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
OPINION NO. PSC-02-1305-FOF-TL
ISSUED: September 25, 2002

The following Commissioners participated in the disposition of this matter:

LILA A. JABER, Chairman
J. TERRY DEASON
BRAULIO L. BAEZ
MICHAEL A. PALECKI
RUDOLPH "RUDY" BRADLEY

CONSULTATIVE OPINION REGARDING BELLSOUTH'S OPERATIONS SUPPORT SYSTEMS

TABLE OF CONTENTS

DOCUMENT NUMBER-DATE

10267 SEP 25 ≊

FPSC-COMMISSION CLERK

LIST OF ACRONYMS

ACNA	Access Carrier Name Abbreviation
ACNI	Average Completion Notice Interval
ADSL	Asymmetric Digital Subscriber Line
ADUF	Access Daily Usage File
AFIG	Address Facility Inventory Group
ALEC	Alternative Local Exchange Carriers
API	Application Program Interface
ASR	Access Service Request
BAN	Billing Account Number
BAR	Billing Adjustment Request
BBR-LO	BellSouth Business Rules for Local Ordering
BFR/NBR	Bona Fide Request/New Business Request
BOCRIS	Billing Operations Customer Relations Information System
BOS/BDT	Billing Output Specification/Bill Data Tape
BRC	Business Repair Center
BTN	Billing Telephone Number
BTSI	BellSouth Technology Systems Integration
CABS	Carrier Access Billing System
CAVE	CLEC Application Verification Environment
CCB	Change Control Board
CCM	Change Control Manager
CCT	Customer Contact Team
CCP	Change Control Process
CFA	Connecting Facilities Assignment
CFR	Code of Federal Regulations
CLEC	Competitive Local Exchange Carrier
CLUB	Customized Large User Bill
CN	Completion Notice
CO	Central Office
COG	Corporate Order Gateway
COSMOS	Computer System for Mainframe Operations
CPG	Circuit Provisioning Group
CR	Change Request
CRIS	Customer Record Information System
CRSG	Complex Resale Support Group
CSR	Customer Service Record
CSOTS	CLEC Service Order Tracking System
CTE	CLEC Test Environment
CTG	Complex Translations Group

CWINS	Customer Wholesale Interconnection Network Services
DD	Due Date
DOE	Direct Order Entry System
DS0	Digital Signal 0 (64 kb/s)
DS1	Digital Signal 1 (1.544 Mb/s)
DSL	Digital Subscriber Line
DUF	Daily Usage File
EC	Electronic Communication
ECTA	Electronic Communication Trouble Administration
EDI	Electronic Data Interchange
EEL	Enhanced Extended Loop
ET	Electronic Technicians
EXACT	Exchange Access and Control Tracking
FA	Functional Acknowledgment
FCC	Federal Communications Commission
FDT	Frame Due Time
FOC	Firm Order Confirmation
FPSC	Florida Public Service Commission
FRN	Facilities Reservation Number
FTTF	Flow Through Task Force
GUI	Graphical User Interface
HDSL	High Digital Subscriber Line
IBS	Integrated Billing System
ICAIS	Interexchange Carrier Analysis and Information System
IDSL	Integrated Services Digital Network Subscriber Line
ILEC	Incumbent Local Exchange Carrier
IOF	Interoffice Facilities
ISDN	Integrated Services Digital Network
IXC	Interexchange Carrier
KCI	KPMG Consulting Inc.
LATA	Local Access and Transport Area
LCSC	Local Carrier Service Center
LENS	Local Exchange Navigation System
LEO	Local Exchange Ordering
LESOG	Local Exchange Service Order Generator
LFACS	Loop Facility Assignment and Control System
LISC	Local Interconnect Service Center
LMOS	Loop Maintenance Operating System
LMU	Loop Make-Up
LNP	Local Number Portability
LON	Local Order Number
LPIC	Local Primary Interexchange Carrier

LSR	Local Service Request
MA	Missed Appointment
MARCH	Memory Administration Recent Change History
MLT	Mechanized Loop Test
MTP	Master Test Plan
NDM	Network Data Mover
NID	Network Interface Device
NFT	Non-Flow Through
NPAC	Number Portability Administration Center
NODS	Normalized Operational Data Store
OCN	Operating Company Numbers
ODUF	Optional Daily Usage File
OSS	Operation Support Systems
PCN	Provisioning Completion Notices
PIC	Primary Interexchange Carrier
PMAP	Performance Measurements Analysis Platform
PON	Purchase Order Number
POTS	Plain Old Telephone Service
PPR	Processes and Procedures Review
PQT	Presale Quality Team
RDUM	Raw Data User Manual
PMAP	Performance Measurements Analysis Platform
PMR	Performance Metrics Review
RoboTAG	Robust TAG
RRC	Residential Repair Center
SEEM	Self Effectuating Enforcement Mechanism
SOCS	Service Order Communication System
SOEG	Service Order Entry Gateway
SQM	Service Quality Measurement
TAG	Telecommunications Access Gateway
TAFI	Trouble Analysis Facilitation Interface
TN	Telephone Number
TVV	Transaction Verification and Validation
UCL-ND	Unbundled Copper Loop Non-Design
UNE	Unbundled Network Element
UNE-L	Unbundled Network Element Loop
UNE-P	Unbundled Network Element - Platform
USOC	Universal Service Order Code
WeBS	Wholesale Billing Support
WFA/C	Workforce Administration/Control
WFA/DI	Workforce Administration/Dispatch In
WFA/DO	Workforce Administration/Dispatch Out

WMC   Work Management Center
xDSL   Generic term for Digital Subscriber Loop

BY THE COMMISSION:

I. CASE BACKGROUND

On December 10, 1998, the Florida Competitive Carriers Association (FCCA), the Telecommunications Resellers, Inc. (TRA), AT&T Communications of the Southern States, Inc. (AT&T), MCImetro Access Transmission Services, LLC (MCImetro), WorldCom Technologies, Inc. (WorldCom), the Competitive Telecommunications Association (Comptel), MGC Communications, Inc. (MGC), and Intermedia Communications Inc. (Intermedia) (collectively, "Competitive Carriers") filed their Petition of Competitive Carriers for Commission Action to Support Local Competition in BellSouth's Service Territory.

On December 30, 1998, BellSouth Telecommunications, Inc. (BellSouth) filed a Motion to Dismiss the Petition of the Competitive Carriers for Commission Action to Support Local Competition in BellSouth's Service Territory (Competitive Carriers' Petition.) BellSouth requested that we dismiss the Competitive Carriers' Petition with prejudice. On January 11, 1999, the Competitive Carriers filed their Response in Opposition to BellSouth's Motion to Dismiss. By Order No. PSC-99-0769-FOF-TP, issued April 21, 1999, we denied BellSouth's Motion to Dismiss. In addition, we denied the Competitive Carriers' request to initiate a rulemaking proceeding to establish expedited dispute resolution procedures for resolving interconnection agreement disputes. We also directed our staff to provide more specific information and rationale for its recommendation on the remainder of the Competitive Carriers' Petition.

On May 26, 1999, we issued Order No. PSC-99-1078-PCO-TP, which granted, in part, and denied, in part, the petition of the Florida Competitive Carriers' Association to support local competition in BellSouth's service territory. Specifically, we established a formal administrative hearing process to address unbundled network elements (UNE) pricing, including UNE combinations and deaveraged pricing of unbundled loops. We also ordered staff workshops on Operations Support Systems (OSS) be conducted concomitantly in an effort to resolve OSS operational issues. We stated that the request for third-party testing (TPT) of OSS was to be addressed in these workshops. These workshops were held on May 5-6, 1999. We ordered a formal administrative hearing to address collocation and access to loop issues, as well as costing and pricing issues.

On May 28, 1999, FCCA and AT&T filed a Motion for Independent Third-Party Testing of BellSouth's OSS. BellSouth filed its Response to this Motion by the FCCA and AT&T on June 16, 1999. That same day, FCCA and AT&T filed a Supplement to the Motion for Third-Party Testing. On June 17, 1999, ACI Corp. (ACI) filed a Motion to Expand the Scope of Independent Third-Party Testing. On June 28, 1999, BellSouth responded to the Supplement filed by FCCA and AT&T. On June 29, 1999, BellSouth responded to ACI's Motion to Expand the Scope of Independent Third-Party Testing. By Order No. PSC-99-1568-PAA-TP, issued August 9, 1999, we denied the motion. Upon our own motion, we decided to proceed with Phase I of third-party testing of BellSouth's OSS. Phase I of third-party testing required a third party, in this case KPMG Consulting LLC, to develop a Master Test Plan (MTP) that would identify the specific testing activities necessary to demonstrate nondiscriminatory access and parity of BellSouth's systems and processes.

By Order No. PSC-00-0104-PAA-TP, issued January 11, 2000, we approved the KPMG Consulting MTP and initiated Phase II of third-party testing of BellSouth's OSS. On February 8, 2000, by Order No. PSC-00-0260-PAA-TP, we approved interim performance measures to be used during the course of testing to assess the level of service BellSouth is providing to Alternative Local Exchange Carriers (ALECs). By Order No. PSC-00-0563-PAA-TP, issued March 20, 2000, we approved the retail analogs/benchmarks and the statistical methodology that should be used during the OSS third-party testing.

By Order No. PSC-00-2451-PAA-TP, issued December 20, 2000, we approved revised interim performance measures, benchmarks and retail analogs to be used during the third-party OSS testing. The revised interim measures were ordered to address several changes made to BellSouth's initial set of interim measures approved by Order No. PSC-00-0260-PAA-TP. The revised interim measures included corrections to the business rules used to calculate the measures and additional levels of detail allowing the measures to capture BellSouth's performance on newer services such as Local Number Portability (LNP). Since Order No. PSC-00-2451-PAA-TP, BellSouth has issued additional changes to its revised interim measures in other jurisdictions. By Order No. PSC-01-1428-PAA-TL, issued July 3, 2001, we approved additional changes to update measures and retail analogs and provide additional levels of disaggregation.

On June 21, 2002, KPMG Consulting, Inc. presented its Draft Final Report to our staff containing preliminary results and conclusions from the third-party testing of BellSouth's OSS. The draft report addressed its findings regarding the pre-ordering, ordering, provisioning, and maintenance/repair operations support systems. On July 12, 2002, we held a Commissioner's workshop to address questions concerning the Draft Final Report. Comments on the draft and workshop were filed by parties on July 24, 2002.

On July 30, 2002, KPMG Consulting submitted its Final Report regarding the third-party testing. The Final Report contains KPMG Consulting's final conclusions regarding BellSouth's pre-ordering, ordering, provisioning, and maintenance and repair operating support systems. Subsequently, on September 9, 2002, we considered BellSouth's compliance with its Operating Support Systems under Section 271 of the Act.

II. JURISDICTION

Section 271(a) of the Telecommunication Act of 1996 (the Act) provides that a Regional Bell Operating Company (RBOC) may not provide interLATA services except as provided in Section 271. Section 271(d) of the Act provides, in part, that prior to making a determination under Section 271, the Federal Communications Commission (FCC) shall consult with the State commission of any State that is the subject of a Section 271 application in order to

verify the compliance of the RBOC with requirements of Section 271(c). In addition, Section 120.80(13)(d), Florida Statutes, provides that we can employ processes and procedures as necessary in implementing the Act. Therefore, we find that we have jurisdiction in evaluating BellSouth's OSS through third-party testing, which will enable us to consult with the FCC when BellSouth requests 271 approval from the FCC.

III. ANALYSIS

A. INTRODUCTION

The issue to be addressed is whether BellSouth provides ALECs nondiscriminatory access to its OSS, thus satisfying the OSS requirements of Section 271 of the Telecommunications Act of 1996. To determine the adequacy of OSS support provided by BellSouth to Florida ALECs, we have, over the course of the last several years, adopted an approach to rely on three key sources of information. These three sources have been likened to a three-legged stool upon which our assessment of BellSouth's OSS will sit. The three legs of the stool, to be used to determine BellSouth's compliance with the requirements of Section 271 of the 1996 Telecommunications Act, are as follows:

- the results of the OSS third-party test conducted by KPMG Consulting, Inc;

- January 2002 through March 2002 commercial data results showing the quality of OSS support provided to ALECs by BellSouth in terms of its performance against our approved OSS benchmarks and analogs; and

- input regarding ALECs' "real-world" experience via the February 18, 2002 ALEC Experience Workshop and comments filed in this docket.

The KPMG Consulting test results, entitled *BellSouth Telecommunications, Inc. OSS Evaluation Project, Final Report, Version 2.0* (Final Report), are incorporated here by reference as Attachment A to this Order. The entire report can be accessed electronically via our web site. We conclude that 522 (more than

97 percent) of the KPMG Consulting evaluation criteria were satisfied, while 14 (less than 3 percent) were not satisfied through its testing activities. Testing of an additional 542 performance measurement evaluation criteria remains in progress at this time.

Based upon our review and participation in the testing, we consider many of the not-satisfied criteria to be resolved or pending resolution at a time certain through a software change. We believe the remaining not-satisfied test criteria do not constitute significant barriers to competition. Our analysis of the third-party OSS test results is contained in Section B below.

The review of January through March 2002 commercial data performed by KPMG Consulting is contained within Appendix G of KPMG Consulting's Final Report. We recognize that interpretation of the commercial data results is a matter of judgement. We believe it would be difficult to reach a point of attaining parity for each of the thousands of measurement points reflected by performance measures and submeasures, and are not aware of any specific "percentage at parity" that has been applied by any regulatory body as constituting compliance with the 1996 Telecommunications Act. We believe the commercial data analysis compiled by KPMG Consulting generally confirms the OSS test results and indicates support by BellSouth for Florida ALECs in aggregate is at parity. Our analysis of the commercial data review is contained in Section C below.

We have analyzed the information provided by the ALECs at our February 18, 2002 ALEC Experience Workshop, which raised over 50 OSS issues. In our opinion, the most significant of these issues have been addressed either through the tests or through action taken by us on our own motion. In other instances, we believe either the ALEC issues are not supported by the information available or do not reflect a systemic problem that inhibits the ALECs' ability to compete with BellSouth. We note that certain ALECs filed comments too late for us to fully analyze in this Opinion. We have, however, thoroughly reviewed these comments and believe that the issues identified therein are either already addressed in this Opinion through our analysis of the comments of other ALECs or that the issues do not rise to a level which would alter our ultimate decision. Our analysis of the issues raised by the ALECs at the workshop is contained in Section D below. A more

technical and detailed discussion of these issues is included as Attachment B to this Order. A glossary of terms is provided as Attachment C for reference.

B.   OPERATIONS SUPPORT SYSTEMS TEST

1.   OSS Test Summary

In Order No. PSC-00-0104-PAA-TP, issued January 11, 2000, we approved the Master Test Plan (MTP), selected KPMG Consulting, Inc. as the third-party test manager, and ordered execution of the MTP to begin. As directed, our staff maintained an active role directing and monitoring KPMG Consulting's test activities, while BellSouth paid the substantial cost of this testing. ALEC participation was sought throughout, beginning with the drafting of the MTP itself, continuing through more than 130 weekly test status meetings, and including both direct participation in test activities and input via interviews. ALECs were also able to monitor test status and results via our web site, which listed all test observations and exceptions and provided monthly status reports.

The objective of the test was to provide us with evidence for use in assessing whether BellSouth has met the requirements of Section 271 of the Act, which are to:

- provide nondiscriminatory access to its OSS on appropriate terms and conditions,

- provide the documentation and support necessary for ALECs to access and use these systems, and

- demonstrate that its systems are operationally ready and provide an appropriate level of performance.

The scope of the test included examination of activities involved in establishing and maintaining the ILEC-ALEC relationship and in performing daily operations in support of providing local telecommunications service. The test was designed to address all ALEC service delivery methods (resale, UNE, and interconnection).

In fact, the test scope addressed a far broader range of product offerings than most Florida ALECs provide. As stated in the MTP, the test was conducted using a "military-style" approach, meaning that testing iterations would continue until a passing result is achieved.

Our third-party OSS test has been widely recognized for its independence, openness to ALEC participation, breadth of coverage, and depth of detail. The Florida test was actively monitored by the Commissions of several BellSouth states that chose not to conduct their own tests.

Our third-party OSS test actively sought and obtained ALEC input in test planning, conduct and monitoring. Over 130 weekly status meetings were attended by ALECs, as well as over 250 observation and exceptions discussion calls, and at least 15 face-to-face meetings or workshops were conducted. Over the course of the test, 26 Florida ALECs participated in the weekly OSS test status calls. Of these 26 participants, three were highly active, participating in the majority of the calls held, while 12 ALECs were moderately active, and 11 others participated occasionally on the weekly status calls.

ALECs, such as WorldCom, have affirmed that the Florida test is the "best in the country." In North Carolina, AT&T stated, "the Florida test is a truly complete test.... We're on record before several bodies as saying that we're very satisfied with the test in Florida." North Carolina Utilities Commission, Docket No. P-55, Sub 1022, May 2, 2001 Session Transcript at p.15. AT&T also stated in Tennessee, "The Florida test as it is currently structured is comprehensive in its scope...the Florida Public Service Commission took steps to assure the independence of the tester, thereby bolstering the reliability of the testing...." AT&T, Tennessee Regulatory Authority Docket No. 01-00362, May 11, 2001, Exhibit A at pp. 2,8.

Despite their active participation in the test and their praise of it in other venues, some ALECs have criticized the test's inherent design and application in recent filings with us. In its comments on the July 12, 2002, Florida Public Service Commission (FPSC) Draft Report workshop, AT&T stated, "this Commission cannot rely upon the results of KCI's [KPMG Consulting's] third-party test." AT&T further claims that the test does not provide a

complete portrait of BellSouth's OSS performance, lacks root-cause analyses of BellSouth deficiencies, lacks blindness, and inadequately tests parity with BellSouth. Mpower criticizes KPMG Consulting's application of "military style" testing, saying it worked in reverse. Covad claims some vital test areas were "missed entirely either through oversight or through design."

We note that these complaints came very late in the process. We also note that, ironically, many of these same ALECs helped with the design of the MTP or failed to raise these objections to its design at either the time the MTP was approved or during the two and one-half years of testing. Before testing began, we indicated that the test would be the only yardstick by which BellSouth's OSS would be measured. In fact, our January 11, 2000, Order stated,

> Independent third-party testing will enable us to make a definitive determination of whether BellSouth has met this Section 271 criteria. Thus, if we determine that BellSouth's OSS pass third-party testing, BellSouth will be considered to have remedied the OSS concerns that we previously identified in Order No. PSC-97-1459-FOF-TL for purposes of our recommendation to the FCC on any future application by BellSouth for interLATA authority in Florida.

Order No. PSC-00-0104-PAA-TP, p. 5, issued January 11, 2000.

After we have spent 30 months conducting a complete set of process and transaction tests as requested in 1999, we believe the test was conducted as planned and as agreed, and the results should be trusted and accepted.

In our opinion, testing until complete perfection is achieved is not realistic, nor is it required by the Act or by the FCC's established standards. The FCC notes in its Georgia/Louisiana order that "the checklist does not require perfection." FCC 02-147, ¶194. In its order on Bell Atlantic's New York 271 application, the FCC stated, "We note that we do not hold Bell Atlantic to a standard of perfection. If [there] were a systemic problem occurring for a significant number of orders, however, it would warrant a finding of noncompliance." FCC Order No. 99-404, ¶176.

The test was designed to examine all OSS interfaces in use and the vast majority of BellSouth product offerings. At the request of ALECs, the test scope was broadened by the our project manager to include products such as line-sharing and operator services/directory assistance. The result was that KPMG Consulting's pseudo-ALEC transactions covered the gamut of products and scenarios.

Throughout the design and execution of the tests, extreme care was taken to maintain testing blindness on the part of BellSouth. It must be stressed that 100 percent blindness is simply not possible in all third-party testing activities. However, we took great pains to ensure that, where applicable, KPMG Consulting received only the information and assistance generally available to operating Florida ALECs. In addition, along with KPMG Consulting, we carefully guarded information such as the actual dates and times of on-site inspections and volume tests to prevent any unfair preparation on BellSouth's part that could skew the test outcome.

Also protected from disclosure were the specific test criteria by which test results were judged. KPMG Consulting's detailed test plans and criteria were reviewed only by our staff. Each test exception was triggered when a specific testing criterion was not passed. Exceptions were only closed when both KPMG Consulting and our staff concurred that the problem was resolved, averting a "not satisfied" outcome for the criterion.

The test was designed to provide conclusive evidence upon its completion of the adequacy of BellSouth's OSS, as required by the Act. The policies and procedures tests (PPR1 through PPR16) examined the basic form and structure of BellSouth's OSS. The transaction validation and verification tests (TVV1 through TVV11) allowed direct evidence of OSS capability through both simulated and real-world transactions. These 27 tests are listed below, followed by a discussion of any outstanding test criteria as of the Final Report publication date. Our analysis included ALEC comments filed in response to our workshop held on July 12, 2002, regarding KPMG's Draft Final Report. Also provided is an overall conclusion for each of the test domains of relationship management, pre-ordering, ordering, provisioning, maintenance and repair, and billing.

2.   Relationship Management Test

a.   *Relationship Management Test Summary*

The objective of the Relationship Management Infrastructure (RMI) test was to examine BellSouth's wholesale business rules, policies, procedures, and functional units in both the establishment and maintenance of ongoing business relationships with its ALEC customers.   The Relationship Management domain consisted of five tests.   All five tests were process oriented. The tests examined change management (PPR1), account establishment and management (PPR2), help desks (PPR3), ALEC training (PPR4), and interface development and forecasting (PPR5).

KPMG Consulting evaluated 74 evaluation criteria in the Relationship Management domain.   Sixty-eight of these criteria were satisfied.   Six evaluation criteria were not satisfied.

The evaluation criteria that were not satisfied primarily involve the areas of release management and change management. There are two open exceptions associated with the not-satisfied criteria.   Each is discussed below.

b.   *Relationship Management Test Open Exceptions*

Exception 88

In July 2001, KPMG Consulting issued Exception 88 stating that BellSouth change control and release management processes did not allow ALECs to mutually assess the impact of software changes to wholesale interfaces. Exception 88 also stated that ALECs were unable to engage in mutual resource planning with BellSouth. Mutual resource planning and impact assessment are stated objectives in the BellSouth Change Control Process document.   The impact of the exception is that ALECs are unable to collaborate in the prioritization of change requests.   That lack of collaboration in changes that affect ALEC business could result in change requests important to the ALEC community not being developed or implemented in a timely manner.

BellSouth responded by widening the scope of the Change Control Process to include more ALEC-affecting systems, including billing, legacy systems and back office systems. Further, on May 28, 2002, BellSouth and ALECs agreed to a rewritten definition of

"ALEC-affecting" within the Change Control Process guide that recognizes the various types of impacts that a BellSouth system change might have on an ALEC's operation, training needs, or system code requirements. These BellSouth responses substantially satisfied our staff and KPMG Consulting's concerns involving the mutuality of impact assessment. ALECs now will have visibility and opportunity for dialogue on proposed system changes that they previously did not have.

Further, on June 10, 2002, BellSouth responded to Exception 88 by providing a draft of the *End-to-End Process Flow, Version 2.1.* This process, commonly known as the "50/50 plan," provides that, at minimum, ALECs will receive 50 percent of available software release capacity annually after BellSouth implements defect fixes, regulatory mandated changes and necessary updates of industry standards. BellSouth will then use up to 50 percent of the remaining available capacity for changes it needs to make to its systems. The plan proposes two releases yearly for BellSouth-initiated changes and two releases yearly for ALEC-initiated changes. Capacity information will be verified by an independent third party.

As this proposal has not yet been fully implemented and KPMG Consulting did not have an opportunity to review the revised process in operation before the test ended, Exception 88 remains open. However, in Order Number PSC-02-1034-FOF-TP, issued July 30, 2002, we ordered BellSouth to implement the *End-to-End Process Flow, Version 2.1*, which both we and KPMG Consulting believe will provide ALECs with a process to prioritize, assess the impact of, and plan resources for all change requests affecting the ALEC community. In addition, we will monitor the BellSouth Change Control Process over the next year to identify areas of concern and, if necessary, any matter of concern will be considered by us.

Exception 157

In March 2002, KPMG Consulting issued Exception 157, which states that BellSouth fails to follow its software testing and quality processes. The exception noted internal documentation indicating BellSouth's failure to fully complete all prerelease testing procedures. KPMG Consulting reviewed five software releases during a one-year period. The impact of the exception is that ALECs' customers suffer when orders or other wholesale customer transactions are not processed efficiently due to

preventable software defects. That results in ALEC customer
dissatisfaction due to the inability of the end-use customer to
discern the root cause of the problem they are experiencing.

BellSouth responded by asserting that it does, in fact, follow
its own procedures. In May 2002, KPMG Consulting amended the
exception to note subsequent defects associated with Release 10.5.
BellSouth continued to disagree with KPMG Consulting's assessment
of BellSouth's failure to follow software testing and quality
process for each release. BellSouth said that it had made a number
of improvements related to software testing including:
implementation of the CLEC Application Verification Environment
(CAVE), refining the defect management process, regression testing,
creating better liaison with ALECs who wish to test before a new
release, increasing the availability of the test environment,
including a broader scope of ordering and pre-ordering scenarios,
and others.

To address issues identified in Exception 157, on July 22,
2002, we issued Order No. PSC-02-0989-PAA-TP, which required
BellSouth to establish three new measures associated with the
prevention and timely correction of defects in software releases.
One measure requires BellSouth to expand the number of customer
scenarios that an ALEC might use for purposes of internal BellSouth
prerelease testing. We believe that this measure will reduce the
number of errors in new releases. Additionally, we believe the
Self Effectuating Enforcement Mechanism (SEEM) plan, effective May
2002, will provide adequate incentive for BellSouth improvement in
delivering quality software releases on time.

Two other measures track correction timeliness of post-release
defects. One of these is diagnostic and the other will trigger
SEEM penalties if the benchmark is not attained, creating an
incentive to prevent post-release defects. We believe that these
measures will assist in resolving the concerns that were raised
during the test.

c.   *Relationship Management Test Conclusion*

Based on the results of the KPMG Consulting OSS test and our
actions in response to issues identified in the test, we find that
BellSouth is providing collaborative opportunities and
nondiscriminatory access to its OSS processes for the RMI domain.

Additionally, we find that BellSouth is providing the documentation and support necessary for ALECs to access and use the RMI processes. The OSS test results further prove that the RMI processes, such as Change Control, Account Management, and Training, are operationally ready and provide an appropriate level of performance. Notwithstanding, we will continue to monitor the Change Control Process and Account Management functions to ensure BellSouth is providing service in a nondiscriminatory manner. Additionally, we encourage BellSouth to collaborate fully with ALECs in these important processes. Finally, we note that BellSouth's SEEM plan provides a tool for use by us to ensure that adequate OSS access and support is provided in the future.

3.   Pre-Ordering and Ordering Test

a.   *Pre-Ordering and Ordering Test Summary*

The primary objective of the Pre-Ordering and Ordering test was to test the systems, processes, and other operational elements associated with BellSouth's support for Pre-Order and Order activities for wholesale operations. The test examined functionality, compliance with measurement agreements, and comparable systems supporting BellSouth retail operations.

The Pre-Ordering and Ordering domain consisted of five tests, of which three were transaction-oriented (TVV1,2,3) and two were process-oriented (PPR7,8). KPMG Consulting evaluated 110 evaluation criteria in the Pre-Ordering and Ordering domain. One hundred six of these evaluation criteria were satisfied, while four evaluation criteria were not satisfied.

The evaluation criteria that are not satisfied lie primarily in the areas of flow-through performance and accuracy of responses. There are four open exceptions associated with the not satisfied evaluation criteria. Each of these open exceptions is discussed below.

b.   *Pre-Ordering and Ordering Test Open Exceptions*

Exception 165
On May 16, 2002, KPMG Consulting issued Exception 165 stating BellSouth provides inconsistent and incorrect information on

Clarification responses for Resale, UNE-P, and UNE Loop service requests.

KPMG Consulting expects at least 95 percent of all clarification responses from BellSouth to be accurate and complete. In the absence of us approving a standard for this measure KPMG Consulting used its professional judgment. A sample of clarification responses was reviewed to determine the accuracy and completeness of the content of each response. Of the total responses reviewed, 17 percent (54 of 308) were determined to be inaccurate.

BellSouth's failure to accurately review service requests for errors and clarifications may require ALECs to utilize additional resources to verify order information before successfully processing individual customer orders. Inaccurately clarified service requests may result in missed appointments and rescheduled orders, decreasing ALEC customer satisfaction.

BellSouth does not agree with KPMG Consulting's assessment of 23 of the 54 responses determined to be inaccurate. As BellSouth points out in its detailed response to Exception 165, "[when reducing the number of lines on an account, business customers typically disconnect a secondary line and not the main TN used by their customers." BellSouth's contention is that this scenario is unrealistic and not likely to occur in real ALEC transactions. Therefore, BellSouth questions the validity and significance of this exception. BellSouth's assessment indicates a 89 percent success rate, which is still below KPMG Consulting's applied standard of 95 percent.

We agree with KPMG Consulting's assessment of Exception number 165. We note BellSouth's own recalculation of the clarification accuracy rate at 89 percent still falls below the 95 percent benchmark applied by KPMG Consulting. However, we point out that 20 percent (11 of 54 failures) were the result of disconnecting the main telephone number of a multiline account, which we believe is a nontypical scenario. We agree with BellSouth that the test case is unlikely to be encountered in actual commercial practice.

We do not believe this exception is significant enough to warrant a finding of noncompliance. We will continue monitoring of this area and will address matters that warrant our attention. We

believe BellSouth needs to reduce the number of clarification responses it issues in error through continued training of employees in this area.

Exception 161

On April 23, 2002, KPMG Consulting issued Exception 161 stating it had not received timely nonmechanized rejects from BellSouth. According to the Reject Interval (O-8) performance measure, BellSouth should return at least 85 percent of nonmechanized rejects to ALECs within 24 hours of receiving the Local Service Request(LSR).

