

FL Third Party Test Observations & Exceptions Addressed in the GA Third Party Test

Florida Observations

FL Obs #	FL KPMG Finding	GA Exc #	BellSouth Response to SEN-1
2 (PMR-5) Closed	KPMG cannot replicate the values in the Non-Mechanized % Rejected Service Requests SQM report for the CLEC Aggregate using the RDUM and the corresponding raw data (5/00)	45 46 52	KPMG discovered the same issue for this metric in both the GA 3PT & FL 3PT. BellSouth noted to KPMG in its FL Observation response that the issue of excluding non-mechanized LSRs received or processed during weekends was the subject of an (at the time) existing GA 3PT Exception. In fact, KPMG successfully retested 5/00 & 6/00 CLEC Aggregate data in order to resolve both FL Obs #2 & GA Exc #52.4. KPMG's FL 3PT finding in connection with this SQM report in no way challenges the adequacy of the GA 3PT.
3 (PMR-5) Closed	KPMG cannot replicate the values in the Reject Interval (Non-Trunks) SQM report for the CLEC Aggregate using the RDUM and corresponding raw data (5/00)	45 46 52	KPMG discovered the same non-mechanized weekend LSR processing issue with 5/00 Reject Interval data in both the GA 3PT (GA Exc #46.2) & FL 3PT. The issue was identified as KPMG was retesting KCL Test CLEC 5/00 results in GA while conducting its initial testing of CLEC Aggregate results in FL. Once BellSouth reran the 5/00 data to include the weekend LSRs and KPMG successfully replicated the results, both FL Obs #3 & GA Exc #46.2 were closed. KPMG's FL 3PT finding in connection with this SQM report in no way challenges the adequacy of the GA 3PT.
4 (PMR-5) Closed	KPMG cannot replicate the values in the Firm Order Confirmation Timeliness (Non-Trunks) SQM report for the CLEC Aggregate using the RDUM and corresponding raw data (5/00)	23 46 52 62 90 110	KPMG discovered the same non-mechanized weekend LSR processing issue with 5/00 FOC Timeliness data in both the GA 3PT (GA Exc #56.6 & #62.1) & FL 3PT. The issue was identified as KPMG was retesting KCL Test CLEC 5/00 results in GA while conducting its initial testing of CLEC Aggregate results in FL. Once BellSouth reran the 5/00 data to include the weekend LSRs and KPMG successfully replicated the results, FL Obs #4, GA Exc #56.6, & GA Exc #62.1 were closed. KPMG's FL 3PT finding in connection with this SQM report in no way challenges the adequacy of the GA 3PT.
5 (PMR-5) Closed	KPMG cannot replicate the values in the Order Completion Interval (UNE Non-Design) SQM reports for the CLEC Aggregate using the RDUM and corresponding raw data (5/00)	46 62 86 90	KPMG discovered the same null commitment date coding issues with 5/00 OCI data in both the GA 3PT (GA Exc #46.4, #86.2, & #90.2) & FL 3PT. The issue was identified as KPMG was retesting CLEC Aggregate and KCL Test CLEC 5/00 results in GA and while KPMG was conducting its initial testing of CLEC Aggregate 5/00 results in FL. Once BellSouth updated the RDUM to address the coding issue and KPMG successfully replicated the results, FL Obs #5, GA Exc #46.4, GA Exc #86.2 & GA Exc #90.2 were closed. KPMG's FL 3PT finding in connection with this SQM report in no way challenges the adequacy of the GA 3PT.
	KPMG cannot replicate the		In the FL 3PT, KPMG incorrectly excluded transactions from the calculation where the

