping  
24 the Florida OSS test design by submitting written comments to the Florida  
25 Commission and attending Commission-sponsored workshops. CLECs are also  
26 included in three different weekly conference calls (a status call, an observation  
27 call, and an exception call) among BellSouth, the Commission, and KCI. These  
28 calls permit CLECs to substantively discuss exceptions and observations opened

1 by KCI with the Commission and BellSouth and also provide an opportunity for  
2 CLECs to recommend additional testing items or suggest changes to  
3 communication methods. These calls are made even more meaningful because  
4 KCI provides CLECs access to observation and exception reports at the same time  
5 it provides access to BellSouth and provides CLECs access to written weekly  
6 status reports and timely, detailed project plans. This information greatly  
7 facilitates effective CLEC participation.  
8

9 **Q. IS CLEC PARTICIPATION IN OSS TESTING IMPORTANT?**

10 A. Testing is intended to predict “real-world” performance of OSS without requiring  
11 competitors and their customers to suffer the consequences of undeveloped or  
12 faulty OSS. Testing is useful, however, only if it accurately reflects the  
13 conditions in the real world. The CLECs who use and will use BellSouth’s OSS  
14 can provide a wealth of information, including discussing the relevance of the test  
15 to the marketplace and sharing experiences and problems faced when using  
16 BellSouth’s OSS.  
17

18  
19 **II. THE GEORGIA TEST RESULTS**

20  
21 **A. Volume Testing**  
22

23 **Q. DID THE GEORGIA TEST REVEAL WHETHER BELL SOUTH’S OSS**  
24 **COULD HANDLE REAL WORLD CLEC VOLUMES?**

25 A. No. The volume testing was not conducted in BellSouth’s production  
26 environment, ENCORE. Instead, BellSouth enhanced a special test environment,  
27 RSIMMS, for performance of the volume test. (See SEN3PT-2 at 213:13-23.)

1 **Q. IS SUFFICIENT VOLUME CAPACITY CRITICAL TO SUPPORTING**  
2 **CLECS' ENTRY INTO THE LOCAL EXCHANGE MARKET?**

3 A. Yes. CLECs are dependent on BellSouth's OSS for pre-ordering information,  
4 ordering and provisioning, billing, and maintenance and repair. Inadequate OSS  
5 would place CLECs at a competitive disadvantage because they will not be able  
6 to assure their customers that the CLECs' service will be at least as accurate,  
7 dependable, and fast as service provided by BellSouth. Inadequate OSS also  
8 impacts the consumers directly. Without nondiscriminatory access to OSS,  
9 CLECs "will be severely disadvantaged, if not precluded altogether, from fairly  
10 competing' in the local exchange market."<sup>12</sup> If BellSouth's OSS cannot handle  
11 the volumes of CLEC transactions, customers will be negatively impacted  
12 because CLECs will not be able to process their requests promptly.

13 **Q. HAS KCI EVER CONDUCTED VOLUME TESTING FOR A THIRD-**  
14 **PARTY TEST OF AN ILEC'S OSS IN AN ARTIFICIAL ENVIRONMENT**  
15 **IN ANY STATE OTHER THAN GEORGIA?**

16 A. No. In fact, during the Georgia OSS testing, KCI told BellSouth "running the  
17 volume test in something other than the production environment was not "a[s]  
18 strong a record as running that same test in the production environment . . . ."  
19 (SEN3PT-2 at 219:16-21.) BellSouth nonetheless chose to run the test in the  
20 artificial environment because it did not want to spend money to upgrade its  
21 production system. (*See id.* at 213:13-23.)

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<sup>12</sup> *See Bell Atlantic New York Order* ¶ 83 (citations omitted).

1 **Q. DO THE RESULTS FROM THE TEST ENVIRONMENT ASSURE THAT**  
2 **THE PRODUCTION ENVIRONMENT UPON WHICH CLECS WILL**  
3 **RELY WILL PERFORM AT THE SAME LEVEL AS THE**  
4 **ENVIRONMENT TESTED?**

5 A. No, and KCI admitted at the third-party test hearing conducted by the Georgia  
6 Commission on May 8, 2001, that the results from the test environment do not  
7 assure that the production environment upon which CLECs will rely will perform  
8 at the same level as the environment tested. (*See id.* at 226:23-227:15.)

9 **Q. IS RSIMMS, BELLSOUTH'S ARTIFICIAL TEST ENVIRONMENT,**  
10 **EQUAL TO ENCORE, BELLSOUTH'S PRODUCTION ENVIRONMENT?**

11 A. No. The Final Report on its face reveals that RSIMMS has at least twice the  
12 capacity of the production system. For all three applications at issue, TAG,  
13 LESOG, and LNP, the test environment possessed substantially more power than  
14 BellSouth's production environment. The RSIMMS TAG servers have 4GB of  
15 memory whereas the ENCORE TAG servers only have 2GB. This difference  
16 allows the RSIMMS TAG servers to "deliver a 20% faster compute  
17 performance" than the ENCORE servers. (*See RSIMMS and ENCORE Systems*  
18 *Review* in Final Report ("*RSIMMS Report*") at 7.)

19 Likewise, the RSIMMS environment runs three LESOG servers, each of  
20 which possess a compute performance four to six times that of the two ENCORE  
21 LESOG servers. (*See id.* at 8.) Additionally, the combined compute capacity of  
22 the RSIMMS LNP servers is almost 100% greater than the combined capacity in  
23 ENCORE. (*See id.* at 7-8.)

24 **Q. DID KCI CONDUCT AN ANALYSIS FOR PURPOSES OF EVALUATING**  
25 **WHETHER THE HARDWARE AND SOFTWARE CONFIGURATIONS**  
26 **IN RSIMMS MIRRORED THE CONFIGURATIONS IN ENCORE?**

27 A. Yes, KCI recognized that additional hardware and software had been created to  
28 support the specified test volumes. (*See id.*). For example, the directory

1 structures between the two systems were different. (*See id.* at 15.) Such  
2 differences could affect the capacity of the system, but have not been tested.

3 **Q. ARE THERE OTHER DIFFERENCES BETWEEN RSIMMS AND**  
4 **ENCORE THAT COULD ADVERSELY AFFECT ENCORE'S**  
5 **PERFORMANCE?**

6 A. Yes. ENCORE is configured to run from a local area network ("LAN") across  
7 three data centers while RSIMMS is run from a wide area network ("WAN")  
8 within one data center. (*See RSIMMS Report* at 5 & 7) Inherent delay across  
9 BellSouth's LAN could negatively impact ENCORE's performance. *Id.* Testing  
10 in RSIMMS simply cannot provide an accurate picture of what will happen in  
11 ENCORE.

12 **Q. DID KCI CONDUCT VOLUME TESTING IN BELLSOUTH'S**  
13 **PRODUCTION ENVIRONMENT?**

14 A. KCI conducted limited volume testing of BellSouth's production environment.  
15 KCI's testing was based on the existing capacity of the production system, not  
16 projected order volumes. KCI submitted only 24,594 pre-orders and 7,429 orders  
17 in the production environment test. (*See SEN3PT-2* at 240:11-15.) When KCI  
18 ran normal volume testing in BellSouth's artificial test environment, the numbers  
19 of transactions were based on projected volume and were much greater: 118,000  
20 pre-orders and 35,000 orders. (*See id.* at 240:16-19.)

21 **Q. DOES THE LIMITED VOLUME TEST CONDUCTED IN THE**  
22 **PRODUCTION ENVIRONMENT PROVIDE ANY INFORMATION ON**  
23 **THE ABILITY OF BELLSOUTH'S OSS TO HANDLE ORDERS AT**  
24 **FUTURE PRODUCTION VOLUMES?**

25 A. No. ENCORE's stated capacity uses 5,800 pre-orders and 1,700 orders per hour.  
26 Forecast requirements for capacity at year-end 2001 are twice that much: 11,800  
27 pre-orders and 3,500 orders per hour. KCI's test thus demonstrates that

1 BellSouth's production environment has only half of the capacity necessary to  
2 meet year-end 2001 volumes.

3 **Q. DID BELL SOUTH SATISFY ALL OF THE VOLUME TESTS RUN IN ITS**  
4 **PRODUCTION ENVIRONMENT?**

5 A. No. For example, KCI performed two tests in BellSouth's actual production  
6 environment to evaluate the timeliness of Functional-Acknowledgements-EDI.  
7 (See O&P-3-3-1.) These tests evaluated BellSouth's performance at normal  
8 volume (O&P-3-3-1) and at peak volume (O&P-4-3-1). Both of these tests  
9 yielded "not satisfied" determinations.

10 In his testimony, Mr. Varner attempts to dismiss the fact that BellSouth  
11 failed to satisfy these tests on the theory that BellSouth's failures were limited to  
12 the peak volume testing. (See Testimony of Alphonso J. Varner, May 18, 2001  
13 ("Varner") at 20:23-24.) Mr. Varner's argument is flawed. O&P-3-3-1 only  
14 tested BellSouth's normal volume performance. (See Test Report at V-D-12-13).  
15 As I explained above, at normal volumes, BellSouth's production environment  
16 only has half the capacity required to meet year-end 2001 volumes. Accordingly,  
17 despite his attempts to minimize the importance of this test, Mr. Varner highlights  
18 that for O&P-3-3-1 BellSouth could not handle the volumes tested.

19 **Q. DID KCI'S VOLUME TEST INCLUDE ALL ORDER TYPES AND**  
20 **INTERFACES?**

21 A. No. KCI's testing did not assess volume processing of partially mechanized and  
22 manual orders. It did not include the GUI interfaces (LENs and Robo-TAG) or  
23 the repair interface (TAFI), and it did not include all order and product types.  
24

1 **Q. DID KCI CONDUCT ANY VOLUME STRESS TESTING IN GEORGIA?**

2 A. No. Stress tests are designed to determine the outer limits of a particular system's  
3 or interface's volume capacity. Typically, stress tests are an attempt to escalate  
4 the volumes until the system breaks. KCI did not conduct stress testing in either  
5 the RSIMMS test environment or the ENCORE production environment.

6 **Q. WAS STRESS TESTING COMPLETED IN OTHER STATES?**

7 A. The New York test included significant stress testing. The New York stress test  
8 was designed to test and report the ability of Bell Atlantic-New York's EDI  
9 interface to timely process a higher than normal volume of pre-order and order  
10 transactions. To perform the test, KCI took the highest hourly order volume, in  
11 this case 11% of the total daily order volume, and used it to establish a baseline  
12 for the test. The stress load for the test was 150% of the baseline hourly volume.  
13 In the second hour of the test, KCI incrementally increased the transaction volume  
14 every fifteen minutes until the volume for the second hour was approximately  
15 150% of the baseline hourly volume. This increased volume was maintained for  
16 two hours during which KCI submitted orders evenly throughout each hour. The  
17 volumes in the last two hours of testing were two and one-half times greater than  
18 the baseline hour volume. None of this was done in the Georgia test.

19 **Q. WAS THE VOLUME TEST IN GEORGIA REPRESENTATIVE OF**  
20 **WHETHER BELL SOUTH'S SYSTEMS WILL BE ADEQUATE TO**  
21 **HANDLE CLEC ACTIVITY?**

22 A. No. The test provides no assurance that BellSouth's production environment will  
23 be able to support CLEC requests for service for all order types or be able to  
24 handle orders at future production rates. Instead, the results reveal that  
25 BellSouth's current production system has only one-half the capacity necessary to  
26 meet year-end 2001 volumes.

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**B. Domain Results**

**Q. HAVE YOU IDENTIFIED ANY OTHER CONCERNS REGARDING THE GEORGIA TEST?**

A. I have identified five specific concerns with the test as it was performed in Georgia.

- (a) First, it is important to recognize that much of the test involved purely subjective analyses of BellSouth’s documentation and reports, not an analysis of whether BellSouth complied with that documentation or the adequacy of those reports. The majority of the Billing and Maintenance and Repair tests fall into this category, as well as almost 60% of the Pre-Ordering tests and almost 65% of the Ordering and Provisioning tests. In KCI’s judgment, BellSouth *satisfied* all of these tests. The comments underlying the conclusions, however, call these satisfied results into question.
- (b) Second, KCI’s test results are questionable because (i) KCI aggregated test results in ways that hid performance deficiencies in key areas, and masked the true performance of BellSouth’s systems; and (ii) KCI’s tests were not structured to identify deficiencies.
- (c) Third, KCI skewed the test results through incomplete and improper statistical analysis. In a number of instances, KPMG determined that a test was satisfied even though BellSouth did not meet the benchmark.
- (d) Fourth, when KCI’s improper statistical analysis did not bring BellSouth up to the Commission-established standards, KCI simply disregarded those standards and stated that, in its “professional judgement,” BellSouth had satisfied the test.



