

OSS-79

Exhibit to the Rebuttal Testimony of Ron Pate  
Public Service Commission of Kentucky  
Case No. 2001-105  
JULY 30, 2001

Florida Observations and Exceptions mentioned in CLECs' Testimony

CLEC testimony	Florida Observation No.	KPMG finding	Response
ATT – Norris	10	BellSouth does not follow its documented process of providing proper notification intervals when software interfaces are to be retired.	The Change Control Process Group met with the CLECs on December 7, 2000 to present BellSouth's plan for retiring a version or versions of an interface, and to seek the CLECs concurrence on the plan. The proposal included modifying the CCP Manual to incorporate a section for the Retirement of a Version or Versions of an Interface which included a procedure whereby BellSouth provides the CLECs 120 days notice before a TAG API is expired and removed from production. Once an API is removed from production, it will no longer be supported by BellSouth. CLECs approved the proposal and the CCP Manual was updated 2/9/01. KPMG closed this observation 2/28/01.
ATT - Norris	29	BellSouth failed to meet the Frame Due Time on Commercial CLEC loop migrations	This was an identified as an issue in GA as well as FL. KPMG in both cases reported their observations during live loop migrations and determined if BellSouth met the Frame Due Time. Both the FL and GA commissions have adopted a benchmark of 95% within 15 minutes. This benchmark was met in both tests. KPMG opened this observation just to report that BellSouth had missed 4 Frame Due Times. At the completion of the loop migration timeliness testing, KPMG closed and satisfied this observation on the basis that BellSouth had completed over 95% of the loop migrations within the prescribed 15-minute benchmarks. This is an example where Ms. Norris is attempting to distort the facts and draw a negative conclusion while disregarding the fact that this issue was thoroughly tested and conclusively satisfied in both the Georgia and Florida tests. Closed 2/28/01.
ATT – Norris	30	The BellSouth UNE-Center does not always call the CLEC Network Operations Center (NOC) to verify and confirm Coordinated Conversions or calls a different telephone number than that which the CLEC designated as the Impcon on the LSR.	BellSouth researched the PONs and found supporting documentation indicating that in 14 of the 19 orders in question, proper calls were made to the appropriate Impcon. Log notes were entered with contact names as well as number called. Those numbers were then compared to the Impcon number listed on the service order for accuracy. Of the remaining 5 orders, log notes indicate calls were made on 2 of the orders, however, log notes did not indicate number called or CLEC contact name. Two orders indicate that an improper Impcon number was called on a verification and completion contact. One order indicates a name consistent with other contacts; however, log notes did not include the number that was called. Closed 4/25/01.
ATT - Norris	40	There are inconsistencies in BellSouth's process and technical	BellSouth CWINS provisioning work instructions for xDSL were inconsistent with the Technical Reference (TR73600) documentation for

CLEC testimony	Florida Observation No.	KPMG finding	Response
		documentation with regard to the allowable foreign voltage parameter established for xDSL loops.	unbundled local loop technical specifications. The TR73600 is the reference that establishes the parameters for provisioning unbundled loops. The CWINS work instructions, (UNEC Methods and Procedures for Unbundled ADSL Capable Loops, Unbundled HDSL Capable Loops, and Unbundled Copper Loops) have been updated to reflect a change defining the foreign voltage limit on xDSL loops as less than 6VDC between any conductor and ground. The updated procedure is documented in CDIA, version number 1.1 dated 01/17/01. Center job aids have also been updated to reflect this change. The updated information was referred to the CWINS centers for appropriate technician coverage in January 2001. This observation was closed and satisfied on March 7, 2001.
ATT - Norris	44	BellSouth does not meet the stated intervals and target objectives for maintenance on UNE Non-Designed (SL1) Loops (PPR14).	<p>Maintenance targets are set as an overall <u>targeted objective</u>, however SL1 trouble reports are given offered appointments comparable to the retail offering. That commitment is controlled by the Work Management Center (WMC) and may vary based on areas according to force and load. The commitment offered at the time of the report may sometimes exceed 24 hours based on load. However, 24 hours is an overall BellSouth targeted objective time for SL1. The WMC schedules their work equally for retail and wholesale. There may be times when an offered commitment could be greater than 24 hrs, i.e., weekends, holidays, weather, heavy load, etc. This commitment will still be equal for the comparable retail service for that serving area. The CWINS center does not enter appointments. Trouble tickets are entered into LMOS by the CWINS where the commitment has already been set based on the trouble and that particular serving area's force to load. KPMG made the statement, "Troubles are prioritized between out of service and affected service; however, once the appointment is established in the system (TAFI/LMOS), the work is driven by the appointment, not a 24-hour timeframe." This is a true statement. This compares to retail trouble report handling. The 24 hours is published as a maintenance <u>target</u>. BellSouth uses this measure to set an overall objective for a 24-hour <u>average</u> on SL1 trouble reports. This is not a set <u>commitment time</u>. Commitment times will always vary for SL1's just as it does for the BellSouth POTS analogue comparison. In response to the KPMG's question: <u>It would appear that the 24-hour repair interval policy is out of sync with the business practices in the WMC and CWINS Center.</u></p> <p>Please clarify. The 24-hour hour interval is published as a guideline or target and is not intended to be interpreted as a firm commitment time. To further clarify this issue, BellSouth will update the document in question to remove the 24 hour targeted interval for SL1's and replace with the language, "<u>retail comparison offering</u>". An updated version of that</p>