During the production retest of the nonmechanized interface, BellSouth returned 76.42 percent of nonmechanized rejects during the 24-hour time frame, well below the Reject Interval (O-8) benchmark of 85 percent.

Failure to return accurate clarifications may negatively impact ALECs because the receipt of timely rejects is a critical factor in the ALECs' ability to process service requests and meet their customers' needs. Delays in the return of rejects may negatively impact the timeliness of the ordering process, decreasing ALEC customer satisfaction.

BellSouth disagrees with KPMG Consulting's assessment of all items identified in this exception. BellSouth states the Reject Interval (O-8), Reject Interval, does not apply to the process for the complex products and services that are handled by the Complex Resale Support Group (CRSG). The Reject Interval (O-8) Business Rules for Nonmechanized LSRs specifically state: "The elapsed time from receipt of a valid LSR (date and time stamp of FAX or date and time mailed LSR is <u>received in the LCSC</u>) until notice of the reject (clarification) is returned to the ALEC." [Emphasis added]

BellSouth summarizes its analysis of the results stating that of the 123 transactions, 94 were both valid for the test and received nonmechanized rejects in less that 24 hours, giving a success rate of 100 percent. In BellSouth's opinion, of the remaining 29 transactions, 27 were not applicable because Reject Interval (O-8) does not apply and no record exists that the remaining two transactions were ever sent.

BellSouth states it would like to further clarify the Reject Interval (O-8) and Firm Order Confirmation Timeliness (O-9) measures in our biannual reviews of the Performance Assessment Plan. BellSouth described in its response to the exception that KPMG Consulting misapplied these two measures to CRSG-handled orders.

BellSouth states that when the CRSG submits the appropriate ordering package to the Local Carrier Service Center (LCSC) and a clarification or Firm Order Confirmation (FOC) is returned to the ALEC, the time intervals associated for these measures are captured through the Local Order Number (LON) Tracking System and reported in the Service Quality Measures (SQM) report. Thus, these products are captured in the Reject Interval (O-8) and Firm Order Confirmation Timeliness (O-9) measures, but only for the portion of time while being processed in the LCSC.

In its comments to the draft Final Report, Covad points to the problems in receiving timely partially-mechanized and nonmechanized clarifications and FOCs as an indication that the manual ordering process is flawed.

However, we agree with BellSouth's assessment of this exception. As BellSouth notes, 27 of the 29 PONs classified by KPMG Consulting as failing to meet the benchmark were complex orders sent directly to the CRSG. Therefore, we believe that according to business rules, the Reject Interval (O-8) measure does not apply. We believe that this exception is not significant and does not indicate that BellSouth prohibits ALECs from placing orders in a timely manner. We will ensure these measures are clarified in the six-month Performance Assessment Plan review.

Exception 121

On November 13, 2001, KPMG Consulting opened Exception 121 stating it could not identify flow-through Firm Order Confirmations (FOCs) on Local Number Portability (LNP) Local Service Requests (LSRs) submitted via the mechanized ordering process. According to the Percent Flow-through Service Requests-Summary (O-3) measure, BellSouth should flow through 85 percent of LNP LSRs submitted through mechanized ordering processes. As of November 9, 2001, KPMG Consulting results indicated a flow-through rate of 48 percent (62 of 128) on orders submitted. BellSouth's response stated that due to errors and misclassifications on KPMG Consulting's part

(detailed in BellSouth's response to the exception) the flow-through rate was 86 percent rather than 48 percent, putting them above the benchmark.

KPMG Consulting reviewed BellSouth's response and found that BellSouth's performance for LNP flow-through was 71.82 percent. Based on BellSouth's response, KPMG Consulting initiated an LNP flow-through re-test. The results indicated a flow-through rate of 76.74 percent.

BellSouth disagreed with KPMG Consulting's results to amended Exception 121 stating invalid data on the Customer Service Record (CSR) when the test account was created, and not poor handling by BellSouth's OSS, caused the eight LSRs to fall out. The CSR data was corrected on May 8, 2002.

BellSouth states commercial data available through SQM reports provides a complete view of Flow-Through (O-3) results for LNP. BellSouth's results for January 2002 through April 2002 are 92.81 percent, 94.12 percent, 92.25 percent and 92.59 percent compared to a benchmark of 85 percent. These results show that BellSouth is meeting the benchmark for flow-through in its commercial results.

We agree with KPMG Consulting on Exception 121 and believe, although BellSouth's commercial data results indicate LNP flow-through is above the benchmark, the test-related flow-through performance in general was unacceptable. In response to this exception and Exception 136, we took action to improve BellSouth's flow-through performance. In Order No. PSC-02-0989-PAA-TP, BellSouth was ordered to file a plan with us, which it has subsequently done, outlining its proposed steps to improve flow-through rates for each level of disaggregation, including LNP.

In addition, our Order doubled the current SEEM plan payments triggered when flow-through benchmarks are not met. We believe the action we have taken should motivate BellSouth to improve flow-through results. We will continue to monitor results of the flow-through measure, but do not believe this test issue warrants a finding of discrimination against ALECs since commercial data indicates acceptable performance for LNP flow-through.

Exception 122

On November 13, 2001, KPMG Consulting issued Exception 122 stating BellSouth did not provide flow-through classification information for Digital Subscriber Line (DSL) orders submitted by KPMG Consulting. ALEC LSR information (O-6), makes available to ALECs a list of flow-through activity of all LSRs submitted by the ALEC during each reporting period. KPMG Consulting requested the report information and received its LSR Detail Report each month during testing.

As part of the flow-through evaluation in the TVV2 test, KPMG Consulting reconciled all LSRs submitted in the Pre-Ordering and Ordering Functional Evaluation with the LSR Detail Report. KPMG Consulting did not receive LSR status information on 117 DSL orders submitted through the available electronic interfaces.

BellSouth's response stated:

> BellSouth is in the process of adding xDSL products to the Flow-Through SQM reports. Team Connection Number 2456 has been entered to begin the development process.

KPMG Consulting and we believe the impact of absence of flow-through classification data could be an increased order error rate, resulting in an ALEC's inability to identify ordering problems in a timely manner. We note this issue is to be resolved by BellSouth with BellSouth Business Rules for Local Ordering, Release 10.6, due August 25, 2002. As a result, we do not believe this issue warrants a finding of noncompliance.

Exception 136

Exception 136 was issued by KPMG Consulting on January 15, 2002, and addresses nonreceipt of flow-through FOCs on Unbundled Network Element (UNE) LSRs submitted electronically.

According to Percent Flow-Through Service Requests (Summary) measure (O-3), BellSouth should issue a flow-through FOC on 85 percent of UNE LSRs submitted through mechanized ordering processes. During production retesting of the Telecommunications Access Gateway (TAG), Electronic Data Interchange (EDI), and Local Exchange Navigation System (LENS) interfaces, a number of LSRs submitted by KPMG Consulting unexpectedly fell out. KPMG Consulting's retest indicated a UNE flow-through rate of 61

percent. BellSouth disagreed with KPMG Consulting's findings and stated that, by its calculations, 75 percent of KPMG Consulting's UNE LSRs successfully flowed through.

KPMG Consulting conducted retest transactions between November 26, 2001, and February 17, 2002. The results indicated a UNE flow-through rate of 80 percent, still below the benchmark. KPMG Consulting again retested between February 28 and March 24, 2002. Results of this retest indicated a flow-through rate of just 44.7 percent. KPMG Consulting again retested between February 28 and April 21, 2002. Results of this retest indicated a flow-through rate of 74.53 percent. KPMG Consulting also analyzed February 2002 Multi-State Summary (MSS) reports for UNE transaction patterns and calculated a weighted UNE flow-through rate of 74.72 percent.

We believe flow-through of LSRs is a critical factor in the ALECs' delivery of service to customers in a timely manner. Unexpected manual intervention may cause significant delays in the return of confirmations or clarifications, which can affect order timeliness and, ultimately, ALEC customer satisfaction.

We agree with KPMG Consulting on Exception 136. In response to this exception and to Exception 121, we issued Order No. PSC-02-0989-PAA-TP to improve BellSouth's flow-through performance. In this order, BellSouth is required to file a plan with us outlining its proposed steps to improve flow-through rates for each level of disaggregation, including UNE. In addition, our Order doubled the current SEEM plan payments triggered when flow-through benchmarks are not met. We believe the action we have taken should motivate BellSouth to improve flow-through. We will continue to monitor results of the flow-through measure.

c. Pre-Ordering and Ordering Test Conclusion

Based on the overall results of the KPMG Consulting OSS test, we find that BellSouth is providing nondiscriminatory access to its OSS for the Pre-Ordering and Ordering domain. Additionally, we believe that BellSouth is providing the documentation and support necessary for ALECs to access and use the Pre-Ordering and Ordering OSS systems. The OSS test results further prove that the systems for Pre-Ordering and Ordering are operationally ready and provide an appropriate level of performance. We will continue to monitor

flow-through results and are satisfied that the SEEM plan is in place to correct future deficiencies.

4. Provisioning Test

a. *Provisioning Test Summary*

The Provisioning domain evaluation was designed to review the systems, processes, and other operational elements associated with BellSouth's provisioning activities used for wholesale markets. The third-party OSS test examined functionality, compliance with performance measures, and comparable systems supporting BellSouth retail operations.

The Provisioning evaluation included two process and procedure-oriented tests (PPR6 and 9) and one transaction-oriented test (TVV4). Provisioning tests covered 113 evaluation criteria, of which four remain not satisfied. Evaluation criteria not satisfied at the conclusion of the test were related to switch translation and directory listing.

There are two open exceptions associated with the not-satisfied evaluation criteria. Each of these open exceptions is discussed below.

b. *Provisioning Test Open Exceptions*

Exception 84

On July 11, 2001, KPMG Consulting issued Exception 84, which states BellSouth failed to use the proper codes when provisioning switch translations.

KPMG Consulting applied a professional judgment success standard of 95 percent when testing BellSouth's ability to accurately provision service and features. There is no applicable benchmark by us for this test activity. To conduct the test, KPMG Consulting reviewed switch translation reports for a random sample of telephone numbers and verified the translation accuracy using switch translation codes provided by BellSouth. KPMG Consulting reviewed translations for 134 telephone numbers and found 14 were not provisioned accurately, a success rate of 90 percent.

BellSouth responded that the discrepancies identified by KPMG Consulting contain only five orders that are listed multiple times resulting in the 14 discrepancies. For two, BellSouth responded that the service representative error would be discussed with the employee. For two others, BellSouth responded that it would update service representative methods and procedures to clarify service order format required to add telephone numbers with the hunting feature.

According to BellSouth, the remaining ten discrepancies are the result of a single unrealistic test scenario - a service request to disconnect the main telephone number of a multi-line account. BellSouth responded that it was opening a change request for updating of business rules for disconnecting the main number of an existing multi-line account. However, BellSouth contended that, although this scenario is possible, it is rarely encountered in a business environment because such customers would not typically disconnect a main telephone number that is published, known to customers, and used to conduct business. Instead, BellSouth noted, a customer would more typically disconnect a secondary line that is no longer needed. BellSouth said that this scenario is not representative of commercial activity and noted that, if this test scenario were removed from the results, BellSouth's success rate for this test would be 97 percent, which exceeds the KPMG Consulting 95 percent benchmark.

Both AT&T and WorldCom raised the issue of Exception 84 in their comments on the Draft Report Workshop of July 12, 2002. However, we agree with BellSouth that the test case of a customer disconnecting its main telephone number is unlikely to be encountered in actual commercial practice. In the absence of that nontypical scenario, we agree the test would have resulted in BellSouth's having met the KPMG Consulting benchmark.

However, because such a service request is within the realm of possibility, we also agree with BellSouth's decision to open a change request that will ensure that it can accurately process a customer's request to disconnect the main telephone number of an account. Nevertheless, this exception would likely never have been issued had the results not been weighted by a nontypical scenario beyond its expected frequency of occurrence in commercial practice. We believe these test order transaction results do not appear to

represent any significantly meaningful impact on an ALEC's ability to compete in the local market.

Exception 171
On June 14, 2002, KPMG Consulting issued Exception 171, which states BellSouth's systems or representatives have not consistently updated the directory databases as specified in orders submitted by KPMG Consulting.

KPMG Consulting applied a professional judgment success standard of 95 percent when testing BellSouth's updates to the directory database, since there is no applicable benchmark by us for this activity. KPMG Consulting verified 152 directory listing records and observed that BellSouth updated 130 records accurately, for a success rate of 85.5 percent.

BellSouth's response is that the discrepancies identified by KPMG Consulting contain only 12 orders, of which five are listed multiple times resulting in 22 discrepancies. For two of those discrepancies (resulting from two of the orders), BellSouth responded that it would open a change request to include the community name when appropriate. But, BellSouth stated, because the directory assistance database automatically defaults to the appropriate city of an account, the absence of a community name has no material impact on a customer's ability to obtain directory listings. For the other 20 discrepancies (resulting from the other ten orders), which are the result of a single test scenario, BellSouth responded that it was opening a change request for updating of business rules to disconnect the main number of an existing multi-line account.

BellSouth contended that, although this scenario is possible, it is rarely encountered in a business environment because such customers would not typically disconnect a main telephone number that is published, known to customers, and used to conduct business. Instead BellSouth noted a customer would more typically disconnect a secondary line that is no longer needed. However, this scenario constituted 13 percent of KPMG Consulting's test transactions. Because it does not represent typical or realistic ALEC transactions, if that single atypical case test scenario and its corresponding 20 issue items were removed from the results, BellSouth's success rate for this test would be 98.5 percent, exceeding the 95 percent benchmark.

Both AT&T and WorldCom raised the issue of Exception 171 in their comments on the Draft Report Workshop of July 12, 2002. However, we agree with BellSouth that the test case of a customer disconnecting its main telephone number is unlikely to be encountered in actual commercial practice. In the absence of that nontypical scenario, we agree the test would have resulted in BellSouth's having met the KPMG Consulting benchmark.

We also, however, because such a service request is within the realm of possibility, agrees with BellSouth's decision to open a change request that will ensure that it can accurately process a customer's request to disconnect the main telephone number of an account. Nevertheless, this exception would likely never have been issued had the results not been weighted by a nontypical scenario beyond its expected frequency of occurrence in commercial practice. We believe these test order transaction results do not appear to represent any significantly meaningful impact on an ALEC's ability to compete in the local market.

c. *Provisioning Test Conclusion*

Based on the overall results of the KPMG Consulting third-party OSS test, we find that BellSouth is providing nondiscriminatory access to its OSS for the Provisioning domain. We find that BellSouth is providing the necessary documentation and support for ALECs to access and use Provisioning systems in a manner similar to that BellSouth provides to its retail and subsidiary customers. Further, the third-party OSS test results prove that BellSouth Provisioning systems are operationally ready and provide an appropriate level of performance.

5. *Maintenance & Repair Test*

a. *Maintenance & Repair Test Summary*

The purpose of the maintenance and repair domain test was to determine whether BellSouth provides ALECs nondiscriminatory access to its maintenance and repair operating support systems. Additionally, the test was to provide a basis of comparison for wholesale and retail operational procedures, systems, and processes supporting maintenance and repair activities.

The test sought to determine whether adequate procedures, documentation and back office support exists, and whether ALECs can identify, report, manage, and resolve trouble reports in a manner similar to BellSouth's retail operations.

Eight detailed maintenance and repair tests included a total of 100 different test criteria. Five tests were transaction-oriented (TVV5, TVV6, TVV7, TVV8 and TVV9) and measured 64 different evaluation criteria. Three tests were process-oriented (PPR14, PPR15 and PPR16) and measured a total of 36 criteria. All 100 maintenance test criteria were satisfied at the time of the Final Report.

b. *Maintenance and Repair Test Exceptions*

A total of four exceptions were identified during the completion of maintenance and repair testing. All four exceptions were satisfied and closed at the time of the Final Report.

c. *Maintenance and Repair Test Conclusion*

Based on the KPMG Consulting OSS test results, we believe BellSouth is providing nondiscriminatory access to its OSS for the Maintenance and Repair domain. We believe BellSouth is providing the necessary documentation and support for ALECs to access and use maintenance and repair systems in a manner similar to that which BellSouth provides to its retail customers. Further, the OSS test results prove that BellSouth maintenance and repair systems are operationally ready and provide an appropriate level of performance.

6. *Billing Test*

a. *Billing Test Summary*

The purpose of the Billing test was to evaluate BellSouth compliance with measurement agreements and to ensure adherence with industry billing standards and sound management practices. Additionally, the test was designed to compare BellSouth wholesale and retail billing processes and practices to ensure ALECs receive nondiscriminatory billing and support.

The Billing domain test evaluated existing BellSouth procedures and bills generated by the Customer Record Information System (CRIS), Carrier Access Billing System (CABS), and Integrated Billing Solution (Tapestry/IBS) systems. The test sought to determine whether BellSouth provides adequate procedures, documentation and technical support, and whether ALECs receive bills in a timely, accurate and complete manner, similar to BellSouth's retail and subsidiary operations.

Five detailed billing tests included a total of 87 different test criteria. Two tests were transaction-oriented (TVV10 and TVV11) and measured 35 different evaluation criteria. Three tests were process-oriented (PPR10, PPR12 and PPR13) and measured a total of 52 criteria. All eighty-seven test criteria were satisfied at the time of the Final Report.

b. Billing Test Exceptions

A total of 20 exceptions were identified during the completion of the five billing tests. All exceptions were corrected and satisfied by the time of the Final Report.

c. Billing Test Conclusion

Based on the results of the KPMG Consulting OSS test, we find that BellSouth is providing nondiscriminatory access to its OSS for the Billing domain. We find that BellSouth provides the necessary documentation and support for ALECs to receive billing in a manner similar to that provided to its retail and subsidiary customers. Further, the OSS test results prove that BellSouth billing systems are operationally ready and provide an appropriate level of performance.

7. Performance Measures Test

a. Performance Measures Test Summary

The purpose of KPMG Consulting's Performance Measures Review (PMR) test was to evaluate BellSouth's systems and processes used to capture retail and wholesale service quality measurements. The PMR test relied on a combination of interviews, operational and statistical analysis, and review of BellSouth supporting documentation. Additionally, the PMR tests relied on BellSouth's

Service Quality Measurement (SQM) plan and data extracted from BellSouth's Performance Measurement Analysis Platform (PMAP). The SQM plan describes in detail the performance measurements produced to evaluate the quality of service delivered to both BellSouth's wholesale and retail customers. The performance measurement reports flowing from BellSouth's SQM plan are posted and produced in PMAP. PMAP results are posted to a BellSouth internet-based Web site which allows regulators and BellSouth's ALEC customers to view and extract individual and statewide ALEC aggregate performance measurement reports.

During the first two years of testing of the performance measures, KPMG Consulting relied on SQM data extracted from BellSouth's PMAP, Version 2.6. In April 2002, BellSouth implemented PMAP Version 4.0. At the time of KPMG Consulting's draft report, PMAP Version 4.0 had just become publicly available. As BellSouth begins producing performance measurement data through the PMAP Version 4.0 environment, KPMG Consulting will conduct additional testing. Completion of testing is projected for October 31, 2002, and a supplemental report is expected to be published in November 2002.

The performance measures test domain consisted of five detailed tests (PMR 1,2,3,4, and 5), which contained 542 evaluation criteria. Currently, all 542 evaluation criteria remain to be tested due to the introduction of BellSouth's PMAP Version 4.0 in April 2002. In testing performed in BellSouth's PMAP Version 2.6 environment, 369 of the 542 (68 percent) evaluation criteria had been satisfied prior to the release of PMAP Version 4.0.

b. ***Performance Measures Test Open Exceptions***

A total of 35 exceptions were identified during the testing of BellSouth's performance measurements in the PMAP Version 2.6 environment. Of the 35 exceptions, 24 were satisfied and closed at the time of publication of KPMG Consulting's Final Report. The remaining 11 open exceptions are to be retested by KPMG Consulting using data extracted from BellSouth's PMAP Version 4.0 environment.

Of the 11 open exceptions, eight are associated with KPMG Consulting's performance measures Data Integrity test (PMR 4). The Data Integrity test evaluates BellSouth's policies and procedures for processing data used in the production of performance

measurement reports. KPMG Consulting could not resolve the eight exceptions using data extracted from BellSouth's PMAP Version 2.6 environment. BellSouth recognized that data may not have properly flowed through the various legacy systems for processing and posting to the BellSouth PMAP Web site, but believes such problems will be corrected in PMAP Version 4.0.

The other three open exceptions are associated with KPMG Consulting's Metrics Calculations Verification and Validation test (PMR 5). The Metrics Calculations test evaluates the process used to calculate and report performance measurement reports and retail analogs and benchmarks. For each of these exceptions, KPMG Consulting found that BellSouth's computation instructions are insufficient to allow replication of the values of the measure being tested. In response to each exception, BellSouth indicated that a data "fix" would be implemented in the PMAP Version 4.0 environment. KPMG Consulting is currently attempting to replicate the measures associated with these three open exceptions using data extracted from PMAP Version 4.0.

In AT&T's post-workshop comments regarding KPMG Consulting's Draft Final Report, AT&T expressed its concerns regarding the 11 open exceptions. AT&T noted that KPMG Consulting could not replicate key performance measures such as flow-through, local number portability, and average completion notices. Additionally, AT&T commented on deficiencies found by KPMG Consulting in regards to BellSouth's new PMAP Version 4.0 system.

Given this, AT&T concluded that, ". . . BellSouth's data is unreliable and that certain calculation methods BellSouth uses to prepare its performance reports are questionable. Accordingly, it would be inappropriate for us to evaluate BellSouth's compliance with Section 271 until KCI [KPMG Consulting] verifies, and BellSouth corrects, its performance data."

In response to AT&T's concerns regarding the validity of the performance measurement data, BellSouth noted that,

> There are a number of other indicia of reliability of the data in addition to the audit upon which this Commission can rely. First, and importantly, in BellSouth's Georgia/Louisiana FCC application, the FCC

> determined that BellSouth's data validation
> processes provided reasonable assurances of
> data reliability and accuracy stating: 'In
> view of the extensive third-party auditing,
> the internal and external data controls, the
> open and collaborative nature of metrics
> workshops in Georgia and Louisiana, the
> availability of the raw performance data,
> BellSouth's readiness to engage in data
> reconciliations, and the oversight of the
> Georgia and Louisiana Commissions, we are
> persuaded that, as a general matter,
> BellSouth's performance data is accurate,
> reliable and useful.

We agree with BellSouth's assessment of the performance measurement data and further note that in the FCC ruling on the Georgia/Louisiana 271 application, the FCC stated, "BellSouth's [performance] data is sufficiently reliable for purposes of conducting our 271 analysis. Consistent with the recommendation of the Department of Justice, however, where specific credible challenges have been made to the BellSouth data, . . . we [FCC] will exercise our discretion to give the data lesser weight, and . . . look to other evidence to conclude that BellSouth has met its obligations under [S]ection 271." Additionally, as noted by BellSouth, "PMAP reports will be monitored by the several state commissions in BellSouth's region and audited annually for the next five years by an outside auditor." FCC Order No. 02-147, ¶20.

Additionally, the self-effectuating enforcement mechanism (SEEM) plan, effective May 2002, will provide a tool to ensure that ALECs receive nondiscriminatory access to the BellSouth's OSS. We contend that BellSouth's SEEM plan establishes a standard against which ALECs and we can measure performance over time to detect and correct degradation of service provided to ALECs.

c.   *Performance Measures Test Conclusion*

The performance measure test is evaluating BellSouth's ability to capture retail and wholesale service quality measures for all domains. While testing is incomplete at this time, we find that 68 percent of the performance measures evaluation criteria were satisfied prior to release of PMAP Version 4.0. We will continue

to monitor performance measurement testing until its completion. Any significant exceptions remaining open at the conclusion of the performance measurement test will be brought to us for resolution.

8. OSS Test Conclusions

KPMG Consulting's Final Report represents the culmination of more than 30 months of exhaustive testing activity involving the joint efforts of the Florida ALEC community, KPMG Consulting, our staff, and BellSouth. We believe that the report results testify to a quantum leap in BellSouth's OSS support capability and delivery during the time between the inception of Docket No. 960786-TP and the completion of this test.

Through the Final Report publication date, a total of 175 test exceptions were issued by KPMG Consulting. All had been resolved except for nine related to the completed areas of testing, and 11 related to the performance measures testing to be completed in October 2002. The vast majority of the 155 resolved test exceptions resulted in an improvement to BellSouth's operations support systems. In addition, we have taken action aimed at correcting the underlying problems noted in three of the open test exceptions, through Order Nos. PSC-02-1107-CO-TP, PSC-02-1034-FOF-TP, and PSC-02-0989-PAA-TP.

We believe the policies and procedures tests (PPR1 through PPR16) examined the basic form and structure of BellSouth's OSS and found them to be sound. Similarly, we believe that the transaction validation and verification tests (TVV1 through TVV11) provided direct evidence of OSS capability through both simulated and real-world transactions. Certain test exceptions remain outstanding and certain test criteria, therefore, were not met at the time of the test report. However, we believe the remaining 14 criteria are not sufficiently significant to warrant a finding of overall noncompliance with the Act and do not deny ALECs a meaningful opportunity to compete with BellSouth in Florida.

While the performance metrics tests (PMR1 through PMR5) are not yet completed (and therefore the related test exceptions and evaluation criteria are not yet resolved) we believe a determination on BellSouth's OSS can still be made by us. The 11 policies and procedures tests and the 15 transaction validation and verification tests completed to date address the five key

operational functions which ALECs perform daily to serve customers and to compete with BellSouth: relationship management, pre-ordering/ordering, provisioning, maintenance/repair, and billing. In and of themselves, performance measures do not impact an ALEC's ability to compete, nor directly affect customers. Instead they reflect the outcomes of the five key end-use customer service activities which in our opinion (and in the opinion of KPMG Consulting) have been thoroughly tested.

Based on the results of the completed KPMG Consulting testing, we find that BellSouth is providing nondiscriminatory access to its OSS. Additionally, we find that BellSouth is providing the necessary documentation and support functions and has demonstrated that its systems are operationally ready and provide an appropriate level of performance.

The two remaining legs of the three-legged stool (commercial data performance and ALEC experience) are discussed below in Sections C and D of this Opinion.

C. COMMERCIAL DATA ANALYSIS

1. Commercial Data Summary

To assist us in determining whether BellSouth is providing nondiscriminatory OSS support to ALECs, we requested KPMG Consulting to produce in its Final Report a description of any differences between the access to OSS functions BellSouth provides itself and that which it provides to ALECs in the aggregate. KPMG Consulting's Commercial Data analysis, provided as Appendix G to the OSS Final Report, is a summary of BellSouth retail and ALEC aggregate state-level performance results extracted from BellSouth's PMAP system for the period January 2002 through March 2002. The commercial data depicts the aggregate ALECs' "real world" experience and represents the second leg of the "three-legged" stool to determine the adequacy of OSS support provided by BellSouth to Florida ALECs. Order No. PSC-00-0104-PAA-TP, issued in Docket Nos. 960786-TL and 981834-TP on February 8, 2000.

In the FCC ruling on BellSouth's Georgia/Louisiana 271 application, the FCC noted the importance of commercial data:

> The persuasiveness of a third-party review
> depends upon the conditions and scope of the
> review. To the extent a test is limited in
> scope and depth, we rely on other evidence,
> such as commercial usage, to assess whether
> the BOC [Bell Operating Company] provides
> nondiscriminatory access to its OSS.

FCC Order No. 02-147, ¶105

Both AT&T and WorldCom believe that BellSouth's commercial
data should not be considered as evidence supporting 271 approval
because KPMG Consulting has not validated the performance data. In
their view, KPMG Consulting will be unable to do so until the
performance measures review is completed. WorldCom specifically
stated:

> Only after BellSouth's performance measurement
> system has been validated can the Commission
> review confidently BellSouth's performance
> data and determine whether it is providing
> nondiscriminatory access to is OSS and
> providing ALECs a meaningful opportunity to
> compete. Accordingly, the Commission should
> refrain from making a 271 recommendation until
> metrics testing has been completed
> successfully.

Similarly, AT&T stated that, "it would be inappropriate for
this Commission to evaluate BellSouth's compliance with Section 271
until KCI [KPMG Consulting] verifies, and BellSouth corrects, its
performance data." AT&T continued by noting that KPMG Consulting
was not able to verify that its experience as a pseudo-ALEC
comports with the commercial data. Additionally, KPMG Consulting
has not completed its review and validation of the Performance
Measurements test. AT&T contends that both are support that
BellSouth is providing nondiscriminatory access to local services.

We assert that although the commercial data has not been
validated by KPMG Consulting, the data can still provide a
meaningful assessment for making a general determination of whether
or not BellSouth is providing parity service. While the current
testing of BellSouth's performance measurements remains open due to

the upgrade of BellSouth's PMAP system, the data has been audited extensively by KPMG Consulting in BellSouth's former PMAP system, PMAP Version 2.6. KPMG Consulting passed 369 of the 542 (68 percent) evaluation criteria in PMAP Version 2.6.

Significantly, the FCC noted in its ruling approving BellSouth's Georgia/Louisiana 271 application that "BellSouth's data has been subject to a series of audits overseen by the state commissions and the previous audits have demonstrated that almost all of the data is reliable and accurate." FCC Order No. 02-147, ¶19

We also note that the ALECs did not provide evidence of a systemic problem with the commercial data. We do not have a formal complaint on file in this docket regarding any invalid commercial data. Additionally, BellSouth's Self-Effectuating Enforcement Mechanism (SEEM) plan, effective May 2002, provides us a means to ensure that ALECs receive nondiscriminatory access BellSouth's OSS into the future.

We believe that the Florida OSS third-party test was broad in scope and depth, and that KPMG Consulting's analysis of commercial data provides additional evidence regarding the current performance of BellSouth's OSS in real-world transactions. BellSouth's commercial data covers many aspects of the services and facilities that BellSouth provides to ALECs under the 1996 Telecommunications Act. The commercial data used in this analysis was obtained from BellSouth's published Monthly State Summary (MSS) report which contains both BellSouth retail and ALEC aggregate state-level performance results. The majority of the MSS values are produced in BellSouth's Performance Measurement Analysis Platform (PMAP) system. The remainder are calculated manually by BellSouth.

