



**GEORGIA OSS TEST NOT SATISFIED EVALUATION CRITERIA – EXHIBIT MM-1**

This report identifies the Georgia OSS Test Evaluation Criteria that received a Not Satisfied rating in the March 20, 2001 final report.

Plan	Issue Name	Issue	Multi-State Summary Measure			Kentucky SQM Results				
			Measure	June	July	August	Measure	June	July	August
MTP	O&P 3-3-1	EDI untimely Functional Acknowledgements (FA): Standard is 95% received in < 30 minutes (Normal Volume Test).	OSS – Functional Acknowledgement Timeliness	O-1	Yes	Yes	No			
MTP	O&P 4-3-1	EDI untimely Functional Acknowledgements (FA): Standard is 95% received in < 30 minutes (Peak Volume Test).	OSS – Functional Acknowledgement Timeliness	O-1	Yes	Yes	No			
MTP	O&P 1-3-2a	EDI untimely Fully Mechanized (FM) UNE errors (ERRs)/clarifications (CLRs): Standard is 97% received within 1 hour.	UNE – Fully Mechanized Clarification Timeliness	O-8 Loop + Port 2W Analog Loop Standalone	No Yes No	No Yes Yes	No No Yes			
STP	PO&P 11-3-2a	EDI & TAG untimely Fully Mechanized (FM) Resale errors (ERRs)/clarifications (CLRs): Standard is 97% received within 1 hour.	Resale – Fully Mechanized Clarification Timeliness	O-8 Residence Business	No Yes	Yes Yes	No No			
MTP	O&P 2-3-3a	TAG untimely Fully Mechanized (FM) errors (ERRs)/clarifications (CLRs): Standard is 97% received within 1 hour.	UNE – Fully Mechanized Clarification Timeliness	O-8 Loop + Port 2W Analog Loop Standalone	No Yes No	No Yes Yes	No No Yes			
STP	PO&P 11-3-3b	BellSouth's TAG & EDI interface does not provide timely Partially Mechanized (PM) order clarifications (CLRs) to Resale requests: Standard is 85% received within 24 hours.	Resale – Partially Mechanized Clarification Timeliness	O-8 Residence Business	Yes Yes	- -	- -			

					June	July	August
MTP	O&P 1-4-2	BellSouth's systems and representatives do not provide clear and accurate errors (ERRs)/clarifications (CLRs) for UNE requests sent via EDI.	<b>UNE – Percent Rejected Service Request</b>	O-7	Diagnostic	Diagnostic	Diagnostic
STP	PO&P-11-4-3	BellSouth's systems and representatives do not provide clear, accurate, and complete Firm Order Confirmations (FOCs) for Resale requests sent via TAG and EDI.	<b>Resale – Percent Provisioning Troubles w/in 30 Days and Billing Invoice Accuracy</b>	P-9 Res/Bus <10 L B-1	Yes Yes	Yes Yes	Yes Yes
STP	PO&P 11-4-4	BellSouth's systems and representatives do not provide clear, accurate and complete order errors (ERRs)/clarifications (CLRs) to Resale requests sent via TAG and EDI.	<b>Resale – Percent Rejected Service Request</b>	O-7	Diagnostic	Diagnostic	Diagnostic
MTP	O&P 2-4-2	BellSouth's systems and representatives do not provide clear, accurate, and complete order rejects (ERRs)/clarifications (CLRs) to UNE requests sent via TAG.	<b>UNE – Percent Rejected Service Request</b>	O-7	Diagnostic	Diagnostic	Diagnostic
MTP	O&P 5-2-1	Provisioning was not completed accurately for UNE orders placed in O&P-1 EDI Functional Test and O&P-2 TAG Functional Test for the Switch Translations Verification.	<b>UNE – Percent Provisioning Troubles w/in 30 Days &amp; Billing Invoice Accuracy</b>	P-9 Loop + Port 2Wire Analog Loop Des 2W An L w/ LNP xDSL Loops ISDN Loops Line Sharing	No Yes - Yes No Yes	Yes Yes Yes Yes No Yes	Yes No Yes Yes Yes Yes
STP	PO&P 13-4-2	Provisioning was not completed accurately for Resale orders placed on PO&P-11 EDI & TAG Functional Evaluation for Directory Listings.	<b>Resale – Percent Provisioning Troubles w/in 30 Days and Billing Invoice Accuracy</b>	P-9 Res/Bus <10 L B-1	Yes Yes	Yes Yes	Yes Yes

Plan	Issue Name	Issue	Multi-State Summary Measure	Measure	June	July	August
STP	PO&P 13-4-3	Provisioning was not completed accurately for Resale orders placed on PO&P-11 EDI & TAG Functional Evaluation for Switch Translations.	<b>Resale – Percent Provisioning Troubles w/in 30 Days and Billing Invoice Accuracy</b>	<b>P-9 Res/Bus &lt;10 L B-1</b>	Yes Yes	Yes Yes	Yes Yes
MTP	O&P-1-2-1	KCL failed to receive the expected level of EDI UNE system and representative responses for Completion Notices (CNs).	<b>General – Recurring Charge Completeness</b>	<b>B-7 Resale UNE Interconnection</b>	Yes Yes Yes	Yes No No	Yes Yes Yes
MTP	O&P 2-2-1	KCL failed to receive the expected level of TAG UNE system and representative responses for Completion Notices (CNs).	<b>General – Recurring Charge Completeness</b>	<b>B-7 Resale UNE Interconnection</b>	Yes Yes Yes	Yes No No	Yes Yes Yes
STP	PO&P-12-2-1	BellSouth's representatives failed to provide expected responses to pre-order Loop Makeup and Service Inquiry (LMU-SI) and order LSR requests.	<b>General – Service Inquiry w/Firm Order</b>	<b>O-10</b>	Yes	Yes	Yes
STP	PMR6-1-2	The test CLEC performance failed to meet the parity level or benchmark standard for the levels of disaggregation tested for Resale provisioning.	<b>See the Supplemental Test Plan Version 1.0 page VIII-F-15 Table VIII-6.4 for the appropriate measure.</b>	<b>N/A</b>	N/A	N/A	N/A
STP	PMR6-2-1	The test CLEC performance failed to meet the parity level or benchmark standard for the levels of disaggregation tested for UNE ordering.	<b>See the Supplemental Test Plan Version 1.0 page VIII-F-15 Table VIII-6.4 for the appropriate measure.</b>	<b>N/A</b>	N/A	N/A	N/A
STP	PMR6-2-2	The test CLEC performance failed to meet the parity level or benchmark standard for the levels of disaggregation tested for UNE provisioning.	<b>See the Supplemental Test Plan Version 1.0 page VIII-F-15 Table VIII-6.4 for the appropriate measure.</b>	<b>N/A</b>	N/A	N/A	N/A