1 (e) Fifth, when KCI could not through either its application of inappropriate  
2 statistical methodology or its professional judgement conclude that  
3 BellSouth had satisfied a test, KCI told the Commission that the  
4 unsatisfied result did not matter because the performance measures and  
5 penalty plans in Georgia would ensure that BellSouth corrected the  
6 problem or would provide compensation to CLECs if BellSouth did not.  
7 KCI is wrong. The performance measures in Georgia are not currently  
8 designed to identify discrimination in the areas of performance that KCI  
9 found were deficient or provide compensation for such discrimination.

10 All of these factors call into question the persuasive authority of KCI's third-party  
11 test in Georgia.

12 **Q. MR. VARNER TESTIFIED THAT BELLSOUTH PASSED ALL BUT A**  
13 **FEW OF THE MORE THAN 1100 TESTS. (See Varner at 4:12-19.) IS**  
14 **THAT TRUE?**

15 A. Mr. Varner's statement must be put in context. KCI did not really conduct 1,175  
16 tests. Several different test points were developed from a single set of test data.  
17 For example, test BLG-1 included 49 test points, all of which were created for the  
18 purpose of testing BellSouth's ability to deliver timely and accurate invoices for  
19 UNEs. Indeed, the unique purpose of some of these test points was to establish  
20 detail such as whether bills cross-totaled correctly. (See BLG-1-1-16.)

21 Moreover, many of the tests were simply reviews of documentation. In  
22 the Pre-Ordering test domain, 48 of the 81 test points involve review of  
23 documentation and other subjective analyses. In the Ordering and Provisioning  
24 test domain, 114 of the 177 test points could be classified as subjective analyses,  
25 rather than measurements against standards. These too consisted of reviews of  
26 BellSouth documentation and systems. In the Billing test domain, 131 of the 137

1 tests were subjective analyses. Similarly, the Maintenance and Repair and  
2 Change Management evaluations were subjective analyses.

3 In all of these subjective analyses, KCI concluded that BellSouth satisfied  
4 the test. Often, however, the comments in the Georgia Final Report call the  
5 conclusions into question.

6  
7 **Q. WHAT DO KCI'S BILLING TESTS IN GEORGIA SHOW?**

8 A. The tests show problems with collecting usage, delivering usage to CLECs, and  
9 providing CLECs information necessary to interpret that information. KCI's  
10 subjective determination that these tests were satisfied is undercut by its report.  
11 In the billing area, KCI determined that BellSouth satisfied all tests, despite its  
12 identification of concerns relating to the accuracy of usage information contained  
13 in BellSouth's Access Daily Usage Files ("ADUF") and Optional Daily Usage  
14 Files ("ODUF").  
15

16 **Q. WHAT PROBLEMS DID KCI IDENTIFY RELATED TO COLLECTING**  
17 **USAGE?**

18 A. KCI's billing tests in Georgia show that for test CLEC invoices, the expected  
19 usage did not match the Exchange Message Interface ("EMI") provided by  
20 BellSouth. (See Final Report at VI-A-23.) KCI opened Exception 91 in  
21 connection with this problem but closed it based on BellSouth's promise to  
22 correct the problem.  
23

24 **Q. DID BELL SOUTH CORRECT THE PROBLEM IDENTIFIED IN**  
25 **EXCEPTION 91 BEFORE KCI CLOSED THE EXCEPTION?**

26 A. No. KCI's closure report for exception 91 states "according to its response,  
27 BellSouth expects to implement a fix for the billing and interrupt charges on

1 September 19, 2000. KCI's professional experience indicates that if properly  
2 implemented, BellSouth's proposed fix is likely to adequately correct the issue  
3 identified in exception 91." KCI thus determined that test BLG-1-1-19 was  
4 satisfied based on BellSouth's promise to correct the problem.  
5

6 **Q. IS KCI'S SUBJECTIVE DETERMINATION PERSUASIVE EVIDENCE**  
7 **THAT BELLSOUTH CORRECTED THE PROBLEM?**

8 A. No, KCI's subjective determination that the issue is likely to have been  
9 adequately corrected is not persuasive evidence that the problem has been fixed.  
10 If this error is not adequately corrected, consumers will be affected. CLECs may  
11 use the wholesale bill as a means of billing their customers. Inaccuracies in the  
12 wholesale bill would then lead to inaccuracies in retail billing. Inaccuracies in  
13 retail billing are likely to lead to lost customers for CLECs.  
14

15 **Q. DID KCI IDENTIFY ANY OTHER PROBLEMS COLLECTING USAGE**  
16 **DATA FOR BILLING?**

17 A. In the performance of billing tests, KCI found that service orders were "hung up"  
18 in the system, preventing usage from being delivered to CLECs. Nonetheless,  
19 KCI determined that tests BLG-2-1-2, BLG-2-1-10, and BLG-2-1-11, tests related  
20 to the accuracy and completeness of usage files, were satisfied even though  
21 BellSouth did not return six percent (6%) of the daily usage files.<sup>13</sup> Notably,  
22 Exception 28, which addressed this issue, contained a second amended exception

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<sup>13</sup> BLG-2-1-2's evaluation criteria states, "for all scripted and completed test calls that should generate a DUF record, all expected DUF records are contained in the electronically delivered daily usage files." (Final Report at VI-B-14.) BLG-2-1-10 concerns whether BellSouth's "[p]rocess includes procedures to ensure all relevant usage is received, validated and processed." (*Id.* at VI-B-16.) BLG-2-1-11 evaluated whether BellSouth's "[p]rocess includes procedures to ensure all usage is correctly reported." (*Id.* at VI-B-17.)

1 because BellSouth failed to deliver DUF records for 6% of the second retest calls  
2 for which records were expected, the same amount that later was deemed  
3 satisfactory.  
4

5 **Q. ON WHAT BASIS DID KCI DETERMINE THESE TESTS WERE**  
6 **SATISFIED?**

7 A. KCI's conclusions that these tests were satisfied appear from the test report to  
8 have been based on BellSouth's assurance that when these errors occur, CLECs  
9 would not be billed for the usage in question. (See Final Report at VI-B-15.)  
10 BellSouth's decision not to bill CLECs for the delayed and missing usage does  
11 not address the deficiency identified by KCI. CLECs' profit, in part, is based  
12 upon the difference between what they pay BellSouth for usage and the amount  
13 CLECs charge their customers for usage. Accordingly, if BellSouth does not  
14 provide a CLEC some portion of its usage, then that CLEC cannot bill its  
15 customers. The transaction is effectively eliminated along with CLEC profit.  
16

17 **Q. DID KCI IDENTIFY DEFICIENCIES OTHER THAN REPORTING**  
18 **USAGE?**

19 A. KCI also identified deficiencies with BellSouth's documentation that CLECs rely  
20 upon to interpret the bills they receive from BellSouth. KCI's qualifications to  
21 BLG-5-1-2 include, "[t]here is no overview of how information is organized  
22 across various documents," and "[e]xamples or illustrations were noted without  
23 corresponding explanation." (Final Report at VI-E-6.) Regardless of these  
24 concerns, KCI determined the deficiencies would have little impact on CLECs  
25 and found that BellSouth had satisfied the test.  
26

1 **Q. PLEASE COMMENT ON IS KCI'S CONCLUSIONS IN LIGHT OF ITS**  
2 **COMMENTS RELATED TO BILLING?**

3 A. KCI's willingness to dismiss identified concerns related to billing is troublesome.  
4 There is perhaps no issue that is more likely to inflame customers than late or  
5 inaccurate bills. While certain determinations obviously must be subjective, it is  
6 curious that every subjective analysis conducted by KCI resulted in a *satisfied* for  
7 BellSouth—despite the many times KCI qualified its satisfied determination. The  
8 Final Report and KCI's testimony regarding the evaluation suggest a subjective  
9 analysis that was weighted toward BellSouth.  
10

11 **Q. DID KCI CONDUCT ANY TESTS AGAINST OBJECTIVE STANDARDS?**

12 A. The bulk of the objective standards against which KCI tested BellSouth's  
13 performance are contained in the Pre-ordering and Ordering and Provisioning test  
14 domains of the GMTP. Ninety-six (96) tests in those test domains in the Master  
15 Test Plan-Final Report included objective standards against which BellSouth's  
16 performance was measured. The results of these tests reveal that this Commission  
17 can have no confidence that BellSouth's OSS provides nondiscriminatory support.  
18

19 (a) First, the results of all tests relating to the timeliness of BellSouth's  
20 responses to orders must be discounted because KCI did not test the  
21 disaggregated levels the Georgia Commission ordered it to test. KCI's  
22 determination that BellSouth satisfied some of these tests does not answer  
23 the question of whether BellSouth's OSS would have met the Georgia  
24 Commission-established standards for each service/activity type.  
25

26 (b) Second, KCI included data and constructed tests in ways that masked the  
27 true performance of BellSouth's systems.  
28

29 (c) Third, KCI skewed the test results through improper and incomplete  
30 analysis.  
31

32 (d) Fourth, when KCI's improper statistical analysis did not bring BellSouth  
33 up to the Commission-established standards, KCI disregarded those  
34 standards and stated that, in its "professional judgment," BellSouth had  
35 satisfied the test.

1           Thus, the majority of KCI's findings for those 96 objective tests are questionable.

2   **Q.   WAS KCI REQUIRED TO TEST TO DISAGGREGATED SERVICE**  
3   **LEVELS?**

4   A.   Yes. The Georgia Commission specified objective standards by disaggregation  
5   levels to be used in performing the third-party test. Those levels of  
6   disaggregation are: (a) 2-wire loop-Design; (b) 2-wire loop-Non Design;  
7   (c) 2-wire loop with INP-Design; (d) 2-wire loop with INP-Non Design;  
8   (e) 2-wire loop with LNP-Design; (f) 2-wire loop with LNP-NonDesign; (g) INP  
9   (Standalone); (h) LNP (Standalone); (i) switch port; (j) loop and port  
10   combination; (k) local interconnection trunks; and (l) local transport. (*See Order*  
11   *Adopting Standards and Benchmarks, In re: Investigation into Development of*  
12   *Electronic Interfaces for BellSouth's Operational Support System, Dckt. No.*  
13   *8354-U (June 6, 2000).*)<sup>14</sup> Aggregating test results across these service types does  
14   not reveal BellSouth's performance for any individual service type.  
15

16   **Q.   DO YOU KNOW WHY KCI FAILED TO TEST TO THE GEORGIA**  
17   **COMMISSION'S ORDER?**

18   A.   KCI did not offer an explanation. KCI did admit at the hearing on the Georgia  
19   third-party test, that it did not test to the ordered levels of disaggregation: "[o]ur  
20   test was not constructed with the level of disaggregation specified in the June 6  
21   Order." (SEN3PT-2 at 82:21-23.) KCI also admitted that it could have done so.  
22   (*See id.* at 76:19-22.)

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<sup>14</sup> *See also* Georgia Public Service Commission's Staff Report and Order on Petition for Third Party Testing, *In re: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support System*, Dckt. No. 8354-U, (May 20, 1999); Georgia Public Service Commission Order on Supplemental Test Plan, *In re: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support System*, Dckt. No. 8354-U, (January 12, 2000). KCI did not test to the disaggregated services types set forth in these orders either.

1 **Q. WHAT WAS THE EFFECT OF KCI'S FAILURE TO TEST TO THE**  
2 **DISAGGREGATION LEVELS ORDERED BY THE GEORGIA**  
3 **COMMISSION?**

4 A. As a result of KCI's failure to test to disaggregated service types, BellSouth  
5 satisfied certain tests even though it did not meet Commission-established  
6 standards for important order types such as orders that allow consumers to keep  
7 their own telephone numbers when switching carriers.  
8

9 **Q. PLEASE GIVE AN EXAMPLE OF HOW EVALUATING AGGREGATED**  
10 **RESULTS DISGUISED INADEQUATE PERFORMANCE.**

11 A. When evaluating whether BellSouth delivers timely error and clarification notices  
12 on orders, for example, KCI initially tested no 2-wire loops with local number  
13 portability ("LNP"). (See Final Report at V-A-34.) In the first retest, KCI  
14 evaluated thirty-four orders for 2-wire loops with LNP. On those transactions,  
15 BellSouth failed to meet the GPSC's standards for order clarification and error  
16 notices for either fully mechanized or partially mechanized orders.<sup>15</sup> *Id.*  
17 Nonetheless, based on the summary data for partially mechanized orders across  
18 all service types, KCI determined that BellSouth has satisfied the Georgia  
19 Commission's standard for timely error and clarification notices for partially  
20 mechanized orders.<sup>16</sup> Accordingly, KCI concluded that BellSouth had satisfied  
21 the test even though the test results reveal that BellSouth did not satisfy the

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<sup>15</sup> The Georgia Commission's standard is 97% received within one hour for fully mechanized transactions. For fully mechanized orders, BellSouth returned order clarification and error notices within one hour for only 62% of 2-wire loops with LNP-Design and only 71% of 2-wire loops with LNP-Non Design. GPSC's standard for partially mechanized orders is 85% received within 24 hours. For partially mechanized orders, BellSouth returned only 56% of 2-wire loops with LNP-Design within 24 hours and only 60% of 2-wire loops with LNP-Non Design.