The MSS report covers the following 12 categories of measurements as listed in BellSouth's SQM Plan.

- Change Management
- Operations Support Systems (OSS)
- Ordering
- Provisioning
- Maintenance and Repair
- Billing

- Operator Services (Toll) and Directory Assistance
- Database Update Information
- E911
- Trunk Group Performance
- Collocation
- Bona Fide/New Business Request Process

In the MSS reports BellSouth subdivides these measurement categories into 71 individual service quality measurements. As shown in Table C-1, these 71 measurements are further disaggregated into 2,355 submeasures and grouped according to the ALEC modes of market entry available to ALECs in Florida (i.e., Resale, UNE, and Local Interconnection Trunks). BellSouth's performance data on the MSS reports is provided at the submeasurement level.

The performance data results were then compared by KPMG Consulting to benchmarks or retail analogs mandated by us, as appropriate, to determine whether BellSouth is providing parity service to ALECs. Additionally, as part of Docket 960786B-TL and 981834-TP, on a monthly basis, BellSouth files an assessment of the MSS data. Each submeasurement designated as failing to satisfy the benchmark or retail analog is included in the filing.

KPMG Consulting's commercial data analysis covers the months of January, February, and March 2002, the most recent three months of commercial data available prior to publication of KPMG Consulting's OSS Draft Final Report on June 21, 2002. KPMG's Consulting's summary of the three-month weighted average of BellSouth's commercial results, organized by domain is provided in the table below.

Table C-1

BellSouth Commercial Data Summary January-March 2002					
	Diagnostic Measurement Only (a)	Cannot Determine (b)	Failed Standard (c)	Met Standard (d)	Percent Meeting Standard (e) = [(d) / (c) + (d)]
OSS	4	5	8	79	86%
Ordering	79	105	77	202	72%
Provisioning	835	367	67	261	80%
M&R	0	28	33	131	80%
Billing	0	1	4	11	73%
OSDA	0	4	0	0	NA
Database Update	0	3	1	3	75%
E911	0	3	0	0	NA
Trunk Group	0	1	0	0	NA
Collocation	0	1	0	13	100%
Change Management	0	0	3	2	40%
BFR	0	2	0	2	100%
Overall Total	918	548	193	704	78%

The number of transactions shown for many of the level of disaggregation in the performance measurements is often small or zero. Consequently, there are many individual performance measurement results at the disaggregated level that are statistically inconclusive. In addition, over 900 of the measurements currently are being monitored for diagnostic purposes only. Since the diagnostic measures have no designated benchmarks or analogs, they were also excluded from the KPMG Consulting's analysis. Of the 2,355 dissaggregated performance measurements, KPMG Consulting was able to determine if BellSouth was providing parity service for 897 measurements.

KPMG Consulting's analysis shows that BellSouth met the our mandated standard for 704 of these 897 individual performance measures, or 78 percent. KPMG Consulting's evaluation was based on comparison of the calculated weighted average of each submeasure over the three-month period, January through March 2002, to the mandated benchmark or retail analog. BellSouth argues that over the same three-month period, BellSouth satisfied the comparison criteria for 689 of 792 individual performance measures, or 87 percent. BellSouth's assessment is based on the number of individual performance measures that "passed" parity in the MSS reports for any two of the three months and not the weighted three-month average.

Our detailed analysis of the commercial data results organized by domain is provided below. The information is offered as one tool to be used in analyzing whether BellSouth has met its commercial performance commitments. We also considered data from additional months (April, May 2002) as it became available.

2. Relationship Management Commercial Data

In the area of relationship management, we have adopted five measurements regarding Change Management--the process through which ALECs request changes to BellSouth's operations support systems. These measurements are:

- CM-1 Timeliness of Change Management Notices
- CM-2 Change Management Notice Average Delay Days
- CM-3 Timeliness of Documents Associated with Change
- CM-4 Change Management Documentation Average Delay Days
- CM-5 Notification of CLEC Interface Outages

An examination of KPMG Consulting's commercial data analysis regarding the Change Management performance measures indicates that BellSouth did not fully meet its commercial performance commitments over the three-month period, January through March 2002. KPMG Consulting's analysis indicates that BellSouth satisfied the parity criteria for only two of the five submeasures (40 percent). This is attributable to two software release notices (CM-1) and two software documentation releases (CM-3 and CM-4) issued in January and February 2002, respectively, that were not provided to the ALECs on time. BellSouth's commercial data for April and May indicates that two software release notices were sent on time--one

in each month. The commercial data shows that BellSouth did not release any associated software documentation in April and May.

To enhance BellSouth's efficient communication and implementation of system changes affecting ALECs, we ordered BellSouth to establish and implement six new Change Management performance measures as part of BellSouth's SQM in Docket 000121A-TP. Three new measurements were implemented to address concerns over the quality of software release management and the timely correction of software defects. Another three measures were ordered to address concerns over the timely and effective implementation of ALEC-initiated Change requests for new features. These new measurements will provide a view of BellSouth's ability to accomplish its stated objective of "timely and effective implementation of feature and defect change requests." See Order Nos. PSC-02-0989-PAA-TP and PSC-02-1034-FOF-TP.

We believe that the commercial data results show that improvement is needed in the area of relationship management and that BellSouth's Self Effectuating Enforcement Mechanism (SEEM) plan, effective May 2002, will provide future incentive to correct these shortcomings. With the ability to adjust the associated penalties, any less-than-parity results can adequately be addressed by us should they occur.

3. Operations Support Systems Commercial Data

The OSS domain consists of six measurements listed below which capture system availability and response times.

- OSS-1   Average Response Time and Response Interval (Pre-Ordering/Ordering)

- OSS-2   Interface Availability (Pre-Ordering/Ordering)

- OSS-3   Interface Availability (Maintenance & Repair)

- OSS-4   Response Interval (Maintenance & Repair)

- PO-1   Loop Makeup-Response Time-Manual

- PO-2   Loop Makeup-Response Time-Electronic

The data collected for each measurement is regional in scope and is based on a combination of 30 OSS front-end and back-end systems and databases that the ALECs depend on for pre-ordering, ordering, and maintenance and repair activities. Many of these systems are also used by BellSouth in its retail activities. BellSouth makes these OSS systems available so the ALECs can access the same systems and processes that BellSouth uses to provide its retail services.

These six measurements are further disaggregated into 96 submeasures to determine whether BellSouth is providing parity service. From the available data, KPMG Consulting was able to determine whether BellSouth was providing parity service for 87 of the 96 submeasures. KPMG Consulting's analysis indicates that BellSouth satisfied the parity criteria for 79 of these submeasures (91 percent). The results measure the systems' average response times and the percentage of time each of the 30 OSS systems/databases are available for use.

The Average Response Time (OSS-1) for the pre-ordering and ordering systems met the retail analog (parity + 2 seconds) from January to March 2002. For system Interface Availability (OSS-2 and OSS-3) submeasures, BellSouth met or exceeded the benchmark 100 percent of the time for each OSS system that supports pre-ordering, ordering, and maintenance and repair activities.

KPMG Consulting's analysis shows that 76 percent of the submeasures supporting the Average Response Time for the maintenance and repair systems (OSS-4) met the retail analog (parity with retail). An examination of the commercial data indicates that the ALEC response intervals did not meet the retail response intervals for the "less than 4-second" level of disaggregation. According to BellSouth, "for the 4-second interval, there was only approximately one percent or less difference between the ALEC responses as compared with the retail analog. These very small differences in response intervals indicate virtually equivalent service levels for the ALECs and BellSouth retail."

We believe these results support the conclusion that BellSouth is providing parity operations support systems and service in the OSS domain. Although some levels of disaggregation show that improvement is needed, we believe these differences do not

constitute denial of a meaningful opportunity for ALECs to compete.

4. Ordering Commercial Data

BellSouth's commercial data collected for the ordering domain consists of 12 separate measurements listed below.

- O-1 Acknowledgment Message Timeliness

- O-2 Acknowledgment Message Completeness

- O-3 Percent Flow-Through Service Requests (Summary)

- O-4 Percent Flow-Through Service Requests (Detail)

- O-5 Flow-Through Error Analysis

- O-6 CLEC LSR Information

- O-7 Percent Rejected Service Requests

- O-8 Reject Interval

- O-9 Firm Order Confirmation Timeliness

- O-10 Service Inquiry with LSR Firm Order Confirmation (FOC) Response Time

- O-11 Firm Order Confirmation and Reject Response Completeness
- O-12 Speed of Answer in Ordering Center

The 12 measurements, for the most part, are dissagregated and reported into three modes of order handling: 1) fully mechanized; 2) partially mechanized; and 3) nonmechanized. Within each of these categories, there are numerous submeasurements reflecting the various products ALECs purchase for entry in both the residential and business markets. Examples of product disaggregation include UNEs, trunks, and unbundled loop types. Table C-1 reflects a total of 463 submeasurements for the ordering domain.

Of the 463 submeasures, KPMG Consulting was able to determine that BellSouth was providing parity service for 279 of the

submeasures. BellSouth satisfied the comparison criteria for 202 out of 279 submeasurements (72 percent). A break down of the 279 submeasurements by mode of entry and general ordering is provided below. The general ordering category includes BellSouth's Flow-Through (0-3), Acknowledge Message Timeliness (0-1), Acknowledgment Message Completeness (0-2), Service Inquiry with LSR Firm Order Confirmation Response Time (0-10), and Speed of Answer in Ordering Center (0-12) performance measures.

- For Resale, BellSouth met or exceeded the benchmarks for 40 of the 65 submeasures (61 percent).

- For UNE, BellSouth met or exceeded the benchmarks for 151 of the 200 submeasures (76 percent).

- For Local Interconnection Trunks, BellSouth met or exceeded the benchmarks for 3 of the 3 submeasures (100 percent).

- For General ordering BellSouth met or exceeded the benchmarks for 8 of 11 submeasures (73 percent).

Upon further examination of the ordering submeasurements that KPMG Consulting determined to have not met parity service, we note that BellSouth needs to focus on the Flow-Through (0-3), Reject Interval (0-8) and Firm Order Confirmation and Reject Response Completeness (0-11) performance measurements. In Order No. PSC-02-0989-PAA-TP, we ordered BellSouth to provide a plan for improving flow-through results and also doubled the associated SEEM payment amounts.

According to BellSouth, key efforts and corrective actions have been taken to satisfy these performance measurement criteria. Included in these corrective actions were a root cause analysis of the process for electronic rejects and development of a template to lower rejection rate for individual ALECs, coding changes to fix system defects, and establishment of a Flow-Through Improvement Program Management process to determine trends and identify problems.

We believe these results lead to the conclusion that BellSouth is providing parity OSS service in the ordering domain. With BellSouth's Self Effectuating Enforcement Mechanism (SEEM) plan

will further motivate improved performance for those ordering measurements where parity was not met. As a result, we will continue to monitor the areas mentioned above and will take corrective action if appropriate compliance is not shown.

5. Provisioning Commercial Data

BellSouth's commercial data collected for the provisioning domain consists of 14 separate measurements listed below.

- P-1 Mean Held Order Interval and Distribution Interval

- P-2 Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices

- P-3 Percent Missed Installation Appointments

- P-4 Average Completion Interval & Order Completion Interval Distribution

- P-5 Average Completion Notice Interval

- P-6 Percent Completions/Attempts without Notice or <24 Hours Notice

- P-7 Coordinated Customer Conversions Interval

- P-8 Cooperative Acceptance Testing-Percent of xDSL Loops Tested

- P-9 Percent Provisioning Troubles within 30 days of Service Order Completion

- P-10 Total Service Order Cycle Time (TSOCT)

- P-11 Service Order Accuracy

- P-12 LNP-Percent Missed Installation Appointments

- P-13 LNP-Average Disconnect Timeliness Interval & Disconnect Timeliness Interval Distribution

- P-14 LNP-Total Service Order Cycle Time (TSOCT)

The 14 measurements, for the most part, are dissagregated and reported into two types of provisioning processing categories, dispatch and non-dispatch. Like the ordering domain, the 14 provisioning measurements are also disaggregated for various products ALECs order. Examples of product disaggregation include UNEs, trunks, and unbundled loop types. Table C-1 reflects a total of 1,530 submeasurements for the provisioning domain.

Of these 1,530 provisioning submeasurements, 835 have been designated as diagnostic. A diagnostic measurement is one where data is collected but no standard (benchmark or analog) is yet designated to measure BellSouth's performance. An example is the Total Service Order Cycle Time (P-10) measurement. Through the six-month review, additional data review will determine whether this measure should continue to be monitored and a standard set.

KPMG Consulting was able to determine if BellSouth was able to provide parity service for 328 submeasurements. Of the 328, results indicate that BellSouth satisfied the parity criteria for 261 submeasurements (80 percent). A break down of the 328 submeasurements by mode of entry is as follows:

- For Resale, BellSouth met or exceeded the benchmarks or analogs for 74 of the 91 submeasurements (81 percent).

- For UNE, BellSouth met or exceeded the benchmarks or analogs for 181 of the 230 submeasurements (79 percent).

- For Local Interconnection Trunks, BellSouth met or exceeded the benchmarks or analogs for 6 of the 7 submeasurements (86 percent).

BellSouth asserts that provisioning services for both the ALECs and its own retail operations are at a very high level even though the statistical results may technically show that BellSouth failed to meet the analog. Specifically, BellSouth notes that situations exist where there are a large number of observations and the difference between the means is very small, the results can be misleading and not indicative of the absolute level of performance that BellSouth provides to ALECs.

For the provisioning measures where the commercial data indicates that BellSouth was not providing parity service,

BellSouth identified key deficiencies and addressed the corrective actions taken to improve performance measurement results. Included in these corrective actions were root cause analysis of the differences between BellSouth retail and ALEC performance, employee training, assignment of dedicated personnel to specific provisioning tasks, implementation of improved procedures, and improved availability of company facilities.

Upon further examination of the 67 provisioning measures where the data indicate that BellSouth did not provide parity service over the entire three-month aggregated period, our staff performed additional analyses. We found that BellSouth met the analog for 52 and 42 percent of the measures for the months of April and May 2002 respectively--the most recent months of commercial data available. Specifically, BellSouth showed improved performance for the submeasurements that capture the Percent of Missed Installation Appointments.

We believe the commercial data supports the conclusion that BellSouth is providing parity OSS service in the provisioning domain. Additionally, BellSouth's Self Effectuating Enforcement Mechanism (SEEM) will continue to improve performance for those provisioning measurements where parity was not met.

6. Maintenance and Repair Commercial Data

BellSouth's commercial data collected for the maintenance and repair domain provides a basis of determining whether ALECs can identify, report, manage, and resolve trouble reports in a manner equivalent to BellSouth's retail operations. Similar to the provisioning domain, BellSouth's maintenance and repair performance measurements are reported separately for dispatch and non-dispatch operations and further disaggregated by ALEC product type. The maintenance and repair commercial data consists of the following seven measurements which are further divided into 192 performance submeasurements:

- M&R-1   Missed Repair Appointments
- M&R-2   Customer Trouble Report Rate
- M&R-3   Maintenance Average Duration
- M&R-4   Percent Repeat Troubles within 30 Days
- M&R-5   Out of Service (OSS)>24 Hours
- M&R-6   Average Answer Time-Repair Centers

- M&R-7   Mean Time To Notify CLEC of Network Outages

Of the 192 maintenance and repair submeasurements, KPMG Consulting was able to determine if BellSouth was able to provide parity service for 164 submeasurements. KPMG's analysis shows that BellSouth satisfied our criteria for 131 submeasurements (80 percent). A break down of the 164 submeasurements by mode of entry is as follows:

- For Resale, BellSouth met or exceeded the benchmarks or analogs for 49 of the 60 submeasurements (82 percent).

- For UNE, BellSouth met or exceeded the benchmarks or analogs for 80 of the 100 submeasurements (81 percent).

- For Local Interconnection Trunks, BellSouth met or exceeded the benchmarks or analogs for 2 of the 4 submeasurements (50 percent).

The April and May 2002 maintenance and repair commercial data results show that BellSouth satisfied 91 and 90 percent of its performance standards, respectively. We believe these results support the conclusion that BellSouth is providing parity OSS service in the maintenance and repair domain. We also believe BellSouth's Self Effectuating Enforcement Mechanism (SEEM) provides BellSouth further incentive to maintain exceptional performance in the maintenance and repair domain.

7. Billing Commercial Data

The commercial data collected for the Billing domain sought to determine whether ALECs receive bills in a timely, accurate and complete manner, equivalent to BellSouth's retail operations. The data consists of the following eight performance measurements of which four (B-1,2,7,and 8) are further disaggregated by mode of entry:

- B-1 Invoice Accuracy
- B-2 Mean Time to Delivery Invoices
- B-3 Usage Data Delivery Accuracy
- B-4 Usage Data Delivery Timeliness
- B-5 Usage Data Delivery Completeness

- B-6 Mean Time to Deliver Usage
- B-7 Recurring Charge Completeness
- B-8 Non-Recurring Charge Completeness

Table C-1 data shows a total of 15 submeasurements where KPMG Consulting was able to determine whether BellSouth provides parity service. Of the 15, BellSouth's results satisfy our criteria for 11 of the measures (73 percent). For the four submeasurements where BellSouth did not meet the performance standards, BellSouth states that the differences were the result of system problems, bill period delays encountered with BellSouth's billing system upgrade, and back-billed OSS charges applied to ALEC accounts.

Our examination of the 15 billing submeasurements for the April and May 2002 commercial data indicates that BellSouth met 87 and 93 percent of the standards, respectively. We believe these results support the conclusion that BellSouth is providing parity service in the billing domain. Additionally, we believe that BellSouth's Self Effectuating Enforcement Mechanism (SEEM) provides BellSouth further incentive to maintain the high level of billing support performance.

8. Other Domains Commercial Data

The remainder of BellSouth's commercial data consists of performance measurements collected for the following six domains: 1) Operator Services and Directory Assistance; 2) E911; 3) Database Update Information; 4) Trunk Group Performance; 5) Collocation, and; 6) Bona Fide/New Business Request Process. These six domains are further subdivided into 18 measurements discussed separately below.

BellSouth's Operator Services/Directory Assistance and E911 domains consist of the six measurements listed below. Each measurement and submeasurement are categorized as "parity by design." In other words, the systems used to provide these services serves both BellSouth retail and ALECs and cannot distinguish between BellSouth retail and ALEC customers. As a result, by definition, parity service is provided.

- OS-1 Speed to Answer Performance/Average Speed to Answer-Toll

- OS-2 Speed to Answer Performance/Percent Answered with "X" Seconds - Toll

- DA-1 Speed to Answer Performance/Average Speed to Answer-Toll

- DA-2 Speed to Answer Performance/Percent Answered with "X" Seconds-Directory Assistance

- E-1 Timeliness

- E-2 Accuracy

- E-3 Mean Interval

The Database Update Information domain consists of performance measurements to determine whether BellSouth's Line Information Database (LIDB), and Directory Assistance and Listings databases are updated in a timely and accurate manner. Also included in this domain is a measurement of the percentage of NXX(s) and Location Routing Numbers LRN(s) loaded in end office and tandem switches by the Local Exchange Routing Guide (LERG) effective date. The three measurements in this domain are:

- D-1 Average Database Update Interval

- D-2 Percent Database Update Accuracy

- D-3 Percent NXXs and LRNs Loaded by the LERG Effective Date

The Average Database Update Interval (D-1) and the Percent Database Accuracy (D-2) measurements are divided into three submeasurements, one for each of the databases listed above. The submeasurements included in the Average Database Update Interval (D-1) are "parity by design". by definition, parity service is provided. For the Percent Database Accuracy (D-2) measurement, KPMG Consulting's aggregated analysis shows that BellSouth met the standard (95 percent accurate) for each submeasurement.

KPMG's analysis shows that BellSouth did not meet the standard (100 percent by LERG effective date) for the Percent NXXs and LRNs Loaded by the LERG Effective Date (D3) measurement. BellSouth met

the effective date for loading 29 of the 30 NXXs implemented during March 2002. Upon examining the most recent months of commercial data available, we found that BellSouth met the effective date for loading 141 NXXs implemented in April and May 2002.

BellSouth's trunk blocking measurement compares BellSouth retail's trunk blockage rate to those of aggregate Florida ALECs. The measurement is TGP-1 Trunk Group Performance-Aggregate

KPMG Consulting's analysis of the trunk group performance measurement shows zero volume for the three-month aggregate period. This is indicative of zero violations where BellSouth allowed greater than .5 percent of blockage on ALEC calls for two consecutive hours. We examined the hourly detailed monthly data and found the difference in blockage rate for the entire period was within the .5 percent difference allowed by this performance measure indicating that parity service levels were provided.

According to KPMG's analysis, BellSouth met the approved standard for 100 percent of all collocation opportunities in each of the submeasurements with ALEC activity in January, February and March 2002. BellSouth provides the following three separate collocation measurements:

- C-1 Collocation Average Response Time
- C-2 Collocation Average Arrangement Time
- C-3 Collocation Percent of Due Dates Missed.

Similarly, BellSouth met the approved standards for all new business requests. The following two measurements are used to capture the business request process:

- BFR-1   Percentage of BFR/NBR Requests Processed Within 30 Business Days

- BFR-2   Percentage of Quotes Provided for Authorized BFR/NBR Requests Processed Within X (10/30/60) Business Days

In summary, KPMG Consulting's analyses of these six domains shows that BellSouth satisfied 18 out of the 19 performance measurements (95 percent), where a parity determination could be

made.   We believe these results support the conclusion that
BellSouth is providing parity service in these six domain. We also
believes BellSouth's Self Effectuating Enforcement Mechanism (SEEM)
provides BellSouth further incentive to maintain exceptional
performance in each of these domains.

9.   Commercial Data Conclusion

We believe the commercial data analysis performed by KPMG
Consulting generally confirms the OSS test results. Further, the
analysis supports the conclusion that BellSouth is providing
nondiscriminatory access to its OSS. Additionally, we believe these
results show that BellSouth is providing the necessary
documentation and support functions, has demonstrated that its
systems are operationally ready, and provide an appropriate level
of performance.

The ALECs argue that BellSouth's commercial data does not
support 271 approval because the data has not been validated by
KPMG Consulting and cannot be validated until the performance
measures review is completed.   It is our opinion that the
commercial data review supplements a thorough third-party test and
provides a cross check on its conclusion that BellSouth's OSS
performed as required by the 1996 Telecommunications Act.

We would also note that in the FCC ruling on BellSouth's
Georgia/Louisiana 271 application, the FCC acknowledged the
reliability of BellSouth's performance measures:

> In view of the extensive third-party auditing,
> the internal and external data controls, the
> open and collaborative nature of metric
> workshops in Georgia and Louisiana, the
> availability of the raw performance data,
> BellSouth's readiness to engage in data
> reconciliations, and the oversight of the
> Georgia and Louisiana Commissions, we are
> persuaded that, as a general matter, Bell's
> performance metric data is accurate, reliable,
> and useful.   We furthermore cannot find
> general allegations of problems with the
> reliability of BellSouth's data to provide
> sufficient   reason   to   reject   BellSouth's

application. BellSouth's data has been
subject to a series of audits overseen by the
state commissions, an the previous audits have
demonstrated that almost all of the data is
reliable and accurate.

We will continue to monitor performance measurement testing
until its completion. Upon completion of the performance measures
test, any significant unresolved issues will be addressed by this
Commission.

D. ALEC EXPERIENCE

1. ALEC Experience Summary

At the request of several ALECs, in late 2001 we added the
third leg of the stool for its Section 271 determination on
BellSouth - the ALEC Experience Workshop. ALECs requested that the
we heard first-hand their descriptions of problems and needs
regarding BellSouth's OSS. This workshop was held on February 18,
2002 and all Florida ALECs were invited to make presentations.
Participating ALECs provided summaries and data in advance for
response by BellSouth, and we asked questions of the parties.
Following the workshop all parties were invited to file comments on
March 18, 2002.

We have assessed these workshop presentations and the post-
workshop comments, identifying over 50 issues raised by ALECs.
Some of these issues have been addressed and resolved during the
ensuing months of testing. Others have been addressed through our
action in Order Nos. PSC-02-1107-CO-TP, PSC-02-1034-FOF-TP, and
PSC-02-0989-PAA-TP. In some instances, insufficient information was
provided, either by ALECs or the OSS third-party test results, to
determine whether a serious or systemic problem had been
identified.

Our focus throughout our evaluation was on BellSouth's OSS
support of the Florida ALEC community as a whole. However, we
realize that since these systems and processes are dynamic, and
since variations occur in volume and types of orders placed, the
quality of OSS support may vary from one ALEC to another at a given
time. Therefore, we placed major emphasis on ALEC problems cited
that represented either systemic problems, or ones that impacted a

large percentage of a particular ALEC's orders.

Efforts towards resolution of remaining issues will continue in various forums for other issues which, in our opinion, do not constitute significant impediments to competition on an aggregate Florida basis.   Where ever necessary, in the event successful resolution of such issues cannot be reached, the matter will be considered by us.

A brief explanation of the parties' positions, as well as our analysis of the issues raised by ALECs and their impact on our recommendation regarding BellSouth's 271 application, are provided below. A more detailed description of the parties positions on these issues is provided in Attachment B. Where applicable, this detailed discussion also presents a summary of KPMG Consulting's position regarding how the particular issue was dealt with in the third-party testing.

2.   Relationship Management ALEC Experience

a.   *Relationship Management ALEC Experience Summary*
During the February 18, 2002 workshop and the subsequent comment period, ALECs identified six OSS-related issues for the Relationship Management domain. Of these six issues, we believe that five have now been satisfied and that one is not significant enough to warrant a finding of noncompliance on the part of BellSouth.   Each of the issues raised by the ALECs will be discussed below.

b.   *Relationship Management ALEC Experience Issues*

Prioritization
ALECs argue that internal BellSouth processes inhibit or prevent a fully collaborative Change Control Process (CCP). ALECs say that they are unable to rationally prioritize Change Requests due to a lack of mutuality in impact assessment and resource planning as well as a lack of visibility into release management processes.   BellSouth argues that the current BellSouth CCP satisfies a five-point FCC criteria for a change control process. BellSouth also states it has changed the manner in which prioritization meetings are conducted. BellSouth contends that it listens to ALECs and has modified the Change Control Process to create a process in which BellSouth collaborates with ALECs on

prioritizations, Change Request acceptance or rejections, determinations of ALEC-impacts, etc. We note that in Order No. PSC-02-1034-FOF-TP, we ordered BellSouth to implement what is called the "50/50 plan" for release management. ALECs and BellSouth have agreed on a definition of what system changes will impact ALECs so that they will have visibility into those. BellSouth has expanded the scope of the Change Control Process to include more systems, including Legacy, back office and billing systems. We believe that ALECs are now able to express priorities on changes they wish to see made to BellSouth OSS. We will continue to monitor the BellSouth Change Control Process over the next year. We will take additional action, when needed, after implementation of the "50/50" plan.

Backlog of Change Requests

ALECs noted that there was no time frame for the implementation of ALEC-initiated Change Requests. As a result, a large backlog of Change Requests accumulated. ALECs point out that BellSouth implemented its own Change Requests in an average of 60 days average while taking 164 days to implement ALEC Change Requests. In comparison, either no or minimal backlogs exist at three other Regional Bell Operating Companies. BellSouth stated it is committed to the ongoing development of an efficient and effective Change Control Process. BellSouth proposed a new process for release management to permit ALECs to use 50 percent of all release capacity remaining after implementation of defects and mandates. In early 2002, BellSouth also stated a commitment to implement the top 15 priority Type 5 Change Requests during 2002. We believe that our Order No. PSC-02-1094-PAA-TP established a 60-week cycle for implementation of all ALEC-initiated change requests and that it may resolve this issue. Additionally, the three related measures which were ordered will assist us in further monitoring efforts. We will continue to observe the BellSouth Change Control Process over the next year and take any appropriate action as needed.

Defect Correction Timeliness

ALECs contend that BellSouth takes too long to classify and correct defects. As a result, a backlog exists at BellSouth of defects waiting for fixes. BellSouth responds that the FCC adequately addressed these complaints together in its Georgia/Louisiana 271 application approval. BellSouth agrees that a reduction of defects is beneficial for ALECs. BellSouth also

responds that the FCC was "reassured that new measures being developed in Georgia will measure how well BellSouth fixes defects within the required time frames." We believe that our Order No. PSC-02-0989-PAA-TP, which requires BellSouth to establish tighter defect correction intervals may resolve this issue. We also ordered the establishment of three associated measures; one diagnostic measure and two measures that included are the SEEM plan to encourage BellSouth to both prevent and correct future defects. Tighter intervals will also diminish ALEC and our concerns about miscoding the severity levels of defects by BellSouth. Again, we will continue to observe the BellSouth Change Control Process over the next year and take any appropriate action as needed.

Billing Systems in Change Control Process

ALECs contended that the scope of the BellSouth Change Control Process did not include billing. ALECs contended that it is a crucial function and that they need to be able to propose changes as well as see changes made to billing systems. BellSouth held that billing is outside the scope of CCP. According to BellSouth, the industry's ad hoc Ordering and Billing Forum is the appropriate forum because billing systems are built to industry standards. BellSouth argued that its retail customers are using the exact same systems as the ALECs. We note that in May 2002, ALECs and BellSouth agreed to amendments widening the scope of the Change Control Process to include billing systems changes. We believe this issue is now resolved.