Plan	Issue Name	Issue	Multi-State Summary Measure	Measure	Kentucky SQM Results			
					June	July	August	
STP	PMR6-3-1	The test CLEC performance failed to meet the parity level or benchmark standard for the levels of disaggregation tested for "Other" billing.	See the Supplemental Test Plan Version 1.0 page VIII-F-15 Table VIII-6.4 for the appropriate measure.	N/A	N/A	N/A	N/A	
STP	PMR6-3-2	The test CLEC performance failed to meet the parity level or the benchmark standard for the levels of disaggregation tested for flow-through.	See the Supplemental Test Plan Version 1.0 page VIII-F-15 Table VIII-6.4 for the appropriate measure.	N/A	N/A	N/A	N/A	

## 1.0 Document Objective

In this document, KPMG Consulting, Inc. (KPMG Consulting) provides an interim status report on developments related to the BellSouth-GA OSS Test Master Test Plan (MTP) and Supplemental Test Plan (STP) final reports. An update of the status of test criteria for which testing was not complete as of the July 27 Interim Status report, but now is complete, is provided in section 2.0. An update of the status of open issues within Exceptions is summarized in section 3.0.

## 2.0 Updates to MTP and STP final reports

Since issuing the Interim Status report on July 27, 2001, KPMG Consulting has continued its evaluation of all test criteria that were “Not Complete” at that time. The following test cross references were “Not Complete” in July, but are now “Satisfied.”

- PMR 1-2-1 – *“BLS has adequate and complete data collection policies and procedures.”* – As of the date of our last Interim Status report, BellSouth had not fully implemented the data retention policies detailed in Exception 79.

As of September 30, 2001, BellSouth issued a statement indicating that it was fully in compliance with these procedures, including:

- Retention of raw data for a period of at least three years;
  - Retention of early stage data for a period of 18 months;
  - Retention of computer programs used to process data and create SQM reports, for a period of three years; and
  - Retention of the SQM reports themselves for a period of three years.
- PMR 4-13-1 - *Provisioning – Percent Provisioning Troubles within 30 days of Service Order Activity* – As of the previous Interim Status report, KPMG Consulting could not match the values of the trouble date field in the early stage data to the corresponding values in the raw data.

BellSouth has now corrected the procedure by which the raw data trouble date field is populated, and KPMG Consulting has matched these values contained in the early stage and raw data files for the month of July 2001.

## 3.0 Status of ongoing evaluations

In addition to the findings above, there are also a number of open issues that KPMG Consulting is currently evaluating. The following open Exceptions are part of the Performance Measurements test:

- Exception 86 (issue 1) – *Percent Provisioning Troubles within 30 days of Service Order Completion* – KPMG Consulting continues to be unable to replicate the values

BellSouth reports in its monthly SQM reports for the CLEC aggregate and BellSouth retail categories. BellSouth currently believes these issues will be addressed effective with the September 2001 reports published this month. KPMG Consulting will retest this issue using the September 2001 raw data, and determine whether its calculations and the BellSouth-reported values agree.

- Exception 89 (issue 3) – *Pre-Ordering – OSS Response Interval* – Because of the errors in the raw data previously identified, BellSouth has made changes to its Navigator system.

KPMG Consulting has verified that the NewLens raw data were accurate, based upon the early stage data.

KPMG Consulting continues to discuss the raw and early stage data from ROS with BellSouth. Additionally, KPMG Consulting is expecting raw and early stage data for the RNS and TAG systems from BellSouth shortly, in order to conduct further testing of data from these systems.

- Exception 122 – BellSouth has indicated that effective October 2001 for orders arising from the TAG system, it will be using gateway timestamps in its Ordering metric duration calculations. BellSouth also indicated that it is currently working to use gateway timestamps for these duration calculations for those orders arising from the EDI systems. A corresponding update will be made to the SQM manual, specifically indicating the use of these timestamps when both the changes have been implemented in both systems.
- Exceptions 136/137 – As discussed in these exceptions, KPMG Consulting had difficulties matching the KPMG Consulting-collected data to the BellSouth-provided data, for the test CLEC, for the ordering metrics.

Based upon the information BellSouth has provided since the issuing of these Exceptions, KPMG Consulting considers these discrepancies resolved, with the exceptions of those relating to the TAG system.

To resolve the remaining issues with the TAG data, KPMG Consulting intends to perform a data integrity comparison of early stage and raw data upon receipt of August 2001 data. KPMG Consulting expects to receive these data shortly.

The projected completion date for the Metrics portion of the testing activities is estimated to be March 2002. This date is based upon a number of assumptions, including successful testing activities, any commitments made by BellSouth to enhance its systems within a specified time period, and the timely resolution of any issues and/or questions that arise during testing.