<sup>16</sup> Even using summary data, BellSouth could not satisfy the Commission's standard for fully mechanized error notices. (See Final Report at V-A-12 (O&P-1-3-2a).)

1 Commission's standard for timely order and clarification notices for orders that  
2 allow a customer to keep his or her own phone number when switching carriers.<sup>17</sup>  
3

4 **Q. ARE THERE ANY OTHER EXAMPLES OF HOW AGGREGATED**  
5 **RESULTS MASKED DEFICIENT PERFORMANCE?**

6 A. KCI also did not perform its evaluation to the required levels of disaggregation  
7 when testing firm order confirmation ("FOC") timeliness. When evaluating FOC  
8 timeliness, KCI initially tested fifteen 2-wire loops with LNP and three LNP  
9 standalone orders. (*See* Final Report at V-A-41-42.) In the first retest, KCI  
10 evaluated twenty-six 2-wire loops with LNP and fourteen standalone LNP orders.  
11 (*See id.* at V-A-43-46.) After this first retest, based on summary data aggregated  
12 across all service/activity types, KCI determined that BellSouth had met the  
13 Commission standard of 85% of FOCs returned within thirty-six hours for orders  
14 that did not flow through. The disaggregated view, however, reveals that no  
15 orders for 2-wire loops with LNP and no orders for standalone LNP were  
16 included in this evaluation of non-flow-through orders. Thus, again, this test does  
17 not reveal that BellSouth has satisfied the Commission's standards for FOC  
18 timeliness for non-flow-through orders when the orders are ones that permit  
19 customers to keep their own phone numbers when switching carriers.  
20

21 **Q. HOW DOES KCI'S FAILURE TO TEST TO THE REQUIRED LEVEL OF**  
22 **DISAGGREGATION AFFECT ITS CONCLUSIONS?**

23 A. KCI's failure to test to the required level of disaggregation impacts KCI's  
24 conclusions on all tests relating to BellSouth's timeliness of response to CLEC  
25 orders as described above. KCI simply did not adequately evaluate each of the

---

<sup>17</sup> KCI only tested one standalone LNP on this retest.



1 individual service/activity types. Indeed, the test conducted by KCI masked  
2 deficiencies in certain areas of importance to consumers and therefore important  
3 to a CLEC's ability to compete, such as number portability. Thus, KCI's  
4 conclusions are not persuasive evidence of how BellSouth's OSS will perform in  
5 the real world of CLEC competition.

6 **Q. CAN BELL SOUTH RELY ON KCI'S DETERMINATION THAT IT**  
7 **SATISFIED PRE-ORDERING TESTS?**

8 A. No. BellSouth's reliance on KCI's determination that it satisfied the pre-ordering  
9 tests, is misplaced. (*See Pate* at 75:10-14.) KCI's analysis did not evaluate  
10 BellSouth's backend systems.  
11

12 **Q. CAN YOU GIVE AN EXAMPLE, PLEASE?**

13 A. KCI designed pre-order timeliness queries to evaluate various BellSouth back-end  
14 systems. (*See SEN3PT-2* at 55:6-13.) In evaluating those back-end systems,  
15 however, KCI did not confine its reporting and analysis to the time it took the  
16 systems to process queries. Instead, KCI included in the analysis queries that  
17 were rejected at the gateway, before they entered BellSouth's back-end systems.  
18 (*See id.* at 56:15-20.)

19 The time for processing queries that are rejected at the gateway is  
20 generally shorter than the time for processing queries that actually enter  
21 BellSouth's back-end systems. (*See id.* at 58:7-20.) As a result, including  
22 response times for queries that were rejected at the gateway reduces the average  
23 time for processing queries and masks the actual performance of BellSouth's  
24 back-end pre-order systems.

1 Q. **HOW DOES INCLUDING THIS DATA AFFECT THE VALIDITY OF**  
2 **THE THIRD-PARTY TEST?**

3 A. The purpose of the third-party test is to review whether BellSouth's systems  
4 provide CLECs a meaningful opportunity to compete. Including data that mask  
5 the performance of BellSouth's systems and makes them look better is  
6 misleading. It is one more reason this third-party test does not provide persuasive  
7 evidence that BellSouth's OSS is adequate.

8 Q. **DOES KCI'S TEST SHOW THAT BELLSOUTH'S SYSTEMS WERE**  
9 **FUNCTIONALLY AVAILABLE?**

10 A. No. KCI evaluated the "availability" of BellSouth's pre-ordering and ordering  
11 systems.<sup>18</sup> For both pre-ordering and ordering and provisioning tests on TAG,  
12 KCI concluded that BellSouth had satisfied the test. (See Test Report at IV-A-10  
13 (PRE-1-1-1); V-B-7 (O&P-2-1-1).)<sup>19</sup> The Final Report reveals, however, that the  
14 manner in which KCI conducted the test would not have demonstrated whether  
15 BellSouth's systems were functionally available.  
16

17 Q. **HOW DID KCI STAY IN CONTACT WITH BELLSOUTH'S SYSTEMS?**

18 A. KCI kept contact with BellSouth's systems through a process called "pinging."  
19 Pinging is simply a method for determining if electronic connectivity exists  
20 between two systems. It therefore does not reveal whether BellSouth's systems  
21 were functionally available as is required by SQM business rules for the

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<sup>18</sup> Tests PRE-1-1-1; PRE-1-2-1; PRE-1-2-2; and O&P-1-1-1; O&P-1-2-1; O&P-1-2-2; O&P-2-1-1; O&P-2-2-1; O&P-2-2-2; O&P-3-1-1; O&P-4-1-1; O&P-10-1-1; and O&P-10-1-2 evaluated the "presence of functionality" of BellSouth's pre-ordering and ordering and provisioning systems.

<sup>19</sup> For the ordering and provisioning tests in EDI (O&P-1-1-1), KCI reached a conclusion of "no result determination made." (Test Report at V-A-6.)

1 measurement of OSS availability. All KCI's test determined was whether the  
2 phone rang; it did not measure whether anyone was there to answer the phone.

3 **Q. ARE THERE ANY OTHER AREAS IN WHICH KCI'S CONCLUSIONS**  
4 **THAT BELL SOUTH SATISFIED TESTS ARE QUESTIONABLE?**

5 A. Yes. KCI also evaluated BellSouth's ability to return completion notices. Indeed,  
6 Mr. Pate testified to this Commission that BellSouth satisfied the test criteria for  
7 electronic notification of order completion. (*See Pate* at 124:1-3.) Mr. Pate's  
8 citation to those two tests, however, obscures the actual test results.  
9

10 **Q. WHY IS MR. PATE'S ANALYSIS INCORRECT?**

11 A. Six tests related to BellSouth's ability to return completion notices. Tests O&P-1-  
12 2-1, O&P-1-3-4, and O&P-1-4-4 tested, respectively, whether BellSouth provided  
13 an expected response, whether BellSouth's response was timely, and whether the  
14 response was accurate and complete for EDI. Tests O&P-2-2-1, O&P-2-3-4, and  
15 O&P-2-4-4 tested the same things for TAG. BellSouth did not satisfy all of these  
16 tests.

17 For O&P-1-2-1 and O&P-2-2-1, KCI determined that BellSouth did not  
18 satisfy the test criteria because BellSouth did not return 14% of completion  
19 notices for EDI and did not return 16% of completion notices for TAG. Indeed,  
20 Mr. Pate admits that these tests were not satisfied. (*See Pate* at 160:13-17.)

21 Then, when evaluating whether the completion notices were timely (O&P-  
22 1-3-4 and O&P-2-3-4), KCI reached a conclusion of "no result determination  
23 made." (Final Report at V-A-16 & V-B-16.) Nonetheless, KCI concluded that  
24 BellSouth had satisfied the tests on whether completion notices were accurate and  
25 complete (O&P-1-4-4 and O&P-2-4-4).

26 These three separate determinations on tests that were part of the same  
27 evaluation process make no sense. A determination that BellSouth satisfied the

1 criteria for returning accurate and complete completion notices should not follow  
2 a determination that BellSouth failed to return approximately 15% of the  
3 completion notices at all and that KCI could not determine whether the ones  
4 BellSouth did return were timely.

5 **Q. DID KCI DETERMINE THAT BELLSOUTH PROVIDES TIMELY**  
6 **ACCURATE AND COMPLETE COMPLETION NOTICES?**

7 A. No. Despite KCI's findings of "satisfied" for O&P-1-4-4 and O&P-2-4-4,  
8 exception 125 reveals that KCI did not determine that BellSouth returned accurate  
9 and complete completion notices. KCI opened Exception 125 because  
10 BellSouth's completion notices were inaccurate. It closed that exception based on  
11 BellSouth's representation that a correction would be implemented in a future  
12 software release and, in the interim, service order status could be checked in  
13 BellSouth's CLEC Service Order Tracking System ("CSOTS"). KCI did not  
14 retest BellSouth's correction. The whole picture reveals a serious problem with  
15 BellSouth's ability to adequately return completion notices.

16 **Q. WHAT IS THE EFFECT OF BELLSOUTH'S FAILINGS IN THE AREA**  
17 **OF COMPLETION NOTICES ON CLECS?**

18 A. BellSouth's multiple failings in the area of completion notices portend great  
19 difficulties for CLECs. They may begin billing on the wrong date, be uncertain of  
20 when to assume maintenance responsibilities, or other activities that impact  
21 customer service. These multiple failings, not the fact that BellSouth somehow  
22 satisfied two tests, are what this Commission should review in evaluating  
23 BellSouth's ability to return completion notices.

1 **Q. YOU HAVE TALKED ABOUT HOW THE STRUCTURE OF CERTAIN**  
2 **TESTS MAY HAVE RESULTED IN UNRELIABLE CONCLUSIONS. DO**  
3 **YOU HAVE ANY OTHER CONCERNS REGARDING KCI'S**  
4 **CONCLUSIONS?**

5 A. Yes. I am concerned that through an improper statistical analysis and use of its  
6 professional judgment, KCI determined BellSouth satisfied certain tests even  
7 though BellSouth's performance was deficient.  
8

9 **Q. WHAT TYPE OF STATISTICAL ISSUES ARE OF CONCERN?**

10 A. I am not a statistician. The testimony of statistician Robert M. Bell, Ph.D., also  
11 filed today, explains that the results of many of the objective Pre-Ordering and  
12 Ordering and Provisioning tests are questionable due to KCI's use of statistical  
13 methodology to evaluate test results. In essence, Dr. Bell concludes that KCI's  
14 conclusions on the objective tests are questionable because KCI did not conduct a  
15 balanced statistical analysis. According to Dr. Bell, for many of the tests for  
16 which KCI concluded "satisfied," BellSouth's performance could be well below  
17 the specified standard.  
18

19 **Q. HOW DID KCI QUESTIONABLY USE ITS PROFESSIONAL**  
20 **JUDGMENT?**

21 A. When statistical analysis did not enable KCI to say that a test was satisfied, in  
22 many instances, KCI concluded that the test was satisfied based on its  
23 professional judgment. KCI used its professional judgment to override  
24 Commission-established standards on 24 of the 96 tests for which objective  
25 criteria were applied.  
26

1 **Q. MOST OF THOSE TESTS WERE PRE-ORDERING TESTS. IS**  
2 **TIMELINESS OF PRE-ORDERING SYSTEMS REALLY THAT**  
3 **IMPORTANT?**

4 A. Yes. The FCC has recognized that “[t]o compete effectively in the local exchange  
5 market, competing carriers must be able to perform pre-ordering functions and  
6 interact with their customers as quickly and efficiently as the incumbent.”<sup>20</sup> “A  
7 slower process can lead to delay while a perspective customer is on the line,  
8 causing the customer to view the competing carrier as a less efficient competitor  
9 than the [incumbent]. Such a delay would also increase a carrier’s operating costs  
10 and impede its ability to engage in aggressive marketing campaigns.” *Bell*  
11 *Atlantic New York Order* ¶ 145; (citing *BellSouth South Carolina*, 13 FCC Rcd. at  
12 588, 636.)<sup>21</sup>  
13

14 **Q. KCI IS A PROFESSIONAL CORPORATION. WHAT IS WRONG WITH**  
15 **IT EXERCISING ITS PROFESSIONAL JUDGMENT?**

16 A. The problem is KCI disregarded Commission-established standards in favor of its  
17 professional judgment on twenty-four (24) pre-ordering and ordering and  
18 provisioning tests. Moreover, as detailed above, KCI’s subjective conclusions  
19 frequently appear to disagree with the findings in its exceptions and its comments.  
20

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<sup>20</sup> *Bell Atlantic New York Order* ¶145. See also Memorandum Opinion and Order, *To Provide In-Region, InterLATA Services In South Carolina*, 13 FCC Rcd. 539 (F.C.C. December 24, 1997) (No. CC 97-208, FCC 97-418) ¶ 89 (“*BellSouth South Carolina Order*”), (expressing concern that significantly greater time is required for competitors to access and review pre-ordering information); *Ameritech Michigan Order* ¶ 178 (finding that limits on the processing of information between an interface and legacy systems that prevent a competitor from performing a transaction in substantially the same time and manner as the BOC would be discriminatory).