Software Testing Process Improvements

ALECs believe that BellSouth software releases contain excessive defects or errors, in part due to inadequate testing. ALECs say that end-to-end testing would minimize software defects after release. BellSouth contends that, in the Georgia/Louisiana 271 proceeding, the FCC discarded ALEC complaints regarding inadequate testing. BellSouth contends that the evidence shows that BellSouth does adequately test for defects. BellSouth is working with ALECs to implement and expand the availability of CLEC Application Verification Environment (CAVE). BellSouth agrees that a reduction of coding defects is beneficial for ALECs and that software releases with numerous defects can significantly impede ALEC business. We believe our Order No. PSC-02-1034-FOF-TP, requiring BellSouth to establish three measures concerning defect correction and prevention will assist in resolving this issue. One of the measures which is included in the SEEM Plan requires

BellSouth to expand the number of scenarios it tests prior to release as an incentive to prevent defects. The two other measures encourage BellSouth both to avoid defects and to correct them rapidly. We also note the positive steps BellSouth has taken to improve the functionality and availability of CAVE.

Long Account Team Resolution Intervals

ALECs state that a lack of responsiveness to inquiries from the BellSouth account team functions exacerbates ALEC problems. ALECs say that multiple interface points for ALECs confuse what should be a simple liaison process between ALECs and BellSouth. ALECs also say that they cannot get timely or consistent answers to their inquiries of BellSouth Account Teams or CLEC Care Teams. BellSouth policy is for Account Teams and CLEC Care Teams to acknowledge receipt of an ALEC inquiry within 24 hours. BellSouth contends that its teams work cooperatively with ALECs in providing reasonable and achievable target dates for resolving all inquiries. We encourage ALECs to use existing escalation procedures whenever timeliness of resolutions to their inquiries of BellSouth Account and CLEC Care Teams is an issue. We believe that internal BellSouth procedures could be improved to optimize resolution intervals. We will continue to monitor BellSouth Account Team activities and processes. If resolutions are not reached in a timely manner, we will take the appropriate action to seek a resolution. This issue does not constitute denial of a meaningful opportunity for ALECs to compete.

c.   *Relationship Management ALEC Experience Conclusion*

ALECs identified six issues in the Relationship Management domain during the February 18, 2002 workshop and subsequent comment period. Of the six issues in Relationship Management, we find that five have been resolved. The remaining issue involves the timeliness of BellSouth resolutions to ALEC inquiries. We will monitor Account Management activities and will take further action that may be required on this issue. Additionally, we will monitor activities in the area of the BellSouth Change Control Process. We find that the remaining identified issue does not warrant a finding of noncompliance by BellSouth.

3.   Pre-Ordering and Ordering ALEC Experience

   a.   *Pre-Ordering and Ordering ALEC Experience Summary*

   During the February 18, 2002 workshop and the subsequent comment period, the ALECs identified 15 OSS-related issues for the Pre-Ordering and Ordering domain. Of these 15 issues, we believe that none are significant enough to warrant a finding of noncompliance on the part of BellSouth. Each of the issues raised by the ALECs will be discussed below.

   b.   *Pre-Ordering and Ordering ALEC Experience Issues*

   Inaccurate CSRs
   ALECs believe that BellSouth's Local Carrier Service Center (LCSC) delays its updating of CSRs causing errors, time delays, added cost, and customer dissatisfaction. According to BellSouth, the process for updating the CSRs for retail and wholesale are the same, with 93 percent of CSRs updated in 24 to 72 hours. We believe resolution of this issue is being discussed in the FPSC Competitive Topics Forum. If resolution on this issue is not reached in a timely manner, we will take the appropriate action to seek a resolution.

   Facilities Reservation Numbers Restrictions
   The ALECs state they are prevented by BellSouth from aligning back office when sending Facilities Reservation Numbers electronically. BellSouth complains that the one ALEC was abusing a trial process to obtain a manual loop makeup inquiry free of charge. We believe this issue affects a small number of ALECs and has not been shown to reflect a systemic problem. Further, we believe this issue does not constitute denial of a meaningful opportunity for ALECs to compete. We note that Network Telephone did develop a method to obtain Loop Make-up information using a combination of manual request and electronic submission during a trial process by BellSouth.

   Inaccurate Information from LENS
   ALECs state that inaccurate or incomplete data from LENS is resulting in higher costs, longer service due dates, and customer dissatisfaction. BellSouth states any inaccuracies in the back-end

databases accessed by LENS are not discriminatory because they affect it in the same fashion as competing carriers. We believe during OSS testing, KPMG Consulting issued pre-order loop makeup inquires using addresses and facilities information provided by BellSouth for the purposes of setting up the pseudo-ALEC. Using the accounts set up by BellSouth for the pseudo-ALEC, KPMG Consulting did experience some instances where address validation did not occur due to inaccurate information. However, we agree with BellSouth when it states that when either BellSouth or an ALEC needs additional loop makeup information that is not available electronically, both parties would be required to submit a manual loop makeup inquiry request. As BellSouth states, its loop makeup information process operates in a nondiscriminatory manner because any information that is missing for the ALEC is also missing for BellSouth.

Inaccurate information from TAG

ALECs state that information cannot be gathered from TAG CSRs that is available from LENS. On February 2, 2002, in Release 10.3.1, Change Request 0498 was implemented to correct this defect. Since this date, BellSouth states it is not aware of any ALEC reporting a problem related to the defect that was addressed in Change Request 0498. Therefore, BellSouth states it considers this issue resolved. We believe this defect was resolved with implementation of Change Request 0498 in Release 10.3.1 on February 2, 2002.

Pending Service Orders

ALECs state that pending BellSouth service orders prohibit end users from switching to an ALEC. BellSouth claims that ALECs are able to determine in the pre-order mode from an indicator on the CSR whether there is a pending service order. BellSouth states it is involved with Change Request 0127 regarding a request for new pre-ordering functionality in LENS and TAG which would provide ALECs with indicator(s) on the Customer Service Record (CSR) whenever a "pending service order" exists for the end-user customer. This indicator would act to alert the ALEC representative that service order activity is taking place on the end user's service. We note that during the test, KPMG Consulting stated they experienced some issues relating to pending services orders and the inability to make changes to accounts with this status. KPMG Consulting reported that, in most instances, this was due to activity requests on the account that were made by KPMG

Consulting. We also note that Change Request 0127 (ranked seven of 26 at the June 7, 2002 change control process meeting) is open and provides a method of alerting the end user through the TAG format that a CSR is pending on a service order during the pre-ordering stage. We further note that resolution of this issue is also being discussed in the FPSC Competitive Topics Forum. If resolution on this issue is not reached in a timely manner, we will take the appropriate action to seek a resolution.

Manual Handling of Local Service Requests

ALECs state that manual handling of orders results in higher costs and introduction of errors at BellSouth's LCSC, causing delays and inaccuracy in provisioning, and customer dissatisfaction. According to BellSouth, nondiscriminatory access does not require that all LSRs be submitted and flow-through electronically, requiring no manual processing. We believe, as noted in staffs recommendation in Docket No. 000731-TP, dated June 8, 2001, that the proper mechanism to address this issue is the change control process. It would be beneficial for ALECs to have the ability to electronically enter all LSRs and have them flow through to Service Order Control System (SOCS) without designed manual fall-out. However, the system in place does not create disparity for ALECs regarding order submission. Therefore, we believe this issue is currently best suited to be pursued through the change control process. We further note that, with regard to electronically ordering unbundled copper loop-non-designed, this issue is currently being addressed in the change control process via Change Request 0541 (electronic ordering portion of 0541 scheduled for implementation with release 10.6 on August 25, 2002) and is also being discussed in the FPSC Competitive Topics Forum. If resolution on this issue is not reached in a timely manner, we will take the appropriate action to seek a resolution.

Local Freeze Lifts

ALECs state that BellSouth does not properly execute Primary Carrier (PC) Freeze lifts, thereby delaying ALEC LSRs. BellSouth states that the migration of an end user with a Local/PC freeze on their account is governed by specific FCC rules and that its current process is in compliance with FCC slamming rules (47 CFR Part 64; FCC Docket Nos. 94-129; 00-255, and 01-67) which describe the allowable procedures to remove preferred carrier freezes. We believe KPMG Consulting adequately tested this issue and the relevant test criteria were satisfied. We note that KPMG

Consulting issued orders that included the freezing and unfreezing of the Primary Interexhange Carrier (PIC) and the Local Primary Interexchange Carrier (LPIC). KPMG Consulting did not experience functionality issues associated with this activity. However, we believe resolution of this issue is also currently being discussed in the FPSC Competitive Topics Forum. If resolution on this issue is not reached in a timely manner, we will take the appropriate action to seek a resolution.

ADSL USOC Causes Invalid Clarifications

ALECs state that whenever an ADSL Uniform Service Order Code (USOC)(or ADL11) is on the CSR, the ALEC is blocked from transferring the customer's service from BellSouth. ALECs further state that BellSouth delays the delivery of UNE-P to customers who have an ADSL USOC appearing on their CSR. BellSouth states that two change requests (Change Request 0399-combined with Change Request 0493 and implemented in November 2001, and Change Request 0625 currently scheduled for Release 11.0 on December 8, 2002) have been issued, and a manual work-around has been developed and is in place to deal with this issue. We note KPMG Consulting did encounter this situation during testing. We believe KPMG Consulting tested this issue adequately and relevant test criteria were satisfied. We further believe that the submission of two change requests by ALECs, and the development of a manual work-around in the interim by BellSouth is an indication that the ALECs and BellSouth are working to resolve this issue.

LCSC Effectiveness Concerns

ALECs state that inadequate LCSC staff skill levels foster confusion and wasted time in resolving rejects and clarifications and high work load results in delays. In addition, ALECs also argue that the load on the LCSC remains high and the resulting delays in partially mechanized order processing have not changed. BellSouth states its LCSC representatives are trained to handle the majority of ALEC issues in a timely manner over the phone and that an escalation process is also in place. BellSouth also points out that, for the months of January through March 2002, on an aggregate basis, it surpassed the 85 percent benchmark for Reject Interval (O-8) and FOC Timeliness (Partially Mechanized and Manual) (O-9) measurements. We believe KPMG Consulting adequately tested LCSC operations and the relevant test criteria were satisfied. We also believe that some ALEC LCSC issues are currently being addressed in the FPSC Competitive Topics Forum. If resolution on this issue is

not reached in a timely manner, we will take the appropriate action
to reach a resolution. Regarding delays in rejects and FOCs, for
the period January through March 2002, BellSouth is meeting the
benchmark (ALEC Aggregate, Florida) for the non mechanized Reject
Interval and FOC Timeliness (O-8, and O-9), while falling behind
for the partially-Mechanized component of the same two measures.
We believe the SEEM plan, effective May 2002, will provide adequate
incentive for BellSouth improvement in Reject Interval (O-8) and
FOC Timeliness (O-9) measurements.

System Outages

ALECs state that system outages continue to reduce ALEC
operating efficiency and effectiveness. BellSouth states it meets
Florida-approved performance measures for OSS availability.
BellSouth states that, in fact, during the three-month period
January 2002 through March 2002, EDI was available more than 99.7
percent of the time and both TAG and LENS exceeded the monthly
benchmark. We believe KPMG Consulting adequately tested this issue
and the relevant test criteria were satisfied. Aggregate Florida
commercial data does not support the ALEC claim. We believe that
for the months of January through March 2002, BellSouth exceeded
the OSS-2 metric "Interface Availability (Pre-Ordering/Ordering)."

Invalid Clarifications and Rejects

ALECs state that invalid LSR clarifications add time and
expense to the order process and result in customer dissatisfaction
and loss. BellSouth states it has a high accuracy rate on manual
clarifications.   BellSouth replies to WorldCom's complaint by
stating that WorldCom received 5,928 clarifications in January 2002
and that WorldCom called the LCSC to challenge the validity of only
289 of those clarifications. BellSouth states that of the 289
challenged, only 65 (1.09 percent) were clarified by the LCSC in
error. BellSouth states it will continue to keep these records to
ensure that its performance for WorldCom and other ALECs remains
high.   We believe this issue does not constitute denial of a
meaningful opportunity for ALECs to compete. We acknowledge that
KPMG Consulting tested this issue and subsequently issued Exception
165 (discussed in the Pre-Ordering and Ordering Test Open
Exceptions section of this Order), which remains open. We further
note that of the 54 clarifications classified as incorrect by KPMG
Consulting on the final sample taken, BellSouth has instituted
corrective action for 33, while maintaining that the remaining 21
were incorrectly classified as errors by KPMG.

Electronic Ordering

ALECs claim that the inability to electronically order (required manual ordering) all products results in BellSouth errors, timeliness issues and increased cost and customer dissatisfaction/loss. BellSouth states that in 2001, 89 percent of the 4.6 million LSRs submitted were done so electronically and that the electronic submission rate is increasing. BellSouth states that the issue of electronic ordering of Unbundled Copper Loop-Non-Designed (UCL-ND) is currently pending in the change control process (CR0541, with its electronic ordering portion currently scheduled for Release 10.5 on August 25, 2002). We believe that ideally everything should be electronically orderable. However, BellSouth appears to be working toward this goal by virtue of the fact that 89 percent of LSRs were processed electronically in 2001. We acknowledge some order types may always have to be issued manually due to their complex nature. We further note that, with regard to electronically ordering UCL-ND, this issue is currently being addressed in the change control process via Change Request 0541, and is being discussed in the FPSC Competitive Topics Forum. If resolution on this issue is not reached in a timely manner, we will take the appropriate action to reach a resolution.

Hunting

ALECs claim that defects in ordering the Hunting feature cause delays and customer dissatisfaction. BellSouth states it addressed the issues surrounding Parsed CSR-Hunting in Change Request 0651, which was implemented in Release 10.4 on March 23, 2002. Regarding all other matters regarding Hunting, BellSouth states it has been working with the ALECs to address those issues and believes it has addressed those issues. We believe KPMG Consulting has adequately tested this issue and the relevant test criteria were satisfied. In addition, Release 10.5 will include a system fix that is expected to correct the remaining defects. We believe this issue does not constitute denial of a meaningful opportunity for ALECs to compete.

Due Date Calculator Not at Parity

ALECs state that BellSouth's due date calculator continues to return improper (longer) intervals for various Request Type/Activity Type combinations. BellSouth states that it provides ALECs with due date information in substantially the same time and manner as it does for its retail operations. BellSouth claims it is committed to returning to the ALEC the first available due date

for the activity requested. We believe KPMG consulting has adequately tested this issue. Furthermore, we believe this issue does not constitute denial of a meaningful opportunity for ALECs to compete. Testing indicated that BellSouth returns a Firm Order Confirmation Due Date (FOC DD) equal to the Desired Due Date (DDD) 73.82 percent of the time in the EDI interface and 82.26 percent for the TAG interface.

Disparate Flow-Through

According to ALECs, their flow-through rate is lower when compared to retail, indicating the ordering process is not functioning at parity. BellSouth states that it is flawed analysis to compare BellSouth flow-through to ALEC flow-through; We agree that ALEC Flow-Through should be compared to a bench mark not to BellSouth Flow-Through per Order PSC-01-1819FOF-TP. Additionally, ALEC flow-through should be compared to the approved benchmarks. We believe the SEEM plan, effective May 2002 and modified by our Order No. PSC-02-1107-CO-TP, will provide adequate incentive for BellSouth improvement in flow-through.

c. **Pre-Ordering and Ordering ALEC Experience Conclusion**

ALECs identified 15 issues for the Pre-Ordering and Ordering domain during the February 18, 2002 workshop and the subsequent comment period. Of the 15 issues, we expect many will be resolved via mechanisms already in place, such as the change control process, and the FPSC Competitive Topics Forum. Others, such as some LCSC concerns and flow-through issues, will be closely monitored by us through performance measures with SEEM plan payments applying as necessary. For the Pre-Ordering and Ordering domain, we believe that the issues identified do not warrant a finding of noncompliance on the part of BellSouth. However, we will continue to monitor BellSouth activities in the area of flow-through and others as necessary. If resolution on this issue is not reached in a timely manner, we will take the appropriate action to reach a resolution.

4. **Provisioning ALEC Experience**

a. **Provisioning ALEC Experience Summary**

During the February 18, 2002 workshop and the subsequent comment period, the ALECs identified six OSS-related issues for the

Provisioning domain. Of these six issues, we believe that all have
now been satisfied or are not significant enough to warrant a
finding of noncompliance on the part of BellSouth. Each of the
issues raised by the ALECs will be discussed below.

b.   *Provisioning ALEC Experience Issues*

Provisioning Accuracy
ALECs state that BellSouth provisioning has resulted in an
unacceptably high number of lines provisioned incorrectly, which
negatively impacts ALECs and their customers. BellSouth states
that, regarding WorldCom's analysis of a 500 line sample, its
reported 2.5 percent error rate would mean that BellSouth had
achieved a 97.5 percent accuracy rate. While obviously different
views of WorldCom's audit sample performance numbers are presented,
that error rate of 2.5 percent and performance rate of 97.5 percent
represent results well within the professional judgment parameters
KPMG Consulting benchmarks as an acceptable success rate of 95
percent.   The FCC stated it found that BellSouth accurately
processes manual and electronic orders, that it was able to
evaluate BellSouth's performance, and that BellSouth's performance
is substantially in compliance with appropriate standards. FCC
Order No. 02-147, ¶159. We believe that the deciding factor for
provisioning accuracy rests with the results of the third-party OSS
test, which shows 96 percent of test criteria satisfied.

Incomplete Firm Order Confirmations (FOCs)
ALECs state that BellSouth provides incomplete FOCs, which
provide insufficient data, specifically circuit identifications,
that ALECs need to reference for status inquiries and which, if
omitted, could cause database discrepancies. BellSouth states
that, besides its commitment to discuss this issue directly with
individual ALECs such as KMC, a change request reflecting ALEC
desires for the inclusion of circuit identifications on FOCs, as
expressly requested by Covad, was opened in the Change Control
Process by the ALEC community. We believe that this issue is being
appropriately resolved in view of BellSouth's commitment that it
would work with ALECs and its response to ALEC-initiated Change
Request 621, which led to inclusion of circuit identifications on
FOCs in Release 11.0 scheduled for implementation December 8, 2002.

UNE Loop (UNE-L) Issues
ALECs state that ALEC orders for UNE loops are being rejected
in error due to circuit ID discrepancies and incorrect facilities

assignments within BellSouth because COSMOS (Computer System for Mainframe Operations) delivers insufficient information. BellSouth represented that when processes are identified so that when COSMOS or Loop Facilities Assignment and Control System (LFACS) issues require monitoring or manual activity, these issues are being addressed directly as action items to the in-progress development processes by BellSouth product teams. We believe that there is a lack of supporting evidence in the OSS test results or in the commercial data indicating a systemic problem in this area. We will continue to monitor issues with COSMOS and LFACS and will take additional action if necessary.

Line Loss Reporting

ALECs state that BellSouth's failure to provide complete line loss reporting results in critical problems due to being uninformed of ALEC customer departures, which can result in double billing of customers. BellSouth states this issue is believed to be resolved as a result of issuance of Carrier Notifications implementing changes to the standard web-based Line Loss Reporting mechanism for the ALEC community. That Line Loss Report now reflects all TN's (telephone numbers) that will be qualified for line loss notification after all provisioning and related processes have been completed. BellSouth also reports that it has been working with WorldCom to refine WorldCom's unique specifications for its contractually tailored Network Data Mover (NDM) Line Loss Report. We believe this issue to be moving toward a satisfactory resolution. The FCC has stated that line loss report discrepancies, relatively limited in duration and scope, are not indicative of a systemic problem with BellSouth's OSS. FCC Order No. 02-147, ¶163. We believe that the deciding factor for this issue rests upon the results of the third-party OSS test, for which there are no open observations or exceptions related to this issue.

Line Sharing

ALECs state that they have experienced excessive line sharing provisioning intervals, significant troubles and repeat troubles resulting from BellSouth test sets not catching loop inaccuracies. BellSouth states that it has demonstrated commitment to ensuring both manual and electronic Line Sharing orders are successfully processed. Change request 779 was opened in the Change Control Process reflecting ALEC desires for sequencing the billing portion of Line Sharing orders only after the actual provisioning work is physically completed. BellSouth responded that it would be addressed in the 11.0 release scheduled for December 8, 2002. BellSouth reported statistical measurement results indicating BellSouth met retail analogs in January and February 2002 for order

completeness intervals and in January and March 2002 for provisioning troubles within 30 days. We believe that the deciding factor for this issue rests upon the results of the third-party OSS test, for which there are no open observations or exceptions related to this issue. Additionally, the third-party OSS test included a commercial data review that covered loop qualification accuracy, 30 day trouble history, jeopardy notifications, service order confirmation accuracy, and missed appointments. We believe that the test and the commercial data results for line sharing confirm BellSouth's representation of the existence of parity between BellSouth's retail business and service provided to the ALEC community.

Integrated Digital Subscriber Line (IDSL)
ALECs state that frequently BellSouth-provisioned IDSL loops include high numbers of repeat trouble tickets, missed installation appointments, and problems with line card and options settings. BellSouth states that it has demonstrated commitment to ensuring that such unbundled local loops are successfully processed. It reported statistical measurement results indicating BellSouth met retail analogs in January and February 2002 for provisioning troubles within 30 days. Staff believes that the deciding factor for this issue rests upon the results of the third-party OSS test, for which there are no open observations or exceptions related to this issue. Additionally, the third-party OSS test included a commercial data review that included, for those measures having ALEC activity during January through March 2002, results showing BellSouth met the standard for xDSL relative to order completion intervals, missed installation appointments, 30 day trouble history, repeat troubles, and all service order accuracy measures. We believe that the test and the commercial data results for this issue confirm BellSouth's representation of the existence of parity between BellSouth's retail business and service provided to the ALEC community.

c. *Provisioning ALEC Experience Conclusion*

ALECs identified six issues for the Provisioning domain during the February 18, 2002 workshop and the subsequent comment period. Of the six issues, we find that no further action is necessary. However, we will continue monitoring to ensure BellSouth has adequately implemented or addressed several pending issues. For the Provisioning domain, we find that the issues identified do not

warrant a finding of noncompliance on the part of BellSouth.

5. Maintenance and Repair ALEC Experience

a. *Maintenance and Repair ALEC Experience Summary*

At the February 18, 2002 ALEC Experience Workshop and subsequent comment period, ALECs identified seven OSS issues related to the maintenance and repair domain. We have reviewed the parties' comments and subsequent actions to resolve these issues since the workshop. We believe the parties are currently working to resolve one of the maintenance and repair issues within the change control forum. The seven maintenance issues ALECs identified are discussed below.

b. *Maintenance and Repair ALEC Experience Issues*

Dial Tone Outages

Some ALECs believe that dial tone loss is the most significant repair issue facing them today. ALECs contend that BellSouth technicians cause many of the dial tone losses, and improperly close the outages as "no trouble found". BellSouth contends that, since it implemented several edits to reduce UNE-P dial tone loss over a year ago, the loss of dial tone problems have significantly decreased. BellSouth believes dial tone issues now impact less than one percent of ALEC migrations. Currently aggregate commercial data does not measure improper outage closures. We believe the measure that most closely measures the impact of dial tone outages is the Customer Trouble Report Rate measure (M&R-2). This measure does show higher trouble report rates for ALECs in 5 of 17 categories, but does not indicate a substantial barrier to aggregate ALEC competition exists. We believe the SEEM plan, which was effective May 2002, will provide adequate incentive for BellSouth to reduce ALEC trouble report rates, including those caused by dial tone outages.

Chronic Repair Troubles on Designed Services

ALECs state that chronic repeat troubles on designed services are experienced within 30 days of installation caused by improper BellSouth installation and inadequate repair. BellSouth believes all ALEC chronic repeat repair problems should be directed to the Chronic Group within the CWINS center for resolution. This group specializes in resolving repeat troubles continuing beyond 30 days

and can provide more extensive testing for repeat repair
conditions. We believe aggregate commercial data does not support
ALEC contentions. The Customer Trouble Report Rate measure (M&R-2)
shows ALEC repair rates are lower in 12 of 17 (71%) submeasures.
Additionally, the Percent Repeat Trouble Within 30 Days repair
measure (M&R-4) does not support ALEC contentions of chronic repeat
repair rates. Regardless, we believe this issue is similar to
issue R-1 currently being discussed in the Florida Competitive
Topics Forum. We further believe the SEEM plan, effective May
2002, will provide added incentive for BellSouth to improve ALEC
trouble report rates.

Excessive New Install Failures for DS-1
ALECs contend BellSouth discriminates by assigning second-rate
problematic facilities for ALEC DS-1 services. Therefore, ALECs
experience higher failure rates for new DS-1 installations within
the first 30 days than does BellSouth. BellSouth contends the
designed circuit provisioning methodology gives ALECs the ability
to joint test circuits before acceptance. This process solidifies
the end-to-end test process for ALEC validation of the circuit and
assures ALEC and BellSouth technicians that the circuit is
functioning correctly. We believe aggregate commercial data does
not support the ALEC contention of higher failure rates for DS-1
circuits. The Customer Trouble Report Rate (M&R-2)and Percent
Repeat Trouble Within 30 Days (M&R-4)repair measures show lower
repair rates and repeat troubles for ALEC DS-1 services than for
BellSouth. We believe the SEEM plan, which was effective May 2002,
provides a tool for ensuring ALECs receive parity systems and
support for DS-1 services.

Excessive Repair Average Duration
ALECs believe the average duration for repair outages is
greater for ALECs than for BellSouth. ALECs contend that BellSouth
prematurely closes repair tickets without proper notification and
forces them to open new trouble tickets. BellSouth believes the
Customer Wholesale Interconnection Network Services (CWINS) center
properly records and processes repair troubles impacting duration
time and clearing time. We believe aggregate commercial data shows
that the average duration for ALEC repairs was lower than BellSouth
repairs. The Maintenance Average Duration (M&R-3) measure showed
that ALECs experienced longer duration intervals only in Resale
ISDN and 2 wire analog loop design categories. The Out-of-Service
Greater Than 24 Hours (M&R-5) measure shorter average duration

results for ALECs in 16 of 17 categories. We believe aggregate commercial data does not support ALEC claims, nor indicate a significant deterrent to the aggregate ALECs' ability to compete. Additionally, we believe that the SEEM plan provides a tool to ensure ALECs have parity support in maintenance average duration intervals.

Improperly Closed Repair Tickets

ALECs believe BellSouth improperly closes valid repair tickets to a "no trouble found" repair code and also closes trouble tickets before calling ALECs with the closure information. ALECs contend this creates further delays in getting repair problems resolved. BellSouth claims that ALECs have not provided examples of improperly closed valid repair tickets to investigate and that it stands ready to investigate specific examples. BellSouth notes that the CWINS center is responsible for notifying ALECs of repair closures for design services, and the field technician, or network technician, is responsible for notification of POTS and UNE-P repair closures. We note that KPMG Consulting did not experience failures by BellSouth to provide closure notification as an issue during maintenance testing. KPMG Consulting received in excess of 95 percent notification for all test calls completed and observed. We believe that ALECs did not provide sufficient evidence to support the claim of improper closures of valid repair tickets or the lack of proper repair closure notification. We believe aggregate commercial data for Percent Repeat Troubles Within 30 Days (M&R-4) does not support ALEC claims, nor indicate a significant obstacle to the aggregate ALECs' ability to compete. Additionally, we believe the SEEM plan, which was effective May 2002, will provide a tool to ensure ALECs receive proper notification of repair closures.

Repair Reports For Impaired Migrations

AT&T experienced problems with the BellSouth CWINS center not accepting a trouble report for a customer impaired during a migration of service until after 5:00 p.m. AT&T contends that early-morning migration difficulties may last all day long, leaving the ALEC end-use customer without service and the ALEC powerless to resolve the problem. BellSouth states that the CWINS center has responsibility to coordinate the resolution of all reported problems. BellSouth contends the CWINS center has a process in place to work with the LCSC to resolve whatever issue is encountered by the ALEC. During KPMG Consulting's cooperative ALEC

testing, this situation was not encountered, nor did the participating ALECs raise this as an issue. We do not believe ALECs provided sufficient evidence to support this claim or to show a significant deterrent exists to the aggregate ALECs' ability to compete.

Intentional After-Hour Repair Attempts

ALECs insist BellSouth maintenance technicians intentionally go to a customer's premise after normal business hours, without making arrangements for access, to close a trouble ticket to a "no access" or "no trouble found" code. This condition requires an additional repair report be issued and further delays the repair of the customer's service. BellSouth agrees that, if after-hours work is to be completed, technicians should be notifying the ALEC when the work is to occur and get instruction on where to gain access. KPMG Consulting did not experience this condition during testing. We do not believe ALECs provided sufficient evidence to support this claim or to show a significant deterrent exists to the aggregate ALECs' ability to compete.

c. *Maintenance and Repair ALEC Experience Conclusion*

ALECs identified seven maintenance and repair domain issues during the February 18, 2002 workshop and subsequent comment period. One issue is currently being resolved in the FPSC Competitive Topics Forum. We find that the remaining six issues do not represent significant impairment to the aggregate ALECs' ability to compete and can be satisfactorily resolved in the existing collaborative and change control forums. We further find that the remaining six issues do not warrant a finding of BellSouth noncompliance. We will continue to monitor BellSouth activities to resolve these maintenance issues, and we will consider any issues that may remain unresolved.

6. Billing ALEC Experience

a. *Billing ALEC Experience Summary*

During the February 18, 2002 ALEC Experience Workshop and subsequent comment period, ALECs identified nine OSS-related issues in the billing domain. Since the workshop, we have reviewed the parties' comments and subsequent collaborative actions to resolve these issues. Two of these issues are currently being addressed in

the FPSC Competitive Topics Forum and the BellSouth Change Control
Process. Furthermore, we believe seven issues are not sufficiently
significant to warrant finding BellSouth in noncompliance. The
nine issues raised by the ALECs are discussed below.

b. *Billing ALEC Experience Issues*

Delay Orders Pending Billing Completion
ALECs complain they cannot make changes to modify an order, or
report a trouble, until pending billing completion is final, which
causes even small changes to be postponed for up to 30 days. ALECs
believe BellSouth should provide a billing completion notification
to inform ALECs when orders have cleared billing systems.
BellSouth believes the issue should be addressed by the Ordering
and Billing Forum (OBF) to assure an industry standard billing
solution is implemented. BellSouth also agreed to re-consider a
billing completion notice within the Change Control Process (CCP)
if requested by ALECs. ALECs introduced change request CR0443, at
the March 27, 2002 change control meeting, to request a "Billing
Completion Notifier." ALECs ranked the project as number 4 out of
26 in the release prioritization ranking during the May 22, 2002
change control meeting. We believe this issue is successfully
being resolved by the parties within BellSouth's change control
process.