CLEC testimony	Florida Observation No.	KPMG finding	Response
ATT – Norris	45	BellSouth returned Firm Order Commitment (FOC) Frame Due Times that do not match the regular hours for provisioning. (TVV4)	document was provided by March 15, 2001. As of July 5, 2001, KPMG is satisfied and this observation was closed on 7/11/01.
ATT – Norris	48	Business rules do not offer instructions for submitting an order for DS1 with number portability.	On 12/10/00, BellSouth implemented a software change per change request CR0091. CR0091 was submitted to the Change Control Process (CCP) by a CLEC. The CLEC requested BellSouth's Local Number Portability (LNP) interface begin returning the specified frame due time (DFDT) on the FOC instead of 900P. CLECs were informed through the CCP and the BellSouth web site when CR0091 would be implemented. BellSouth has reviewed the 15 CLEC PONS listed in the above table. BellSouth has included the specific date a FOC was returned for each of the CLEC PONS. BellSouth is unable to locate the remaining two PONS as listed in the above table. The CLEC received a FOC prior to implementation of CR0091 on 12/10/00 for each of the 13 PONS listed in the table. KPMG retested in June and issued amended obs 7/10: KPMG Consulting conducted a retest by submitting 7 Coordinated Hot Cut orders between 6/21 and 6/25. The 7 Coordinated Hot Cut Orders had "Desired Frame Due Times" of 13:00 hours. Bell South returned EDI Firm Order Commitments with invalid Frame Due Times on all 7 orders. BLS is preparing a response.
ATT – Norris	53	KPMG questioned the availability of Electronic Data Interchange (EDI) interface documentation for CLECs to describe the limitations (if any) on the size of an EDI batch transmission or the quantity or frequency of batch transmissions that a CLEC may send to BellSouth.	BellSouth clarified its process on how to submit an order for the migration of a customer's Digital Signal 1 (DS1) unbundled (UNE) loop with Local Number Portability with an update to the LNP Reference Guide, Section 4.2 on April 20, 2001. KPMG is currently verifying the documentation. BellSouth referred them to our EDI Specifications Guide, specifically, Section 1.10 where it states on EDI batch processing, "There is, for all practical purposes, no limitation to the size of an ANSI X12 batch file that can be submitted. However, BellSouth's downstream ordering systems have size limitations. To accommodate the downstream systems necessary for electronic ordering, the maximum size of an EDI LSR (Local Service Request) should not exceed 1 Megabyte (1 million characters). Adherence to good EDI business practices and BellSouth's business rules governing local exchange ordering would place reasonable limits on the size of files submitted. Multiple LSRs should be grouped into one EDI enveloping structure for batch processing." KPMG did not believe these instructions were clear enough even though no other CLEC had ever had any problem or raised this as an issue. However, BellSouth agreed to make some slight modifications to the guide. In November 2000, the BellSouth EDI specifications were changed to reflect the maximum size limitation of an LSR. To address further inquiries presented by KPMG,

CLEC testimony	Florida Observation No.	KPMG finding	Response
ATT – Norris	54	KPMG questioned if BellSouth had Telecommunications Access Gateway (TAG) documentation available to CLECs to describe limitations or design recommendations some TAG elements.	BellSouth has made and posted EDI Specifications changes to the wording in Section 1.10. These updates to the specifications were published at the end of May. Pending KPMG. BellSouth's involvement with and ongoing feedback from CLECs does not substantiate KPMG's statement that "the lack of clearly defined limits on the design of a TAG system could impact a CLEC's ability to transmit pre-order and orders to BellSouth." BellSouth will provide this information to CLECs on a case-by-case basis, if and when the need ever arises. The combined information presented in the TAG API Guide, the TAG Programmer's Guide, and the training class has proven to successfully guide TAG users through both the interface development, as well as the implementation processes. The process begins with the Electronic Interface Business Survey. CLECs are required to complete this survey each time they implement or upgrade an electronic interface, but it can also be used any time the CLEC wishes to communicate future ordering plans to BellSouth. Page 9 of the survey has been modified to emphasize BellSouth's need for the CLECs to provide accurate estimates of their projected ordering volumes. This information is essential to ensure that both BellSouth and the CLEC design their configurations appropriately. The same section now includes BellSouth's recommendations for configuring and sizing TAG application Ids, APIs, Notification Servers, and TAG Listeners for large quantities of orders. The survey is available publicly on the web at: <a href="http://www.interconnection.bellsouth.com/carriertypes/ec/html/oss_info.html">http://www.interconnection.bellsouth.com/carriertypes/ec/html/oss_info.html</a> . The information contained in the survey will also be discussed in greater detail during the TAG training class. KPMG has accepted this answer and is closing this observation.
ATT - Norris	56	BellSouth implemented business rule updates from the BellSouth Business Rules for Local Ordering - OSS99, Issue 9L prior to its release on March 30, 2001. (TVV1)	Prior to the release of Issue 9L on March 30, 2001, the BellSouth Business Rules for Local Ordering – OSS99, Issue 9K, Section 28.4.3.25, specified the conditional usage of End User Retaining Listing (ERL) on the End User (EU) form as: Required when the ACT field on the LSR form/screen is V, otherwise prohibited. The March 30, 2001, release of new BellSouth business rules did not reflect the new requirements for the ERL field on the EU form. BellSouth published Carrier Notification SN91081833 on June 19, 2000, to advise that effective August 1, 2000, directory listing requests can no longer be associated with a manually submitted RECTYP A (Loop) request. The notification also stated this change was for the Local Service Order Guide (LSOG) Version 2 and LSOG Version 4 forms and align manual and electronic processing. The business rules for electronic