<sup>21</sup> The FCC also recognizes that timely return of order confirmation notices “is a key consideration for assessing whether competitors are allowed a meaningful opportunity to compete.” *SWBT Kansas Oklahoma Order* ¶ 137.

1 **Q. DID BELL SOUTH SATISFY ALL OF THE OBJECTIVE TESTS**  
2 **NECESSARY TO ESTABLISH THAT ITS OSS IS**  
3 **NONDISCRIMINATORY?**

4 A. No. Even with all of the application of subjective standards, improper statistical  
5 methods, and application of professional judgment, BellSouth failed to satisfy 20  
6 of KCI's tests. Of these 20 tests, even KCI has determined that tests in the  
7 following three areas can severely impact a CLEC's ability to compete:  
8 timeliness of responses to fill mechanized orders; timeliness and accuracy of  
9 clarifications to partially mechanized orders; and accuracy of translation from  
10 external (CLEC) to internal (BellSouth) service orders resulting in switch  
11 translation and directory listing errors.<sup>22</sup> (See SEN3PT-4 at 2.) In response to a  
12 request from the Georgia Commission's staff, KCI opined that BellSouth's failure  
13 to meet these criteria could have a material adverse impact on CLECs' ability to  
14 compete effectively. *Id.*

15 **Q. DO YOU AGREE WITH MR. VARNER'S EFFORT TO EXPLAIN AWAY**  
16 **BELL SOUTH'S FAILURE TO MEET THE OBJECTIVE STANDARDS**  
17 **USED FOR THE TEST?**

18 A. No. His explanations are untenable. For example, in connection with KCI's  
19 testing of TAG FOCs for flow through orders for UNEs (O&P-2-3-3a),  
20 Mr. Varner avers that KCI'S second retest in January 2001 improperly included  
21 seven non-flow-through orders as flow-through orders.<sup>23</sup> (See *Varner* at 24:5-16.)  
22 According to Mr. Varner, these seven orders should have been excluded from

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<sup>22</sup> In these three areas, the following tests remain unsatisfied: O&P-1-2-1, O&P-1-3-2a, O&P-1-4-2, O&P-2-2-1, O&P-2-3-3a, O&P-2-4-2, O&P-3-3-1, O&P-4-3-1, O&P-5-2-1, PO&P-11-3-2a, PO&P11-3-36, PO&P 11-4-4, PO&P-13-4-3, PO&P-14-3-2.

<sup>23</sup> Mr. Varner uses the phrase "partially mechanized" presumably to refer to the non-flow-through category in the report.

1 KCI's testing. (*See id.*) Mr. Varner states had these seven orders been excluded  
2 from the test, BellSouth would have met the standards for FOC orders submitted  
3 in TAG. (*See id.*)  
4

5 **Q. DOES KCI'S TEST REPORT SUPPORT MR. VARNER'S**  
6 **CONCLUSIONS?**

7 A. No. The test report itself belies Mr. Varner's conclusions. Note 2 to Table V-2-  
8 10 Parts 1 and 2 explicitly states that KCI's "[r]esults are based on actual Flow-  
9 Through (FT) performance of LSRs submitted by KCI." (Final Report V-B-43-  
10 n2). Unless KCI did not accurately report its test, Mr. Varner must be mistaken.  
11 Notably, moreover, BellSouth did not raise this issue with KCI during cross-  
12 examination at the hearing on the third-party test.

13 Mr. Varner makes the same argument to allege KCI improperly included  
14 partially mechanized orders in its testing of BellSouth's Timeliness of Rejects and  
15 Clarifications-EDI. Mr. Varner again alleges certain orders "fell out" for manual  
16 handling and thus delayed BellSouth's return of error information. Again,  
17 according to the Test Report KCI only relied on those orders that actually flowed  
18 through BellSouth's systems. (*See id.* at V-A-39-n2.) KCI classified orders that  
19 "fell out" as non-flow through and excluded them from the test results.  
20

21 **Q. DOES MR. VARNER OFFER ANY EXPLANATIONS OTHER THAN**  
22 **PROBLEMS ASSOCIATED WITH MANUAL PROCESSING?**

23 A. Mr. Varner addresses ten other tests BellSouth did not satisfy. (*See Varner* at  
24 25:18-32:4.) Mr. Varner dismisses KCI's findings on grounds that BellSouth has  
25 taken or plans to take steps to improve its performance. This Commission,  
26 however, cannot analyze BellSouth's compliance with Section 271 based on  
27 future untested improvements. Before any final determination is made in this



1 docket the Commission should be permitted to thoroughly evaluate whether  
2 BellSouth has addressed the deficiencies KCI identified.  
3

4 **Q. IS EACH TEST THAT BELLSOUTH HAS BEEN UNABLE TO SATISFY**  
5 **CRITICAL TO CLECS' ABILITY TO ATTRACT AND ADEQUATELY**  
6 **SERVICE CONSUMERS?**

7 A. Yes. The tests evaluate CLECs' basic ability to have BellSouth timely process,  
8 fill, and correctly provision its orders. Failure to satisfy these tests demonstrates  
9 that BellSouth's OSS is not ready to support CLECs' entry into the market.  
10

11 **Q. DIDN'T KCI SAY THAT THE GEORGIA COMMISSION WOULD**  
12 **MONITOR THESE CRITICAL ISSUES THROUGH BELLSOUTH'S**  
13 **PERFORMANCE REPORTING?**

14 A. Yes. After stating that the tests BellSouth failed to satisfy could have an adverse  
15 material impact on CLECs' ability to compete, KCI nonetheless attempted to  
16 minimize the significance of the concerns it raised:

17  
18 As you know, the Commission will be able to monitor  
19 those issues on an ongoing basis through the performance  
20 measures and/or penalty plans in place that address the  
21 timeliness of BellSouth responses, service order accuracy,  
22 and percent of provisioning troubles within 30 days.

23  
24 (SEN3PT-4 at 2.)  
25

26 **Q. IS KCI'S CONCLUSION CORRECT?**

27 A. No. There are two major problems with KCI's conclusion. First, the metrics  
28 review is not yet complete because, among other things, KCI has not completed  
29 its evaluation of the adequacy of BellSouth's data and reporting processes. If the  
30 data on which performance measure penalty plans are based is inaccurate or  
31 incomplete, there will be no way for CLECs to bring poor performance by  
32 BellSouth to the Commission's attention or to obtain penalties.

1           Second, there are no performance measures included in the penalty plan  
2           that address two of the three areas BellSouth did not satisfy. For example, the  
3           penalty plan does not address the accuracy of service orders. This measure is  
4           extremely important to CLECs because it is the only way BellSouth can be held  
5           accountable for the accuracy of its switch translation provisioning and directory  
6           listings. CLECs are entirely dependent on BellSouth to perform these tasks  
7           accurately. BellSouth's failure to do so results in customer dissatisfaction and can  
8           irreparably damage the customer-CLEC relationship. When this occurs, the  
9           penalty plan provides no compensation to CLECs for BellSouth's inadequate  
10          service.

11 **Q. DOES THE PENALTY PLAN ADDRESS THE PROBLEMS WITH**  
12 **ACCURACY OF ORDER REJECTS AND CLARIFICATIONS**  
13 **BELLSOUTH PROVIDES?**

14 A. No, it does not. Verifying BellSouth's clarifications cause CLECs added expense  
15 and delay for which no compensation is available under the penalty plan.

16           Incorrect directory listings, incorrect switch translations, and incorrect  
17           clarifications which can delay provisioning local service requests ("LSRs") all  
18           yield customer dissatisfaction. Yet, CLECs are powerless to correct any of these  
19           issues independently. Only BellSouth and this Commission can ensure these  
20           processes function properly. KCI acknowledges the material adverse impact  
21           these failures may have on CLECs' ability to effectively compete. (*See* SEN3PT-  
22           4 at 2.) That material effect should also be recognized by this Commission  
23           because the areas of deficiency identified by KCI are not addressed in the penalty  
24           plan.

1           **C.     The Georgia Test Is Not Complete**

2           **Q.     IS KCI'S TEST IN GEORGIA COMPLETE?**

3           A.     No, KCI's metrics evaluation in Georgia is not complete. Mr. Varner goes to  
4           great lengths to state why each of the many "not complete" portions of KCI's  
5           testing is unimportant. (*See Varner* at 40-53.) Mr. Varner however, misses the  
6           critical issue. The issue of paramount importance is that BellSouth self-reports its  
7           performance data and does not make available the data necessary to verify the  
8           accuracy of its reports.

9                     Moreover, the Georgia Staff requested an audit of BellSouth's SQM and  
10           enforcement metrics. This audit is separate and apart from the "metrics  
11           evaluation" by KCI. KCI is only beginning this audit and has not yet established  
12           a project plan for conducting the audit. Accordingly, the data for production of  
13           any reports or findings by KCI in Georgia regarding performance measures do not  
14           yet exist. Additionally, KCI in both Georgia and Florida has identified  
15           discrepancies between BellSouth's performance reports and the underlying data.  
16           These issues are addressed more fully in my testimony regarding data integrity  
17           also filed today.  
18

19           **Q.     DOES THE GEORGIA THIRD-PARTY TEST PROVIDE PERSUASIVE**  
20           **EVIDENCE THAT BELLSOUTH OFFERS NONDISCRIMINATORY**  
21           **ACCESS?**

22           A.     No. In fact, it demonstrates that BellSouth's systems are deficient. KCI  
23           identified at least three test areas in which BellSouth's performance is deficient  
24           that could have a material adverse impact on competition. KCI's conclusion that  
25           BellSouth satisfied other tests is questionable. Moreover, numerous performance  
26           deficiencies have been identified in the more comprehensive Florida test.

1 Q. SHOULD THIS COMMISSION CONSIDER THE GEORGIA THIRD-  
2 PARTY TEST RESULTS AS SUPPORT FOR BELLSOUTH'S  
3 APPLICATION FOR SECTION 271 AUTHORITY?

4 A. No.

5

6 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

7 A. Yes.

**Exhibit SEN3PT-1**

**Chart Summarizing Florida Observations and  
Exceptions**

## FLORIDA OSS TEST OBSERVATIONS AND EXCEPTIONS COMPARED TO GEORGIA OSS TEST

### Observations outside scope of Georgia Test

	Observ.	Test #	Description	Comments
1	14	PMR-5 (11/3/00 to 5/2/01)	KPMG cannot replicate LNP – missed appointments metric (5/00).	Not included in Georgia Test.
2	38	TVV-4 (2/14/01 to 5/16/01)	BST issued a FOC on a XDSL/line sharing order when the loop could not support DSL service.	Not included in Georgia Test—line sharing not tested.
3	39	TVV-4 (2/15/01 to CIP)	BST did not provision the CO splitter equipment assigned to a line share order on the FOC date.	Not included in Georgia Test—line sharing not tested.
4	43	TVV1 (3/2/01 to open)	KPMG is unable to complete several orders using EDI interface.	Not included in Georgia Test --OSS99 not tested.
5	46	TVV-1 (3/7/01 to 4/18/01)	Business rules do not accurately describe the process for submitting orders for resale ISDN service.	Not included in Georgia Test--OSS99 not tested.
6	47	TVV-1 (3/7/01 to 3/28/01)	KPMG Consulting is unable to receive documents using the EDI interface.	Not included in Georgia Test --OSS99 not tested.
7	48	TVV-1 (3/8/01 to open)	Business rules do not offer instructions for submitting an order for DS1 with number portability.	Not included in Georgia Test --OSS99 not tested, digital UNE ordering not tested.
8	49	TVV-1 (3/13/01 to open)	BST does not provide time stamps for LSRs for clarifications and completion notices via LENS.	Not included in Georgia Test --OSS99 not tested, LENS not tested.
9	52	TVV-1 (3/20/01 to open)	BST does not provide time stamps for status notices via RoboTAG.	Not included in Georgia Test— OSS99 not tested, Robo-TAG not tested.
10	53	PPR-5 (3/20/01 to open)	BST does not appear to have EDI interface documentation available re batch size transmission.	Not included in Georgia Test.
11	54	PPR-5 (3/20/01 to CIP)	BST does not appear to have some TAG documentation available.	Not included in Georgia Test.
12	55	TVV-1 (3/29/01 to open)	KPMG is unable to receive responses using the EDI interface.	Not included in Georgia Test --OSS99 not tested.
13	58	TVV-1 (4/12/01 to open)	BST business rules do not allow CLECs to submit a local service request manually a SUP to an electronically submitted order.	Not included in Georgia Test --OSS99 not tested, manual ordering, other than xSDL, not tested.
14	60	TVV-1 (4/12/01 to open)	The RoboTAG interface fails to provide Miscellaneous Account Numbers (MANs) for all cities in Florida.	Not included in Georgia Test— Robo-TAG not tested. Also a state/geographic specific issue.
15	64	TVV1 (5/3/01 to open)	KPMG has not received responses to several LSRs submitted via TAG interface.	Not included in Georgia Test --OSS99 not tested.
16	65	TVV1 (5/1/01 to open)	KPMG has not received responses to several LSRs using the EDI interface.	Not included in Georgia Test --OSS99 not tested.
17	66	PPR- 6 (5/14/01 to	BellSouth does not have a documented process to guide CLECs	Not included in Georgia Test.