Billing Errors Cause Significant Problems
WorldCom states there are significant problems in auditing its
wholesale bill due to formatting and other errors. WorldCom
contends that it cannot determine whether a charge or credit
relates to the bill for an existing customer, and cannot compare
charges and credits against the amount WorldCom expects from the
customer. BellSouth believes this issue is limited to a WorldCom
claim that Billing Telephone Numbers (BTNs) are missing from
approximately three percent of their lines. BellSouth believes the
Ordering and Billing Forum (OBF) specifications do not require that
a BTN be placed on each record. On March 4, 2002, representatives
of the BellSouth billing team reviewed this with WorldCom billing
staff. The parties discussed the industry specifications, and
BellSouth explained the exact location within the records where
WorldCom could find the telephone numbers for each line. We note
that, although KPMG Consulting identified and satisfied 20 billing
exceptions during the completion of third-party billing tests, it
did not identify the specific problem experienced by WorldCom.

Additionally, aggregate commercial data for the Billing Invoice
Accuracy (B-1) measure shows that the ALEC aggregate population
receive better levels of billing accuracy than BellSouth retail in
Florida. We believe the problem WorldCom experienced is not
representative of the aggregate ALEC population, and does not
represent a significant obstacle to local competition in Florida.

ALECs Receive Usage Records For Lost Accounts

WorldCom complained that daily usage records for customers it
has lost continue to be sent from BellSouth. WorldCom contends the
reason for this error is the BellSouth switch has not been
translated correctly. WorldCom estimates bills for hundreds of
calls, for up to two months after the loss report, have been
received. BellSouth contends that this condition only happens upon
occasion, due to service order errors, or when the order is
processed around the bill period and additional time is necessary
to post the CSR. When this occurs, DUF records will be sent to the
old ALEC until the order posts in the billing system. However,
BellSouth provides ALECs with a DUF "cancel record" in these cases
to cancel the effect of the original record being sent. This issue
is listed in the Florida Competitive Topics Forum for discussion as
issue B-4 Line Loss Reporting. We believe that this issue may be
resolved by the parties in this forum; however, if it is not, it
does not represent a significant deterrent to ALEC competition in
Florida.

Usage Billed To the Wrong BAN

WorldCom contends that its January 2002 bill had 23 percent of
the Automatic Number Identifications in Georgia billed to the wrong
Billing Account Number (BAN). This problem continues to create
difficulties in maintaining and tracking records. BellSouth
believes WorldCom is confused about what is on the Georgia bill.
BellSouth contends a mix of area codes on a single bill is nothing
new, and is the same manner in which charges for retail services
are billed to multi-location business or residence customers.
BellSouth noted that a document to assist ALECs in better
understanding the bills provided by BellSouth, "Understanding Your
Bill", is on the BellSouth Interconnection Services Web site for
easy access by ALECs. BellSouth also notes that WorldCom raised
this issue in the Georgia/Louisiana joint application and the FCC
determined it was not a substantial problem. We note that KPMG
Consulting's billing tests reviewed ALEC invoices for accuracy and
did not experience any BAN problems. Additionally, aggregate

commercial data for the Billing Invoice Accuracy (B-1) measure shows that the ALEC aggregate population receives better levels of billing accuracy than BellSouth retail in Florida. We believe the problem WorldCom experienced is not representative of the aggregate ALEC billing population, and does not represent a significant obstacle to local competition in Florida.

Manual Billing Controls

ALEC orders sometime drop into billing states, requiring manual work to correct and complete the order before BellSouth billing systems are updated. WorldCom believes this manual handling leads to double billing in many instances. BellSouth contends that some exceptions do occur, but the vast majority of service orders containing these types of errors are corrected in one or two business days. Since these correction activities are performed on retail as well as ALEC orders, the ALECs are provided with an opportunity to compete with BellSouth. BellSouth also notes that WorldCom raised this issue in the Georgia/Louisiana joint application and the FCC found it was not a problem to open competition. We note that KPMG Consulting did not experience delayed orders posting to billing while testing. Additionally, aggregate commercial data for the Billing Invoice Accuracy (B-1) measure shows that the ALEC aggregate population receives better levels of billing accuracy than BellSouth retail in Florida. We believe sufficient evidence was not provided to show the problem WorldCom experienced represents the ALEC aggregate. Furthermore, we are not convinced the problem creates a significant obstacle to local competition in Florida.

Improperly Routed IntraLATA Calls

WorldCom accuses BellSouth of improperly routing tens of thousands of ALEC intraLATA calls through its own switches, rather than the customer-selected ALEC carrier. WorldCom believes the alleged improper routing denies ALECs revenues that could have otherwise been captured by hauling intraLATA traffic through their switches. WorldCom also complains that BellSouth switch translation was identified as the problem, and is concerned about possible recurrences. BellSouth did not specifically address this issue in the workshop or in its post-workshop comments. We note KPMG Consulting by necessity conducted its testing as a non-facilities-based ALEC and used BellSouth as the LPIC carrier. Therefore, it had limited insight into the actual network routing of the call. We believe aggregate commercial data for the Billing

Invoice Accuracy (B-1) measure shows that the ALEC aggregate population receives better levels of billing accuracy than does BellSouth retail in Florida. We believe that the problem WorldCom experienced is not representative of the ALEC aggregate population, nor that the problem creates a barrier to local competition in Florida.

No Out Collection Process

WorldCom states it requested BellSouth to create an "out collect" process, to return incorrect usage records to BellSouth for further research. WorldCom contends that BellSouth has improperly transmitted thousands of intraLATA calls that should have been routed through WorldCom, and wants to research appropriate Daily Usage File (DUF) credits for the intraLATA call traffic. BellSouth contends that WorldCom is really looking for a way to submit a usage bill dispute electronically. BellSouth explains that it does not provide that capability to any customer retail, ALEC, nor Interexchange Carrier. We believe the current BellSouth bill dispute and DUF record resend processes give ALECs access to bill research and correction assistance similar to that of retail operations. We are not convinced that the current BellSouth processes prevent the aggregate ALEC population from effectively researching and correcting bill problems at parity with BellSouth's retail operation. We also believe that, if this issue is significantly important to all ALECs, the change control and collaborative forums offer proper channels of further change and resolution.

Numerous Bills Impair Timely ALEC Bill Payment

Covad believes the number and frequency of BellSouth bills makes timely ALEC payment difficult. Covad contends that dispute acknowledgments also do not reference claims numbers, and make it difficult to match the bill to Covad dispute amounts. Additionally, Covad believes that bill credits are not listed on bills, and no notification of credits being applied are shown, which create further difficulties in bill balancing. BellSouth contends that it provides billing in the same manner (frequency and number of bills) as that provided to retail or IXC customers. Further, industry guidelines call for different services to be included on different bill types. This accounts for the vast majority of bills being provided to Covad. BellSouth offers to complete a BAN or bill period consolidation at a customer's request to reduce the number of bills. In fact, BellSouth completed a billing period

consolidation for Covad in January 2002. We note that KPMG
Consulting reviewed BellSouth's new Tapestry/Industrial Billing
System (Tapestry/IBS)as part of its billing tests. KPMG noted that
the new system includes an invoice number which may help ALECs
review and track bills more efficiently. We believe this
additional reference will help assist ALEC bill tracking and
reconciliation. Additionally, we believe, if the added invoice
number does not fully resolve this issue, ALECs can pursue the
change control and collaborative forums for further change and
resolution.

Miscellaneous Billing Is Difficult to Audit
Covad contends that BellSouth dumps old bill charges into a
lump sum invoice, which makes it impossible to audit detail
charges, and then offers to assist ALECs by charging for an
explanation of the invoice. Covad estimates it has approximately
$62,000 in miscellaneous billing that continues to grow. BellSouth
contends that it provides ALECs separate CABS bill "invoices" for
each month. So, if the current bill has balances due from prior
months, the balance for each of the months is tracked by invoice
number and unpaid monthly charges are separate from current
charges. Once charges get to be 12 months old or older, the system
lumps them under the "0000" invoice remaining balances are no
longer broken out by individual month. BellSouth's position is
that these charges were separately identified on the original bills
provided by BellSouth (when they were first incurred) and that
Covad should pay for being provided copies of the previous bills.
We note that KPMG Consulting billing tests did not experience the
condition identified by Covad. We are not convinced that the Covad
issue is experienced by the ALEC aggregate, that current BellSouth
processes prevent the aggregate ALEC population from effectively
researching and correcting bill problems, or that the problem
creates a significant obstacle to ALEC competition in Florida.
Additionally, we believe that, should this issue prove to be
significantly important to all ALECs, the established change
control and collaborative forums offer proper channels for future
change and resolution.

c. *Billing ALEC Experience Conclusion*

ALECs identified nine billing domain issues during the
February 18, 2002 workshop and subsequent comment period. Two of
the nine issues are currently being resolved in the FPSC

Competitive Topics Forum and BellSouth change control forums. We find that the remaining seven billing domain issues do not represent significant impairments to the aggregate ALEC ability to compete. We believe these issues can be resolved in the existing collaborative and change control forums, and do not warrant a finding of BellSouth noncompliance. We will also continue to monitor BellSouth activities to resolve these and future ALEC billing issues. If appropriate, we will take action to resolve issues.

7. **Performance Measures ALEC Experience**

    a. *Performance Measures ALEC Experience Summary*

During the February 18, 2002 workshop and the subsequent comment period, ALECs identified 11 OSS-related issues for the performance measures domain. Of these 11 issues, we believe that five have been satisfied, four are currently covered in the OSS third-party test of BellSouth's performance measurements, one should be addressed in the six-month review cycle of BellSouth's permanent performance measures, and one is not significant enough to warrant a finding of noncompliance on the part of BellSouth. Each of the issues raised by the ALECs will be discussed below.

    b. *Performance Measures ALEC Experience Issues*

Missing Raw Data

ALECs contend that LSRs classified as "projects" and "dummy FOCs" (confirmation of cancelled LSRs) should be included in BellSouth's PMAP raw data. BellSouth argues that "projects" and "dummy FOCs" should be excluded from BellSouth's PMAP raw data since these type of orders are not used in the calculation of the performance measurement in question. We believe the exclusion of "projects" and "dummy FOCs" from PMAP raw data should be addressed in the six-month review cycle of BellSouth's permanent performance measures as part of FPSC Docket No. 000121A-TP.

Acknowledgment Message Timeliness (O-1) Data Flawed

The ALECs contend that BellSouth is inaccurately reporting data for the Acknowledgment Message Timeliness and Completeness measure. According to AT&T, the order volumes in the raw data to the Acknowledgment Message Timeliness measure are not consistent with the order volumes in the PMAP flow-through report. It is

BellSouth's position that ALECs should not expect the number of
LSRs reported in the flow-through report to match the number of
LSRs in the raw data files for the Acknowledgment Message
Timeliness measure. According to BellSouth, AT&T is making an
invalid comparison due to multiple reasons. First, EDI returns one
acknowledgment per transmission (or a "envelope"), even though the
transmission may contain multiple LSRs. Second, for TAG,
acknowledgments on messages related to pre-order activity are not
reflected on the Flow-Through report but are included in the
Acknowledgment raw data files. Similarly, LSRs fatally rejected by
TAG will not be counted in the Flow-Through report but will be
included in the Acknowledgment raw data files. We believe the data
integrity issues surrounding BellSouth's PMAP Acknowledgment
Message Timeliness data and flow-through reports are currently
being covered in the OSS third-party test of BellSouth's
performance measurements. Upon completion of the performance
measures test, any significant unresolved issues will be brought
before us for resolution.

Data Replication

ALECs state that they cannot replicate the FOC (O-8) and
Reject Interval (O-9) performance measurements from PMAP raw data.
The raw data for the FOC and Reject Interval performance measure
contains the LSR received data, LSR FOC/reject data, and FOC/reject
interval. The interval is reported in hours and minutes, but
BellSouth provides only the dates of the endpoints, not the *time
stamps*. BellSouth contends that they began providing the time
stamps in the PMAP raw data fields for each type of LSR in December
2001 for AT&T and January 2002 for other ALECs. We believe that
this specific issue regarding the missing time stamps from the PMAP
raw data appears to be resolved. Additionally, upon reviewing the
February and March 2002 test ALEC data for FOC Timeliness, KPMG
Consulting found that BellSouth did provide dates and time stamps
indicating when the LSR was received and FOC'd and/or Rejected.
However, it should be noted that in the OSS third-party test, KPMG
Consulting issued Exception 36 regarding the data integrity of the
FOC Timeliness and Reject Interval performance measures. This
exception is currently being addressed in the performance measures
testing of BellSouth's PMAP Version 4.0. Upon completion of the
performance measures test, any significant unresolved issues will
be brought before us for resolution.

Monthly Carry Over of LSR

ALECs state that they cannot replicate the FOC (O-9) and
Reject Interval (O-8) performance measures from PMAP raw data for
LSRs that are submitted in one month but FOC'd/rejected in a
different month. If the LSR was received in one month, but was
FOC'd or rejected/clarified back to the ALEC in the following
month, the ALEC is unable to replicate the interval being
calculated by BellSouth. According to BellSouth, the FOC
Timeliness PMAP report has always included all FOCs sent within the
reporting month, regardless of when the LSR was received. However,
for the Reject Interval PMAP report, prior to August 2001, an LSR
must have been both received and rejected within the reporting
month to be included in the report. Beginning with the August 2001
data, the Reject Interval report now includes all LSRs regardless
of when they were received. We believe that this issue is
resolved. AT&T's preliminary review indicates BellSouth now
provides the missing information. However, it should be noted that
in the OSS third-party test, KPMG Consulting issued exception 36
regarding the data integrity of the FOC Timeliness and Reject
Interval performance measures. This exception is currently being
addressed in the performance measures testing of BellSouth's PMAP
Version 4.0. Upon completion of the performance measures test, any
significant unresolved issues will be brought before us for
resolution.

Orders Incorrectly Coded and Excluded from Performance
Measures

ALECs contend that L-Coded orders are incorrectly coded and
subsequently excluded from the Order Completion Interval (P-4)
measure. Covad provided BellSouth with 15 instances where PONS
were incorrectly coded as "L" and subsequently excluded from the
Order Completion Interval measure. An "L" coded order is one
where the customer requests a later completion date than the
standard offered interval would provide. BellSouth was able to
perform an analysis on 11 of the PONS and unable to locate the
remaining four. BellSouth stated that the "L" codes were properly
being placed on Covad's orders since the requested completion
intervals (number of days) were greater than the standards provided
in BellSouth's Interval Guide. We believe that an ALEC that
contends that L-Coded orders are incorrectly coded and subsequently
excluded from the Order Completion Interval measure can either
dispute the measure in question as provided in our Order No. PSC-
01-1819-FOF-TP, in Docket No. 000121A-TP, or raise the issue in the

six-month permanent measures review process.

Flow-Through Reliability
According to Network Telephone, the December 2001 PMAP
reposting of Flow-through (O-4) data showed 73 TAG orders submitted
by Network Telephone. However, Network Telephone does not submit
LSRs via TAG. Additionally, AT&T stated that the raw data that
BellSouth provides to the ALECs is incomplete for the flow-through
reports. According to AT&T, BellSouth does not provide an LSR
detail for the LNP flow-through report. BellSouth states that
Network Telephone is incorrect in its conclusion. It is
BellSouth's contention that the flow-through report is reliable
because the xDSL orders were shown on the report as having been
submitted through TAG, instead of specifying LENS. In response to
AT&T's concern regarding incomplete raw data for the LNP flow-
through report, BellSouth indicated that a form of underlying raw
data was now available upon request. We believe the data integrity
and replication issues surrounding BellSouth's PMAP flow-through
report is currently covered by KPMG Consulting as part of the OSS
third-party test. KPMG Consulting has issued Exception 113 to
address missing xDSL transactions as part of the completeness
analysis for transfer of data into the performance measures
database. KPMG Consulting also issued Exception 124, which deals
with the accuracy of the BellSouth reported results for the
flow-through performance measures. Exception 124 remains open.
Upon completion of the performance measures test, any significant
unresolved issues will be brought before us for resolution.

ACNI Performance Measure is Incomplete
AT&T stated that the raw data for the Average Completion
Notice Interval (ACNI) performance measure is incomplete. AT&T
addressed five separate issues regarding specific types of orders
that are currently excluded from the ACNI performance measure that
should be included. Additionally, AT&T stated that multiple
entries are being recorded for the same completion notice and
applied in the ACNI calculation. In response to each of the six
instances where AT&T noted that certain types of orders were being
excluded from the ACNI performance measure, BellSouth contends that
the order should have been excluded or that BellSouth was
implementing a system fix to correct the error. We believe the
data integrity and replication issues surrounding BellSouth's
Average Completion Notice Interval performance measure is currently
being covered in the OSS third-party test of BellSouth's
performance measurements. Upon completion of the performance
measures test, any significant unresolved issues will be brought

before us for resolution.

Jeopardy Notice Interval Performance Measure is Incomplete

According to AT&T, the ALEC data provided in PMAP for the Jeopardy Notice Interval (P-2) performance measure is incorrect. BellSouth acknowledges that this measurement is incorrect and has been since June 2001. BellSouth is presently working on targeted fix date of June 2002, data which will become available July 30, 2002. We believe the data integrity and replication issues surrounding BellSouth's Jeopardy Notice Interval performance measure are currently being covered in the OSS third-party test of BellSouth's performance measurements. Upon completion of the performance measures test, any unresolved issues will be brought before us for resolution, if appropriate.

Exclusion of Directory Listings

According to ALECs, BellSouth improperly excludes directory listing orders from some performance measures. BellSouth states that it properly excludes directory listing orders except where the SQM provides a level of disaggregation to include them. To address this issue, BellSouth began reflecting directory listing orders in the UNE-Other Non-Design level of disaggregation for the following performance measures; Percent Rejected Services Request (O-7), Reject Interval (O-8), FOC Timeliness (O-9), and FOC Reject Response Completeness (O-11). We believe this issue is resolved with the exception of the ALECs' request for directory listings to be included in the PMAP raw data, though the listings are excluded from the calculation of the performance measure in question. We believe this issue should be addressed in the six-month review of BellSouth's permanent performance measures as part of FPSC Docket No. 000121A-TP.

UNE-P Data for ALECs is Incomplete

According to AT&T, BellSouth's ALEC data is inaccurate for the UNE-P level of disaggregation. AT&T stated that BellSouth has duplicate reporting for UNE-P. The data is being reported under the UNE-Loop and Port Combo category and the UNE Other Non-Designed disaggregation level. According to BellSouth, the coding problem that was causing UNE Loop/Port combinations to appear in the UNE Other Non-Design category on ALEC PMAP reports was corrected with the December 2001 data. We believe that this specific issue regarding inaccurate reporting of UNE-P data appears to be

resolved. From a replication perspective, the levels of disaggregation and product roll-up are used as stated in the SQM. If the ALECs still contend the issue is unresolved, the performance measure in question and any associated penalties paid by BellSouth should be disputed in Docket No. 000121A-TP. We believe that if necessary, ALECs can either dispute the measure in question as provided in our Order No. PSC-01-1819-FOF-TP, in Docket No. 000121A-TP, or raise the issue in the six-month permanent measures review process.

Service Order Accuracy
According to AT&T, BellSouth's manual rekeying of service orders at the LCSC may result in errors in provisioning of customer orders, which in turn, would not be captured in the Service Order Accuracy (P-11) performance measure reported by BellSouth. BellSouth has agreed that there have been some instances of human errors where the post-provisioning CSR record does not match up precisely with the LSR as specified, such as when the contact name has been omitted, but assured that BellSouth employees were being covered on it and that service representative errors coverage with employees would be completed by April 5, 2002. We believe that this specific issue regarding inaccurate reporting of Service Order Accuracy appears to be resolved. However, the data integrity and replication issues surrounding BellSouth's Service Order Accuracy performance measure are currently being covered in the OSS third-party test of BellSouth's performance measurements. Upon completion of the performance measures test, any significant unresolved issues will be brought before us for resolution.

c. **Performance Measures ALEC Experience Conclusion**

The ALECs identified eleven issues for the performance measures domain during the February 18, 2002 workshop and the subsequent comment period. Of the eleven issues, four are currently covered in the OSS third-party test of BellSouth's performance measurements. If these four issues still remain unresolved upon completion of the test, we believe these issues along with the remaining seven can be satisfied under the direction of Order No. PSC-01-1819-FOF-TP, Docket No. 000121A-TP. Specifically, the issues may be addressed via the six-month review cycle of the permanent performance measurements or the dispute process outlined in that Order.

8. ALEC Experience Conclusion

We have carefully examined each of the OSS issues raised by ALECs either through presentations at the February 18, 2002 workshop or in post-workshop comments. We conclude that the majority of these issues have been addressed by the third-party test or through our action in Docket Nos. 960786B-TP or 000121A-TL. Some issues are scheduled to be addressed through BellSouth software enhancements and releases over the next several months. Other issues are also under review by either the Change Control Process or the FPSC Competitive Topics Forum. Based on the evidence provided none of the outstanding issues warrant a finding that BellSouth is not providing service at parity. However, we will continue to monitor these issues and take the appropriate action as needed.

Where applicable, the ALEC issues are discussed in our analysis of the third-party OSS test results in Section B or in our analysis of commercial data results in Section C. Many of the issues raised by ALECs are not corroborated by the third-party test results or the commercial data. In some instances, the ALEC did not provide sufficient support to allow verification of its claims either through the test or the commercial data review.

We note that certain ALECs filed comments too late for us to be able to do a full analysis of the comments in this recommendation. We have, however, thoroughly reviewed these comments and believe that the issues identified therein are either already addressed in this Order through our analysis of the comments of other ALECs, or the issues do not rise to a level that would alter our ultimate decision.

In assessing BellSouth's OSS, we have sought to determine the degree of support provided on an aggregate statewide basis to ALECs. We realize that BellSouth, like any enterprise, may provide differing levels of service to individual customers at different times. Therefore, OSS service quality issues may arise surrounding a specific product or function that cannot be detected by the most vigorous test, or that may escape the most diligent efforts to provide quality support. We believe the test and the commercial data review both provide an adequate reflection of aggregate results.

We believe that sufficient options are available for dealing with any outstanding problems, or potential future deterioration in OSS service quality provided by BellSouth, also referred to as "backsliding." Most notably, the SEEM plan provides a strong and valuable tool for our use to remedy such trends or problems. Through Docket No. 000121A-TP, the FPSC will continue to monitor the performance of BellSouth's OSS via our approved performance measures. Where necessary, we will address any continuing problems. The first six-month review of these measures is underway, as required in Order No. PSC-01-1819-FOF-TP.

We have taken important recent action to improve the ALECs' ability to use the Change Control Process to resolve OSS issues and to measure its effectiveness. We note that our Competitive Topics Forum also provides a venue for resolution of ALEC issues with BellSouth's OSS. If necessary, ALECs can also bring problems to our attention through formal complaints.

In conclusion, we find that the remaining ALEC issues do not constitute failure by BellSouth to provide ALECs either a meaningful opportunity to complete, or support and access in a similar time and manner to that provided for its retail operations.

E.   CONCLUSION

We believe BellSouth provides ALECs nondiscriminatory access to its OSS. Additionally, we find that BellSouth is providing the necessary documentation and support functions and has demonstrated that its systems are operationally ready and provide an appropriate level of performance. As a result, it is our opinion that BellSouth has satisfied the OSS requirements of Section 271 of the 1996 Telecommunications Act.

The third-party OSS test results meet all but a few of the test criteria specified by KPMG Consulting and approved by this Commission for testing in Order No. PSC-00-0232-CO-TP. The remaining test criteria in the performance measurements tests remain under review, but do not impact the ALECs' ability to perform pre-ordering, ordering, provisioning, maintenance and repair, and billing functions in competition against BellSouth as viable local service providers.

We believe a review of the commercial data reported in KPMG Consulting's Appendix G generally supports KPMG Consulting's OSS test results. These performance measures indicate that BellSouth is meeting 78 percent of the parity benchmarks and analogs adopted by us, but they do not indicate that perfect parity has been attained by BellSouth. We agree with ALECs that there is room for improvement. However, through the SEEM plan, the completion of KPMG Consulting's performance measures testing, and periodic reviews of the performance measurements results and methodologies, we are confident that continuing improvement in OSS support by BellSouth can be achieved. We also note that venues such as the Change Control Process, the FPSC Competitive Topics Forum, and the formal complaint process also provide options for addressing OSS problems encountered by ALECs.

Finally, our analysis of the issues raised in our ALEC Experience Workshop indicates that the systemic competition-impairing issues documented by the participants have been addressed. Many of these were resolved through the test or through changes, both voluntary and ordered by us, that have been made or scheduled by BellSouth. We plan to continue to monitor several areas including change control, account team responsiveness, order flow-through, and the completion of performance measure testing, and to take action where appropriate.

In summary, the results of the three-fold evaluation approach adopted by us provide conclusive and detailed evidence of the adequacy of BellSouth's OSS, as well as ALECs' access to it, as required by the Act. We find that the remaining issues do not constitute failure by BellSouth to provide ALECs a meaningful opportunity to compete, or access in a similar manner to support provided for its retail operations. We, therefore, believe that BellSouth has satisfied the OSS-related requirements of Section 271 of the 1996 Telecommunications Act.

Having completed our review and reached this conclusion, we find it appropriate to now close this docket. Hereafter, a transmittal letter will be prepared for purposes of forwarding our consultative opinion on the Section 271 matters through our Track B testing of BellSouth's OSS as well those addressed through our Track A hearing.

It is therefore

The OPINION of the Florida Public Service Commission that BellSouth Telecommunications, Inc. has complied with the OSS requirements set forth in Section 271 of the Telecommunications Act of 1996 as set forth in the body of this Opinion and should be authorized to provide interLATA service in Florida. It is further

ORDERED that this Docket shall be closed.

By DIRECTION of the Florida Public Service Commission this 25th Day of September, 2002.
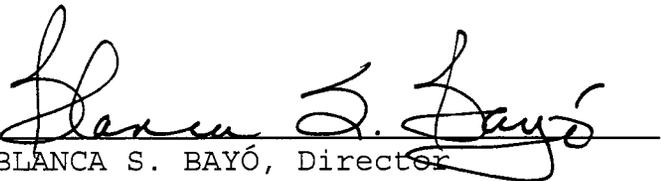
BLANCA S. BAYÓ, Director
Division of the Commission Clerk
and Administrative Services

(S E A L)

FB

ATTACHMENTS

ATTACHMENT A

A.   *KPMG FINAL OSS TEST REPORT, VERSION 2.0*

The *KPMG Final OSS Test Report, Version 2.0* is accessible via the Commission's Web site.

ATTACHMENT B

B. *ALEC EXPERIENCE - DETAIL*

In support of our analysis regarding issues raised by ALECs in the Commission workshops held on February 18, 2002, and June 12, 2002, we offer the following detailed summary of the positions of BellSouth, the ALECs, and KPMG Consulting. These positions were considered and are addressed in Section D within the body of this Order.

1.   **Relationship Management ALEC Experience Detail**

   a. *Prioritization*

   Issue
   2.   Internal BellSouth processes prevent a fully
         collaborative Change Control Process. ALECs are unable
         to rationally prioritize Change Requests due to a lack of
         mutuality in impact assessment and resource planning as
         well as a lack of visibility into release management
         processes.

   ALEC Summary
   ALECs contend that the process of evaluating and implementing
changes to ALEC interfaces as well as Legacy systems has been
largely hidden from ALECs.   AT&T stated that BellSouth
reprioritizes Change Requests ranked by ALECs for implementation.
Further, AT&T states that there should be a binding prioritization
process for both ALEC-initiated and BellSouth-initiated Change
Requests. Both Network Telephone and ITC-DeltaCom said ALECs need
to be able to participate in prioritization and release packaging.
WorldCom said that definitions of "ALEC Impacting" used in internal
BellSouth evaluation processes have not included many impacts that
ALECs experience and for which they need notice. WorldCom stated
that a mutual exercise in prioritization and implementation
scheduling between BellSouth and ALECs will benefit both BellSouth
and their wholesale customers. Both Network Telephone and WorldCom
said ALECs often have no direct dialogue with the BellSouth
personnel responsible for rejection of ALEC-initiated Change
Requests. WorldCom compared the Verizon Change Control Process
model to BellSouth practices. Unlike BellSouth, the Verizon Change
Control Process model includes internal systems changes in its
scope and ALECs have visibility into that.

   BellSouth Response
   BellSouth argues that the current Change Control Process
satisfies a five-point FCC criteria for change management.
BellSouth also states it has modified the conduct of prioritization
meetings.   BellSouth contends that it listens to ALECs and has
modified the Change Control Process to create a process in which
BellSouth collaborates with ALECs on prioritizations, Change
Request acceptance, rejections, determinations of ALEC impacts,
etc. BellSouth claims that it recently made teleconferencing

available to ALECs, more Subject Matter Experts (SMEs) were made available for the prioritization meeting, and better information is distributed to ALECs before the meeting. BellSouth states that it brings appropriate resources to all Change Control Process meetings for dialogue with ALECs, including Information Technology representatives, Account Team members, SMEs, and project managers. According to the Change Control Process document, attending ALECs vote to express their priorities at prioritization meetings. This has been standard practice for more than three years.

BellSouth is implementing the "50/50" release capacity plan for ALEC consideration. BellSouth has also made a commitment to "definitely" implement the 15 highest ALEC-ranked Change Requests for 2002. BellSouth has begun to provide capacity size as well as individual change request sizing information to ALECs to assist the prioritization process so that ALECs can see the relative size of Change Requests with total release capacity to gauge implementation opportunity. BellSouth contends that the proposal makes ALECs "part of the team, real time."