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7 (PMR-5) Closed	values in the Average Completion Notice Interval SQM reports for the CLEC Aggregate and BellSouth Retail using the RDUM and corresponding raw data (5/00)	86 110	ACNI for a completed order falls exactly on the boundary of an interval bucket (1hr, 2hrs, 4hrs, 24hrs, etc.). The remaining issues identified in FL Obs #7 were due to the inadvertent rounding of cell values (to five digits below the decimal point) in the raw data spreadsheet delivered to KPMG by BellSouth. Neither the KPMG coding error nor the BellSouth raw data delivery mistake was made during the GA 3PT evaluation of this metric. However, BellSouth did agree to clarify the SQM to more clearly define the interval buckets in order to close FL Obs #7. KPMG's FL 3PT finding in connection with this SQM report in no way challenges the adequacy of the GA 3PT.
8 (PMR-5) Closed	KPMG cannot replicate the values in the E911 Timeliness SQM report using BellSouth's computational instructions and corresponding raw data (5/00)	52	KPMG discovered the same E911 Timeliness computation instruction issue in the GA 3PT with 10/99 data (GA Exc #52) and later in the FL 3PT with 5/00 data. BellSouth had revised the instructions and corrected a calculation in the computation instructions in order to close the Exception in the GA 3PT. However, BellSouth inadvertently maintained two disparate versions of the internal computation instructions during the period of time between the 10/99 GA test and the 5/00 FL test and provided KPMG with the incorrect version in FL. This was simply human error and KPMG's FL 3PT finding in connection with this SQM report in no way challenges the adequacy of the GA 3PT.
9 (PMR-4/5) Closed	BellSouth does not properly construct the processed data used to validate the Total Service Order Cycle Time SQM report for BellSouth Retail and KPMG cannot replicate the values (5/00)	46 62 86 111	KPMG discovered the same TSOCT computation instruction issue in the GA 3PT and FL 3PT. In this case, KPMG was testing 7/00 data in GA and 5/00 data in FL, but both tests were relying on the same flawed version of BellSouth's RDUM. FL Obs #9 & GA Exc #111 were closed with the publication of the revised RDUM (posted 10/4/00) and the successful replication of the respective month's TSOCT results. KPMG's FL 3PT finding in connection with this SQM report in no way challenges the adequacy of the GA 3PT.
13 (PMR-3) Closed	BellSouth does not properly notify CLECs when they initiate changes to published historical performance reports and/or the subtending raw data files	3	KPMG discovered that BellSouth did not notify CLECs of changes made to historical results in the GA 3PT (GA Exc #3). BellSouth closed this Exception (GA Exc #3) by enhancing its PMAP website, PMAP User Guide, and CLEC Notification Procedures to address the issue. In the FL 3PT, KPMG incorrectly noted an immaterial cosmetic change made to one performance report that BellSouth actually communicated to CLECs in accordance with its CLEC Notification Procedures. KPMG's FL 3PT finding in connection with this SQM report in no way challenges the adequacy of the GA 3PT.
17 (PMR-5) Closed	KPMG cannot replicate the values in the % Missed Installation Appointments (Non-Trunks) SQM report for the CLEC Aggregate (5/00)	86	KPMG discovered the same documentation and coding issues with the 5/00 %MIA data reviewed in the FL 3PT as was already noted with the 10/99 data reviewed in the GA 3PT (GA Exc #86.3). A number of RDUM documentation and coding change requests (clearly documented in GA Exc #86.3) were in progress at the time KPMG attempted to replicate the %MIA values using 5/00 data. Once BellSouth made the coding changes and updated the RDUM, KPMG successfully replicated the results and closed FL Obs #17 & GA Exc #86.3. KPMG's FL 3PT finding in connection with this SQM report in no