## FLORIDA OSS TEST OBSERVATIONS AND EXCEPTIONS COMPARED TO GEORGIA OSS TEST

		CIP)	through completing CLEC Selective Routing Ordering Documents for Resale Flat Rate Line Class Codes.	
18	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.	Not included in Georgia Test.
19	69	PMR-2 (5/14 to open)	The formulas specified in the SQM document for calculating the SQMs listed below are inconsistent with the benchmarks ordered by the Florida FPSC	State specific issue.
20	70	PMR-2 (5/14 to open)	The implementation of the exclusions relative to service request cancelled by the CLEC as stated in the "Ordering: LNP percent rejected service requests" SQM Exclusions Section, may lead to misleading metric results.	Not included in Georgia Test.
21	71	PPR15 (5/16/01 to CIP)	BellSouth has no documented procedures for help desk assistance at the CWINS centers for CLECs reporting troubles using TAFI.	Not included in Georgia test.
22	76	TVV4 (5/18/01 to open)	The BellSouth Provisioning Line Sharing – Methods and Procedure document does not instruct the Central Office technician to half tap the circuit during the provisioning conversion	Not included in the Georgia Test.
23	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)	Not included in Georgia Test.
24	81	TVV-1 (6/7/01 to open)	KPMG has not received manual FOCs on service that have been assigned a completed status in BellSouth's Customer Service Order Tracking System (CSOTS)	No included in Georgia Test. Manual ordering for resale and EELs not conducted in Georgia.
25	84	TVV1 (6/13/01 to open)	The BellSouth Business Rules for Local Ordering –OSS99 contains inaccurate information regarding where to fax UNE service requests.	Not included in Georgia Test. OSS99 not included.
26	85	TVV4 (6/13/01 to open)	The BellSouth ... ADSL M&Ps and job aids... failed to instruct the CO technician to conduct a second ANAC test of the cable and pair.	Line sharing not tested in Georgia.
27	87	TVV1 (6/29/01 to open)	The LENS interface does not support orders requesting to move a CLEC account outside of the end user's location.	LENS not tested in Georgia.

## FLORIDA OSS TEST OBSERVATIONS AND EXCEPTIONS COMPARED TO GEORGIA OSS TEST

### Exceptions outside scope of Georgia Test

	Exception	Test #	Description	Comments
1	1	PPR-5 (7/26/00 to 11/9/00)	BST's electronic EDI test environment is inadequate for testing of a CLEC's EDI interface (LNP).	Not included in Georgia Test.
2	2	PPR-5 (8/2/00 to 2/8/01)	Inconsistencies and omissions in the EDI Specs and OSS99 business rules prevent the development of an EDI interface between BST and a CLEC.	Not included in Georgia Test.
3	3	PPR-5 (8/4/00 to 11/9/00)	The test cases BST provides a CLEC for EDI end-to-end testing are either incomplete or incorrect.	Not included in Georgia Test.
4	4	PPR-2 (8/8/00 to CIP)	BST does not have documented procedures for interaction with CLECs during the account establishment and management process.	Not included in Georgia Test.
5	6	PPR-5 (9/21/00 to open)	BST lacks an appropriate process, methodology and a robust test environment for testing of the EDI interface.	Not included in Georgia Test.
6	7	PPR-5 (10/3/00 to CIP)	BST does not have sufficient publicly available information that provides information to a CLEC—physical connectivity ECTA.	Not included in Georgia Test.
7	8	PPR-5 (10/10/00 to open)	BST lacks a consistent and documented process to enable a CLEC to independently develop an ECTA interface.	Not included in Georgia Test.
8	9	PPR-4 (11/14/00 to 4/5/01)	BST does not have documented procedures for CLEC training management practices and program administration.	Not included in Georgia Test.
9	10	PMR-5 (12/4/00 to open)	KPMG has found that BST's metrics calculations for LNP reject intervals are inconsistent with the documented metrics calculations (formerly observation 12).	Not included in Georgia Test.
10	11	PMR-5 (12/4/00 to open)	KPMG has found that BST's metrics calculations for LNP FOC intervals are inconsistent with the documented metrics calculations	Not included in Georgia Test.
11	14	PMR-1 (2/27/01 to CIP)	BST has inconsistent retention periods of the unprocessed data that is required to calculate the LNP measurements.	Not included in Georgia Test.
12	15	PMR-5 (3/5/01 to open)	KPMG cannot determine whether BST is producing complete SQM reports (conflicting metrics ordered vs SQM).	Florida-specific issue.



## FLORIDA OSS TEST OBSERVATIONS AND EXCEPTIONS COMPARED TO GEORGIA OSS TEST

13	16	TVV-1 (3/5/01 to open)	BST business rules for ordering (9K) do not offer the ability to submit an order for the partial migration of customer's UNE loops.	Not included in Georgia Test --OSS99 not tested.
14	17	TVV-1 (3/6/01 to CIP)	BST does not offer CLECs the ability to migrate a retail customer to a CLEC using an EEL.	Not included in Georgia Test—EEL ordering not tested.
15	18	PPR-16 (3/12/01 to 4/19/01)	BST network reliability center fails to provide proactive notification of network outages.	Not included in Georgia Test.
16	19	TVV-1 (3/12/01 to 3/22/01)	Exception withdrawn by KPMG.	Issue was outside scope of Georgia Test—involved LCCC personnel practices. <u>Exception withdrawn.</u>
17	20	PPR-5 (3/12/01 to CIP)	BST does not appear to have public documentation available for CLECs to establish connectivity to TAG.	Not included in Georgia Test.
18	21	PMR-5 (3/12/01 to CIP)	KPMG cannot replicate the values of LNP Percent Rejected Service Requests measure.	Not included in Georgia Test.
19	22	PMR-5 (3/12/01 to open)	KPMG cannot replicate the values of LNP Disconnect Timeliness measure.	Not included in Georgia Test.
20	24	PMR-5 3/12/01 to 5/24/01)	KPMG cannot replicate the values of LNP Total Service Order Cycle Time measure.	Not included in Georgia Test.
21	25	PPR-5 (3/12/01 to CIP)	BST does not have public documentation available to correlate available versions of TAG with business rules.	Not included in Georgia Test.
22	28	TVV1 (3/12/01 to 5/22/01)	BST's business rules for OSS99 provide ambiguous information on use of conditional field.	Not included in Georgia Test --OSS99 not tested.
23	32	TVV1 (3/12/01 to open)	OSS99 business rules for ordering provides information inconsistent with the system responses being generated.	Not included in Georgia Test --OSS99 not tested.
24	34	PPR8 (3/13/01 to 6/12/01)	BST does not have detailed and fully documented guidelines for Customer Support Manager interaction with CLECs.	Not included in Georgia Test.
25	39	TVV1 (3/29/01 to CIP)	A field required by the business rules for ordering loop/port combinations is not provided in LENSs.	Not included in Georgia Test --LENS not tested.
26	40	TVV1 (4/3/01 to open)	The LENSs interface does not appropriately implement the business rules for ordering ISDN UNE loops.	Not included in Georgia Test --LENS not tested.
27	42	TVV1 (4/4/01 to open)	The TAG interface does not accurately implement the End User information requirements contained in OSS99 business rules.	Not included in Georgia Test --OSS99 not tested.
28	45	TVV1	BellSouth Business rules for Local Ordering – OSS99, Issue 9L,	Not included in Georgia Test --OSS99 not tested.

## FLORIDA OSS TEST OBSERVATIONS AND EXCEPTIONS COMPARED TO GEORGIA OSS TEST

		(4/12/01 to open)	contains inconsistent and incomplete instructions necessary for CLECs to access and use BellSouth's systems.	
29	46	TVV1 (4/12/01 to open)	Neither TAG interface, nor the EDI interface, accurately applies the business rules for directory listings forms found in the BellSouth Business Rules for Local Ordering –OSS99, Issue 9L.	Not included in Georgia Test --OSS99 not tested
30	48	PPR-9	BellSouth does not have formal, documented processes for capacity management in the WMC, AFIG, CO_FWG, CWINS, and NISC work centers.	Not included in Georgia Test—No work center capacity management other than xDSL.
31	49	TVV1- (4/24/01 to open)	The BellSouth Business Rules for Local Ordering-OSS 9 does not define a process for an unbundled loop (REQTYP A) service migration (ACT V) request from one CLEC to another CLEC. O	Not included in Georgia Test --OSS99 not tested
32	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.	Not included in Georgia Test --OSS99 not tested
33	51	TVV1 (4/25/01 to CIP)	KPMG has not received timely mechanized rejects from BellSouth's EDI interface.	Not included in Georgia Test --OSS99 not tested
34	52	TVV1 (5/1/01 to CIP)	KPMG did not receive timely mechanized FOCs from BellSouth's TAG interface. (withdrawing)	Not included in Georgia Test --OSS99 not tested
35	53	TVV1 (5/2/01 to CIP)	KPMG did not receive timely mechanized FOCs from BellSouth's EDI interface. (withdrawing)	Not included in Georgia Test --OSS99 not tested
36	54	TVV1 (5/3/01 to open)	KPMG has not received timely mechanized rejects from BellSouth's TAG interface	Not included in Georgia Test --OSS99 not tested
37	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	Not included in Georgia Test --OSS99 not tested, LENS not tested.
38	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.	Not tested in Georgia.
39	58	TVV-1 (5/11/01 to open)	KPMG has not received timely mechanized rejects from BellSouth's ROBOTAG interface	ROBOTAG not tested in Georgia.
40	61	TVV1 (5/22/01 to open)	KPMG Consulting has not received timely functional acknowledgements from BellSouth's EDI interface.	OSS 99 not tested in Georgia.
41	64	TVV1 (5/24/01 to open)	BellSouth Business Rules for Local Ordering –OSS99 9M contains inconsistent instructions for CLECs to access and use BellSouth's systems.	OSS 99 not tested in Georgia

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

42	65	PPR-2 (5/21/01 to open)	The BellSouth Account Management Team does not have processes or documentation related to CLEC collocation.	Not included in Georgia Test
43	66	TVV1 (6/7 to open)	BST's EEL CLEC information package and Dedicated Transport non-switched combinations package do not provide consistent information that identifies applicable Network Code (NC) and Secondary network Code SECNCI for loop (REQTYP A) service requests.	Not tested in Georgia
44	67	PPR-2 (6/7/01 to open)	The Account Establishment and Management Process does not have defined processes or documentation related to the management of CLEC billing issues.	Not included in Georgia Test
45	68	TVV1 (6/12/ 01 to open)	BellSouth has no record of xDSL Local Service Requests that were submitted by KPMG via the EDI interface.	Electronic ordering of xDSL not tested in Georgia.
46	69	TVV1 (6/12/01 to open)	BellSouth does not provide an accurate method for assigning the USOC code to request BellSouth's OS/DA branding feature.	OS/DA branding not tested in Georgia.
47	70	TVV1 (6/12/01 to open)	KPMG did not receive responses to orders sent via fax to the LCSC.	Manual ordering (other than xDSL) not tested in Georgia.
48	72	TVV2 (6/28/01 to open)	KPMG has not received responses to multiple Local Service Request submitted to BST via fax.	No manual volume testing was done in Georgia .
49	73	TVV1 (6/28/01 to open)	BST is providing error and rejection responses that are inconsistent with the BellSouth Business rules for local ordering (OSS99 for conversion requests for ISDN-BRI resale service.	OSS 99 not tested in Georgia.
50	74	TVV1 (6/28/01)	The RoboTAG interface does not provide access to fields that are required for non-designed loop service disconnect and for ISDN BRI resale service disconnect requests.	RoboTAG not tested in Georgia.
51	75	TVV1 (6/28/01 to open)	BST's error responses are inconsistent with the BellSouth business rules for local ordering OSS 99 for conversions of retail, resale, and UNE-P accounts to line-sharing accounts	Line-sharing not tested in Georgia.
52	77	TVV1 (6/28/01 to open)	BellSouth LSR rejection messages are inconsistent with the BellSouth Business Rules for Local Ordering OSS99 for designed UNE loop with LNP service requests via TAG.	OSS99 not tested in Georgia

