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July 9, 2002

VIA HAND DELIVERY

Blanca S. Bayo, Director  
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Betty Easley Conference Center  
4075 Esplanade Way  
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COMMISSION  
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Re: Docket No.: 960786-B-TL & 981834-TP

Dear Ms. Bayo:

Pursuant to the request contained in the Notice of Workshop dated June 28, 2002, enclosed are the original and 15 copies of DIECA Communications, Inc. d/b/a Covad Communications Company's (Covad) list of questions for the July 12 workshop. Covad's representative at the workshop will be Mr. William H. Weber, Senior Counsel for Covad.

Please contact me if you have any questions.

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Sincerely,

*Vicki Gordon Kaufman*  
Vicki Gordon Kaufman

Enclosures

cc: Beth Keating (w/enclosure)  
Lisa Harvey (w/enclosure)  
William Weber

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McWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOID & STEEN, P.A. 07059 JUL-9 02

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of BellSouth  
Telecommunications, Inc.'s entry into  
interLATA services pursuant to Section 271 of  
the Federal Telecommunications Act of 1996.  
(Third Party OSS Testing)

DOCKET NO. 960786B-TL

In re: Petition of Competitive Carriers for  
Commission action to support local  
competition in BellSouth  
Telecommunications, Inc.'s service territory.

DOCKET NO. 981834-TP

Filed: July 9, 2002

**QUESTIONS FOR KPMG CONSULTING REGARDING ITS  
DRAFT FINAL REPORT,  
BELLSOUTH OSS EVALUATION PROJECT**

Covad's first questions concern problems with BellSouth's manual processes in the Pre-Order, Order and Provisioning Functional Evaluation (TVV1) and Volume Evaluation (TVV2).

- (1) These two test areas accounted for more than one third of all Exceptions logged during the evaluation process. Why did these test areas accounted for such a disproportionate share of all logged Exceptions?
- (2) A large percentage of Exceptions opened in these areas concerned problems related to BellSouth's manual processes involved in the Ordering and Provisioning of CLEC orders (i.e. Exceptions 70, 72, 90, 91, 92, 93, 116, 117). Why were manual processes so problematic in the testing?
- (3) Is it fair to state that BellSouth had more problems with its manual and semi-mechanized processes involved in the Ordering and Provisioning portions of the test than it did with its fully mechanized processes? Why or why not?
- (4) Is it fair to state that Exceptions related to fully mechanized processes were generally closed more quickly than Exceptions related to partially mechanized or manual processes? Why or why not?

Covad's next questions concern KPMG's measurements of BellSouth's OSS performance for Line Shared Loops (questions appear to relate to test areas PPR1, TVV1, TVV2, TVV10, and TVV11).

- (5) Covad's commercial experience indicates that BellSouth does not return a pseudo circuit number with a FOC for a Line Shared Loop order, and this prevents Covad from being able to validate BellSouth's bills for that circuit without resorting to a

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FPSC-COMMISSION CLERK

time-consuming and costly process to obtain the pseudo circuit number manually from BellSouth's CSOTS databases. This problem with BellSouth's OSS has been classified as a "Defect" by BellSouth (see Change Request 621, available at [http://www.interconnection.bellsouth.com/markets/lcc/ccp\\_live/docs/statuses/change\\_requests/cr0621.pdf](http://www.interconnection.bellsouth.com/markets/lcc/ccp_live/docs/statuses/change_requests/cr0621.pdf)), yet KPMG's testing did not identify or evaluate it. Why not?

- (6) BellSouth has delayed fixing this Covad-identified defect for more than six months. Does Covad's commercial experience with this BellSouth OSS defect reflect some of the same concerns that KPMG has with BellSouth's change management process as reflected in PPR1-4 ("not satisfied") and the still-open Exception 88?
- (7) KPMG states that the PPR1-1 standard has been "Satisfied," but Covad's commercial experience has been quite different. Covad submitted Change Request 621, described above, on January 18, 2002, and it took BellSouth until May 9, 2002, to even classify it as a Type 6 defect. Despite this classification, BellSouth has yet to repair the it. How is it that BellSouth has satisfied PPR1-1?
- (8) How can BellSouth have satisfied PPR1-1 if Exception 123 is still open?
- (9) A further defect in BellSouth's OSS causes it to begin billing CLECs for orders before it has completed the provisioning of a loop (see Change Request 779, available at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/docs/statuses/change\\_requests/cr0779.pdf](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/docs/statuses/change_requests/cr0779.pdf)). Once again, KPMG's test did not identify or evaluate this defect. Why not?
- (10) Change Request 779 was filed on May 9, 2002 and has been designated a Type 6 defect, yet it still has not been repaired nor has repair even been scheduled. Did KPMG take this defect into account in reporting that BellSouth "Satisfied" PPR1-1? Why or why not?

Covad's next questions concern KPMG's measurements of BellSouth's performance with regard to the Unbundled Copper Loop — Nondesignated (UCL-ND) (questions potentially relate to test areas TVV1 and TVV2).

- (11) Were test areas TVV1 and TVV2 designed to include the testing of loops capable of supporting xDSL services?
- (12) Did KPMG do any testing related to the UCL-ND?
- (13) If the answer to question (4) was "no," why not?
- (14) Since the ordering process for the UCL-ND is manual, would it be fair to say that any problems KPMG identified with manual pre-ordering and ordering processes would apply to this loop? Why or why not?

- (15) Would it be fair to say that KPMG simply did not do any testing at all specifically designed to evaluate BellSouth's performance with regard to the UCL-ND in any test area? Why or why not?
- (16) Would it be possible for KPMG to conduct testing on this loop if the Florida Public Service Commission directed such testing?

*William Weber Kaufman for*

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## CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing the Questions for KPMG Consulting Regarding its Draft Final Report, BellSouth OSS Evaluation Project has been furnished by (\*) hand delivery or by U. S. Mail on this 9th day of July, 2002, to the following:

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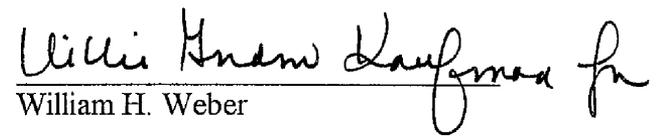
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