However, it is BellSouth's position that ALECs should not be part of the changes that occur to internal BellSouth systems. BellSouth states that it is not appropriate to include ALECs in internal systems modifications. BellSouth contends that it modifies those systems only after considering how to avoid any impediment to ALECs. The company argues that ALEC participation would stymie BellSouth's ability to make its own decisions for its own systems based on its business needs.

KPMG Consulting Analysis
KPMG Consulting conducted interviews with the BellSouth Change Control Process staff as well as the internal Change Management staff. KPMG Consulting reviewed both Change Control Process and internal process documentation. As a result, KPMG Consulting identified deficiencies in the BellSouth Change Management Process and documented these deficiencies in Observation 86, Exception 88, and Exception 106. Observation 86 and Exception 106 have been resolved. Exception 88, which concerns prioritization of Change Requests, remains open.

BellSouth recently held three meetings to resolve a number of outstanding issues in Change Control Process. These meetings produced significant changes to the Change Control Process, but

have not resolved the issues of prioritization central to Exception 88. BellSouth and the ALECs determined that they are at an impasse on this issue.

These meetings noted above resulted in a new definition of "ALEC Impacting" and significantly expanded the scope of Change Control Process. The new definition of "ALEC Impacting," as well as the scope of Change Control Process, will now include all OSS Gateways (previously included in Change Control Process), linkages and back-end systems (previously excluded), and legacy systems (previously excluded). This will allow ALECs to conduct an impact assessment of changes made by BellSouth to any of the above systems. In addition, billing systems are now included in the scope of Change Control Process.

b.   *Backlog of Change Requests*

Issue
There exists no time frame for the implementation of ALEC-initiated and defect Change Requests.

ALEC Summary
ALECs contend that BellSouth takes too long to process and implement ALEC-initiated (new features) and defect Change Requests. As a result, a large backlog of Change Requests has accumulated. Over the last two years, BellSouth has implemented few ALEC-initiated Change Requests. As of January 22, 2002, there were 90 ALEC-initiated Change Requests requesting feature changes awaiting disposition. There exists no required time frame for the implementation of ALEC-initiated Change Requests. Based on the ALEC-initiated implementations in the current year's release schedule, the existing backlog of ALEC-initiated Change Requests will not be cleared until 2005. ALECs note that BellSouth averaged implementation of its own Change Requests in 60 days while averaging 164 days to implement ALECs' Change Requests.

WorldCom noted that no backlog of ALEC-initiated changes exists at Verizon. WorldCom added that Verizon implemented over 170 ALEC-requested Change Requests during the same three-year period in which BellSouth implemented only 32. WorldCom stated that BellSouth is under-resourcing interface development and that BellSouth should provide a capacity forecast for current and subsequent annual cycles showing new features to be implemented in

each future release.

In its preworkshop comments, WorldCom states the use of a value added network delays transmission of orders, as well as FOCs, rejects and completion notices, between WorldCom and BellSouth. WorldCom further complains that these delays are not captured in BellSouth's performance measures. Despite this, BellSouth had refused to adopt Interactive Agent, the industry standard mode of transmission, according to WorldCom. WorldCom states that it filed a Change Request for Interactive Agent on September 26, 2001. It has not been implemented and is not scheduled for implementation in 2002.

BellSouth Response
According to BellSouth, its Change Control Process satisfies each of the five criteria specified by the FCC for change management. BellSouth stated it is committed to the ongoing development of an efficient and effective Change Control Process. BellSouth said it is working with ALECs to provide more support to ALECs in a user-friendly forum; modifying the Change Control Process in response to ALEC needs, implementing "top-priority" Change Requests; and adding Change Control Process performance measurements. New BellSouth management has furthered a Change Control Process Improvement Task Force working with ALECs.

BellSouth is implementing a new process for release management to permit ALECs to use 50 percent of all release capacity remaining after implementation of defects and mandates. BellSouth also stated a commitment to implement the top 15 priority ALEC-initiated Change Requests in 2002.

KPMG Consulting Analysis
KPMG Consulting conducted interviews with the BellSouth Change Control Process staff and the internal Change Management staff. KPMG Consulting reviewed both the Change Control Process and internal process documentation. As a result, KPMG Consulting identified deficiencies in the BellSouth Change Management Process and issued Exception 88, which concerns prioritization of Change Requests. Exception 88 remains open.

BellSouth held three meetings to resolve a number of outstanding issues in Change Control Process. These meetings resulted in a new definition of "ALEC Impacting" and significantly

expanded the scope of Change Control Process. The new definition of "ALEC Impacting" and the scope of Change Control Process will now include all OSS Gateways (previously included in Change Control Process), Linkages and back-end systems (previously excluded), and Legacy Systems (previously excluded). This will allow ALECs to conduct an impact assessment of changes made by BellSouth to any of the above systems. Billing systems are now included in the scope of Change Control Process.

c.   **Defect Correction Timeliness**

Issue
BellSouth takes too long to classify and correct defects.

ALEC Summary
ALECs claim BellSouth fails to implement defect Change Requests (those involving system defects) quickly enough. Many defect Change Requests involve critical functionality. Defects impede the ability to send mechanized orders resulting in higher costs due to the need to use manual processes. They can stall billing processes and affect cash flow. Defects can also affect maintenance and repair intervals and customer satisfaction. ALECs contend a reasonable time frame for correction of defects should be established. Covad is impeded by a defect that is over 6 months old. There exists a considerable backlog of defect change requests, numbering 73 as of February 4, 2002. Only 37 had scheduled implementations before April 7, 2002. The implementation of a work-around solution does not constitute correction of a defect. Correction of defects should occur within 10, 20 and 30 days for high, medium, and low- impact defects respectively. BellSouth refuses to provide a date when it might fix a defect which was identified months earlier. If a defect has been identified by an ALEC instead of BellSouth, it will take longer to fix. BellSouth is unable to properly develop, test and implement releases. The number and seriousness of defects is excessive.

BellSouth Response
In its post-workshop supplemental data submission on May 31, 2002, BellSouth states that this issue mirrors Florida Third-Party Test Exceptions 123 and 157. It argues that, notwithstanding the current status of the two exceptions, the FCC addressed these complaints in its Georgia/Louisiana 271 application approval. BellSouth believes that, due to information it provided the FCC in

its application, and supported by the Georgia Public Service
Commission in its comments, the FCC did not concur with
"commenters' assertions that BellSouth fails to implement
corrections to defects in a timely manner and that there are
unnecessary defects because BellSouth's software implementations
are not sufficiently tested before release." BellSouth agrees that
a reduction of coding defects is beneficial for ALECs and that
software releases with numerous defects can inhibit a smooth
transition between releases.

BellSouth claims that the FCC found "BellSouth demonstrates
that most of these defects have a very small impact and have been
corrected quickly and within the time frames set by the Change
Control Process." BellSouth said that the FCC noted the BellSouth
explanation that, of the 38 defects outstanding as of March 5,
2002, a number were scheduled or targeted for implementation this
year. In response to Covad's specific allegations regarding a so-
called "backlog" of 11 defects that impacted Covad directly,
BellSouth claims that the FCC supported its showing that one defect
had been cancelled, six had been implemented, and the remaining
four were scheduled for a release in May 2002.

BellSouth also contends that the FCC was "reassured that new
measures being developed in Georgia will measure how well BellSouth
fixes defects within the required time frames." BellSouth further
contends that the FCC discarded ALEC complaints regarding adequate
testing. BellSouth believes that the quality of and parameters for
its internal testing processes are set forth in its response to
Florida Exception 157. The FCC added that it would continue to
monitor BellSouth's performance in this regard. BellSouth approves
of the FCC continuing to monitoring its performance in testing and
release problems because BellSouth continues to improve its testing
environment and processes. Additionally, BellSouth disagrees with
KPMG's interpretation of documents reviewed to reach its conclusion
that BellSouth does insufficient testing.

BellSouth also contends that the evidence shows that BellSouth
does adequately test for defects. As affirmation of its resolve to
properly test and implement releases, BellSouth states that it can
point to the recent testing of Release 10.5. This release
contained numerous complex features and defect fixes. According to
BellSouth, all appropriate notifications leading up to the
implementation were provided to ALECs. BellSouth said that Release

10.5 was also available to ALECs in the CLEC Application Verification Environment (CAVE.) BellSouth discovered certain defects for which there was no work-around or fixes by the scheduled date for implementation. Therefore, BellSouth argues that it acted appropriately by delaying Release 10.5 for two weeks.

BellSouth contends that such discoveries are not the result inadequate testing, but rather the result of extensive internal testing. It believes that ALECs will be better served by the delay by receiving a better release, as well as gaining an additional two weeks of testing ALEC scenarios. BellSouth states that the ALEC complaints, as well as the Florida Third-Party Test Exceptions, are based upon situations occurring prior to the development of new Change Control Process language regarding "ALEC-affecting" defects and revisions to the software testing processes (including additional ALEC testing capabilities in CAVE).

KPMG Consulting Analysis

KPMG Consulting determined that the BellSouth software and interface development methodology includes the process for release management and control; however, it is not consistently followed. KPMG Consulting reviewed these procedures as related to Release 10.5, scheduled for production on May 31, 2002. Based on the number of defects encountered in BellSouth Releases 10.2 and 10.3, it appears that the BellSouth Quality Assurance process was not consistently followed for new software releases. Therefore, Exception 157 was issued. KPMG Consulting reviewed the results of Release 10.5 to ensure adherence to the BellSouth quality assurance process. As of July 17, 2002 there have been 28 software and 24 documentation defects identified in Release 10.5. KPMG Consulting amended Exception 157 to reflect these additional issues, and this exception remains open.

d. *Billing Systems in Change Control Process*

Issue

The BellSouth practice within its Change Control Process does not include billing.

ALEC Summary

The Change Control Process should be amended to include changes to BellSouth billing systems. ALECs disagree with BellSouth's interpretation of the Change Control Process document

to say that billing systems are not included. Verizon includes billing system changes within the change management process. BellSouth avoids dialogue with ALECs on billing issues by excluding billing from the Change Control Process. Numerous aspects of the billing systems changes affect ALECs as shown by the recent launch of Tapestry. BellSouth will not fix billing systems problems that affect ALECs.

BellSouth Response
BellSouth maintains that billing is outside the scope of Change Control Process. Billing issues are controlled by industry guidelines issued by the Ordering and Billing Forum (OBF) where ALECs have representation. According to BellSouth, the OBF is the appropriate forum because billing systems are built to industry standards. BellSouth retail customers are using the same systems as the ALECs. BellSouth does not want to affect those retail customers negatively if BellSouth were to effect changes requested by the wholesale side. That would necessitate BellSouth providing change notices to retail customers and to do impact analysis for them.

KPMG Consulting Analysis
Billing systems are now included in the scope of the Change Control Process.

e.   *Software Testing Process Improvements*

Issue
BellSouth fails to follow software testing and quality processes and delivers faulty software.

ALEC Summary
ALECs say that end-to-end testing would minimize software defects after release. WorldCom claims that, in comparison, Verizon tests well and corrects quickly. Defects mean that there is a problem with the quality of the programming. The CAVE environment should be improved. ALECs should not be required to use codes other than their own. Nor should BellSouth limit the number of ALEC participants in the CLEC Application Verification Environment (CAVE) or their test scenarios. Doing so limits the ability of ALECs to test as needed to in conjunction with new product launches, ad campaigns, etc. AT&T claims that BellSouth fails to perform adequate internal testing and the external test

environment is limited in scope, functionality and availability.
Correcting faulty software takes away from any opportunity to
implement new changes that ALECs want. ALECs say BellSouth needs
to do more stringent testing, including beta testing with ALECs.

Covad claims that the lack of an End-to-End test environment
for LENS has caused defects in ordering line sharing and ADSL to
not be identified. Covad states that it has not seen anything from
KPMG addressing this issue despite having filed documents
chronicling these and other problems in LENS.

BellSouth Response
BellSouth argued that the number of scenarios and test cases
the ALECs want BellSouth to construct are so extensive that it
cannot be supported. BellSouth is working with ALECs to implement
and expand availability of its non production testing environment
(CAVE).

BellSouth says that this issue mirrors Florida Third-Party
Test Exceptions 123 and 157. BellSouth contends that,
notwithstanding the ongoing status of the two exceptions, the FCC
adequately addressed these complaints in its Georgia/Louisiana 271
application approval. BellSouth believes that due to information
provided to the FCC in its application, and supported by the
Georgia Public Service Commission, the FCC did not concur with
"commenters' assertions that BellSouth fails to implement
corrections to defects in a timely manner and that there are
unnecessary defects because BellSouth's software implementations
are not sufficiently tested before release." BellSouth agrees that
a reduction of coding defects is beneficial for ALECs and that
software releases with numerous defects can inhibit a smooth
transition between releases.

BellSouth claims that the FCC found "that BellSouth
demonstrates that most of these defects have a very small impact
and have been corrected quickly and within the time frames set by
the Change Control Process." BellSouth said that the FCC noted
BellSouth's explanation that, of the 38 defects outstanding as of
March 5, 2002, a number were scheduled or targeted for
implementation this year. In response to Covad's specific
allegations regarding a so-called "backlog" of 11 defects that
impacted Covad directly, BellSouth claims that the FCC supported
its showing that one defect had been cancelled, six had been

implemented, and the remaining four were scheduled for a release in May 2002. BellSouth also claims that the FCC was "reassured that new measures being developed in Georgia will measure how well BellSouth fixes defects within the required time frames."

BellSouth contends the FCC discarded ALEC complaints regarding adequate testing. BellSouth states that the quality of and parameters for its internal testing processes are set forth in its response to Florida Exception 157. The FCC added that it would continue to monitor BellSouth's performance in this regard. BellSouth said it welcomes regulatory scrutiny because it continues to improve its testing environment and processes.

In addition, BellSouth disagrees with KPMG's interpretation of documents it reviewed to reach its conclusion that BellSouth does insufficient testing. According to BellSouth, the documents simply provide BellSouth's vendors' risk assessment for expedited releases. BellSouth argues that the documents cited by KPMG Consulting do not make an affirmative statement that BellSouth failed to adequately test.

BellSouth contends that the evidence shows that it does test adequately for defects. As affirmation of its resolve to properly test and implement releases, BellSouth points to the recent testing of Release 10.5. This release contained numerous complex features and defect fixes. The company notes that Release 10.5 was available to ALECs in CAVE. BellSouth said it discovered certain defects for which there was no work-around solution or fixes by the scheduled date for implementation. BellSouth argues that it acted appropriately by delaying Release 10.5 for two weeks.

BellSouth states that such discoveries are not the result of inadequate testing, but rather the result of extensive internal testing. It said ALECs will be better served by the delay by receiving a better release, and gaining an additional two weeks of testing ALEC scenarios. BellSouth believes that the ALEC complaints, as well as the Florida Third-Party Test exceptions, are based upon situations before the development of new Change Control Process language regarding "ALEC-affecting" defects and revisions to the software testing processes.

BellSouth declares that it is expanding the capabilities of CAVE and now allows ALECs to conduct testing in CAVE using the LENS

interface. ALECs began beta testing LENS in CAVE in January 2002. On March 25, 2002, BellSouth deployed LENS in CAVE for all ALECs.

KPMG Consulting Analysis

KPMG Consulting determined that the BellSouth software and interface development methodology includes the process for release management and control; however, it is not consistently followed. KPMG Consulting reviewed these procedures as related to Release 10.5 scheduled for production on May 31, 2002. Based on the number of defects encountered in BellSouth Releases 10.2 and 10.3, it appears that the BellSouth Quality Assurance process was not consistently followed for new software releases. Therefore, Exception 157 was issued. KPMG Consulting reviewed the results of Release 10.5 to ensure adherence to the BellSouth quality assurance process. As of July 17, 2002, there were 28 software and 24 documentation defects identified in Release 10.5. KPMG Consulting amended Exception 157 to reflect these additional issues, and this exception remains open.

f. *Long Account Team Resolution Intervals*

Issue

CLEC inquiries to the BellSouth Account Teams and CLEC Care Teams are often unresolved after weeks.

ALEC Summary

BellSouth has made difficult what should be a simple liaison structure between ALECs and account team functions. There is a lack of responsiveness to ALECs from BellSouth account management. BellSouth refers certain issues and ALEC inquiries to the External Response Team resulting in a lack of dialogue between ALEC and BellSouth and lengthy delays in resolution of an ALEC inquiry.

BellSouth Response

As a standard practice, the Account Team and CLEC Care Team acknowledge receipt of an ALEC's inquiry within 24 hours. This acknowledgment could include an actual answer to the ALEC's question, but might include a request for additional information or a discussion of the actions required to resolve the ALEC's inquiry. As part of the acknowledgment, the ALEC might be advised to contact the specific group within BellSouth that handles the ALEC's question or concern. Turn around times, however, are not standardized. Instead, the Account Team or CLEC Care Team will

determine resolution time frames based upon the nature and complexity of the issue, its urgency, and the projected amount of work and/or research required to return a complete and accurate response. The Account Team and CLEC Care Team will work with ALECs to provide reasonable target dates for resolving routine and urgent inquiries.

KPMG Consulting Analysis

KPMG Consulting looked at the adequacy and quality of responses given to KPMG Consulting as an ALEC. It did not look at responses given to other ALECs. KPMG Consulting only commented on what it experienced.

2. Pre-Ordering ALEC Experience Detail

a. *Inaccurate CSRs*

Issue

BellSouth LCSC delays its updating of CSRs causing errors, time delays, added cost, and customer dissatisfaction.

ALEC Summary

ITC states it frequently sees products and services on its customer's CSRs that were either omitted or added that were not part of the original order. ITC states it needs correct CSRs in order to do business with its customers accurately. ITC stated that, initially, after the new account team structure was implemented, it was no longer be allowed to send in lists of incorrect CSRs to be reviewed by BellSouth, but would have call them in with a limit of five CSRs to discuss per call. ITC states that sanction has now been lifted and lists are once again being accepted. ITC states that about 30 percent of the lists are related to Hunting.

WorldCom states one of the key problems it has had with BellSouth is that records are not updated regularly. WorldCom claims that the CSRs it retrieves do not match what has been done for the customer. According to WorldCom, this is true for both the wholesale and retail side. Because the CSR is not updated, the customer has to wait to add features because the ALEC order is rejected over and over again, according to WorldCom.

WorldCom discussed the possibility of BellSouth providing what WorldCom calls a "billing completion notice" to aide ALECs in identifying incomplete CSRs. The topic of billing completion notices was brought up by WorldCom while discussing the problem of pending service orders. According to WorldCom, a billing completion notice would provide notification to the ALEC when a customer's billing record had been updated. Since the billing records are what drive the CSRs, this would be an indication to the ALEC that the CSR is now in an up-to-date status. According to WorldCom, billing completion notifications are currently in place with other ILECs. WorldCom states the billing completion notification concept was placed before BellSouth via the Change Control Process and was rejected.

WorldCom also stated that BellSouth has done nothing to bring the Regional Street Address Guide (RSAG) and CSRs into alignment. According to WorldCom, this problem causes pre-order questions and rejects.

WorldCom reported that there are instances of discrepancies (that can impact customers) between the current CSR information and the realities of service status, such as when WorldCom receives a rejection response that it cannot migrate a customer but the customer has the phone service. WorldCom stated the LCSC (Local Carrier Service Center) has responded to its inquiries with comments that the CSR has not been updated and, in one case, that it takes at least five days to update the CSR. WorldCom added that it is unable to track the handling of these items because the LCSC did not allow it to get a trouble ticket number to refer back to.

WorldCom also reported that it had provided BellSouth with numerous examples of orders for which WorldCom has received order completion notices but for which BellSouth has not updated the CSR. WorldCom stated it believes some of this may be resulting from the fact that orders have dropped into a pending billing state within BellSouth, requiring some further manual action by BellSouth before it updates the CSR. WorldCom commented that it cannot determine for sure if this is at the root cause of some of the CSR update problems because it has been unable to obtain sufficient answers to its questions posed to BellSouth about systems and processes used in updating CSRs. WorldCom asserted that such delayed updating of CSRs can lead to the potential for double billing.

Network Telephone stated that CSRs are not updated in a timely manner by BellSouth, citing a 50 percent rate found in a sample of 498 PONs provided to BellSouth. Network Telephone asserted that this problem creates extended customer service intervals and extended back office area impacts.

BellSouth Response

According to BellSouth, the process for updating the CSRs for retail and wholesale are the same. The billing systems CRIS and CABS take the information that is handed to it from the ordering systems and formats it into the databases and the billing systems. According to BellSouth, this serves as the underlying information for the CSR.

BellSouth states that a CSR will be updated for an error-free order generally within one cycle (one business day, Monday through Friday, not including the companies six holidays). BellSouth further explains that the systems involved are batch systems and that at the cut-off time (5:00 or 6:00pm) each day, the information in the batch at that time then goes to update the billing systems.

BellSouth claims there are some situations that can lead to delayed posting of information to the CSR. As mentioned, the systems used to update CSRs are the billing systems CRIS and CABS. These systems may be actively involved in pulling both retail and wholesale bills. As explained by BellSouth, the billing process can hold-up CSR updates for up to three days while the billing systems access current CSRs and generate bills (one day before, day of, and day after the billing period). While this billing activity is performed, CSR updates are not performed.

Another situation that can cause a delay in updating a customer's CSR, according to BellSouth, is that the billing systems themselves may detect an error on the customer's service order. According to BellSouth, these types of errors may be caused for a number of reasons and occur at a rate of about one, to one and one-half percent of all service orders. BellSouth states this rate is approximately the same as it experiences for business customers. BellSouth explains this is mainly due to the accounts being large and complex, with multiple transactions going on at the same time.

BellSouth represented that CSR updates should occur within 24 to 72 hours after order completion and that the ALEC process is at parity with BellSouth Retail. BellSouth analyzed Network Telephone's example PONs (Network Telephone stated those PONs equaled 50 percent of the 498 cited, while BellSouth contended the percentage was somewhat less than 50) that did not meet the 72 hour interval per Network Telephone, and reported that results showed only five (which would represent one percent of the total 498 sample size) were out side the 72 hour interval. BellSouth asserted its willingness to work with that ALEC to reconcile differences.

BellSouth states that to review this allegation it conducted a study of all the service orders issued by the ALECs represented at the workshop and identified for each service order the time required to update the CSR from the date the order was completed in provisioning (Order Completion Notice sent) until the order posted to the CSR.

Citing the results of the study, BellSouth states that 80 percent of the CSRs are posted in one day, with 93 percent being updated within three days, and 98 percent in five days. According to BellSouth, this is consistent with the fact that, on occasion, service orders will contain errors that need to be resolved prior to updating to the CSR, or the fact that the CSR is used to calculate the bills themselves. According to BellSouth, these situations occur on both wholesale and BellSouth retail bills.

BellSouth states that in those relatively few cases where service orders are being corrected, thereby delaying the CSR posting, BellSouth works diligently to clear errors in a timely manner for both ALEC and retail service orders.

BellSouth states that in an effort to be responsive to the ALEC community, it has agreed to support the inclusion of a "Records Completion Notice" feature in the CCP to be prioritized by the ALECs. According to BellSouth, if the CCP prioritizes this request, the records completion notice feature will provide the ALECs with additional information as to when service offer information has been updated to the CSR.

BellSouth addressed WorldCom's concern regarding billing completion notices that would provide information to the ALECs when

a CSR would be updated stating it has not been addressed by the Ordering and Billing Forum (OBF). OBF recognition would make it a more standard process. BellSouth stated it was willing to reconsider the issue of billing completion notices as part of the CCP.

Additionally, BellSouth agreed (in responsiveness to the ALEC community, it asserted) to support the inclusion of a "records completion notice" feature in the CCP to be prioritized by the ALECs. If implemented, BellSouth said that would then provide ALECs with information as to when the CSR has been updated with service order data.

As to hunting-related issues, BellSouth issued a Carrier Notification of hunting refinements to be addressed in BBR-LO (BellSouth Business Rules for Local Ordering) 10.4, to be released April 5, 2002. (BellSouth 4/2/02 Carrier Notification SN91082969.)

KPMG Consulting Analysis

As part of the Pre-Ordering, Ordering, and Provisioning (POP) Functional Evaluation (TVV1), KPMG Consulting validated a sample of post-activity CSRs to determine whether the intended activity of the order (LSR) was executed and evident in the post activity account status.

As part of the Provisioning Verification and Validation (TVV4) test, accuracy of CSR updates was evaluated. KPMG Consulting did not review timeliness of CSR updates as there is no standard requiring BellSouth to update CSRs within a specific time frame.

KPMG Consulting applied a 95 percent benchmark to test the accuracy of CSR updates. Since BellSouth did not meet the 95 percent benchmark, KPMG Consulting issued Exception 112 to detail discrepancies between orders and updates to the customer service records.

KPMG Consulting conducted a retest of BellSouth's system fixes that were implemented to correct discrepancies found during initial testing and detailed in Exception 112. During the retest, KPMG Consulting reviewed 113 CSRs from April – May 2002. BellSouth provisioned 105 (93 percent) CSRs accurately. Although the test percentage is below the benchmark of 95 percent, the statistical evidence is not strong enough to conclude with confidence that the

performance is below the 95 percent benchmark. The inherent
variation in the process is large enough to have produced the
substandard result, even with a process that is operating above the
benchmark standard. The p-value, which indicates the chance of
observing this result when the benchmark is being met, is 0.2049.
This value exceeds 0.0500, which is the threshold used to determine
a statistical conclusion of failure. Based on these results,
Exception 112 was closed.

b. *Facilities Reservation Numbers Restrictions*

Issue
ALECs are disallowed by BellSouth to align back office when
sending Facilities Reservation Numbers electronically.

ALEC Summary
Network Telephone states it often receives incomplete data
when trying to pre-order loops through LENS. This often results in
Network Telephone having to contact BellSouth's LCSC to obtain a
Facilities Reservation Number (FRN).

According to Network Telephone, BellSouth developed a process
to deliver FRNs to it (when reservation IDs could not be obtained
via LENS) and arranged a test for that process. However the test
required orders to be submitted manually--a method that entails
higher costs and longer service due dates.

Network Telephone states it discovered a way to request loops
with FRNs via EDI which would get around the problems of higher
costs and longer service due dates. As a result of sending the
FRNs electronically through EDI, BellSouth deemed the test
unsuccessful. (ALEC Experience Workshop TR, pp. 14-16.) Network
Telephone states that BellSouth declared the test unsuccessful
because it could not recoup its cost if an order with FRN was sent
electronically as opposed to being sent manually. (ALEC Experience
Workshop TR, pp. 14-16.) The end result for Network Telephone is
loss of back office alignment.

BellSouth Response
According to BellSouth, what Network Telephone is referring to
in its complaint is a manual process to perform loop makeup.
BellSouth states the manual process for providing loop make-up
information involves a higher cost than using LENS or TAG

(BellSouth states EDI has no pre-ordering functionality, therefore, no way to submit a loop makeup request and subsequent FRN).

BellSouth states that the FRN is a function that goes with manual loop makeup (LMU). In brief, BellSouth describes the FRN as a process whereby a ALEC may place an inquiry for a loop and upon finding a suitable one may reserve it.

According to BellSouth, in order to understand the issue it is important to understand the means by which an ALEC can obtain loop makeup information and FRNs. BellSouth states there are three ways an ALEC can obtain loop makeup information, of which two can provide the ALEC with an FRN:

1. Electronic LMU-Service Inquiry (SI)
2. Manual LMU-SI
3. Firm Order LSR with SI
(BellSouth Post-Workshop comments Issue 4, p. 4)

BellSouth explains that, under the first scenario, the ALEC conducts an electronic LMU-SI on its own, via BellSouth interfaces (currently free of charge). According to BellSouth, if the SI indicates there is an acceptable loop, the ALEC can obtain an FRN and reserve that facility.

Under the second scenario, BellSouth states an ALEC can order a manual LMU-SI pursuant to which BellSouth will perform a loop makeup inquiry and provided the loop makeup information, including the FRN if appropriate.

BellSouth explains that under the third scenario, the ALEC submits a firm order LSR and BellSouth performs the service inquiry for the ALEC. According to BellSouth, if there is a suitable facility, BellSouth will provision the order. If not, BellSouth will clarify the LSR back indicating that there are no facilities. Under this scenario, BellSouth says it does not provide the actual LMU information to the ALEC, but handles the transaction on behalf of the ALEC.

BellSouth complains that what Network Telephone wants is for BellSouth to provide a manual loop makeup inquiry free of charge. BellSouth contends that Network Telephone uses the scenario one process (currently free) via LENS. If LENS returns a compatible

facility with an FRN, Network Telephone issues the order via EDI and it is processed without incident.

BellSouth explains that, if the LMU indicates that there are no spare facilities, or if the LMU data was not populated, Network Telephone wants to submit a Scenario Three order whereby BellSouth will perform a manual loop makeup on that same location, but Network Telephone does not have to populate the LSR until it learns whether or not there are facilities available.

BellSouth states it instituted a trial during which Network Telephone only needed to submit a service inquiry without the firm order LSR using the Scenario Three method. According to BellSouth, during the trial BellSouth performed the service inquiry and returned the results to Network Telephone, with the expectation that they would then manually submit the firm order LSR to BellSouth's Complex Resale Support Group (CRSG). BellSouth explained that it expected to would be compensated for a scenario two ordering process through the non-recurring charge for the loop.

BellSouth complains that once Network Telephone received the results of the Service Inquiry, it submitted the order mechanically via EDI (a Scenario One process), thereby avoiding the cost of the Service Inquiry.

BellSouth states it deemed the trial unsuccessful because, for every location without facilities, it was incurring the costs of conducting the Service Inquiry without being compensated for those costs. BellSouth complains that even though the order is sent via EDI, there is still a manual process involved in getting loop makeup information, which is why the charge for processing applies.

BellSouth complains that the process described above is what Network Telephone described as a "firm commitment" at the workshop. BellSouth further states that since this was never a firm commitment, it has not reneged on this commitment.