## FLORIDA OSS TEST OBSERVATIONS AND EXCEPTIONS COMPARED TO GEORGIA OSS TEST

### Observations in Areas Tested in Georgia but No Exception Issued

	Observ.	Test #	Description	Comments
1	10	PPR-1 (10/12/00 to 2/22/01)	BST does not follow its documented process of providing proper notifications when software interfaces are being retired.	Within scope of Georgia Test, no exception issued.
2	23	PMR-5 (12/15/00 to 2/28/01)	KPMG cannot replicate Reject Interval – Trunks metric (10/00).	Test area included in Georgia Test. No exceptions issued.
3	24	PMR-5 (12/15/00 to 3/7/01)	KPMG cannot replicate Provisioning Troubles (Trunks) within 30 days metrics (5/00).	Test area included in Georgia Test. No exception issued for trunks.
4	28	PMR-5 (1/17/01 to 1/31/01)	KPMG cannot replicate OS/DA speed to answer metric (5/00).	Test area included in Georgia Test. No exception issued.
5	31	PMR-5 (1/22/01 to 3/7/01)	KPMG cannot replicate 3 collocation measures (5/00).	Test area included in Georgia Test. No exception issued.
6	40	TVV-4 (2/15/01 to 3/7/01)	Inconsistencies in BST's process and technical documents with regard to allowable foreign voltage parameter established for xDSL loops.	Within scope of Georgia Test—PO&P 13 and 14.
7	44	PPR-14 (3/6/01 to open)	BST does not meet the stated intervals and target objectives for maintenance for UNE Non-Designed (SL1) loops.	Appears to be included in Georgia Test. (M&R-10). No exception issued.
8	45	TVV-4 (3/6/01 to open)	BST returned FOC frame due times that do not match the regular hours for provisioning.	In scope of Georgia Test, no exception issued.
9	56	TVV-1 (4/5/01 to CIP)	BST implemented business rule updates prior to the release of the business rules.	In scope of Georgia Test, no exception issued.
10	59	TVV-4 (4/12/01 to CIP)	BellSouth does not have a documented process to reconcile a mismatch between a CLEC telephone and the BellSouth telephone number on coordinate conversions with LNP.	In scope in Georgia Test, no exception issued.
11	62	PPR-14 (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.	Included in Georgia Test. (M&R-10). No exception issued.
12	63	TVV9 (4/24/01 to open)	KPMG observed that the BST customer whole interconnect network service (CWINS) center trouble receipt process restricts a CLEC from reporting more than 3 troubles on a single call	Included in Georgia Test. (M&R-10). No exception issued.
13	72	PMR-4 (5/16/ to	BellSouth's inability to capture and retain CLEC LENS data for	Tested in Georgia. Exception 92 was issued for an earlier

## FLORIDA OSS TEST OBSERVATIONS AND EXCEPTIONS COMPARED TO GEORGIA OSS TEST

		open)	December-March 2001 prevents KPMG from conducting the Data Integrity test for the OSS Average Response Time and Response Interval SQM. BellSouth's SQM reports for this metric may also be suspect.	period of time and satisfied. No exception was issued by KPMG for this period of time.
14	74	TVV-1 (5/18/01 to open)	BellSouth does not provide the expected response to Address Validation Query by Telephone Number Query submitted through TAG.	In scope of Georgia Test, no exception issued.
15	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.	Included in Georgia Test. (M&R-10). No exception issued.
16	77	TVV-1 (5/18/01 to open)	BellSouth does not provide sequential telephone numbers as requested using the Telephone Number Availability Query (TNAQ)	Included in Georgia Test. No exception issued.
17	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	Included in Georgia Test. (M&R-10). No exception issued.
18	83	TVV6 (6/13/01 to open)	The BellSouth ECTA system failed to adhere to the guidelines of the JIA with regard to Front End Close Out functionality.	Included in Georgia Test (M&R-2). No exception issued.
19	86	PPR1 (6/29/01 to open)	The BST Release Management Team does not provide all prioritized change requests to the BellSouth IT Team for development and implementation.	Included in Georgia Test. No exception issued.
20	88	PMR3 (6/29/01 to open)	KPMG has discovered that BellSouth has no documentation that describes the process of notifying outside parties of metrics changes.	Included in Georgia Test. No exception issued
21	89	TVV1 (6/29/01 to open)	The BellSouth Pre-order business rules do not clearly and consistently define the values for completing the address validation query submitted via the TAG.	Tested in Georgia (See PRE 3-4. (No exception on this issue)

## FLORIDA OSS TEST OBSERVATIONS AND EXCEPTIONS COMPARED TO GEORGIA OSS TEST

### Exceptions in Areas Tested in Georgia, but No Exception Issued

	Exception	Test #	Description	Comments
1	5	PPR-1 (8/17/00 to 1/18/01)	BST does not follow their documented process of providing proper time intervals when posting documentation changes.	Within scope of Georgia Test, no exception issued.
2	12	PPR-1 (2/14/01 to open)	BST does not adhere to the procedures for System Outage established in the BST change control process.	Within scope of Georgia Test, no exception issued.
3	26	PPR-1 3/12/01 to 6/12/01)	BST does not have a clearly defined process for addressing the expedited release of BellSouth documentation defects. (See observation 27).	Within scope of Georgia Test, no exception issued.
4	29	TVV10 (3/12/01 to open)	BST has improperly populated "ToNumber" field in the usage records for 611 calls in the 407 area code-- formerly observation 34.	Included in Georgia Test, no exception issued, state specific issue.
5	30	TVV10 (3/12/01 to open)	BST has improperly populated "ToNumber" field in the usage records for certain long distance calls. Formerly observation 35.	Included in Georgia Test, no exception issued, state specific issue.
6	35	PPR14 (3/21/01 to CIP)	BST processes for responding to customer requests for earlier appointments differs between retail and wholesale centers, resulting in disparity of service.	Included in Georgia Test. (M&R-10). No exception issued.
7	37	PPR10 (3/22/01 to open)	BST's billing work center lacks a formal process for identifying and planning for variations in work load.	Not included in Georgia Test.
8	44	TVV11 (4/4/01 to open)	BST issued CABs bills which reflect incorrect quantities of switching and transport usage.	Included in Georgia Test, no exception issued.
9	47	TVV11 (4/12/01 to open)	KPMG CLEC bills do not reflect unbundled transport shared usage for calls made to points greater than 35 miles from the originating central office.	Included in Georgia Test, no exception issued.
10	60	TVV11 (5/21/01 to open)	BellSouth failed to cease billing on disconnected auxiliary lines.	Included in Georgia Test, no exception issued.
11	76	TVV4 (6/28/01)	BellSouth failed to provision disconnect orders properly with the expected intercept recording message.	Included in Georgia Test, no exception issued.
12	78	PMR3 (6/28/01)	KPMG has found that BellSouth's implemented Metrics change control process is inconsistent with its documented metrics change control process	Included in Georgia Test. (See Test PMR 3-1-3.)

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

## FLORIDA OSS TEST OBSERVATIONS AND EXCEPTIONS COMPARED TO GEORGIA OSS TEST

### Observations in Florida in Areas that Also Had Exceptions in Georgia

	Observ.	Test #	Description	Comments
1	2	PMR-5 (7/25/00 to 8/23/00)	KPMG cannot replicate the values in the % rejected service requests (5/00).	Test area included in Georgia Test. See Georgia exception 45 (3/31/00 to 8/2/00). Exception 46 (4/6/00 to 12/14/00). Exception 52 (4/12/00 to 12/14/00).
2	3	PMR-5 (8/8/00 to 8/23/00)	KPMG cannot replicate the values in the reject interval for non-trunks (5/00).	Test area included in Georgia Test. See Georgia exception 45 (3/31/00 to 8/2/00). Exception 46 (4/6/00 to 12/14/00). Exception 52 (4/12/00 to 12/14/00).
3	4	PMR-5 (8/8/00 to 8/23/00)	KPMG cannot replicate the values in the Ordering FOC timeliness for non-trunks (5/00).	Test area included in Georgia Test. See Georgia exception 23 (2/11/00 to 1/5/01). Exception 46 (4/6/00 to 12/14/00). Exception 52 (4/12/00 to 12/14/00). Exception 62 (4/26/00 to 11/14/00). Exception 90 (5/30/00 to 12/14/00). Exception 110 (8/8/00 to 1/5/01).
4	5	PMR-5 (8/29/00 to 10/25/00)	KPMG cannot replicate the values in the Average Completion Interval /Distribution (5/00).	Test area included in Georgia Test. See Georgia exception 46 (4/6/00 to 12/14/00). Exception 62 (4/26/00 to 11/14/00). Exception 86 (5/8/00 to open). Exception 90 (5/30/00 to 12/14/00).
5	7	PMR-5 (9/7/00 to 12/14/00)	KPMG cannot replicate the values in Average Completion Notice Interval (5/00).	Test area included in Georgia Test. See Georgia exception 86 (5/8/00 to open). Exception 110 (8/8/00 to 1/5/01).
6	8	PMR-5 9/19/00 to 10/18/00)	KPMG cannot replicate the values in E911 (5/00).	Test area included in Georgia Test. See Georgia exception 52 (4/12/00 to 12/14/00).
7	9	PMR 4&5 (9/21/00 to 10/18/00)	KPMG does not properly construct the processed data used to validate the total service order cycle time (5/00).	Test area included in Georgia Test. Exception 46 (4/6/00 to 12/14/00). Exception 62 (4/26/00 to 11/14/00). Exception 86 (5/8/00 to open). Exception 111 (9/11/00 to 1/5/01).
8	13	PMR-3 (11/3/00 to 12/14/00)	BST does not notify CLECs when they make changes to historical performance reports a/d or raw data.	Included in Georgia Test. See Georgia exception 3 which was closed, re-opened and closed again. (12/15/99 to 2/10/00) and (3/29/00 to 6/16/00).



## FLORIDA OSS TEST OBSERVATIONS AND EXCEPTIONS COMPARED TO GEORGIA OSS TEST

9	17	PMR-5 (11/30/00 to 2/7/01)	KPMG cannot replicate % missed appointments (5/00).	Test area included in Georgia Test. <i>See</i> exception 86 (5/8/00 to open).
10	18	PMR-5 11/30/00 to 2/7/01)	KPMG cannot replicate M&R customer trouble report rate (5/00).	Test area included in Georgia Test. <i>See</i> exception 86 (5/8/00 to open).
11	19	PMR-5 (11/30/00 to 1/24/01)	KPMG cannot replicate Average Jeopardy Notice metric (5/00).	Test area included in Georgia Test. <i>See</i> Georgia exception 110. (8/8/00 to 1/5/01).
12	20	PMR-5 (11/30/00 to 1/24/01)	KPMG cannot replicate Mean Held Order Interval metric (5/00).	Test area included in Georgia Test. <i>See</i> Georgia exception 23 (2/11/00 to 1/5/01). Exception 52 (4/12/00 to 12/14/00).
13	22	PMR-5 (12/15/00 to 4/11/01)	KPMG cannot replicate Coordinated Cutovers metric (9/00).	Test area included in Georgia Test. <i>See</i> Georgia exception 52 (4/12/00 to 12/14/00). Exception 90 (5/30/00 to 12/14/00). Exception 100 (7/5/00 to 10/30/00).
14	29	TVV-4 (1/18/01 to 2/28/01)	BST failed to meet the frame due time on commercial CLEC loop migrations.	Included in Georgia Test. <i>See</i> exception 106 (8/10/00 to 3/9/01).
15	30	TVV-4 (1/22/01 to 4/25/01)	BST UNE center does not make hot cut related calls.	Included in Georgia Test. <i>(See</i> Georgia exception 58 (3/30/00 to 8/4/00). Exception 82 (5/10/00 to 8/25/00).
16	42	TVV10 (2/21/01 to open)	BST failed to deliver Daily Usage File (DUF) records for a variety of completed calls.	Included in Georgia Test. <i>See</i> Georgia exception 28 (2/14/00 to 3/7/01).
17	57	PMR-5 (4/12/01 to open)	KPMG cannot replicate the values in the Total Service Order Cycle Time report for January 2001.	Test area included in Georgia Test. <i>See</i> Georgia exception 46 (4/6/00 to 12/14/00). Exception 62 (4/26/00 to 11/14/00). Exception No. 86 (5/8/00 to open). Exception No. 111 (9/11/00 to 1/5/01).
18	61	TVV8 (CIP)	BellSouth does not close trouble tickets in a timely manner when requested by a CLEC using the ECTA interface.	Included in Georgia Test. Potentially related to Exception 20.
19	68	PMR5-5 (5/12 to open)	KPMG cannot replicate the values for the Ordering: Percent Flow-Through Service Requests SQM report for the CLEC Aggregate (November 2000)	Test area included in Georgia Test. Related to Exception 21.
20	73	PMR-3 (5/16/01 to open)	BellSouth did not properly conduct a downstream impact analysis when transitioning between LENS systems for the OSS Average Response Time Interval Metric.	Tested in Georgia. Related to Exception 70 in Georgia which was closed satisfied January 5, 2001.
21	80	TVV-11 (5/23/01 to open)	The application of recurring and non-recurring charges associated with UNE ports denoted by the USOC UEPLX, appear to be	Included in Georgia Test. Related to Exception 35.

