

FL Third Party Test Observations & Exceptions Addressed in the GA Third Party Test with No Exception Issued

Florida Observations

FL Obs #	FL KPMG Finding	BellSouth Response to SEN-1
23 (PMR-5) Closed	KPMG cannot replicate the values in the Reject Interval (Trunks) SQM report for the CLEC Aggregate using BellSouth's computation instructions (10/00)	KPMG did not identify errors for this metric in the GA 3PT, yet uncovered errors in the FL 3PT using 10/00 results. This measure is "manually" calculated and human error could occur on a month-to-month and/or state-specific basis as a result of a number of factors. In order to close this Observation, BellSouth has introduced additional calculation automation techniques to minimize the occurrence of future errors in this report. KPMG's FL 3PT finding in connection with this manually produced SQM report in no way challenges the adequacy of the GA 3PT.
24 (PMR-5) Closed	KPMG cannot replicate the values in Provisioning Troubles w/in 30 Days (Trunks) SQM report for the CLEC Aggregate using BellSouth's RDUM and corresponding raw data (5/00)	Despite Ms. Norris' assertion to the contrary, KPMG issued GA Exc #86.1 in the GA 3PT for replication issues associated with the PTR30 (Non-Trunks & Trunks) submetrics. In fact, FL Obs #24 makes several direct references to the changes being made to this metric as a result of the ongoing audit in the GA 3PT (GA Exc #86.1 remains open). KPMG's FL 3PT finding in connection with this SQM report in no way challenges the adequacy of the GA 3PT.
28 (PMR-5) Closed	KPMG cannot replicate the values in the OS/DA Speed to Answer Performance (Toll & Directory Assistance) SQM reports for the CLEC Aggregate using BellSouth's computation instructions (5/00)	KPMG did not identify errors for these metrics in the 11/99 OS/DA reports reviewed for the GA 3PT, yet uncovered errors in the FL 3PT using 5/00 results. These measures are "manually" calculated and human error could occur on a month-to-month and/or state-specific basis as a result of a number of factors. In order to close this Observation, BellSouth has introduced additional safeguards to ensure that the use of the incorrect OS/DA conversion table binders does not occur in the future. KPMG's FL 3PT finding in connection with this manually produced SQM report in no way challenges the adequacy of the GA 3PT.
31 (PMR-5) Closed	KPMG cannot replicate the values in the three Collocation SQM reports (Avg Response Time, Avg Arrangement Time, and % of Due Dates Missed) for the CLEC Aggregate (5/00)	KPMG did not identify errors in the 10/99 Collocation reports reviewed for the GA 3PT, yet uncovered errors in the FL 3PT using 5/00 results. These measures are "manually" calculated and human error could occur on a month-to-month basis as a result of a number of factors. The issue uncovered in the FL 3PT has driven BellSouth to introduce additional calculation automation techniques and validation resources to minimize the occurrence of future errors in these reports. KPMG's FL 3PT finding in connection with this manually produced SQM report in no way challenges the adequacy of the GA 3PT.
72	BellSouth's inability to capture and retain CLEC LENS data for	KPMG did not identify data integrity issues in the 10/99 & 1/00 OSS Average Response Time reviewed for the GA 3PT, yet uncovered issues in the FL 3PT by reviewing 1-3/01

FL Obs #	FL KPMG Finding	BellSouth Response to SEN-1
(PMR-4)	12/00-3/01 prevents KPMG from conducting the Data Integrity test for the OSS Average Response Time SQM	results. BellSouth concurs that CLEC LENS data was unavailable from 12/00-3/01 following the retirement of the TCIF7 (old LENS) system, as posted on the PMAP website. However, this issue occurred nearly a year following the completion of KPMG's review of this metric in the GA 3PT. In fact, BellSouth identified the LENS data feed issue immediately following the implementation of the legacy system change control process discussed in GA Exc #70, albeit too late to resolve the issue prior to the system transition. KPMG's FL 3PT finding in connection with this raw data integrity issue in no way challenges the adequacy of the GA 3PT.
88 (PMR-3)	KPMG discovered that BellSouth has no documentation that describes the process of notifying outside parties of metrics changes	Despite Ms. Norris' assertion to the contrary, KPMG noted a similar concern that BellSouth did not notify CLECs of changes made to historical results in the GA 3PT (GA Exc #3). BellSouth closed this Exception by enhancing its PMAP website, PMAP User Guide, and CLEC Notification Procedures to address the issue. In the FL 3PT, KPMG has noted that BellSouth may not have documentation describing the CLEC notification process for metrics changes. BellSouth disagrees with this assertion as stated in the Exception Response dated 7/11/01. KPMG's FL 3PT assertion in connection with this metrics external change control issue may turn out to be incorrect (it is an Observation, not an Exception) and in no way challenges the adequacy of the GA 3PT.

Florida Exceptions

FL Exc #	FL KPMG Finding	BellSouth Response to SEN-1
78 (PMR-3)	BellSouth's implemented Metrics change control process is inconsistent with its documented metrics change control process.	KPMG tested BellSouth's compliance with its published metrics change control process in the GA 3PT, but did not identify an Exception related to the issues raised in FL. Although the formal BellSouth response to FL Exc #78 is pending, I would expect to discover that the issues raised are a direct result of the accelerated metrics development process required to implement the GA "Rocket Docket". It is possible that in certain cases, internal documentation was not updated in a timely manner in order to focus largely on the development of new metrics and product disaggregations. At worst, the issues raised by KPMG in FL will be addressed via minor updates to BellSouth's change control documentation and have no material adverse impact to the publication of BellSouth's monthly performance results. KPMG's FL 3PT finding in connection with this metrics change control issue in no way challenges the adequacy of the GA 3PT.