

## Florida Billing Observations and Exceptions Mentioned in CLECs' Testimony

Florida Observation No.	KPMG finding	Response
42	BellSouth failed to deliver Daily Usage File (DUF) records for a variety of completed calls	<p>This was identified as an issue in GA (exception 28) as well as FL. Generally, however, the specific causes were different.</p> <ul style="list-style-type: none"> <li>• In Florida, 800 usage rates were not listed in the contract, and therefore usage remained in an error status until rates were available. This was not an issue in the Georgia test as usage rates for 800 service were available and used in the billing system.</li> <li>• In both the Florida and Georgia tests, BellSouth clarified KPMG's understanding of the timing of service order dates in relation to billing. The BellSouth policy is that usage on the day of a migration order will be associated with the previous customer and class of service. For example, if a disconnect order and new order are issued on the same day changing a particular line number from resale to UNE, any usage on the day of disconnect will be treated as resale. This clarification cleared the issue associated with this misunderstanding during both the GA and FL tests.</li> <li>• In both the FL and GA tests, BellSouth clarified that usage records for 800 calls associated with a resale account (excluding resold WATS service) would not be sent to DUF as BellSouth bills the carrier for this traffic. Once this clarification was made this specific issue was cleared in both the GA and FL tests.</li> <li>• In both the GA and FL tests, usage records were not sent to KPMG due to delays in posting the service order in the billing system. To correct the issue seen in Florida, BellSouth implemented a process (implemented on January 8, 2001) to re-circulate all UNE AMA usage associated with a service orders in progress. The usage is now sent to the appropriate billing system when the order posts. BellSouth implemented a similar change in conjunction with the Georgia test but had to enhance the change to address the usage issues seen in Florida.</li> <li>• KPMG has recommended that this Observation be closed.</li> </ul>
80	The application of recurring and non-	Two issues were raised in this Observation:

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	<p>recurring charges associated with UNE ports denoted by the Universal Service Order Code (USOC) UEPLX, appear to be inconsistent</p>	<ul style="list-style-type: none"> <li>• Some order types did not result in the billing of non-recurring charges – BellSouth responded that non-recurring charges would not be created when a service order is either removing a USOC from a customer's account or when the order is merely "recapping" (or restating) a USOC on an order. Full descriptions for applying the billing concepts of recurring, non-recurring, and fractional charges are described on the internet web site at:  <a href="http://www.interconnection.bellsouth.com/billing">http://www.interconnection.bellsouth.com/billing</a> in Appendix A - Billing Concepts, of the 'Understanding Your Bill' Section.</li> <li>• The rates contained on bills from 7/29/00 were not the same as those on bills dated 4/29/01 for USOC UEPLX –Testing for KPMG in Florida spanned two different Interconnection Agreements negotiated with KPMG. The early agreement had no recurring rate for this USOC and therefore none was billed on the 7/29/00 invoice. However, an error was detected when BellSouth incorrectly loaded the non-recurring rate from the early contract and therefore non-recurring charges were not correctly billed. The later agreement contained a recurring charge for UEPLX but not a non-recurring charge. Therefore only the recurring charge was included on the bill dated 4/29/01.</li> </ul>

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Florida Exception No.	KPMG Finding	Response
13	BellSouth failed to deliver at least 95% of Daily Usage File (DUF) records within six calendar days following the date the calls were placed.	<p>In both the Georgia and Florida Tests KPMG found that BellSouth did not meet the stated objective of sending 95% of usage records within 6 workdays:</p> <ul style="list-style-type: none"> <li>• In the Georgia test, a re-test of the exception cleared the issue since BellSouth did meet the objective during the re-test.</li> <li>• In the Florida test, usage was delayed due to an error in the BellSouth network which caused manual corrections to be made to usage records prior to sending them to KPMG. During the re-test of this exception, KPMG migrated an unusually large number of accounts from different CLEC provider types (i.e. Resale to UNE, Retail to UNE, etc.). This type of migration causes usage to be held until service orders post in the billing system, ensuring correct billing and DUF delivery. The result of these migrations is that the production of DUF records will take longer than when after the migration has occurred. Since a large percentage of test calls were placed during the migration period (a much larger percentage than seen by "normal" CLEC operations) the overall measure was impacted.</li> </ul>
29	BellSouth improperly populates the "ToNumber" field in the related Daily Usage File (DUF) record for customer service calls (611 calls) placed from telephone numbers within the "407" area code. (TVV10)	BellSouth found a discrepancy between the population of the switch recording and the population of the ALPHA billing system record. UNE calls that terminate to 611 are sent from the ALPHA billing system directly to BIBS with 'FFF' as the terminating NPA. This record is then sent out via the DUF record. An enhancement was made to the billing system on February 23, 2001 to mechanically correct this problem as opposed to using a manual method. KPMG has recommended this exception be closed.
30	BellSouth has improperly populated the "ToNumber" field in the Access Daily Usage File (ADUF) records for certain long distance calls. (TVV10)	BellSouth found a discrepancy between the population of the switch recording and the population of the ALPHA billing system record. UNE calls with a terminating NPANXXLINE of '0000000000' are sent from the ALPHA billing system to BIBS with the terminating NPANXXLINE populated as 'FFFFFFFF'. Due to a manual change of these records,

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		DUF records were generated with the terminating data as '000000FFFF'. A mechanized process was implemented February 23, 2001 to mechanically correct these records as opposed to using a manual correction method. KPMG has recommended this exception be closed.
31	BellSouth failed to deliver Daily Usage File (DUF) records for toll free calls	See also Observation 42. KPMG has recommended this exception be closed.
43	BellSouth Resale bills fail to reflect usage charges for calls made by KPMG Consulting during the course of the Functional Usage Evaluation	The issue here was a misunderstanding by KPMG as to the impact of "credit" records on the resale bills. BellSouth found that the Billing system operated properly when local and toll credit calls did not appear on the bill. BellSouth provided KPMG information on how credit records impact the resale bills.
44	BellSouth issued CABS bills, which reflect incorrect quantities for Unbundled Switching and Transport usage.	BellSouth identified four scenarios that contributed to the differences in the expected and actual number of minutes of use that were observed in the rate elements. All four issues were addressed by clarifying for KPMG as to which types of calls from unbundled switch ports are billable and which types of calls are not billable.
47	KPMG CLEC bills do not reflect unbundled transport shared usage for calls made to points greater than 35 miles from the originating central offices.	Two issues were raised by this exception: <ul style="list-style-type: none"> <li>• Transport charges for toll calls LPIC'd to BellSouth were not being billed on the UNE invoices – These calls were considered to be unbillable at the time the test calls were made, although DUF records are provided for the CLECs' use.</li> <li>• Mileage sensitive transport for Operator Services Calls was not being billed - BellSouth implemented a system change to resolve this issue on May 26, 2001.</li> </ul>
62	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.	This issue is associated with a discrepancy existing in the October, 2000 Interconnection Agreement negotiated with KPMG. The contract language for USOC SOMEK provides for a rate that is not the same as the rates specified in the agreement rate sheets. BellSouth correctly applied the rates contained in the contract language. Therefore, no billing issue should have been raised in the Florida test.