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

			inconsistent.	
22	82	TVV4 (6/13/01 to open)	BellSouth's systems or representatives did not update Customer Service Records consistently following a change in the status of a customer's account.	Included in Georgia Test. See exception 76, which was satisfied in this area.

## FLORIDA OSS TEST OBSERVATIONS AND EXCEPTIONS COMPARED TO GEORGIA OSS TEST

### Exceptions in Florida in Areas that Also Had Exceptions in Georgia

	Except	Test Area	Description	Comments
1	13	TVV-10 (2/27/01 to open)	BST failed to deliver at least 95% of DUF records within 6 calendar days.	Included in Georgia Test. See Georgia exception 29 (2/15/00 to 8/4/00).
2	23	PPR-1 (3/12/01 to open)	Carrier notification deficiencies associated with Change Control Process. (See observation 21).	Within scope of Georgia Test. Related to Georgia exception 2 (11/12/99 to 7/21/00).
3	27	PMR-5 (3/12/01 to open)	KPMG cannot replicate the values of the Provisioning Troubles within 30 days of Provisioning measure. (former observation-32).	Test area included in Georgia Test. See Georgia exception 23 (2/11/00 to 1/5/01). Exception 86 (5/8/00 to open). Exception 123 (2/18/00 to 3/9/01).
4	31	TVV10 (3/12/01 to open)	BST failed to deliver daily usage file records for toll free calls--formerly observation 36.	Within scope of Georgia Test. See Georgia exception 28 (2/14/00 to 3/7/01).
5	33	TVV3 (3/12/01 to CIP)	BST flow-through documentation is incomplete and inconsistent.	In scope of Georgia Test. See Georgia exception 41 (3/21/00 to 8/25/00).
6	36	PMR4 (3/21/01 to open)	BST does not properly construct the processed data used to validate FOC and rejection timeliness (former observation-6).	Test area included in Georgia Test. Related to exception 87 (5/23/00 to 1/5/01).
7	38	TVV8 (3/27/01 to CIP)	BellSouth's ECTA system failed to process correctly following an outage and re-initialization.	Included in Georgia Test. (M&R-2). Potentially related to Georgia exception 20 (2/14/00 to 3/07/00).
8	41	TVV1 (4/3/01 to open)	BST does not consistently apply its USOC business rules to requests for UNE switched combinations.	Within scope of Georgia Test. See Georgia exception 18 (2/15/00 to 10/5/00).
9	43	TVV11 (4/4/01 to open)	BST resale bills fail to reflect usage charges.	Within scope of Georgia Test. See Georgia exception 103 (7/27/00 to 3/23/01).
10	56	PMR-5 (5/10/01 to open)	KPMG has found that BellSouth's implemented metrics calculation for the Reject Interval - Trunks SQM report for March 2001 are inconsistent with the documented metrics calculations.	Test area included in Georgia Test. In exception 52, KMG successfully replicated this measure using <i>October, 1999</i> data.
11	59	PMR-2 (5/16/01 to open)	KPMG found that BST's business rules in the Florida Interim Performance Metrics document for the OSS Interface Availability (pre-order and maintenance and repair are ambiguous.	Test area included in Georgia Test. Related to exception 133 in Georgia.
12	62	TVV11 (5/23/01 to open)	BellSouth bills reflect a rate for a Service Order mechanized Charge that is inconsistent with the rate contained in the ICA agreement between BST and KPMG CLEC.	Included in Georgia Test. Related to exceptions 16 and 124.
13	63	TVV8 (5/24/01 to open)	The BellSouth ECTA system failed to appropriately process "enterTroubleReport" transactions.	Included in Georgia Test (M&R2) (Similar issue (different error code) to Exception 15 closed June 16, 2000.
14	71	TVV1 (6/28/01 to	KPMG has not received timely responses to customer service	Included in Georgia Test (PRE-1) See exception 24 closed on

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

	open)	record pre-order inquiries submitted via TAG.	March 9, 2001.
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## FLORIDA OSS TEST OBSERVATIONS AND EXCEPTIONS COMPARED TO GEORGIA OSS TEST

### Observations Escalated to Exceptions

1	1	PPR-5 (7/18/00 to 3/21/01; escalated to exception)	BST does not appear to have public documentation available for CLECs to establish connectivity for TAG.	See Florida Exception 20
2	6	PMR-4 (8/30/00 to 3/28/01, escalated to exception.)	BST does not properly construct the processed data used to validate certain ordering service quality measurements—systematically excludes the entire weekend.	See Florida Exception 36.
3	11	PMR-5 10/25/00 to 3/21/00: escalated to exception)	KPMG cannot replicate LNP - % rejected service requests metric (5/00).	See Florida Exception 21
4	12	PMR-5 10/25/00 to 12/6/00; escalated to exception)	KPMG cannot replicate LNP – reject interval metric (5/00).	See Florida Exception 10.
5	15	PMR-5 (11/14/00 to 3/21/00; escalated to exception)	KPMG cannot replicate LNP-Disconnect Timeliness metric (5/00).	See Florida Exception 22.
6	16	PMR-5 (11/14/00 to 12/6/00; escalated to exception)	KPMG cannot replicate LNP FOC Timeliness (5/00).	See Florida Exception 11.
7	21	PPR-1 (12/13/00 to 3/21/01; escalated to exception)	The distribution of carrier notification info associated with change control process is not adequate. Also significant information is not included in the notice. (See exception 23).	See Florida Exception 23.
8	25	PMR-5 1/9/01 to 3/21/01; escalated to exception)	KPMG cannot replicate LNP Total Service Order Cycle Time (5/00).	See Florida Exception 24.
9	26	PPR-5 (1/9/01 to 3/21/01; escalated to exception)	No documentation for CLECS to correlate the available versions of TAG to business rules.	See Florida Exception 25.
10	27	PPR-1 (1/9/01 to 3/21/01; escalated to exception)	BST does not have a clearly defined process for addressing documentation defects. (See exception 26).	See Florida Exception 26
11	32	PMR-5 (1/24/01 to 3/27/01; escalated to exception)	KPMG cannot replicate Provisioning Troubles (non-Trunks) within 30 days metrics (5/00).	See Florida Exception 27.
12	33	TVV1 (2/1/01 to 3/21/01; escalated to exception)	BST business rules (9K) provides ambiguous information.	See Florida Exception 28.

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

13	34	TVV10 (2/6/01 to 3/21/01; escalated to exception)	BST improperly populates "ToNumber" Field in DUF files— 611 calls—reclassified as exception 29.	See Florida Exception 29 below.
14	35	TVV10 (2/6/01 to 3/21/01; escalated to exception)	BST improperly populates "ToNumber" Field in ADUF files— LD calls-- reclassified as exception 30.	See Florida Exception 30 below.
15	36	TVV10 (2/6/01 to 3/21/01; escalated to exception)	BST failed to deliver daily usage files (DUF) records for toll- free calls—reclassified as exception 31.	See Florida Exception 31 below.
16	37	TVV1 (2/14/01 to 3/21/01; escalated to exception)	BST business rules for ordering provides information inconsistent with system responses.	See Florida Exception 32.
17	41	TVV3 (2/15/01 to 3/21/01; escalated to exception)	BST flow-through documentation is incomplete and inconsistent.	See Florida Exception 33.
18	50	TVV-10 (3/14/01 to 4/11/01; escalating to exception)	BST incorrectly billed for unbundled usage for various call types. (Now exception 44).	See Florida Exception 44 below.
19	51	TVV-10 (3/15/01 to 4/11/01; escalating to exception)	BST incorrectly billed for resale usage for various call types (Now exception 43).	See Florida Exception 43 below.

NOTE: CIP (closure in progress) indicates that although no firm date has been assigned, KPMG is in the process of closing the observation/exception.

**Exhibit SEN3PT-2**

**Excerpts from Transcript of Hearing before Georgia  
Public Service Commission  
Docket 8354-U, Dated May 8, 2001**

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

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

\* \* \*

Brandenburg & Hasty  
231 Fairview Road  
Ellenwood, Georgia 30294



1 Q And then Table IV-1.6 shows the results of the  
2 retest, is that correct?

3 A (Witness Weeks) That's correct.

4 Q And again, that's by query type, is that correct?

5 A (Witness Weeks) That is by query type, yes.

6 Q Now the reason it's reported by query type is  
7 because in order to evaluate the different back end systems  
8 that BellSouth had, you sent through the types of queries  
9 that those systems handle, is that correct?

10 A (Witness Weeks) It's correct to say that in the  
11 design of the test, we sent in different order types. The  
12 purpose of these tables in the report is to provide  
13 additional information for people using the report.

14 Q But in order to evaluate the back end systems,  
15 some of those systems -- if I look at Table IV-1.4 -- handle  
16 more than one query type that you tested, is that correct?

17 A (Witness Weeks) That's correct.

18 Q And others handle only one query type, is that  
19 correct?

20 A (Witness Weeks) I believe that's correct.

21 Q So let's walk through an example of this. In  
22 order to evaluate BellSouth's DSAP system, you sent through  
23 appointment availability queries, is that correct?

24 A (Witness Weeks) Yes.

25 Q And those results -- and the standard for that is

1 means there's less than a one percent chance that the  
2 difference was just due to pure randomness. One percent or  
3 less.

4 WITNESS WEEKS: That's correct.

5 COMMISSIONER DURDEN: Okay.

6 MS. AZORSKY: I'm impressed. But let me follow...

7 COMMISSIONER DURDEN: What I'm impressed with is  
8 that they have to consult before they answer these  
9 questions. I don't know what to make of that.

10 MS. AZORSKY: That's a good question. But I'll  
11 let you ask that question.

12 COMMISSIONER DURDEN: I will ask it.

13 BY MS. AZORSKY:

14 Q Following up on Commissioner Durden's question,  
15 and looking at Table 1.6, Part 2, which lists the levels of  
16 disaggregation ordered by the Commission, did you conduct  
17 any analysis to set sample sizes that you felt -- I won't  
18 use the term "statistically valid" -- that would be  
19 meaningful for each of these individual levels of  
20 disaggregation?

21 A (Witness Frey) No, our -- our test was not  
22 constructed with the levels of disaggregation specified in  
23 the June 6<sup>th</sup> order.

24 Q Thank you. I have no further questions.

25 COMMISSIONER BURGESS: BellSouth?

1 party test; is that correct?

2 A (Witness Weeks) Yes.

3 Q But your evaluation was not based on that?

4 A (Witness Weeks) That's correct.

5 Q Okay. Is there a reason that you based your

6 evaluation on the aggregated data instead of the

7 disaggregated data ordered by the Commission?

8 A (Witness Frey) At the time of the test, when the  
9 order sample sizes were designed, the standards to be used  
10 for purposes of the test had not been specified by the  
11 Commission. These levels of disaggregation were not known  
12 to us. These tables were provided for information purposes  
13 only.

14 Q When did you conduct the retest? You might want  
15 to look at page V-A-37, the notes to the table on the  
16 retest.

17 A (Witness Frey) We conducted August 25<sup>th</sup> through  
18 November 15<sup>th</sup>, 2000.

19 Q Could you have tested for the retest based on  
20 statistically valid samples for the level of disaggregation  
21 ordered by the Commission?