CLEC testimony	Florida Observation No.	KPMG finding	Response
			requests were implemented with the OSS99 software release in January 2000. The business rules for manual requests were implemented in August 2000. The BellSouth Business Rules for Local Ordering – OSS99 was updated on April 30, 2001 to add further clarification on the use of ERL for REQTYP A. KPMG is satisfied as of May 16, 2001 and this issue is pending closure.
ATT - Norris	58	BST business rules do not allow CLECs to submit a local service request manually a SUP to an electronically submitted order.	The BellSouth Business Rules for Local Ordering, section 2.6.2 Electronic Downtime, provides information regarding the submission of manual LSRs during periods of BellSouth system downtime. The BellSouth Business Rules for Local Ordering were updated 05/31/01 to provide for the submission of manual supplemental LSRs during CLEC system downtime. This is a new business rule functionality addition, not an implementation or quality issue.
ATT – Norris	59	KPMG claimed that BellSouth did not have a documented process for central office forces to reconcile a mismatch between the CLEC Telephone Number and the BellSouth Telephone Number on coordinated conversions with Local Number Portability (LNP).	BellSouth Responded that the "Central Office forces will not expect that TN's will be reused with the same cable and pair facilities. There is no requirement for the CLEC to reuse the same TN on the same facility or to notify the ILEC which TN they will use on any facility. The present process provides sufficient checks during the conversion process for problem resolution." BellSouth did have sufficient processes for its central office forces. BellSouth did agree to update its CWINS work instruction Turn-up Designed Combined Inside and Outside Coordinated Conversions and Turn-up Non-Designed Combined Inside and Outside Coordinated Conversions with some clarifying language associated with the performance of remote pre-due date tests on SL2 services. As of June 25, 2001, KPMG is satisfied that BellSouth has addressed all issues.
ATT – Norris	61	BellSouth does not close trouble tickets in a timely manner when requested by a CLEC using the ECTA interface	CLECS say this relates to Georgia Exception 20. KPMG re-tested 5/2/01 and advised that they were satisfied 5/9/01. Closed 5/23/01.
ATT – Norris	62	KPMG found that information about network outages or service-impacting conditions was not provided to CLECs as it is to retail customers.	This was corrected and notification is being sent to the CWIN center technician's terminal. Technicians will advise CLEC of any known failures upon receipt of an associated trouble report. KPMG revisited this issue on its visit to the CWINS Center in June and is satisfied with its finding and has moved this issue to closure on July 11, 2001. This issue was not found in the Georgia test; therefore AT&T's statement that this was duplicative with the Florida test is incorrect.
ATT – Norris	63	KPMG observed that the BellSouth Customer Wholesale Interconnect	This was not a process issue. CWINS procedures do not restrict CLECs from reporting more than three troubles per call. To ensure compliance

CLEC testimony	Florida Observation No.	KPMG finding	Response
		Network Service (CWINS) Center trouble receipt process appeared to restrict a CLEC from reporting more than three troubles on a single call.	with the existing process and clarity around this issue, all CWIN center personnel were covered with the process on April 26, 2001. KPMG performed a retest and only observed one incident where more than three troubles were provided on a single call. In fact, KPMG reported, that after approximately ten troubles were provided the CWINS technician ask if there were any more and the CLEC advised they did not want to provide any more at this time and would call back later. KPMG has moved to close this exception. On 7/1/01, KPMG advised that they'd retested and were satisfied that all issues were resolved – KPMG pending closure.
ATT – Norris	66	KPMG observed that BellSouth did not have a documented process to guide CLECs through completing CLEC Selective Routing Ordering Documents for Resale Flat Rate Line Class Codes, which is a relatively new product offering, which has received very little CLEC interest.	BellSouth provided this documentation informing CLECs how to complete the CLEC Selective Routing Ordering Documents for Resale and UNE-P through a web posting in May 2001. Pending KPMG review.
ATT – Norris	67	This observation was issued over a perceived difference in hours of operations between one of the retail business offices and the LCSC.	Observation 67 is not a process or documentation issue and BellSouth's hours of operation for the LCSC are posted. To this point BellSouth has not been requested by any CLEC to alter its hours of operation. Additionally, BellSouth's electronic systems are available even outside the hours of operation for staffing of the LCSC – pending KPMG closure.
ATT – Norris	71	KPMG erroneously assumed that BellSouth would have documented procedures for Help Desk assistance at the Customer Wholesale Interconnect Network Service (CWINS) Centers for CLECs reporting troubles using the Trouble Analysis Facilitation Interface.	This center is does not have responsibility for Help Desk assistance with TAFI. BellSouth provides training to the CLEC's call receipt personnel in the proper operation of TAFI. Additionally, BellSouth provides a 'train the trainer' class at no charge to the CLEC. The CLEC also has the option of purchasing additional TAFI training through the BellSouth Professional Services organization. Therefore, the CLEC is responsible for resolving their own "Help Desk" type issues within their own organization with the training and tools that are provided by BellSouth. Closed 7/5/01.
ATT – Norris	74	BellSouth does not provide the expected response to Address Validation Query by Telephone Number Query submitted through TAG.	BLS responded 6/1/01, instructing KPMG to call EC Support (per the normal process) while online, and activate trace notifier. 7/5/01, KPMG advised they did so with no resolution. KPMG to provide new AVQ_TNs to BLS with trace on and requested monitoring of transmission in progress - resolution pending.
ATT – Norris	75	KPMG questioned areas in the Work Management Center (WMC) process that appeared to lack safeguards that	BellSouth provided KPMG with the current strategies/guidelines for prioritizing M&R dispatches for the "collective organizations" which had been appropriately documented, disseminated and covered with all WMC