According to BellSouth, it has offered five free, on-site training classes on manual and mechanized LMU (one in Orlando, one in New Orleans, two in Atlanta, and one in Charlotte). In addition, BellSouth states it held an additional two training sessions via conference calls on September 13 and 28, 2001 (follow-up calls were scheduled for September 27 and October 11,

respectively, 2001.)

BellSouth states that Network Telephone had seven attendants participate in the last scheduled training session held via conference call on September 28, 2001. Network Telephone also attended the scheduled follow-up call on October 11, 2001, according to BellSouth.

According to BellSouth, Network Telephone indicated during the October 11 follow-up call that it had an understanding of the process and that there were no new issues from their perspective. BellSouth states it took this and feedback from others participating in the training sessions as an indication that the training sessions were good. BellSouth further states that the training classes have resulted in reduced errors by ALECs. (ALEC Experience Workshop TR, pp. 33-34.) BellSouth says that since November of 2000, it has seen only one manual loop makeup service inquiry.

BellSouth sums up by stating that the company incurs costs to conduct manual service inquiries and is entitled to recover those costs. BellSouth states it will continue to work with Network Telephone to find the most efficient and cost effective process for both parties. BellSouth states that if Network Telephone would like BellSouth to pursue changing this process, it should submit a change request via the CCP for processing and prioritizing by the ALEC community at large.

KPMG Consulting Analysis

KPMG Consulting issued Pre-order Loop Make-Up (LMUs) requests via the three methods described by BellSouth although due to the nature of the independent third-party test, KPMG Consulting used facilities that were provided by BellSouth prior to the start of testing. KPMG Consulting did confirm that Change Request 0422 was issued on the subject detailed above.

c.   *Inaccurate Information from LENS*

Issue

Inaccurate/incomplete data from LENS results in higher costs, longer service due dates, and customer dissatisfaction.

ALEC Summary

In its pre-workshop comments filed on November 15, 2001, Covad states it encounters continuing problems placing orders for xDSL and Line Shared loops via BellSouth's LENS pre-order/ordering interface. Covad claims that it has repeatedly escalated key operational issues regarding the functionality of LENS to BellSouth by way of correspondence and weekly conference calls. Covad complains that, despite these efforts, it has been unable to obtain consistent, satisfactory results.

According to Covad, BellSouth has stated on a number of occasions that it rigorously and extensively tested the LENS graphical user interface (GUI) to ensure electronic order flow seamlessly through BellSouth's systems. Not withstanding this, Covad claims its experience proves otherwise.

Covad complains that when BellSouth recognizes a problem exists, the company only implements system patches that do not address the problem as a whole. Covad claims that until BellSouth is forced to acknowledge and repair system flaws, the LENS GUI will remain an ineffective means of transmitting orders electronically.

Covad states the issues it encounters with LENS range from syntax used in completing fields on an order to critical issues such as Covad's inability to obtain the status of orders via LENS. Additional problems Covad states it encounters include:

1.   Inability to supplement, change, cancel or disconnect xDSL and line shared orders.

2.   Inability to find the status of an order on the Purchase Order Number (PON) status report.

3.   LENS rejection of orders due to invalid BellSouth Account Numbers (BANs).

4.   LENS formatting flaws including inaccuracy of documentation regarding how to submit an order for Line Sharing and xDSL. (Covad, Document No. 14541-01, p. 2.)

Covad further complains that while some of the issues linger, others have only been addressed with system patches or manual work-arounds. According to Covad, none of these system patches or any

permanent software solutions have been tested, leaving Covad to have no reason to believe these issues have been satisfactory and permanently resolved.

In addition, Covad claims information regarding address validation and loop make-up (which can cause failure to identify load coils until after an LSR is submitted) via LENS is inaccurate. Also, Covad states no F2 residential pairs are contained in database LENS references.

Covad states that although some of its complaints may seem minor, they will have a significant impact on its ability to function efficiently and provide high quality service to its customers.)

Network Telephone complains that inaccurate and incomplete data obtained from the "LENS database" causes ALECs to obtain a reservation ID or a Facilities Reservation Number from the LCSC resulting in higher costs and longer service due dates.

BellSouth Response

BellSouth states Covad and Network Telephone utilize the LENS graphical user interface (GUI) to obtain Loop Makeup information from BellSouth's Loop Facilities Assignment and Control System (LFACS). BellSouth states Network Telephone claims to have problems with the LENS database in obtaining accurate data in order to reserve the loop. According to BellSouth, Covad claims that the Loop Makeup data contained in LFACS is often wrong or missing, which causes them to cancel the order and resubmit an order with request for conditioning. BellSouth states that although the ALECs claim that this supposed LFACS deficiency " . . . causes unforeseen provisioning delays, prevents ALECs from providing timely DSL service, and causes ALECs to incur additional expense." This concern was prioritized sixth out of six by the ALECs. BellSouth's LFACS database is very accurate, although it certainly is not perfect. BellSouth states it is true that in some instances, some of the LMU information may not be listed in the LFACS database. In those instances when either BellSouth or an ALEC needs additional information that is not available electronically, both parties would be required to submit a manual LMU request. BellSouth states its loop makeup information process operates in a nondiscriminatory manner because any information that is missing for the ALEC is also missing for BellSouth.

According to BellSouth, Network Telephone claims that the incomplete data in LFACS results in their inability to mechanically obtain a Facility Reservation Number (FRN) and then send its orders electronically. According to BellSouth, Network Telephone alleges that BellSouth has refused to work with Network Telephone on these matters. BellSouth states these allegations are untrue, as BellSouth has previously explained in great detail in BellSouth's Post-Workshop Comments at pages 4-6. BellSouth described several alternatives that are offered to ALECs for obtaining loop makeup information. In addition to the alternatives previously addressed, Network Telephone has the option of ordering an Unbundled Copper Loop--Non-Designed (UC-ND) that will support DSL services and does not require a FRN. In any case, Network Telephone is not disadvantaged with respect to pre-ordering. It simply appears to be attempting to circumvent the normal process to avoid the manual service inquiry charge that is necessitated in the circumstances described. BellSouth remains committed to work with Network Telephone to find an efficient and cost effective process for both parties and suggested that a change request be submitted through the Change Control Process if Network Telephone wants to change this process.(BellSouth, Document No. 03106-02, p. 6.) Network Telephone has not submitted such a change request.

BellSouth states that Covad's issue relates to a concern about the need to issue two orders when Covad has ordered loops believed to have no impediments (load coils), but discovers during the provisioning process that load coils exist and that conditioning is thus required. (ALECs, Document No. 03114-02, p. 14.) BellSouth states that this concern is being addressed. According to BellSouth, Covad submitted a Change Request on January 17, 2002, to the Flow Through Task Force (Change Request 0622/TTF-33) requesting that BellSouth allow ALECs to preauthorize loop conditioning on mechanically submitted orders. This request was prioritized 12 of 18 at the April 9, 2002, Flow Through Task Force meeting. According to BellSouth, this change request is currently in Candidate Request status, but is not currently being actively pursued due to its lower priority ranking. BellSouth states that the FCC addressed the issue of nondiscriminatory access to loop makeup information and found ALECs' similar complaints to be without merit by stating, that:

[b]ased on the evidence in the record, we find, as did the Georgia and Louisiana Commissions," that BellSouth

provides competitive LECs with access to loop
qualification information in a manner consistent with the
requirements of the UNE Remand Order. Specifically, we
find that BellSouth provides competitors with access to
all of the same detailed information about the loop that
is available to itself and in the same time frame as any
of its personnel could obtain it.

As a result, BellSouth states any inaccuracies in the ILEC's
database are not discriminatory because they affect the ILEC in the
same fashion as competing carriers.

KPMG Consulting Analysis

KPMG Consulting did issue pre-order LMUs; however, both
addresses and facilities information were provided by BellSouth for
the purposes of setting up the pseudo-ALEC. Using the accounts set
up by BellSouth for the pseudo-ALEC, KPMG Consulting did experience
some instances where address validation did not occur due to
inaccurate information.

d. *Inaccurate Information from TAG*

Issue

Information that is available from LENS cannot be gathered
from TAG CSRs.

ALEC Summary

ITC DeltaCom states that it can go into LENS and pull customer
service records that cannot be accessed via TAG. ITC states that
BellSouth acknowledges this as a defect in TAG.

BellSouth Response

BellSouth states that, at the time of the workshop, the
company received over 2.5 million pre-order transactions per month.
For the period January through December 2001, BellSouth states it
received just under 1,800 manual loop makeup inquiries compared to
50,000 electronic loop makeup inquires for the same period.

BellSouth states that this issue is the same as the one
submitted to the CCP by ITC DeltaCom on September 24, 2001, and
assigned Change Request Number 0498. Change Request 0498 concerned
the inability to view certain CSRs in TAG and was determined to be
a Type 6 Defect with low impact. As a work-around, ALECs were

advised to access the affected accounts by using LENS to view CSRs
pending resolution. On February 2, 2002, in Release 10.3.1, CR0498
was implemented to correct this defect. Since this date, BellSouth
states it is not aware of any ALEC reporting a problem related to
the defect that was addressed in CR0498. Therefore, BellSouth
states it considers this issue resolved.

KPMG Consulting Analysis
KPMG Consulting did issue pre-order LMUs however both
addresses and facilities information were provided by BellSouth for
the purposes of setting up the pseudo-ALEC. Using the accounts set
up by BellSouth for the pseudo-ALEC, KPMG Consulting did experience
some instances where address validation did not occur due to
inaccurate information.

e.   *Pending Service Orders*

Issue
Pending BellSouth service order prohibits end users from
switching to an ALEC.

ALEC Summary
Florida Digital Network complains that pending BellSouth
service orders on customers' accounts delay the conversion process
in moving the customer to the ALEC. According to Florida Digital
Network, BellSouth will not allow processing of any type order when
the customer has a pending BellSouth service order. According to
Florida Digital Network, pending BellSouth service orders can be on
a customer's account for months without their CSR having been
updated. Florida Digital Network further complains that service
orders can even have been worked and completed and still show up on
the customer's CSR. The result is that the ALEC must cancel the
customer's order or ask the customer to cancel the pending
BellSouth service order. According to Florida Digital Network, the
ALEC must then resubmit the service order.

Florida Digital Network complains that BellSouth does not
clear up pending service orders in a timely manner. Florida
Digital Network points out that when the pending service order is
reported as cleared, the CSR may not be updated for a protracted
period, keeping the LSR in a reject/clarify state. According to
Florida Digital Network, after 10 days, BellSouth automatically
cancels an LSR that has not been accepted, effectively canceling

the ALEC order because BellSouth has not executed a service order
or CSR update in a timely manner.

In many instances, Florida Digital Network states it has given
its customer a specific time commitment but because of the pending
service order, there is nothing that can be done but wait for that
CSR to be updated so the process of moving the customer can begin.

Florida Digital Network states that having the CSR updated is
involved and frustrating. Florida Digital Network states that it
communicates with the customer to verify services shown as pending,
then will contact BellSouth's LCSC to let it know of the problem.
Florida Digital Network says it will even have the customer call
the retail side of BellSouth to try to correct the problem.
Florida Digital Network complains that BellSouth uses these
customer contacts and associated delays to inappropriately engage
in retention/win back activities.

ITC cites the same concerns as Florida Digital Network and
adds that on August 4, 2000, it submitted a change request to have
the TAG interface enhanced by adding a pending service order
indicator. ITC also points out that LENS did have a pending service
order indicator and that in release 9.4 (July 28, 2001), BellSouth
broke that indicator and it remained out of service until February
2, 2002 (six months).

WorldCom discussed the possibility of BellSouth providing what
WorldCom calls a "billing completion notice" to aide ALECs in
identifying pending CSRS. According to WorldCom, a billing
completion notice would provide notification to the ALEC when a
customer's billing record had been updated. Because the billing
records are what drive the CSRs, this would be an indication to the
ALEC that the CSR is now in up-to-date status. According to
WorldCom, billing completion notifications are currently in place
with other ILECs. WorldCom states that the billing completion
notification concept was placed before BellSouth via the Change
Control Process and was rejected.

WorldCom adds that the ability to see that a customer has a
pending order while in the pre-order phase would help. This
problem is not just limited to migrations from BellSouth, but
applies to ALEC-to-ALEC migrations as well according to WorldCom.
If WorldCom is migrating a customer from another ALEC and BellSouth

still has an outstanding service order for that ALEC, BellSouth
will reject the order.

BellSouth Response
BellSouth claims that ALECs are able to determine if there is
a pending service order in the pre-order mode from an indicator on
the CSR. BellSouth implies that using this indicator in the pre-
order process would allow the ALECs to identify and have the
potential migrating customer clear any pending retail service
orders.

Chairman Jaber asked why BellSouth would not immediately put
aside a customer's pending order because in effect it had been
preempted by that customer's request to change their local service
to another local service provider. BellSouth responded that is
very difficult for it to determine what the situation is when there
is still a request pending on a retail customer, even though that
customer is becoming a ALEC customer. Therefore, the company does
not process the order until it is purged or released.

BellSouth states that the process for clearing this situation
is that the ALEC will contact their prospective customer and have
that potential customer contact the BellSouth business office to
resolve the issue. BellSouth states this process ensures accuracy.
BellSouth further argues that another reason to delay the migration
is to determine if the product or service in the pending retail
service order is supposed to be migrated also. According to
BellSouth, after the migration has taken place, the ALEC could then
provide the service that was originally pending.

BellSouth states it could just transfer the customer with the
pending service order attached, but the ALEC would be accepting
responsibility that the migrating customer wants the service that
is currently pending on their BellSouth retail account. After the
migrating customer has canceled the pending service order through
the BellSouth Retail Business office, the ALEC must again contact
BellSouth Wholesale to restart the migration process.

BellSouth states its current process is designed to ensure
that the end user receives the service they want. Currently,
BellSouth states an LSR that encounters a pending service order
will be routed to the LCSC for handling. At the LCSC, the service
representatives will either process the ALEC LSR or will clarify

the LSR back to the ALEC who can then interface with the end user to resolve the pending service order. BellSouth states this process has two main benefits:

1. It allows the LCSC to process the LSRs for which the pending service order has no end user impact. (For example, if the pending service order is for the addition of a feature that will be processed that day, and the LSR is for a conversion with a later due date, the LCSC will process the order because the two requests will not conflict.)

2. For those pending service orders that will affect the end user, it gives the ALEC an opportunity to work with the end user to make sure that the pending service order is resolved to the end user's satisfaction.

Regarding pending order problems, Commissioner Baez offered the solution of having the migrating customer speak directly to the BellSouth Retail Business office during the course of the migration, similar to the exchange that takes place when switching interexchange carriers. BellSouth rejects this solution stating that at that point in time, BellSouth no longer views the migrating customer as its customer. BellSouth stated it would be willing to look at this and other options to simplify this process. BellSouth says its interests here is to protect the customer.

BellSouth refutes WorldCom's claim that there was no means to look at a customer service record prior to providing parsed CSRs. BellSouth states WorldCom could use the LENS interface in a real-time method with their customer on the phone. According to BellSouth, in this way the ALEC would know up-front if there was a pending service order to deal with.

BellSouth states that at one point there was a TAG defect that did not allow pending service orders to be identified. According to BellSouth, this defect has been corrected and is working properly.

BellSouth states it sampled a total of 187 LSRs requesting conversions that fell out for manual handling due to a pending service order. According to BellSouth, 133 LSRs were processed by BellSouth and a FOC was returned without the order being clarified. BellSouth states 29 LSRs dropped out for pending service orders but

were clarified back to the ALEC for reasons other than a pending service order. BellSouth says the remaining 25 LSRs were clarified back to the ALEC due to a pending service order that needed the involvement of the end user to resolve. BellSouth breaks these 25 down to 15 with BellSouth retail orders pending and 10 with ALEC orders pending.

BellSouth submits that this data indicate the company is able to process the vast majority of LSRs for end-user lines on which there is a pending service order without the involvement of the end user. BellSouth also states that for those pending service orders that do require the involvement of the end user, they are both BellSouth and ALEC pending service orders. According to BellSouth, this analysis highlights the need for industry consensus on the best way to make this process more efficient. According to BellSouth, the complexity of this issue indicates that simply canceling all pending service order without involvement of the end user, as suggested by the Commission during the workshop, may not be in the best interest of the end user.

To illustrate its point, BellSouth offered two hypothetical situations. First, BellSouth proposes that an end user placed an order with BellSouth for an additional line. After receiving the order, BellSouth received an order to migrate the customer to an ALEC. BellSouth states the LSR would not include the additional line because the line was not on the CSR at the time the LSR was submitted. According to BellSouth, the end user could have intended any of three things: 1) install the new line with BellSouth and migrate the existing lines to the ALEC; 2) cancel the pending service order for the additional line and just migrate the existing lines to the ALEC; 3) install the new line with BellSouth and then migrate all the lines on the account to the ALEC. BellSouth complains that without involving the end user, BellSouth has a two-thirds chance of processing the order incorrectly.

In its second hypothetical, BellSouth attempts to demonstrate the complexity of the issue when two ALECs are involved. In it, BellSouth assumes it has a pending service order to migrate an end user to ALEC A. In BellSouth's scenario, while the order is being processed, BellSouth receives an LSR to migrate the same end user to ALEC B. Under BellSouth's current process, BellSouth says it would clarify the LSR back to ALEC B to resolve the discrepancy with the end user. BellSouth complains that if it simply cancelled

the pending service order, the end user might not receive service from the carrier it intended.

In summation, BellSouth opines that the complexity of the issue and the significant end user impact leads to the recommendation that the ALECs open a change request in the CCP to allow appropriate input from the entire industry on the issue.

BellSouth addressed WorldCom's concern regarding billing completion notices that would provide information back to the ALECs when a CSR was updated stating it has not been addressed by the OBF. OBF recognition would make it a more standard process. BellSouth stated it was willing to reconsider the issue of billing completion notices as part of the CCP.

Additionally, BellSouth agreed (in responsiveness to the ALEC community, it asserted) to support the inclusion of a "records completion notice" feature in the CCP to be prioritized by the ALECs. If implemented, BellSouth said that would then provide ALECs with additional information as to when the CSR has been updated with service order data.

BellSouth states that it is involved with an additional Change Request Number 0127 regarding a request for new pre-ordering functionality in LENS and TAG. Although the ALECs suggested that this was a defect in TAG, it was determined through testing that this was not a defect and that TAG was operating as "defined in the baselined system requirements," and would therefore be treated as addition of "new" pre-ordering functionality.

BellSouth states that specifically, this change request will provide ALECs with indicator(s) on the Customer Service Record (CSR) whenever a "pending service order" exists for the end-user customer. Such indicator would act to alert the ALEC representative that service order activity is taking place on the end user's service. As stated by Ms. Shamone Stapler, ITC DeltaCom, on the Change Request, "This is the only way to let our people know that they will have to hold the next order until the previous order is complete." BellSouth intends to provide this new functionality and Change Request 0127 was ranked 7 of 26 Pre-Ordering/Ordering activities by ALECs in the May 22, 2002, Change Review Prioritization meeting. At present, a target date for implementation has not been determined. Efforts will continue to

determine or confirm where this new feature falls with relation to other requested ALEC change requests.

KPMG Consulting Analysis
KPMG Consulting experienced some issues relating to Pending Services Orders and the inability to make changes to accounts with this status. In most instances this was due to activity requests on the account that were made by KPMG Consulting.

3. Ordering ALEC Experience Detail

a. *Manual Handling of Local Service Requests*

Issue
Manual handling of orders results in higher costs and introduction of errors at BellSouth's LCSC, causing delays and inaccuracy in provisioning, and customer dissatisfaction.

ALEC Summary
BellSouth's LCSC introduces errors on service requests causing incorrect provisioning of UNE-P orders, according to AT&T. (AT&T, Document No. 01467-02, p. 2.) According to AT&T, these BellSouth-caused input errors impact and increase its operating expenses in conducting work with BellSouth.

AT&T cites a variety of errors that can be introduced during manual handling at the LCSC. AT&T states that in October and November 2001, it had 619 customer lines negatively impacted because there was a wrong entry in a table at BellSouth that caused the orders to fall out, delaying bringing the customer to AT&T. AT&T states that service orders retyped by LCSC service representatives do not always match what AT&T requested on the LSR, causing the customer to not get requested features, and generally delaying service to the customer. According to AT&T, approximately one-third of all ALEC orders still require manual intervention by the LCSC.

Covad states that manual orders cost more to submit than do electronic ones (in Florida, $3.50 for electronic compared to $10.73 per LSR for manual). Covad complains that manual orders result in the pitfalls of all things manual: manual FOCs, manual change orders, manual cancellations, jeopardy activity, status updates, and manual disconnects. Manual orders, according to

Covad, take longer to flow through BellSouth's ordering process (36 hours allowed for a manual FOC).

Covad further complains that there is no electronic ordering for the following products:

- IDSL
- ADSL loops requiring conditioning
- Line Shared orders requiring conditioning
- Unbundled Copper Loop-Non-designed (UC-ND)

According to Covad, BellSouth Retail enjoys fully mechanized ordering for analogous products. Covad further states that every other ILEC has mechanized ordering for these products.

WorldCom states that electronic submission of certain types of orders results in fall-out at BellSouth's LCSC where they are incorrectly rejected or clarified back to them. As a specific example, WorldCom states that migration by TN or address can be clarified back if the customer's name is misspelled, or if the community name is missing on the order-a condition WorldCom claims the BellSouth representatives should not edit on. WorldCom states these problems are due to the manual process that is involved when an order falls-out at the LCSC.

WorldCom also complains its BellSouth account team is being uncooperative in providing it examples of orders that have fallen-out for manual handling. After initial cooperation in providing 100 orders that fell-out for manual handling, WorldCom claims a second request to provide at least 50 additional orders for analysis was met with a flat rejection. WorldCom states it learned a great deal in reviewing the initial 100 orders.

BellSouth Response

BellSouth states it handles on average just under 111,000 ALEC LSRs per month. BellSouth refutes the ALEC claim that manual processing is excessive and states ALEC orders flow through its systems at a very high rate. BellSouth further states there is actually a minimization of the actual manual handling involved in today's environment.

BellSouth offers that the Commission has already addressed this issue in Docket No. 000731-TP dated June 8, 2001, quoting:

> We find that the proper mechanism to address this issue
> is the CCP. It would be beneficial for AT&T and other
> ALECs to have the ability to electronically enter all
> LSRs and have them flow through to SOCS without designed
> manual fall-out. However, the system in place does not
> create disparity for AT&T regarding order submission as
> stated earlier. Therefore, this issue is currently best
> suited to be pursued through the CCP process.

Applying its interpretation of the Order, BellSouth stated the
Commission wants the ALECs and it to "... work as a team on these
efforts."

According to BellSouth, nondiscriminatory access does not
require that all LSRs be submitted electronically and flow through
BellSouth's systems without manual intervention. BellSouth further
offers that manual handling affects it as well as ALECs. According
to BellSouth, its retail operations engage in significant manual
handling for its complex product offerings.

BellSouth supports its contention that manual handling is
minimal by pointing out 91 percent of all ALEC LSRs submitted for
the fourth quarter 2001 were done so electronically. Of these
electronically submitted orders, 10.9 percent fell out properly by
design for manual handling. BellSouth states 9.9 percent fell out
for manual handling due to BellSouth OSS system errors.

Addressing Covad-specific concerns, BellSouth states with
regard to UC-ND, Covad submitted Change Request 0541 on November 1,
2001, and that issue is now being handled via the Change Control
Process. For Covad's issue regarding ADSL/Line Sharing with
Conditioning, BellSouth states Sprint submitted change request
CR0387 on April 27, 2001, which was rejected by BellSouth as cost
prohibitive.

As to UDC/IDSL, BellSouth states it currently offers ALECs an
option to order IDSL manually. According to BellSouth, it
submitted Change Request 0557 on November 26, 2001, which will
provide electronic ordering of UDC. In the interim, BellSouth
states it has implemented a process for electronic ordering with
flow-through of IDSL, which is provisioned over ISDN lines. (Ibid.)

According to BellSouth, CR0557 is being implemented in two-phases: Phase-1 implemented on February 2, 2002 (Release 10.3.1), allows ALECs the ability to order electronically via TAG, LENS and EDI. Phase-2 (currently targeted for release May 18, 2002, as part of Release 10.5) will allow electronic ordering with flow-through.

BellSouth also states it has throughly investigated and resolved Covad's concerns over the Line Sharing and DSL ordering process. BellSouth states it conducts thorough and extensive end-to-end testing of both the manual and electronic ordering processes for new products. Pate states the company has established an internal team to ensure both manual and electronic Line Sharing orders are successfully processed.

Pate further states that Covad's complaint that LENS Would not allow supplemental LSRs for xDSL loops in missed appointment (MA) status is resolved. According to Pate, a temporary work-around was established, and a permanent fix was tracked via CR0508 and implemented on November 3, 2001.

According to BellSouth, Covad's complaint that LENS rejected orders due to invalid Billing Account Numbers (BANs) was resolved in September, 2001. BellSouth refutes Covad's assertion that documentation problems on the side of BellSouth was the cause of the difficulties experienced. BellSouth claims its investigation determined the problems were the result of Covad's failure to follow instructions. According to BellSouth, these instructions are posted on its Web site and were provided to Covad via e-mail.

BellSouth states it began an the analysis of WorldCom's November and December 2001 LSRs in advance of the Florida workshop. BellSouth states it provided WorldCom with an analysis of over 390 LSRs on February 19, 2002, the day after the workshop.

BellSouth states it conducted a similar analysis of October 2001 data at WorldCom's request and presented WorldCom with those results prior to the February 18, 2002 workshop.

BellSouth says it will, on a going forward basis, look at the top five reasons for errors in the monthly flow through data, using the analysis to identify training opportunities, process improvements, document enhancements and other appropriate corrective measures for both ALEC and BellSouth units. According

to BellSouth, this analysis will focus on ALEC requests that are returned for "auto clarification," LSRs that fall-out for manual handling due to ALEC reasons, and those that fall out for manual handling due to BellSouth reasons.

BellSouth further explains that the analysis will explain:

1. The specific causes for the auto clarification (where appropriate).

2. How to correct the cause for the auto clarification.

3. Verify that the BellSouth Business Rules are clear and correct.

4. The specific causes for LSRs falling out for manual handling.

5. Coordinate BellSouth caused reasons with the Flow Through Task Force.

6. Coordinate ALEC caused errors with appropriate ALEC representatives.
7. Determine if BellSouth business rules are strengthened where appropriate. (BellSouth, Document No. 03106-02, p. 10.)

BellSouth says its Customer Support Manager will facilitate the analysis and continue doing so until improvements are realized. Future analysis, according to BellSouth, will be exchanged as it becomes available, and will be discussed either on conference calls or in meetings.

BellSouth says it believes this plan is in keeping with WorldCom's stated objective of decreasing manual handling of LSRs. BellSouth states it will dedicate the resources to assist WorldCom, and other ALECs, with this objective.

KPMG Consulting Analysis
KPMG Consulting issued orders through three electronic interfaces (EDI, TAG and LENS) and also submitted a variety of transactions via fax and e-mail. Interface selection is based on

the documented functionality of the interface and product and ordering information provided by BellSouth to ALECs. In the event a product was electronically order able, KPMG Consulting attempted to submit orders through each interface as well as manually. KPMG Consulting reviewed 308 Clarifications and determined that 17 percent were in error. KPMG Consulting has issued Exception 165 this issue.

Note: KPMG's methodology in reviewing accuracy and completeness of response is independent of interface. Clarification responses are generated by BellSouth representatives in the centers and are unrelated to interface.

b. ***Local Freeze Lifts***

Issue
BellSouth does not properly execute PIC Freeze lifts, thereby delaying ALEC LSRs.

ALEC Summary
In addition to primary interexchange carrier freezes, Florida Digital Network states there are also local carrier freezes that prevent anyone from making an unauthorized switch to another local provider. Florida Digital Network complains that there are numerous examples of customers trying to switch their service to Florida Digital Network from BellSouth only to have those orders clarified or rejected back because of an existing local freeze on the account. Florida Digital Network complains the process of removing the local freeze is nearly equal to that of removing an ADSL USOC in that the local customer must contact BellSouth and obtain an order number which Florida Digital Network then takes to the LCSC. Florida Digital Network states after taking the order number to the LCSC to remove the local freeze nothing happens-the local freeze still stands. Florida Digital Network also states that, in some cases, the customer is unaware a local freeze is in place on their account. Florida Digital Network states Rule 47, CSR 64.1190(e) provides that, at a minimum, the local exchange carrier administering a freeze must offer a mechanism for a three-way conference call with the subscriber to lift the freeze.

Florida Digital Network sums up by stating that with the proper letter of authorization and documentation any ALEC should be

afforded the opportunity to acquire that customer if that customer
is requesting migration.

BellSouth Response

BellSouth states in addressing this issue that it is
imperative to recall that preferred carrier (PC) freezes were
implemented to protect end users from unauthorized account
transfers. In other words, BellSouth states, when end users agree
to a Local/PC freeze on their accounts, they are agreeing to a
certain loss of flexibility in exchange for protection against
unauthorized migration.

BellSouth states that it has reviewed its current process
which requires the end user to initiate the removal of preferred
carrier freezes to their account and allow local service provider
changes. BellSouth states that the migration of an end user with
a Local/PC freeze on their account is governed by specific FCC
rules, and that its current process is in compliance with FCC
slamming rules (47 CSR Part 64; CC Docket 94-129; FCC 00-255, and
FCC 01-67) that describe the allowable procedures to remove
preferred carrier freezes. BellSouth notes that Paragraph 65 of
the above docket mentioned above states in relevant part:

> ... as we stated in the Section 258 Order, ... we
> concluded that LECs administering a preferred carrier
> freeze program must accept the subscribers authorization,
> either oral or written and signed, stating an intent to
> lift a preferred carrier freeze. We determined that LECs
> also must permit a submitting carrier to conduct a three-
> way conference call with the LEC and the subscriber in
> order to lift a freeze. Our rules do not, however,
> prohibit LECs from requiring submitting carriers to use
> separate methods for lifting a preferred carrier freeze
> and submitting a carrier change request.