22 A (Witness Frey) Theoretically, yes.

23 Q Okay. And when did you conduct the second retest?

24 A (Witness Frey) January 19<sup>th</sup> through February 27<sup>th</sup>.

25 Q So those tests also were conducted after the

1 MR. LEMMER: Thank you, Commissioner, no.

2 COMMISSIONER BURGESS: Okay. Thank you. With  
3 that we will proceed.

4 FURTHER CROSS EXAMINATION

5 BY MR. LEMMER:

6 Q Gentlemen, change management. So we're on Section  
7 8 of the report. Describe briefly for me what -- when we  
8 talk about change management in the context of Section 8,  
9 what are we talking about?

10 A (Witness Weeks) I think you could characterize  
11 change management as a process test as opposed to some sort  
12 of transaction test. It is attempting to determine whether  
13 or not the practices in place by the company that govern how  
14 it does change management changes of its interfaces visa a  
15 via the interface specifications and what the capabilities  
16 of those systems are get noticed out to parties and the  
17 process surrounding defining what those would be, when they  
18 will take place, how the -- the form of providing  
19 documentation about those changes to the interface and those  
20 sorts of things.

21 Q What is the -- in your opinion, what is the  
22 importance of providing documentation to CLECs about  
23 changes?

24 A (Witness Weeks) If CLECs are going to -- if the  
25 ILEC is going to change its interface and the CLECs are to

1 Q Well, in fact, BellSouth knew its actual system,  
2 Encore, couldn't pass the volume test, correct?

3 A (Witness Weeks) I wouldn't be able to say yes or  
4 no to that.

5 Q You would agree that BellSouth indicated to you  
6 that it's production system could not handle the volume  
7 anticipated in these volume tests?

8 A (Witness Weeks) They represented to us that they  
9 did not believe that their production system would be able  
10 to support those volumes, but I don't know that that was  
11 based on empirical evidence. I don't know. You would have  
12 to ask BellSouth.

13 Q Do you know any reason why BellSouth couldn't  
14 simply have improved their production system to handle the  
15 volume tests?

16 A (Witness Weeks) They could have done so. The  
17 reasons they gave for doing that were mostly based upon  
18 cost.

19 Q They did not want to spend the money it would take  
20 to bring their system up to level it would need to be to  
21 pass the volume test?

22 A (Witness Weeks) That was the representation that  
23 was made to us.

24 Q Now in setting up RSIMMS, BellSouth didn't simply  
25 duplicate the Encore system, did it?

1 A (Witness Weeks) Right.

2 Q -- do you agree with that?

3 A (Witness Weeks) I agree.

4 Q Corresponding machines in RSIMMS had -- one had  
5 four CPU's and four gigabits and one had two CPUs and one  
6 gigabit, correct?

7 A (Witness Weeks) That's correct.

8 Q And when they're discussing the relative computing  
9 power of RSIMMS versus BellSouth's actual production system,  
10 it states that RSIMMS, in this application, has an almost  
11 100 percent greater computing power, is that correct?

12 A (Witness Weeks) Correct.

13 Q Now did you agree with BellSouth's decision to run  
14 the volume test in RSIMMS as opposed to Encore -- opposed to  
15 its production system?

16 A (Witness Weeks) Well I pointed out that running  
17 the production tests -- excuse me, running the volume tests  
18 in something other than the production environment was not a  
19 strong a record as running that same test in the production  
20 environment, and that's what gave rise to the production  
21 volume tests.

22 Q Well, in fact, did you put language in the RSIMMS'  
23 portion of the report that essentially distanced KPMG from  
24 much of what was contained in that report talking about the  
25 two different systems?

1 could have took that money and enhanced the production  
2 environment and tested it instead.

3 COMMISSIONER DURDEN: And now they've got to spend  
4 that money to upgrade again.

5 WITNESS WEEKS: It's my understanding that the  
6 RSIMMS environment already existed. Now whether it existed  
7 in its exact form, I couldn't comment on. But it wasn't  
8 created solely for the purposes of passing the volume test.  
9 There's also one other concern that all ILECs express when  
10 you talk about running the volume test in production, and  
11 that is if it fails and there's significant problems, real  
12 customers, real CLECs, real orders, real consumers in the  
13 state of Georgia would have been impacted, and the company  
14 was concerned about that as well.

15 MR BARBER: May I follow up on a couple of those  
16 questions, sir?

17 COMMISSIONER BURGESS: Go ahead.

18 BY MR. BARBER:

19 Q In fact, you can tell us of no other state in  
20 which you performed these tests in an artificial environment  
21 instead of the production system, is that correct?

22 A (Witness Weeks) There are none To my knowledge.

23 Q Let me follow up on Commissioner Durden's  
24 questions to you. Would you agree that the volume tests  
25 that you perform do not prove that BellSouth's regular

1 production system, the ones that the CLECs will have to use,  
2 can currently pass the volume tests ordered by this  
3 Commission?

4 A (Witness Weeks) The work that we did would not  
5 demonstrate either way whether they could or couldn't.

6 Q And would you agree that you have performed no  
7 test that assures that BellSouth could increase the capacity  
8 of Encore to a level necessary to pass the volume test?

9 A (Witness Weeks) We have done no demonstration  
10 that that's true.

11 Q Have you done any tests to prove that during the  
12 process of upgrading Encore CLEC's operations would not be  
13 impacted?

14 A (Witness Weeks) We've done no work on that at  
15 all.

16 Q And have you done any tests that would show that  
17 the increased capacity of Encore can accommodate the real  
18 world transaction mix that'll be presented to it?

19 A (Witness Weeks) Because we didn't do any work --

20 COMMISSIONER BURGESS: Now you just asked a good  
21 question. When will it be presented to them? That's what  
22 we've been trying to get a handle on -- this Commission.  
23 It's one thing to build it and they come, it's another thing  
24 to build it and they don't come. We've been in that -- you  
25 hit right on the head, when we get to it. I want to know --



1 Q Give me a second to catch up with you, Mr. Weeks.

2 A (Witness Weeks) Okay. Actually, I believe the  
3 table starts one page earlier than that, Roman V-J-7.

4 Q V-J-7. Could you give us a percentage of the  
5 volume run in Encore production, volume tests relative to  
6 the volume run in RSIMMS? Because I don't believe...

7 A (Witness Weeks) We're going to reference both and  
8 try to tell you that.

9 Q Okay.

10 (Brief pause)

11 A (Witness Frey) The production volume test pre-  
12 order volumes were 24,594; the order volumes were 7,429.

13 Q And this is in Encore?

14 A (Witness Frey) That's correct.

15 A (Witness Weeks) Yes.

16 A (Witness Frey) For the normal volume test in  
17 RSIMMS there were 118,000 pre-orders, and 35,000 orders.

18 A (Witness Weeks) Roughly five times, just real  
19 round numbers.

20 Q Thank you very much, Mr. Weeks. I was doing some  
21 quick calculating in my head.

22 Let me go back to the assumptions briefly. Let me ask  
23 Mr. Ullal -- or Mr. Weeks, you can answer this if you know --  
24 -- how did he derive the assumptions that we discussed a few  
25 minutes earlier?

C E R T I F I C A T E

I, William L. Warren, do hereby certify that the foregoing pages represent a true and accurate transcription of the events which transpired at the time and place set out in the caption, to the best of my ability.

*William L. Warren*

William L. Warren

**Exhibit SEN3PT-3**

**Excerpts from Deposition of Michael Weeks, Dated  
May 4, 2001**

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BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

STATE OF GEORGIA

**CERTIFIED COPY**

IN RE: :  
INVESTIGATION INTO DEVELOPMENT: :  
OF ELECTRONIC INTERFACES FOR : DOCKET NO.  
BELL SOUTH'S OPERATIONAL : 8354-U  
SUPPORT SYSTEM :

Philadelphia, Pennsylvania  
Friday, May 4, 2001

Deposition of MICHAEL WAYNE WEEKS,  
taken pursuant to notice, at the law offices of  
Morgan, Lewis & Bockius, 1701 Market Street, 18th  
Floor, on the above date, beginning at  
approximately 3:15 p.m., before Debra Ann  
Whitehead, a Registered Professional Reporter and  
Notary Public.

1           might not have?

2           A.    Yes.  If we have characterized something as,  
3           "BellSouth has stated," and didn't follow that up  
4           with some words to we tested or didn't test that,  
5           then the absence of that wording would suggest we  
6           just left it.

7           Q.    I asked you at the beginning of the RSIMMS  
8           group of questions on the RSIMMS environment about  
9           the differences in the computer power in the two  
10          systems; correct?

11          A.    Yes.

12          Q.    And I had asked you if you had suggested to  
13          anybody at BellSouth that they use identical  
14          systems.  Do you recall that?

15          A.    I don't recall that specifically, but I will  
16          accept that, if you represent it.

17          Q.    Did you specifically tell someone at BellSouth  
18          that it would present a stronger record to the FCC  
19          if they used identical systems?

20          A.    I believe a fair characterization of what I  
21          said would be that I suggested to BellSouth that  
22          the execution of the volume tests in a stand-alone  
23          environment would be less powerful and compelling  
24          than the same test executed in the production  
25          environment.

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I HEREBY CERTIFY that the  
proceedings and evidence are contained fully and  
accurately in the stenographic notes taken by me  
upon the foregoing matter on Friday, May 4, 2001,  
and that this is a correct transcript of same.

*Debra Ann Whitehead*

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Debra Ann Whitehead  
Registered Professional  
Reporter

(The foregoing certification of this  
transcript does not apply to any reproduction of  
the same by any means, unless under the direct  
control and/or supervision of the certifying  
reporter.)

**Exhibit SEN3PT-4**

**Listing of Objective Tests**



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March 20, 2001

Mr. Leon Bowles  
Director of Telecommunications  
Georgia Public Service Commission  
244 Washington Street, S.W.  
Atlanta, GA 30334-5701

Dear Mr. Bowles:

To support the Georgia Public Service Commission's (GPSC's) consideration of the matter of BellSouth - Georgia's (BellSouth's) compliance with the requirements of Section 271 of *The Telecommunications Act of 1996* in the context of Docket No. 8354-U, KPMG Consulting, Inc. (KCI) is pleased to submit our *Master Test Plan Final Report, Supplemental Test Plan Final Report, and Flow-Through Evaluation* per the directions provided in your letter dated March 5, 2001.

The *Final Reports* are organized around eight major categories or domains, as outlined in the *MTP* and *STP*: Pre-Ordering, Ordering and Provisioning, Billing, Maintenance and Repair, Capacity Management, Change Management, Metrics, and the Flow-Through Evaluation. The test activities specified in the test plans, with the exception of the metrics evaluations, are complete as of the date of this letter. A supplemental report will be filed with the GPSC upon completion of the remaining metrics evaluations.

KCI evaluated BellSouth across some 1,175 test points in the aforementioned categories. Each test point was assigned one of four possible results: Satisfied, Not Satisfied, No Result Determination Made, or Not Complete. In your letter dated March 5, 2001, you directed us to provide an opinion on which of the test areas remaining "Not Complete" or "Not Satisfied" could have a material adverse impact on competition.

While it is important that KCI's comments in this letter be considered only in the context of the substantial volume of performance detail and evaluative commentary presented in the test results sections of the *Final Reports*, as well as in the exceptions reports and closure statements on file with the GPSC, KCI believes, based on our professional judgment of the test performance observed and recorded during the course of the evaluation, that no deficiencies creating potentially material adverse impacts on competition currently exist in the test categories of Pre-Ordering, Billing, Maintenance and Repair, Capacity Management, Change Management, and Flow-Through.



In the Ordering and Provisioning category all evaluation criteria have been satisfied except for those in three areas: timeliness of responses to fully mechanized orders; timeliness and accuracy of Clarifications to partially mechanized orders; and, accuracy of translation from external (CLEC) to internal (BellSouth) service orders resulting in switch translation and directory listing errors. It is our professional judgment that these evaluation criteria, which have been assigned "Not Satisfied" results in the reports, could potentially have a material adverse impact on a CLEC's ability to compete effectively. As you know, the Commission will be able to monitor these issues on an ongoing basis through the performance measures and/or penalty plans in place that address the timeliness of BellSouth responses, service order accuracy, and percent of provisioning troubles within 30 days.

A number of items remain "Not Complete" as of today in the Metrics category. KCI metrics testing is ongoing; and BellSouth has a number of initiatives in place both to conform to the GPSC's January 16, 2001 directive and to address deficiencies identified to date by KCI. It should be noted that, in our judgment, inaccuracies in metrics reporting would not in and of themselves have a materially adverse impact on competition.

We look forward to responding to any questions you may have concerning the attached reports.

Respectfully,



Michael W. Weeks  
Managing Director