

EXHIBIT OSS-71

**Comparison of Georgia Third Party Test with
New York and Texas**

Georgia 3rd Party OSS Test compares favorably with the NY and TX tests.

Test Target	GA	NY	TX	Comments
Third Party Roles/Responsibilities				
Test Plan Development	X	X	X	
Test Management & Education	X	X	X	TX CLECs executed, TT observed/reported
Report/Opinion	X	X	X	
Test Approach				
Blindness	X	X	X	
Military Style/Regression	X	X	X	
Volume Test Bed	Test	Prod	Prod	
CLEC Involvement				
Test Plan Development	X	X	X	CLEC review and comment cycle
Test Execution	X	X	X	LNP-based orders only
Status/Issue Review	X	X	X	

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Pre-Ordering				
Basic Capabilities (Addr Val, TN, Srvc Avail, DD, CSR)	X	X		TX Test Plan defined test; not executed / monitored
Loop Qual/Makeup (Manual)	X		X	
GUI Functional Test		X		153 LENS Users in 5/99; TX Test Plan defined test; not executed/monitored
App-to-App Functional Test	X	X		
Performance Results				
Response Timeliness	X	X		
Response Accuracy/Completeness	X	X		
System Availability	X	X		
Ordering				
Products (Flow-Thru & Non-FT)				
Simple Resale	X	X	X	
Complex Resale	X	X		
UNE-P	X	X	X	
UNE Loops	X	X	X	
UNE Loop + LNP	X	X	X	
xDSL Loops (Manual only)	X		X	
EELs		X		
Interconnections Trunking		X		

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Test Target	GA	NY	TX	Comments
Ordering (Cont'd)				
Activities/Requests				
New/Add	X	X	X	
Change	X	X	X	
Conversion	X	X	X	
Move	X	X	X	
Suspend/Restore	X	X	X	
Disconnect	X	X	X	
Supplement/Cancel	X	X	X	
Errors	X	X	X	
Manual Order Process Evaluation	DSL	X	X	Over 127,000 Manual transactions were processed in 5/99
GUI Functional Test		X	X	153 LENS Users in 5/99
App-to-App Functional Test	X	X	X	EDI & TAG
Process Parity Evaluation	DSL			xDSL Loops
Order Status Accuracy	X	X		TX handles via Workcenter Help Desk
Performance Results				
FA Timeliness & Completeness	X	X	X	
FOC/REJ Interval & Completeness	X	X	X	
DD Accuracy vs. Std Interval Guide	X	X	X	
Pre-Order/Order Integration	X	X	X	All 3PTs address format/mapping

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Maintenance & Repair (Cont'd)				
M&R Process Evaluation				
Process Review & Adherence	X	X	X	
Coordinated Testing Process		X		NY/TX did “deep dives” in specific areas
Manual Operations Review		X		Performance measures provide parity test
Web/GUI Functional Test	X	X	X	TAFI
EB/App-to-App Functional Test	X		X	ECTA
Network Surveillance Support		X		
Performance Results				
Missed Appointments	X	X	X	
Trouble Report Rate	X	X	X	
Maintenance Avg Duration	X		X	
% Repeat Troubles	X	X	X	
% Out of Service for 24 Hours	X		X	
M&R Center Speed to Answer	X		X	
M&R OSS Response Timeliness	X		X	
Avg Delay on Missed Appointments				

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Billing				
CRIS/CABS Invoicing Functional Test	X	X	X	UNE test
DUF Usage Functional Test	X	X	X	
Resale	X	X	X	
UNE	X	X	X	
Performance Results				
Invoice Accuracy	X	X	X	
Usage Data Delivery	X	X	X	
Invoice Delivery Timeliness	X	X		
Usage Data Delivery Timeliness	X	X		
Volume Testing & Scalability Analysis				
Normal Volume Testing (App-to-App)				
Pre-Ordering	X	X		
Ordering (FT only)	X	X	X	EDI & TAG
M&R	X			
Normal Volume Testing (Web/GUI)				
Pre-Ordering		X	X	
M&R		X		