CLEC testimony	Florida Observation No.	KPMG finding	Response
		would ensure that wholesale service were afforded the same considerations and priorities as retail service and they issued this observation in May, 2001.	operations in February 2001. BellSouth has established a baseline for priority setting and a daily reset to baseline for WMC operations – pending KPMG.
ATT – Norris	77	BellSouth does not provide sequential telephone numbers as requested using the Telephone Number Availability Query (TNAQ).	BLS 6/6/01 response: When the TN option selected is "Sequential" - meaning a contiguous set of TNs - and the TN's are not available in the sequence at a particular switch in a Central Office, BellSouth provides other options for pulling blocks of TN's via TAG as well as LENS. Using the Ascending and Descending options, if the TNs are not available contiguously, the numbers will be presented in an ascending and descending order via the next available number. KPMG was satisfied w/response and agrees that current process provides parity – pending KPMG.
ATT – Norris	78	KPMG observed that the BellSouth Customer Wholesale Interconnect Network Service (CWINS) Center does not always provide CLECs with an appointment or estimated time to repair (ETTR) when trouble reports are opened.	BellSouth has appropriate documentation in place and therefore, no process or document update was required. KPMG observed two instances where the appointment time was not given. BellSouth covered this issue with all technicians in May 2001. It should be noted that while the BellSouth technician failed to provide the appointment time, the CLEC representative reporting the trouble did not ask for it so one could question the importance of the issue. Closed 7/18/01.
ATT – Norris	79	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 (LMU-SF)	This issue was over a question on the requirement of a Company Code for all LMU transactions including queries for working loops, spare facilities, reservation requests, and reservation cancel requests. BellSouth requires that the CLEC only request LMU data on loops that are owned by the issuing CLEC or BST. This is a documentation clarification and the Pre-Order Business Rules were corrected and posted to the web on 6/29/01. Pending KPMG closure.
ATT – Norris	82	BellSouth's systems or representatives did not update Customer Service Records consistently following a change in the status of a customer's account.	BellSouth's Response sent 7/18/01: <ol style="list-style-type: none"> <li>1. A directory section is required for service orders associated with REQTYP M/ACT V. If the ERL field is N, the DL form and/or EU form as described in the BellSouth Business Rules for Local Ordering Data Element Dictionary is used to format the service order. The first paragraph of this response describes the processes used if the ERL field is Y.</li> <li>2. As stated in the first paragraph of this response, the manual and electronic process for formatting the directory delivery quantity are different when the ERL field is Y.</li> <li>3. The directory delivery address may be formatted on the CSR even</li> </ol>



CLEC testimony	Florida Observation No.	KPMG finding	Response
			<p>when the account's listed address is the same. There are no impacts to directory delivery when formatted. In addition, BellSouth downstream systems have multiple directory delivery format requirements that are handled by BellSouth upon service order generation. CLECs submit forms based on the BellSouth Rules for Local Ordering. CLECs are not required to format service orders or learn downstream system service order format requirements.</p> <p>BellSouth will update the BellSouth Business Rules for Local Ordering on August 28, 2001.</p>
ATT – Norris	83	<p>The BellSouth ECTA system failed to adhere to the guidelines of the JIA with regard to Front End Close Out functionality</p>	<p>BLS 6/16/01 response: test conducted did not generate a FECO scenario. As indicated in the JIA, in order to generate a FECO, the CLEC enters a testable trouble (i.e., NDT) and the MLT test results indicate a no trouble found situation. None of the test scenarios provided in this observation satisfy the conditions required for a FECO and ECTA, along with our OSSs, performed correctly. KPMG advised on 7/11/01 that this would be re-tested.</p>
ATT – Norris	86	<p>The BST Release Management Team does not provide all prioritized change requests to the BellSouth IT Team for development and implementation.</p>	<p>Observation 86 was discussed in the 7/18/01 FL 3PT conference call with the CLECs, FL PSC, and KPMG. It will also be discussed in next week's 7/25 FL 3PT conference call. BST is currently awaiting KPMG's and the FL PSC's direction. Our process ensures that CLEC requests are considered for the next upcoming release, as we have discussed on numerous occasions. All the information that has been shared thus far with KPMG and the FL PSC is available to the CLECs. The Change Management Team is not avoiding this issue. The Release Manager has provided a response to KPMG and the FL PSC and is currently awaiting their reply. BellSouth does not support providing information related to system development man-hours, hours of effort and duration associated with a CLEC Change Request. As background, BellSouth is consistent with the industry in regards to the subject of sizing. BellSouth has defined sizing as follows:</p> <p>SMALL - No system dependencies - Change existing functionality  MEDIUM - Limited systems dependencies - New/change existing functionality  LARGE - Multiple system dependencies - New functionality</p> <p>To assist the CLECs, BellSouth provides this sizing information (listed above) prior to the Change Control Process prioritization meetings.</p>

CLEC testimony	Florida Observation No.	KPMG finding	Response
ATT – Norris	89	The BellSouth Pre-Order Business Rules do not clearly and consistently define the values for completing the address validation query submitted via TAG.	BellSouth considers release capacity as proprietary and does not provide this information. KPMG introduced this observation on 7/5/01 Observation call. BLS has not yet responded.

CLEC Testimony	Florida Exception No.	KPMG Finding	Response
ATT – Norris; WorldCom – Lichtenberg	4	KPMG indicated that BellSouth did not have documented procedures for interaction with CLECs during the account establishment and management process.	<p>It is true that "relationship management" practices were not tested as part of the Georgia Third Party test. The simple reason for this is because neither the Master Test Plan nor the Supplemental Test Plan called for such as test. It was the Georgia Commission, not BellSouth, who determined the scope both the MTP and STP. Further, as defined by the GPSC, the original intention of the Georgia test was to focus on BellSouth's OSS systems. The "relationship management" aspect of the CLEC experience was rightfully excluded from an OSS test. On the contrary, the Florida Public Service Commission developed a much more comprehensive scope for the Florida test. The FPSC did include "relationship management" component in PPR2 of the Florida Third Party Test. BellSouth has fully cooperated with KPMG in testing, observing, and evaluating the Wholesale Account Team. In addition, analogous teams have been interviewed within BellSouth's retail operations. Exception 4 was filed to correct BellSouth's lack of documentation on the Account Team process. In response to the documentation, BellSouth created detailed and comprehensive methods and procedures documents to govern the Account Team. These documents have been reviewed by KPMG, and their findings have been discussed during a series of conference calls with FPSC and CLEC participation. Because BellSouth's documentation has satisfied KPMG, the FPSC, Exception 4 was moved to closure on June 7, 2001. The fact that this exception had been moved toward closure has not deterred BellSouth from continuing to address "relationship management" issues. The Account Team Procedures document is a "live document" and has been updated on multiple occasions to ensure that all aspects of the Account Team's role have been covered. In addition, the document has been presented to Account Team personnel in a district meeting, and has been posted to the Intranet for easy access and reference by Account Team members. Closed July 19, 2001.</p> <p>On February 28, 2000, version 1.2 of the BellSouth Change Control Process (CCP) document was published on the Change Control website. As background, this document is accessed by the CLEC community, and they are also alerted, via E-mail, when a new version is posted to the website. In version 1.2, the process flow for providing time intervals is as:</p> <ul style="list-style-type: none"> <li>• Software release notification will be provided 30 days or more in advance of the implementation date</li> </ul>
ATT – Norris	5	An exception was identified indicating that BellSouth does not follow their documented process of providing proper time intervals when posting documentation changes.	