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			way challenges the adequacy of the GA 3PT.
18 (PMR-5) Closed	KPMG cannot replicate the values in the Customer Trouble Report Rate SQM report for the CLEC Aggregate using the RDUM and corresponding raw data (5/00)	86	KPMG simply misunderstood the published business rules for CTR and implemented the calculation incorrectly when testing this metric in the FL 3PT. No changes in documentation or code were necessary to close this FL Observation. The coding fix implemented to resolve GA Exc #86.6 for the 5/00 results was successfully tested by KPMG in FL. KPMG's FL 3PT finding in connection with this SQM report in no way challenges the adequacy of the GA 3PT.
19 (PMR-5) Closed	KPMG cannot replicate the values in the Average Jeopardy Notice Interval & % Jeopardies SQM reports for the CLEC Aggregate using the RDUM and corresponding raw data (5/00)	110	KPMG discovered the same computation instruction issues with Avg Jeopardy Notice Interval data in both the GA 3PT (GA Exc #110.3/4) & FL 3PT. The issue was identified as KPMG was testing KCL Test CLEC results for 3/00 & 6/00 in GA and while KPMG was testing CLEC Aggregate results for 5/00 in FL. Once BellSouth updated the RDUM to correct the computation instructions (all three tests relied on the same flawed version) and KPMG successfully replicated the results, FL Obs #19 & GA Exc #110 were closed. KPMG's FL 3PT finding in connection with this SQM report in no way challenges the adequacy of the GA 3PT.
20 (PMR-5) Closed	KPMG cannot replicate the values in the Mean Held Order Interval (Non-Trunks) SQM report for the CLEC Aggregate and BellSouth Retail using the RDUM and corresponding raw data (5/00)	23 52	KPMG discovered the same coding and computation instruction issues with Mean Held Order Interval data in both the GA 3PT (GA Exc #52.7) & FL 3PT, as noted in the FL Observation report. The issue was identified as KPMG was testing CLEC Aggregate results for 10/99 in GA, but the change request required to fix the coding issue was not implemented until the publication of July results. Once BellSouth implemented the coding fix and updated the RDUM to correct the computation instructions, KPMG was able to replicate 7/00 results in both tests to close FL Obs #20 & GA Exc #52.7. KPMG's FL 3PT finding in connection with this SQM report in no way challenges the adequacy of the GA 3PT.
22 (PMR-5) Closed	KPMG cannot replicate the values in the Coordinated Customer Conversions Interval SQM report for the CLEC Aggregate using BellSouth's RDUM and corresponding raw data (9/00)	52 90 100	The latest data month that KPMG tested in the GA 3PT was 5/00, prior to the scheduled mechanization of this metric in 8/00. KPMG discovered coding and computation instruction issues that were a direct result of BellSouth's implementation of a mechanized Coordinated Customer Conversion Interval reporting process. KPMG's FL 3PT finding in connection with this SQM report in no way challenges the adequacy of the GA 3PT.
57 (PMR-5)	KPMG cannot replicate the values in the TSOCT SQM report for the CLEC Aggregate using the corresponding PMAP raw data and the RDUM (1/01)	46 62 86 111	KPMG discovered a TSOCT (UNE Design) replication issue in the FL 3PT that was not identified in the GA 3PT metrics test. BellSouth is currently investigating the root cause of the issue and the coding change being implemented to close FL Obs #57 in order to determine if the problem existed when this area was tested in the GA 3PT.
	KPMG cannot replicate the		KPMG discovered this very error for the exact same data month (10/00) in the GA 3PT

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68 (PMR-5)	volume of Auto Clarifications in the % Flow Through (Detail) SQM report for the CLEC Aggregate using BellSouth's computation instructions and corresponding raw data (10/00)	21	(GA Exc #21) and made the necessary modifications to the calculation for the 3/01 results. KPMG made no request to rerun or restate the 10/00 Flow-Through results in support of the GA 3PT. However, KPMG tested the same (flawed) 10/00 Flow-Through report in the FL 3PT and identified the same error discovered in GA Exc #21. At KPMG's request, BellSouth reran the report with the modifications implemented for the 3/01 report and KPMG was satisfied with the results. KPMG will test 4/01 Flow-Through results before agreeing to close FL Obs #68. To date, KPMG's FL 3PT finding in connection with this SQM report in no way challenges the adequacy of the GA 3PT.
73 (PMR-3)	BellSouth did not properly conduct a downstream impact analysis when transitioning between LENS systems for the OSS Average Response Time SQM (12/00-4/01)	70	KPMG completed their analysis of the OSS Response Time SQM in the GA 3PT just prior to the retirement of the TCIF7 system. In fact, the issue uncovered in the FL 3PT (no LENS TCIF9 data feeds) was identified as a result of BellSouth's renewed focus on legacy system change control procedures. KPMG merely points out a gap in the OSS Average Response Time reports that BellSouth had already identified and communicated to CLECs as a result of a successfully revised change control process.