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Provisioning				
Provisioning Verification/Accuracy	X	X	X	
Coordinated Provisioning Evaluation	X	X	X	
Provisioning Process Parity Evaluation	DSL	X		xDSL Loops
Performance Results				
Notice Interval & Completeness				
Jeopardy Notices	X	X	X	
Missed Appt Notices	X	X	X	
Completion Notices	X	X	X	
Hot Cut Timeliness	X	X	X	
Maintenance & Repair				
Basic Functionality				
Enter Trouble Report	X	X	X	
Status Trouble Report	X	X		
Close/Cancel Trouble Report	X	X		
Access Trouble History	X	X		
Perform MLT Test	X	X	X	
M&R Process Parity Evaluation	X	X	X	BLS confirmed Resale v. Retail process parity
				TX tested Workcenter operations parity

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Volume & Scalability (Cont'd)				
Peak Volume Testing (App-to-App)				
Pre-Ordering	X	X		
Ordering (FT only)	X	X	X	EDI & TAG
M&R	X			
Peak Volume Testing (Web/GUI)				
Pre-Ordering		X	X	
M&R		X		
Stress Volume Testing				
Pre-Ordering		X		App-to-App
Ordering (FT only)		X		App-to-App
M&R		X		Web/GUI only
Systems Capacity Mgmt Evaluation				
Ordering	X	X	X	
M&R	X	X	X	
Billing	X			
Workcenter Scalability				
Ordering	X	X	X	GA - xDSL Loops
Provisioning		X	X	
M&R			X	
Volume Test Performance Results	X	X	X	

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Test Target	GA	NY	TX	Comments
Documentation Evaluation				
Web/GUI User's Guides				LENS commercial usage
Pre-Ordering		X		
Ordering		X		
M&R	X	X		
Process Business Rules				
Pre-Ordering	X	X		
Ordering	X	X		
M&R	X	X		
CRIS/CABS Invoicing	X	X		
Daily Usage Files	X	X		
Programmer's Guides (Interface Specs)				KPMG/HP built interfaces from BLS docs and applied during testing; no efficacy evaluation
Pre-Ordering		X		
Ordering		X	X	
Document Management Process	X	X	X	
Change Management Process				
Process Definition	X	X	X	
CR Prioritization/Severity Process	X	X		
PSC/CLEC Input	X	X	X	

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Change Management Process (Cont'd)				
Notice & Implementation Intervals	X	X	X	Tested documentation intervals only. Recently extended documentation / implementation intervals via CCP
Release Versioning Policy	X	X	X	
Documentation Completeness	X	X	X	
Stable/Separate Test Environment	X	X	X	
Defect Management Process	X	X	X	
OSS Interface Development Review	X	X	X	Observation of OSS '99 (major release)
Relationship Management				
Account Establishment & Mgmt		X		Over 150 CLECs in 5/99 and over 400 today are doing business in BLS territory
Certification Testing		X		KPMG/HP executed, not evaluated
Help Desk Support		X		
Pre-Ordering		X		
Ordering		X		
Billing		X		
OSS Support		X		
CLEC Training		X		KPMG attended as test preparation; not evaluated
Forecasting Verification/Validation		X		

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Performance Metrics				
Raw Data Accuracy & Completeness	X	X	X	
ETE Data Transformation Integrity	X	X	X	
External Documentation Analysis	X	X	X	
SQM Definitions	X	X	X	
Raw/Source Data User's Guide	X		X	
Quantitative Result Replication	X	X	X	
Data Security & Administration	X	X	X	
SQM Development & Change Mgmt	X	X	X	
CLEC/Wholesale	X	X	X	
RBOC Retail		X	X	External docs only
Network Design, Collocation, & Interconnection Planning		X		Commercial volumes & performance metrics
E911 Process Analysis			X	Performance metrics