CLEC Testimony	Florida Exception No.	KPMG Finding	Response
			<ul style="list-style-type: none"> <li>Documentation changes for business rules will be provided 30 days or more in advance of implementation date</li> <li>CLEC notification of documentation updates (non-system) changes will be posted 5 (five) business days in advance of documentation posting date.</li> </ul>
ATT – Norris; WorldCom - Lichtenberg	6	KPMG indicated BellSouth lacked an appropriate process, methodology and robust test environment for testing of the electronic data interchange (EDI) interface.	BellSouth has provided KPMG numerous details on the current system architecture and documentation along with the details associated with the new CAVE testing environment that becomes available in June 2001.
ATT – Norris; WorldCom - Lichtenberg	7	KPMG found that BellSouth did not have sufficient, publicly available, documentation that provides information to a CLEC about how to establish physical connectivity with the Electronic Communications Trouble Administration (ECTA) interface.	On December 4, 2000, BellSouth published the ECTA Start-Up Guide (Issue A), and posted it to the BellSouth Interconnection website. This Guide, along with the CLEC JIA Guide (published and posted in tandem on the website), provides publicly available documentation to support the CLECs timely development of an ECTA interface. As information, the CLECs were issued a copy of these Guides via the Change Control Process and were advised of it being maintained on the website.
ATT – Norris; WorldCom - Lichtenberg	8	KPMG found that BellSouth lacks a consistent and documented process to enable a CLEC to independently develop an Electronic Communications Trouble Administration (ECTA) interface.	BellSouth created the ECTA Start-Up Guide to be used along with the generic CLEC JIA document to support a CLEC's timely development of an ECTA interface for this interface that CLECs choose not to use. KPMG is satisfied and this issue is pending KPMG closure.
ATT – Norris	12	BST does not adhere to the procedures for System Outage established in the BST change control process.	<p>BellSouth agreed with some of the initial analysis provided by KPMG and thus published new guidelines on the Interconnection website for posting Type 1 system outages. This information, as well as info regarding e-mail notification to CLECs were published in Version 2.2 of the Change Control Process document. The additional process improvement steps BellSouth identified were:</p> <ul style="list-style-type: none"> <li>Placing all administrative responsibilities with one member of EC Support, and training an additional individual as a back-up resource.</li> <li>Developing a standard template for outage e-mail notifications and web postings.</li> <li>Investigating e-mail delivery errors, when applicable, and re-sending as needed.</li> <li>Cease requesting changes to the process to provide consistency.</li> <li>Having EDI Central send initial outage mail notification and web posting for EDI outages.</li> </ul>

CLEC Testimony	Florida Exception No.	KPMG Finding	Response
ATT – Norris; WorldCom - Lichtenberg	16	BST business rules for ordering (9K) do not offer the ability to submit an order for the partial migration of customer's UNE loops.	On June 28, 2000, this item, Change Request 0029, was initially presented to the CLECs at the Change Control meeting. The CLECs voted it 10 out of 18 Ordering CRs in that session. Given the low priority determined by the CLECs, this CR had not been scheduled for a release. At the April 25, 2001, CCP meeting, the CLECs merged the priority lists, and voted this CR 10 out of 36 Ordering CRs.
ATT – Norris	20	KPMG indicated that BellSouth does not appear to have public documentation available for CLECs to establish connectivity for TAG, one of their preordering and ordering interfaces.	Although BellSouth has already had some 65 CLECs who have established connectivity and built TAG interfaces, we did agree to update the Electronic Interface Implementation and Upgrade Communications Plan in an attempt to resolve this issue. BellSouth has updated the initial draft of the CLEC Overview of the Telecommunications Access Gateway (TAG) and also submitted three newly developed documents. The Electronic Interface Implementation and Upgrade Communications Plan is replacing the previously submitted TAG Communications Plan. <a href="http://interconnection.bellsouth.com/carriertypes/lech/html/loss_info.html">http://interconnection.bellsouth.com/carriertypes/lech/html/loss_info.html</a> The process for enabling CLECs to gain access to the secured TAG web site does not involve submission of any forms. Instead, the only requirement for accessing the TAG secured web site is that the CLEC has completed TAG training.
ATT – Norris	23	Carrier notification deficiencies associated with the Change Control Process (see Observation 21)	On June 27, 2001, BellSouth and the CLECs discussed changes to Carrier Notifications in their scheduled Change Control Process meeting. As such, version 2.5 of the Change Control Process document includes Appendix G, providing details of carrier notifications. Carrier Notifications for updates to the Local Exchange Ordering Guide – Vol. 1 and the BellSouth Business Rules for Local Ordering (BBR-LO) indicate if the change impacts documentation only or the electronic and/or manual processes, if known. Carrier Notifications list the Change Requests numbers for software releases, if applicable. Associated documentation changes for software releases are also reflected in the Carrier Notification letter. A table consisting of the scheduled release dates and an itemization of release features is attached to each revised Carrier Notification letter. And, each revised letter provides direct access to the original letter.
ATT – Norris	25	KPMG identified that BellSouth did not have public documentation available for CLECs to correlate the available version(s) of the Telecommunications Access Gateway (TAG) interface with either the BellSouth Business Rules for	Even though none of the CLECs who have built and used the TAG interface have raised this as an issue, BellSouth agreed to update the BellSouth Business Rules for Local Ordering and the Pre-Order Business Rules. The BellSouth Business Rules for Local Ordering were updated 03/30/01 to specify which TAG versions are applicable. In addition, the Pre-Order Business Rules were updated 4/23/01 to indicate the