Florida Exceptions

FL Exc #	FL KPMG Findings	GA Exc #	BellSouth Response to SEN-1
27 (PMR-5)	KPMG cannot replicate the values in the CLEC-Aggregate PTR30 SQM report from the corresponding raw data (5/00)	23 86 123	KPMG discovered the same PTR30 replication issue for 10/99 results (originally) in the GA 3PT and GA Exc #86.1 remains open at this time. KPMG's FL 3PT finding in connection with this SQM report in no way challenges the adequacy of the GA 3PT.
36 (PMR-4)	BellSouth does not properly construct the processed data used to validate the FOC Timeliness and Reject Interval metrics for non-mechanized orders with weekend activity (initial test 5/00; retest 10/00)	87	KPMG discovered the same non-mechanized weekend LSR processing issue with 5/00 Reject Interval and FOC Timeliness data in both the GA 3PT (GA Exc #46.2, GA Exc #56.6, & #62.1) & FL 3PT. The issue was identified as KPMG was retesting KCL Test CLEC 5/00 results in GA and while conducting its initial testing of 5/00 CLEC Aggregate results in FL. Although BellSouth reran the 5/00 data to include the weekend LSRs and KPMG successfully replicated the results to close the GA #PT Exceptions, FL Exc #36 remains open. BellSouth contends that KPMG has misinterpreted the overtime hours, FAX servers, and holiday exclusions/business rules stated in the FL SQM resulting in the discrepancies found in KPMG's retest of 10/00 results in the FL 3PT. BellSouth has agreed to clarify the exclusions language for Reject Interval & FOC Timeliness in the FL SQM to match the changes made in the GA SQM as a result of the GA 3PT. KPMG will be retesting using 3/01 data and the revised version of the FL SQM. To date, KPMG's FL 3PT finding in connection with this SQM report in no way challenges the adequacy of

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56 (PMR-5)	KPMG found that BellSouth's metrics calculation for Reject Interval (Trunks) is inconsistent with the documented metrics calculations for weekend exclusions (3/01)	52	<p>the GA 3PT.</p> <p>KPMG discovered two independent issues related to the weekend hours exclusion for Reject Interval (Trunks) at two different points in time as a result of BellSouth's implementation of coding changes following the closure of GA Exc #87. In order to close GA Exc #87, BellSouth agreed to remove the weekend hours exclusion from the SQM since the exclusion was in progress, but had not yet been implemented. FL Exc #56 is addressing the fact that the weekend hours exclusion has now been implemented in the calculations, but the SQM no longer reflects the exclusion language (removed due to the GA 3PT findings). KPMG's FL 3PT finding in connection with this SQM report in no way challenges the adequacy of the GA 3PT.</p>
59 (PMR-2)	KPMG found that BellSouth's business rules in the FL Interim Performance Metrics document for OSS Interface Availability are ambiguous (10/00 SQM)	133	<p>In the FL 3PT, KPMG has taken issue with the language in a single bullet item in the description of a full system outage in support of the OSS Interface Availability metric definition in the 10/00 FL SQM. This language was accepted by KPMG in the Exception report for GA Exc #93, and implemented with the 7/00 GA SQM. Although BellSouth agrees that this language could be more concise, the FL Exception is more a result of "another set of KPMG eyes" interpreting a complex definition than any basic deficiency in the GA 3PT. BellSouth will work with KPMG to further refine and clarify the definition of a full system outage, but KPMG's FL 3PT finding in connection with this SQM report in no way challenges the adequacy of the GA 3PT.</p>