CLEC Testimony	Florida Exception No.	KPMG Finding	Response
		Local Ordering OSS 99 or the BellSouth Pre-Order Business Rules.	applicable versions of TAG. BellSouth will continue to maintain two versions of Pre-Order Business Rules documents on the BellSouth web site. BellSouth also maintains two versions of business rules documents for CLECs. The Local Exchange Ordering Guide, Volume 1 is maintained for CLECs using TCIF Issue 7 and the BellSouth Business Rules for Local Ordering is maintained for CLECs using TCIF Issue 9. BellSouth provides a revision history within the documents to reflect modifications or enhancement made in each update. BellSouth follows the Change Control Process (CCP) requirements for updates to documentation. KPMG closed this exception 6/21/01.
ATT – Norris	26	BellSouth does not have a clearly defined process for addressing expedited release of BellSouth documentation defects.	The CCP document is continuously evolving to include requests from CLECs and become more comprehensive and all encompassing over time. The process for handling defects is located on page 39-46 of the CCP document. In particular, pages 43-46 contain information on the handling of documentation defects. Additionally, Ron Pate discussed the CCP process for handling documentation defects in paragraph 107 of his South Carolina testimony of May 16, 2001. KPMG, with the Florida Public Service Commission, has issued a Disposition Statement and has closed Exception 26.
ATT – Norris	32	KPMG found that there was a mismatch between the BellSouth Business Rules for Local Ordering and the BellSouth systems for REQTYPE M.	The BellSouth Business Rules for Local Ordering document was updated to reflect that the CIC is needed for electronic REQTYPE M orders. This exception was closed on 7/12/01.
ATT – Norris	33	KPMG identified that BellSouth had conflicting flow-through documentation between the BellSouth's Business Rules for Local Ordering OSS99 and BellSouth's SQM Plan LSR Flow-Through Matrix (LSR FT Matrix).	CLECs say this is a repeat of Georgia Exception 41. To satisfy #41, an additional matrix showing LSR REQTYPE, activity types, and other parameters were added to LEO-IG on 4/28/00. Starting 4/15/00, BST provided CLECs with individual raw data file via CLEC PMAP web site. This satisfied the Georgia Exception.  Florida Exception #33 relates specifically the Flow-Through Ordering Matrix (BBRLO-12/22/00, sec 2.6), Flow-Through Parameters (BBRLO-12/22/00, sec 2.6.1), and the BST SQM Plan LSR Flow-Through Matrix (10/00). (TVV3-2/1/01 to 3/21/01; escalated to exception) BellSouth agreed to synchronize the flow-through information between the documents.  This is not a repeat of the same problem; different products were evaluated in the FL test than in the GA test. New products and services will be introduced and changes to flow through will occur over time, as

CLEC Testimony	Florida Exception No.	KPMG Finding	Response
ATT – Norris	35	KPMG indicated that BellSouth processes for responding to customer requests for earlier appointments in the CWINS Center differ from those in the Small Business Telecommunications Center.	will CLECs' requests for them. This is a natural evolution that prompted this exception. Closure of FL #33 is in progress. An instructional Job Aid has been created for the CWINS maintenance center to allow for the negotiation of a reduced repair interval. This process will allow the CWINS technicians to offer a four-hour appointment (without supervisory approval) when the TAFI recommended interval is not satisfactory to the CLEC. The instruction agrees with the SBTC method of operation for small business retail services. All managers and technicians within the CWINS TAFI maintenance group will be covered on updated process by Friday, April 6, 2001. As of July 5, 2001 KPMG retested and found that center personnel did not understand new process and were not following defined procedures. BellSouth is investigating.
ATT – Norris	38	BellSouth's Electronic Communications Trouble Administration (ECTA) system failed to process correctly following an outage and re-initialization	This issue did not occur during the Georgia test. During KPMG testing in the Florida test, BellSouth needed to reboot the ECTA application to resolve a problem with another client. During this period, the association between KPMG and ECTA was lost - but reinitialized shortly after the ECTA application returned. BellSouth did implement mechanical safeguards to ensure that all elements of the ECTA application are up and running whenever a reboot is initiated. This remedy insures that the observed problem will not reoccur. KPMG will re-test.
ATT – Norris	40	KPMG erroneously identified that the Local Exchange Navigation System (LENS) interface does not appropriately implement the published business rules for ordering ISDN UNE loops. They had erroneously attempted to use an incorrect entry of H as the second digit in the Type of Service (TOS) field to request UNE Loop service.	The BellSouth Business Rules for Local Ordering states an entry of H is used to request ISDN-BRI service. The Service Type drop-down menu in LENS was consistent with the BellSouth Business Rules for Local Ordering. KPMG subsequently closed the exception.
ATT – Norris	41	KPMG did not believe that BellSouth was consistently applying its Universal Service Order Code (USOC) business rules to requests for Unbundled Network Switched Combinations.	This issue did not occur in the Georgia test. During the Florida test, KPMG did not believe that BellSouth was consistently applying its USOC business rules to requests for Unbundled Network Switched Combinations. BellSouth's 2 Wire Voice Grade UNE Loop/Port Switched Combination (Business, Residential and Line Side PBX Service) CLEC Information Package does not indicate that the basic class of service USOCs of UEPRX or UEPBX are required as stated by KPMG in this exception. In addition, page 17 of the document clearly states UEPLX is a USOC that is generated by BellSouth. In an effort to

CLEC Testimony	Florida Exception No.	KPMG Finding	Response
			increase flow through and reduce clarifications due to CLEC errors, CLECs are not required to send the basic class of service field or the UEPRX, UEPBX or UEPLX USOCs on the service request form. If a CLEC sends these USOCs, BellSouth will process the request appropriately without requiring the CLEC to send a corrected request. BellSouth is investigating.
ATT – Norris	42	KPMG found that the Telecommunications Access Gateway (TAG) interface does not accurately implement the End User information requirements contained in The BellSouth Business Rules for Local Ordering.	This was not an improper implementation of business rules or a quality of documentation issue. The Telecommunication Access Gateway (TAG) did require the EU address data. A system enhancement (CMVC 13022) was developed so that TAG will no longer require the address information (SANO, SASD, SASN & SATH) for the ACT of C for Req Types A and E (ISDN-BRI). Additionally, a system defect was opened to correct the requirement of the EU address information (SANO, SASD, SASN & SATH) on ACTs of D, (non XDSL) for Req Types A and M, as well as the ACT L not being required on Req Type E. KPMG will re-test.
ATT – Norris	45	KPMG found that the BellSouth Business Rules for Local Ordering - OSS99, Issue 9L, and contained inconsistent and incomplete instructions on a few specific field level details	The BellSouth Business Rules for Local Ordering were updated on 04/30/01 and the Data Element Dictionary for Port Forms on 05/31/01 to correct inconsistencies in instructions for use in BellSouth's systems. Exception 45 deals with KPMG's finding that the BellSouth Business Rules for Local Ordering contained inconsistent instructions for certain field level details. BellSouth updated both the BellSouth Business Rules for Local Ordering and the Data Element Dictionary for Port Orders to correct those inconsistencies. The updates are will be made by August 3, 2001. This exception remains open until the updates have been completed, they have been reviewed by KPMG, and the CLECs have been properly notified of the revisions.
ATT – Norris	46	KPMG found that the BellSouth Business Rules for Local Ordering – OSS '99, Issue 9L, did not accurately apply business rules for Directory Listing (DL) forms.	Subsequently, the BellSouth Business Rules for Local Ordering - OSS99 were updated on May 31, 2001 to clarify the required use of the Directory Listing (DL) form for Resale (REQTYP E), and Unbundled Network Element Switched Combinations (REQTYP M) with partial migrations (ACT P). KPMG closing as of 7/5/01.
ATT - Norris	48	KPMG claimed that BellSouth does not have formal, documented processes for capacity management in the WMC, AFIG, CO-FWVG, CWINS, and NISC work centers that are involved in the provisioning of retail, resale and wholesale orders. BellSouth corrected	KPMG's misunderstand by responding with the capacity management process and associated force-sizing models. BellSouth does have the tools in place to meet the growth of both wholesale and retail customers of the provisioning centers. BellSouth provided KPMG with the Complex Translations Force Model and is awaiting KPMG's response – pending KPMG.
ATT – Norris	50	KPMG misunderstood the association	The PONs listed in the table in the exception were clarified because



CLEC Testimony	Florida Exception No.	KPMG Finding	Response
		between loop and directory listing order types.	KPMG did not follow the business rules documented in the BellSouth Business Rules for Local Ordering to submit a REQ TYP J order. KPMG failed to accurately populate the appropriate fields needed to request a new directory listing account for an account telephone number. The ATN field should be used to provide the main account telephone number to establish a directory listing. The AN field is used to provide the miscellaneous account number for a 800 Service listing or Inter-State Foreign listing (1 <sup>st</sup> character of RTY field is F). The BellSouth Business Rules for Local Ordering provides sufficient information to accurately populate fields for REQ TYP J orders. However, just to ensure that all confusion can be eliminated, BellSouth has committed to add clarifying language for use of the AN field on the DL form in the BellSouth Business Rules for Local Ordering on 06/29/01. Closing as of 7/19/01.
ATT – Norris	55	KPMG erroneously reported that loop conversions via the LENS interface were receiving errors that were inconsistent with BellSouth Business Rules for Local Ordering.	The LENS application is consistent with the BellSouth Business Rules for Local Ordering. LENS automatically takes users to screens with fields required to process the specified order. LENS does not automatically take users to the END USER BILLING page, where the FBI field is located. However, users may choose to access the FBI field by clicking on the END USER BILLING page if desired. LENS automatically populates a default value of "Existing": in the FBI field for Loop Conversions.
ATT - Norris	57	BellSouth does not have detailed guidelines for CLEC interaction with the Complex Resale Support Group (CRSG) during the ordering process.	The CRSG is an extension of the Interconnection Sales Account Team. During the initial CLEC startup process, information regarding Account Team/CRSG business operating rules is provided to the customer. This information is also provided proactively by the CRSG during monthly customer conference calls. CLEC Informums (informational sessions) are also held during the year to educate the CLECs on how to interact with the Account Team/CRSG. The Third Annual 2001 Summer CLEC Informum was held on July 16-17, 2001. In the "How to Improve Operational Efficiency" Session, the CRSG played an intricate part in providing CLECs with information necessary for interacting with CRSG in the ordering and provisioning of Resale/UNE products. Additionally, a CRSG website has been established which provides the CLECs with the CRSG escalation procedures. Efforts are currently underway to include Account Team/CRSG business operating rules. BellSouth pending.
ATT – Norris	58	This is a performance issue where KPMG erroneously reported that they did not received timely mechanized rejects from BellSouth's Robust	This is not a process or documentation issue. BellSouth investigated each PON in the exception and found in each case where the PON fell out for manual handling, the cause was due to incorrect or insufficient data provided by KPMG. BellSouth's findings for the 9 PONs listed in

CLEC Testimony	Florida Exception No.	KPMG Finding	Response
		Telecommunications Access Gateway (ROBOTAG) interface.	this exception were that 5 were partially mechanized clarifications that should not be included in measurements for flow through mechanized rejects: 3 were CLRs sent within the standard interval, but the acknowledgements were delayed in their receipt by KPMG; and 1 CLR was sent and KPMG acknowledgement received all within the standard interval. Pending KPMG closure.
ATT – Norris	60	BellSouth failed to cease billing on disconnected auxiliary lines.	Two accounts (904 Q59-0568-568 and 561 Q59-0568-568) were billed due to an ordering system defect that failed to remove UEPLX from the account. Only the electronically submitted partial disconnect orders with REQ TYP M/ACT C, P or Q and LNA of D that did not fall out for manual handling were impacted by this defect. The ordering system defect was corrected on 04/07/01. The accounts have been corrected and KPMG will receive a credit on the 06/29/01 bill. Pending KPMG response/closure
ATT – Norris	61	KPMG Consulting has not received timely functional acknowledgements from BellSouth's EDI interface.	Exception 61 was withdrawn by KPMG as non-issue
ATT – Norris	63	The BellSouth ECTA system failed to appropriately process "enterTroubleReport" transactions.	Similar issue, different error code to GA exception 15 closed 6/16/00. KPMG was to have re-tested 6/14/01. No further discussion since. On BellSouth's RED FLAG report.
ATT – Norris	64	KPMG identified inconsistent instructions in BellSouth Business Rules for Local Ordering.	BellSouth has agreed to update the Data Element Dictionary section of the BellSouth Business Rules for Local Ordering to correct some inaccuracies and add some clarity to the documents. EXC 64 deals with KPMG's finding that the BellSouth Business Rules for Local Ordering contained inconsistent instructions. BellSouth intends to update the document. As of July 19, 2001, a target date for this update is pending. This exception remains open until the updates have been completed, they have been reviewed by KPMG, and the CLECs have been properly notified of the revisions.
ATT – Norris	65	KPMG indicated that the BellSouth Account Management Team does not have processes or documentation related to CLEC Collocation.	AT&T's statement that "BellSouth's Account Management Team does not have processes or documentation related to CLEC Collocation" is misleading on one front, and blatantly incorrect on another. First of all, it is misleading in that it suggests that the CLEC Account Team, a group that is responsible for sales, sales support, and customer service issues, would serve as coordinators or implementers in the collocation process. BellSouth does not, in fact, assign the Account Team to projects as massive, complex, and specialized as placing CLEC switches into BellSouth central offices. KPMG has perpetuated certain misleading notions about the Account Team by inaccurately ascribing roles to them,

CLEC Testimony	Florida Exception No.	KPMG Finding	Response
			<p>which, in reality, are not part of their responsibilities. As a result, Mr. Bradbury espouses a misleading assertion. The statement is incorrect because the document known as the Account Team Collocation Coordinator's Guide Version 1.2 was created in 1998 and has been in use since that time. It is coincidental that when KPMG filed Exception 65, BellSouth was already planning to revise the Account Team Collocation Coordinator's Guide. The reason for the revision is that improvements had been made to the overall process in February 2001. The process, which had been totally manual in nature, had been enhanced to make it largely mechanized and electronic. In BellSouth's response to Exception 65, we affirmed that a documented collocation process already existed. Rather than submit the old document, BellSouth elected to provide KPMG with the updated version. We committed to providing the new document by July 3, 2001, and actually delivered it on June 22, 2001. Since that time, the document has been under review by KPMG, and BellSouth awaits the results of their analysis.</p>
ATT – Norris	67	<p>The Account Establishment and Management Process does not have defined processes or documentation related to the management of CLEC billing issues.</p>	<p>Exception 67 represents an occasion in which KPMG inaccurately concludes that certain billing responsibilities belong to the Account Team. The exception cites ten areas associated with CLEC billing to which KPMG has ascribed an Account Team role. In its response, BellSouth attempts to explain that for each area mentioned, the Account Team's role is nominal, or one that involves making a referral to BellSouth Billing, Inc. (BBI) KPMG, citing BellSouth documentation, does not accept this explanation and is awaiting an amended response. In order to ensure that the BellSouth Billing Guide refers the CLEC to the Account Team only when appropriate, BBI is revising the Billing Guide. The target date for completing the revisions is August 3, 2001. Once revised, the document will be submitted to KPMG for review, and will be posted to the web in accordance with normal posting guidelines.</p>
ATT – Norris	71	<p>KPMG has not received timely responses to customer service record pre-order inquiries submitted via TAG.</p>	<p>Same as GA exception 24 closed on 3/9/01. BST responded 7/12/01: BellSouth's regional results for CSR pre-order inquiries submitted via TAG are consistent with the results KPMG has experienced as the test CLEC. BellSouth would like to note that there are inherent differences in measurement points between KPMG and BellSouth. KPMG is measuring timestamps from their end of the interface, while for purposes of metrics reporting, BellSouth measures these timestamps when the transaction is received from and sent to CLECs. Thus KPMG's results would be measuring greater response times, although this difference</p>

CLEC Testimony	Florida Exception No.	KPMG Finding	Response
ATT – Norris	76	BellSouth failed to provision disconnect orders properly with the expected intercept recording message.	<p>should be nominal. To address the issue of regional results for pre-order inquiries, BellSouth had already scheduled a system fix for July 28, 2001 that should resolve this issue on CSR timeliness.</p> <p>Bellsouth is currently investigating.</p>