BellSouth opines that the Order demonstrates the options
available to providers are limited to heighten the protection
against unauthorized migrations. To ensure that ALECs understand
BellSouth's process, the company states it recently issued an ALEC
notification that reiterates the process to successfully migrate an
end user's local service with a preferred carrier freeze.

BellSouth discounts ALEC complaints of this being an extensive problem. BellSouth states its clarification data for January 2002 indicated that, out of over 67,000 electronic clarifications issued by the LCSC, only 15 ALEC requests for local service transfer were clarified for Local Service Freeze on the end user account. BellSouth sums-up by stating the above data indicate either the current process is working effectively, or local preferred carrier freezes have a very small impact on total ALEC service requests processed, and further states that in any event this issue is not in any way impeding local competition.

KPMG Consulting Analysis
KPMG Consulting issued orders that included the freezing and unfreezing of PIC and LPIC. KPMG Consulting did not experience functionality issues associated with this activity.

c. *ADSL USOC Causes Invalid Clarifications*

Issue
Whenever an ADSL USOC (or ADL11) is on the CSR, the ALEC is blocked from transferring the customer's service. Also, BellSouth delays the delivery of UNE-P to customers who have an ADSL USOC appearing on their CSR.

ALEC Summary
AT&T states it has experienced the same problems as Network Telephone (discussed below) when ordering ADSL. AT&T states it was given a phone number to call for the DSL services group in order to get the name of the customer's DSL provider (even if the customer says they don't have DSL). AT&T complains that whoever they get at BellSouth's DSL services group never has the answer to any question they have.

AT&T states their customers will tell them that they do not have ADSL and so do not know why the ADL11 USOC would be on their BellSouth account. AT&T says it will then call the BellSouth DSL Services Group to obtain the customer's DSL status and to answer any other technical issues as directed by BellSouth to identify the DSL provider. According to AT&T, the BellSouth employees they are directed to neither know the answer to AT&T's questions, nor know where the answers can be found.

According to Florida Digital Network, whenever it submits an LSR to BellSouth for a customer who has either BellSouth ADSL on any line or ADSL indicated on their CSR, the order falls out for manual handling, and, in most cases, is unreasonably delayed. Florida Digital Network states this occurs even when porting non-ADSL voice lines. Florida Digital Network claims that lack of focus on BellSouth's part in correcting errors in ordering interfaces lead to problems such as having an invalid ADSL USOC on a customer's service record. According to Florida Digital Network, this particular item prevents them and other ALECs from migrating customers from BellSouth when it appears on a service record. According to Florida Digital Network, this particular error can take months to correct

According to ITC, ALECs are prohibited from offering UNE-P to a customer with ADSL. ITC states it has migrated several customers to UNE-P with ADSL. Twenty-four of those customers were later converted by BellSouth to ISP traffic, according to ITC. ITC states it approached BellSouth with the proposition that the migration worked and that the administrative prohibition of having the two at the same time should not exist. According to ITC, BellSouth responded that it was simply policy to not allow UNE-P with existing ADSL. According ITC, the alternatives BellSouth offered were the customer could revert to BellSouth and keep ADSL, or ITC could convert them back to resale.

Network Telephone complains it has experienced a rash of problems with BellSouth on USOC nomenclatures used as it says to "thwart" moving customers to it. (Network Telephone handout pg 5) One such case involves the appearance of an ADSL USOC (or AD111) is on the CSR. According to Network Telephone, in this case the ALEC is blocked from transferring the customer's service.

BellSouth Response
BellSouth states that, in the workshop, various ALECs alleged BellSouth is using a DSL USOC to impede their ability to migrate a customer to the ALEC using UNE-P. BellSouth states flatly that the allegation is baseless.

BellSouth states that until November 3, 2001, when a ALEC submitted an LSR to convert an end user via UNE-P, BellSouth would manually strip the DSL USOC from the CSR so the customer could be converted to the ALEC. According to BellSouth, this process caused

some end users unintentionally to loose DSL service from their ISP
without notification to the ALEC, ISP or end user.

On May 14, 2001, WorldCom submitted Change Request   0399
seeking to have BellSouth clarify UNE-P conversion orders for end
users with DSL Uniform Service Order Codes (USOCs) on their CSRs
back to the ALEC. According to BellSouth, its current process is
to automatically strip the USOC. BellSouth claims the intent of
this was for the ALECs to work with their end users prior to the
cut to the ALEC to ensure advanced knowledge about the potential
loss of DSL service.

According to BellSouth, WorldCom's process was implemented on
November 3, 2001 and included the following steps:

1.   ALEC submits the LSR for end user with DSL USOC on the end
     user's line.

2.   BellSouth clarifies the LSR back to the ALEC with note about
     the DSL USOC.

3.   ALEC contacts end user to have end user cancel DSL service
     with their ISP.

4.   ISP accepts disconnect request from the end user and processes
     a disconnect order with BellSouth.

5.   BellSouth process the disconnect order from the ISP, and
     removes the DSL USOC from the end user's line.

6.   ALEC resubmits the LSR, converting the end user's voice
     service to the ALEC. (BellSouth, Document No. 03106-02, p.
     18.)

BellSouth further states each of the ALECs' specific
complaints is with out merit. BellSouth states that ALECs complain
that BellSouth is "prequalifying" customer lines for DSL service
and indicating the line is qualified with an ADSL USOC. BellSouth
states this is incorrect.

BellSouth states that it puts the ADSL USOC on the end user's
line on the order of the NSP, and does not place a USOC on the end

user's line unless, and until, the NSP requests an order be processed via the BellSouth Service Order Entry Gateway (SOEG).

According to BellSouth, ALECs further complain that BellSouth will clarify an LSR back on the grounds that there is a DSL USOC on the line, and the end user will tell the ALEC they don't have DSL (BellSouth refers to this as the "phantom" USOC issue). BellSouth states this situation can arise for two different reasons. The first is when the NSP orders DSL from BellSouth, but the end user never activates it. In this situation, BellSouth provisions the DSL to the NSP, places the USOC on the end user's line and begins billing the NSP. BellSouth states that from its position, there is DSL on the line, but because the end user never activated it, the end user sees no DSL.

Another situation occurs when the end user has disconnected their DSL service via their NSP, and the NSP has placed the disconnect order with BellSouth, but the disconnect order has not has not been fully processed through BellSouth's systems at the time the LSR is submitted. In this situation, according to BellSouth, the end user believes they have disconnected their DSL. The problem is that disconnect has not worked its way to the CSR on the BellSouth side of the transaction. What results, according to BellSouth, is the end user states they don't have DSL, while BellSouth records indicate they do.

According to BellSouth, these scenarios happen on a very limited bases (approximately 0.3 percent of UNE-P conversion LSRs in January 2002 were affected by the scenarios described).

BellSouth states that Birch Telephone submitted Change Request 0625 on January 27, 2002, requesting the ability to drop ADL11 on conversion orders without getting an auto clarification. BellSouth also says the change request also requests to remove ADL11 on conversion orders with an LNA V without clarification and the ability to issue with LNA G that would automatically clarify back to the ALEC. BellSouth says this request is being reviewed, as well as other concerns regarding DSL, and is being scheduled for prioritization by the ALECs in the April/May time frame.

BellSouth states that in the interim, it is beginning a trial utilizing a manual process with Birch to remove DSL USOCS that are not attached to active DSL accounts (which, according to BellSouth,

would resolve concerns associated with the two scenarios discussed above). BellSouth states that pursuant to this process, whenever BellSouth clarifies a conversion order back to the ALEC for DSL service, and the end user tells the ALEC they don't have DSL service, the ALEC will call a dedicated group in the LCSC and that group will input the service order to remove the DSL USOC from the CSR. BellSouth states if this process is successful with Birch, the process will be rolled out to all the ALECs.

KPMG Consulting Analysis
During the course of testing of ADSL KPMG Consulting did experience this issue.

d.   *LCSC Effectiveness Concerns*

Issue
Inadequate LCSC staff skill levels foster confusion and wasted time in resolving rejects and clarifications, high work load results in delays, and other concerns. In addition, the load on the LCSC remains high and the resulting delays in partially mechanized order processing have not changed.

ALEC Summary
According to AT&T, the load on the LCSC remains high and resulting delays in partially mechanized order processing have not changed. Specifically, AT&T states that the November 2001 LCSC load was 140,404 LSRs. AT&T claims 69 percent of that load (96,849 LSRs) was from fallout from electronically submitted orders. 82 percent of fallouts, (79,562 LSRs) were caused by BellSouth system design failures, according to AT&T.

AT&T also complains that input errors by LCSC representatives have not improved and resolution times on calls to the LCSC have also not improved. AT&T also claims FOC and reject intervals for partially mechanized orders in actual hours still average greater than one full business day. AT&T states the average interval to return a fully mechanized FOC/reject is approximately 15 minutes, while that interval for a partially mechanized order is about 18 hours.

In its preworkshop comments filed October 30, 2001, Covad claims several deficiencies at BellSouth's LCSC:

1. No automated call routing system.
2. LSRs cannot be e-mailed to the LCSC.
3. Data from various BellSouth systems is incorrect, inconsistent, and unreliable.

Covad complains there is no automated call routing system in place at the LCSC. Covad states such a system would allow incoming ALEC calls to be answered in a timely manner. Covad complains that currently, its representatives must call the LCSC and let the phone ring repeatedly until someone answers.

In comparison, Covad states has an automated call routing system that sends the calls to the nest available representative as well as providing information to the caller about how long the wait is likely to be. According to Covad, its representatives must wait long periods of time, or must call back. Covad complains that messages it leaves on voice mail get lost, causing more time and money to be spent remaking calls.

Covad complains that when BellSouth determines that BellSouth has made an error on an LSR, and Covad is calling about that specific LSR, Covad must be transferred to the specific BellSouth representative that put the order into clarification. Covad states that while this action may have some genuine use for training BellSouth representatives, Covad and other ALECs should not have to endure costs, and time delays for BellSouth training.

Covad further states that BellSouth does not allow orders, LSRs, clarifications, jeopardy notices, and others to be submitted via e-mail. Covad states it cannot order all types of loops electronically, resulting in them being submitted manually. Specifically, Covad states the following cannot be ordered electronically:

1. UDC/IDSL Compatible Loops
2. UC-ND
3. ADSL or HDSL Loops the require conditioning
4. Line Shared Loop requiring conditioning
(Covad, Document No. 13723-01, p. 3.)

Covad complains that its electronically submitted orders that
fall out for manual handling are negatively affected because they
are managed via facsimile rather than in a more efficient way such
as e-mail. Covad further complains that BellSouth does not have a
single source of accurate data for ALEC orders. Covad states that
the multitude of systems such as CSOTs, CPSS, COSMOS/SWISH report
and PONS status report all impact the company's ability to issue
and obtain the status of orders correctly and efficiently. Covad
also state that the reports and systems just mentioned contain
conflicting information.

According to Florida Digital Network, attempts to address a
clarification resulted in different LCSC staff requesting different
address information to resolve the same clarification. Florida
Digital Network states that such inefficiency results in confusion
and wasted time.

WorldCom states that electronic submission of certain types of
orders results in fall-out at BellSouth's LCSC where they are
incorrectly rejected or clarified back to them. As a specific
example, WorldCom states that migration by TN or address can be
clarified back if the customer's name is misspelled, or if the
community name is missing on the order-a condition WorldCom claims
the BellSouth representatives should not edit on. WorldCom states
these problems are due to the manual process that is involved when
an order falls-out at the LCSC, and specifically mentions training
levels of LCSC representatives in its complaint.

<u>BellSouth Response</u>
BellSouth states its representatives are trained to handle the
majority of ALEC issues while the ALEC is on the phone. According
to BellSouth, if the resolution to the issue is expected to take
longer than 15 minutes, the service representative will commit to
resolve the issue and to provide a follow-up call to the ALEC if
requested. BellSouth states its policy is for the service
representative to provide a status of the issue to the ALEC within
an hour. In addition to handling ALEC inquiries, BellSouth states
its service representatives are empowered to receive and handle
first level escalations from ALEC customers provided the ALECs give
them the opportunity to do so.
According to BellSouth, if the issue is not resolved to the
ALECs satisfaction, there is an escalation process in place
pursuant to which the ALEC can, if necessary, reach the Operations

Assistant Vice President for the Center (documented on the interconnection Web site). BellSouth states this process is used by the ALECs, and the LCSC is not aware of ALEC complaints.

BellSouth further states it has implemented an Escalation Desk in the Fleming Island LCSC staffed with Escalation Managers who manage such issues. BellSouth says these managers maintain a ALEC Escalation Log to track and monitor escalated issues. According to BellSouth, this log is used to coach and develop service representatives to better handle customer issues and thereby minimizing escalations.

BellSouth states that while the total number of LSRs submitted to BellSouth has increased over the period January 2002 - March 2002, the LSRs handled by the LCSC (Local Carrier Service Center) as a percentage of total LSRs submitted has actually decreased. This is due in large part to an increase in the number of LSRs submitted electronically - specifically, an increase from 87.2 percent of total LSR submissions, both manual and electronic, in January 2001 to 93.3 percent in March 2002. Moreover, a higher percentage of the LSRs handled by the LCSC are due to ALEC errors. That number has almost tripled over the same time period (January 2001 - 6,558 ALEC errors; March 2002 - 19,367 ALEC errors)

FOC Partially Mechanized:
BellSouth states it has also improved its performance in key LCSC measurements of FOC Timeliness and Reject Timeliness for partially mechanized and manual requests as reported via SQM results.

BellSouth states the current benchmark for partially mechanized requests is a return of 85 percent of the FOCs Rejects within 10 hours. BellSouth also states the current benchmark for manual requests is a return of 85 percent of the FOCs /Rejects within 24 hours (both changing to 95 percent with the May 2002 data pursuant to Commission Order in Docket No. 000121-TP). According to BellSouth, the LCSC is meeting the measurement for FOC and Reject timeliness, as indicated by the following chart showing the results for the first quarter 2002 for these measurements:

FOC and Reject Timeliness Results January-March 2002	
FOC	Rejects
Partially Mechanized:	**Partially Mechanized:**
January 92.75%	January 93.80%
February 85.91%	February 89.23%
March 89.76%	March 91.65%
Manual:	**Manual:**
January 99.36%	January 99.11%
February 99.30%	February 99.07%
March 99.46%	March 99.02%

In summing up, BellSouth states the LCSC is actually handling fewer partially mechanized and manual requests as a percentage of total LSRs submitted by the ALECs, and the SQM results have improved, showing that BellSouth consistently exceeds the established performance benchmarks established for the categories in question.

KPMG Consulting Analysis

LCSC Staff Skill Level, Work Load and Other Concerns

KPMG Consulting reviewed the service representative training curriculum and observed employees performing their duties as assigned and documented in BellSouth internal method and procedure guides. KPMG Consulting also noted that employees had ready access to methods and procedures via an online information repository and were therefore able to access information and forms in order to complete their various duties.

Ability to handle workload is tested as part of the POP Volume Performance Test (TVV2) manual volume test. KPMG Consulting issued Observation 192 and Exceptions 72 and 116 concerning LCSC manual volume testing. Manual volume testing is now complete, and two normal tests, one peak test, and one stress test have shown satisfactory results.

KPMG Consulting issued Exception 103 to address the lack of documented guidelines for ALEC interaction with the Fleming Island Local Carrier Service Center (LCSC). BellSouth responded by updating method and procedure guides for call handling service representatives. KPMG Consulting observed call center service representatives at work and observed customer issues being resolved according to documented method and procedure guides e.g. customer calls are addressed while the customer is on the phone unless the issue is expected to take more than 15 minutes to resolve in which case the customer is offered a call back or the issue is escalated per the customer's request.

KPMG Consulting also issued Exception 110 to address the lack of adequate procedures for call tracking and resolution at the Fleming Island LCSC. The paper tracking mechanism did not allow Service Representatives to readily share call details. BellSouth subsequently implemented an electronic customer management system, which put the paper Call Analysis Sheet on an electronic interface. In additional to facilitating quicker sharing of call details, the electronic tracking system facilitates the creation of reports for issue tracking by managers. BellSouth also implemented an internal Escalation Help Desk for tracking of issues through to completion. Managers use Escalation Logs to track call issues. KPMG Consulting observed the new online call tracking mechanism, the Escalation Help Desk as well as the New Escalation Logs, which are used by management to track issues to resolution and are satisfied with the call tracking processes and procedures.

Regarding delays in processing partially mechanized orders,
KPMG Consulting measures Firm Order Confirmation (FOC) timeliness using Service Quality Measurement (SQM) 0-9 and will report all test result in the Final Report. As of May 1, 2002 FOC timeliness results are:

Firm Order Confirmation Timeliness May 1, 2002	
FOC-Fully Mechanized Benchmark 95% ≤3hrs.	FOC-Partial Mechanized Benchmark 85% <10hrs.
EDI - 97.98% TAG - 98.66% LENS - 99.35%	EDI - 92.42% TAG - 91.18% LENS - 87.80%

e. *System Outages*

Issue

System outages continue to reduce ALEC operating efficiency and effectiveness.

ALEC Summary

AT&T claims that system outages continue to reduce ALEC operating efficiency and effectiveness. According to AT&T, during January 2002, BellSouth has reported the following number of outages (only outages of 20 minutes or longer are reported):

- LENS   9
- TAG   4
- EDI   2
- CSOTS   5

AT&T states in February 2002, a further four LENS outages and two TAG/LENS outages occurred.

BellSouth Response

BellSouth quotes the FCC in the Georgia/Louisiana Order, ¶118, that:

> We also find unpersuasive comments by AT&T and US LEC/XO claiming that LENS, TAG, and ED1 outages interfere with their ability to provide service. While we share the Department of Justice's concern that severe interface outages can impact a competing carrier's ability to successfully compete,

commenters do not demonstrate that the few
outages they mention have caused competitive
harm sufficient to warrant a finding of
checklist noncompliance. Moreover, BellSouth's
performance data indicate that these
situations are not significant.

To elaborate on the basis for the FCC's finding, BellSouth
provides the following response for the Florida Commission's
consideration. In previous state and federal 271 proceedings,
BellSouth states the ALECs have complained about system outages and
availability, most often, those unplanned system outages related to
LENS and TAG. In rebuttal, BellSouth claims its recent performance,
however, on the monthly interface availability measurement has been
excellent. BellSouth states that in fact, since December 2000, it
has regularly met the measure of 99.50 percent for TAG, EDI, and
LENS in all nine states. BellSouth states the interface
availability measure is defined as the percentage of time
applications are functionally available as compared to scheduled
availability. The interface availability schedule for each OSS is
listed on the BellSouth Interconnection Web site. BellSouth states
that only full outages are calculated for this measure.

BellSouth states that despite its best efforts, unplanned
outages do occur. When unplanned system outages occur, BellSouth
states it notifies ALECs real-time via e-mail and web postings.
According to BellSouth, this notification process is in keeping
with the Change Control Process guidelines established for Type 1
System Outages. Either BellSouth or an ALEC may initiate a change
request to address the problem according to BellSouth. BellSouth
also states Type 1 System Outages are processed on an expedited
basis.

Type 1 System Outages are reported as one of the following
items.

- No Outage
  There is a No Outage (N) condition that may occur for
  several reasons. First, the investigation finds that no
  problem actually existed. Second, the problem may be
  determined to have occurred on the customer side. Third,
  the investigation was unable to confirm that an outage
  actually occurred. And finally, the reported outage

actually occurred during a previously announced scheduled downtime.

- Degraded Outage
  A Degraded Outage (D) means that an application is processing less than normal capacity or is providing slow responses. This degraded condition may also impact one or more customers. Then, there is Loss of Functionality (LON). Loss of Functionality is incurred when a function normally provided by an application is unavailable to any customer. This may also impact one or more customers.

- Full Outage
  A Full (F) Outage occurs when an application is down or is totally inoperative to one or more ALECs.

BellSouth states it is important to note that even though an outage is posted to the Web site, in many cases it may impact only some of the ALECs. BellSouth states that as described above, even a Full Outage may impact only one customer. However, the posting of the outages to the Web serves as a useful tool. According to BellSouth it allows us to alert all of our customers that a problem has been reported and that each of those problems are actively being investigated by BellSouth.

BellSouth states that a review of the LENS Type 1 System Outages posted to the Interconnection Web site for the months January 2002 through March 2002 as compared to the same period last year, reveals outages are decreasing. BellSouth offers the table below to highlight what it categorizes as a dramatic decline:

LENS System 1 Outages		
	2001	2002
January	14	9
February	18	7
March	15	2

(BellSouth, Document No. 05769-02, pp. 23-26.)

In conclusion, BellSouth states it meets Florida approved performance measures for OSS availability. BellSouth states that in

fact, during the three-month period January 2002 through March 2002, EDI was available more than 99.7 percent of the time; both TAG and LENS exceeded the monthly benchmark. Moreover, BellSouth states, the FCC's approval of the Georgia and Louisiana 271 application reaffirms BellSouth's position that under current standards, BellSouth meets its obligation to provide ALECs with nondiscriminatory access to its OSS.

KPMG Consulting Analysis

KPMG Consulting monitors system outages to ensure that they are properly reported and catalogued by BellSouth and that they are communicated to ALECs within the appropriate times frames, which are covered in under PPR1 and PPR3 tests activities.

During review of System Outage Reporting, KPMG Consulting found that BellSouth was not properly adhering to the procedures for communicating system outages to ALECs. As a result, KPMG Consulting issued Exception 12. KPMG Consulting conducted three retests of the process once BellSouth instituted the necessary changes. KPMG Consulting found that BellSouth is now adhering to the procedures for reporting system outages.

f. *Invalid Clarifications and Rejects*

Issue

Invalid LSR clarifications add time and expense to the order process and result in customer dissatisfaction and loss.

ALEC Summary

During October and November 2001, AT&T received invalid clarifications for USOCS on 203 PONs impacting 619 customer lines, according to AT&T. AT&T states that BellSouth claimed some error had been made in the table for the state of Florida associated with converting a customer from retail to UNE-P.

AT&T complains that when migration by TN and Name was implemented the function contained errors resulting in a rejection rate around 30 percent.

Florida Digital Network states it primarily uses the TAG electronic interface, and does submit some orders manually. Florida Digital Network complains it has experienced significant incidences of receiving erroneous rejects/clarifications for both

electronic and manual orders. Example includes orders clarified for improper LNA codes (line level activity codes) that were later found to be proper. Florida Digital Network also complains that BellSouth rejects/clarifies LSR that could have been easily corrected at the LCSC in one attempt. According to Florida Digital Network, erroneous rejects have become more frequent and have reached problematic levels, requiring a great deal to resolve and stalling the customer's desire to migrate.

WorldCom states that electronic submission of certain types of orders results in fall-out at BellSouth's LCSC where they are incorrectly rejected or clarified back to them. As a specific example, WorldCom states that migration by TN or address can be clarified back if the customer's name is misspelled, or the community name is missing on the order-a condition WorldCom claims BellSouth should not edit on.

WorldCom also claims that BellSouth rejects valid LSRs when BellSouth's RSAG and CRIS databases used in provisioning the order do not match. According to WorldCom, BellSouth stated the problem would be corrected on February 2, 2002, but has neither allowed ALECs to test the system fix, nor allowed them to see the business rules that will be used to govern the edit to ensure it works and does not lead to other problems.

WorldCom further complains that another source of invalid rejects come from LSRs for customers who had voice mail or call forwarding with BellSouth. According to WorldCom, such LSRs are apparently designed to fall out for manual processing (although BellSouth documentation does not indicate such design), and are often rejected in error or provisioned incorrectly. According to WorldCom, BellSouth is considering making these orders flow through electronically; however, WorldCom says it is not aware-through the CCP or other wise-if the company has firm plans to do so.

According to WorldCom, one problem in addressing manual handling problems is having to deal with two LCSCs. WorldCom says that its orders fall out for manual handling at the Atlanta LCSC, but its representatives call the Atlanta LCSC about UNE-P orders, they are informed UNE-P orders are handled at the Jacksonville LCSC.

According to WorldCom, during a recent visit to the Atlanta LCSC, BellSouth representatives stated they were unaware of the manual handling problems, which WorldCom infers is suggestive of a communication breakdown between the two LCSCs.

According to Network Telephone, BellSouth sends queries about questionable entries on LSRs. Network Telephone says it has found over 30 percent of all clarifications (queries) are invalid. Invalid clarifications increase back office labor cost and delay completion of customer orders, according to Network Telephone.

BellSouth Response
BellSouth's concise response to this issue is to state it is not an issue. Explaining, BellSouth states it has a high accuracy rate on manual clarifications. BellSouth replies to WorldCom's complaint specifically stating WorldCom received 5,928 clarifications in January 2002 and that WorldCom called the LCSC to challenge the validity of only 289 of those clarifications. BellSouth states that of the 289 challenged, only 65 (1.09 percent) of those were clarified by the LCSC in error. BellSouth states it will continue to keep these records to ensure that its performance for WorldCom and other ALECs remains high.

KPMG Consulting Analysis
KPMG Consulting reviewed 308 Clarifications through April 3, 2002, and an additional 20 Clarifications from April 4, 2002 through May 15, 2002, for accuracy and completeness of responses and determined that 10.71 percent were issued in error. KPMG Consulting issued Exception 165 detailing the inaccuracies found in the clarification responses.

g. *Electronic Ordering*

Issue
Inability to electronically order (required manual ordering) all products results in BellSouth errors, timeliness issues and increased cost and customer dissatisfaction/loss.

ALEC Summary
According to AT&T, the overall percentage of ALECs LSRs resulting in the creation of fully mechanized service orders has not changed significantly since March 2000. AT&T claims that in March 2000, only 55 percent of ALEC LSRs resulted in the creation

of fully mechanized service orders. As of December 2001, only 57 percent of ALEC LSRs resulted in the creation of fully mechanized service orders.

AT&T states the percentage of ALEC LSRs submitted electronically but subsequently routed to the LCSC for manual handling has also not improved. Citing November (2001) results as normal, AT&T claims combined designed manual fallout and BellSouth system errors were 19.3 percent for non-LNP orders and 37.7 percent for LNP. AT&T states in total, one third of all ALEC orders still receive manual processing at the LCSC.

Manual processing impacts and increase operating expenses in conducting business with BellSouth, according to AT&T. Examples include improper clarifications that cause delays in bringing over customers to AT&T. Also, when an order is manually handled at the LCSC, the opportunity to introduce errors arises which can also delay ALEC customers' orders.

AT&T also states a single order can be sent back multiple times for clarifications instead of addressing all issues at once (AT&T refers to this as "serial clarifications"). AT&T describes this process as one that "absolutely increases the operating costs and delays the customer's desire to get to AT&T." Manual clarifications do not address all errors existing on an LSR the first time the clarification is sent, and subsequent LSRs are rejected for additional errors that existed on the original LSR.

Inability to electronically order IDSL, ADSL, Line sharing, and Unbundled Copper Loop-Undesigned (UC-UD) results in BellSouth errors, timeliness issues, increased cost and customer dissatisfaction/loss.

Inability to electronically order ADSL and IDSL loops with conditioning also subjects ordering these products to the pitfalls of manual ordering.

According to Network Telephone, Unbundled Digital Channel (UDC), a required product for Network Telephone's version of xDSL, can only be ordered manually causing delays and higher costs.

BellSouth Response

BellSouth states in 2001 it had over 4.6 million LSRs submitted, of which 4.1 million, (89 percent) were submitted electronically. According to BellSouth, this represents an increase of 38 percent over the past year. BellSouth further states that the rate of electronic submission of LSRs is increasing over that of overall submissions. Pointing to December 2001, BellSouth states an all-time high of 93 percent of all LSRs were submitted electronically. Further, Pate states that taken as a whole, the first quarter of 2002 experienced an average electronic LSR submission rate of 91 percent.

BellSouth also points to the number of ALECs currently using electronic interfaces. At the time of the workshop, BellSouth estimated 250 ALECs were using LENS, 35 were using TAG, and 30 were using EDI. According to BellSouth, in 2001 2.6 million LSRs were submitted via LENS, 640,000 LSRs were submitted using TAG, and 834,000 LSRs were submitted through EDI.

In comparison, BellSouth states it handles on average just under 111,000 ALEC LSRs per month.

BellSouth further points to ALEC use of electronic ordering by stating region wide over 1 million LSRs for UNE-P have been submitted electronically for the period January through December, 2001. BellSouth also states 9,363 LSRs for xDSL were submitted for the nine month period April through December 2001.

BellSouth states that the issue of electronic ordering of Unbundled Copper Loop-Nondesigned (UC-ND) is currently pending in the CCP. BellSouth adds that ALECs have several other products to meet their needs, which currently can be ordered electronically:

1. Unbundled ADSL compatible loop--A designed loop tailored to support ADSL services. Available for electronic ordering and flow through.

2. Unbundled ISDN compatible loop--A designed loop tailored to support ISDN services. Available for electronic ordering and flow through.

3. Unbundled Universal Digital Circuit/IDSL loop--A designed loop tailored to support an ALEC's IDSL modem over an

ISDN-type loop. Available for electronic ordering now, with flow through capability to be added May 18, 2002.

4. Line Sharing--Unbundled access to the high frequency spectrum of an existing BellSouth-provided voice loop capable of support DSL services. Available for electronic ordering with flow through.

5. Line Splitting-unbundled access to the high frequency spectrum of existing ALEC-provided voice loop capable of support DSL services. Available for electronic ordering with flow through.

6. Unbundled Copper Loop-Designed-A designed, dedicated two or four wire UC/S (short), or two or four wire UC/L (long) metallic transmission facility from BellSouth's Main Distribution Frame (MDF) to a customer's premises (including NID), exclusive of any intervening equipment such as load coils, repeaters, or Digital Access Main Lines (DAMLs), provisioned with test point and a BellSouth provided Design Layout Record (DLR). Available for electronic ordering and flow through.

BellSouth adds that the UC-ND product was developed and rolled out in March 2001. As of January 2002, nine months later, there are only a total of 215 UC-ND loops in service, region-wide, with 32 in Florida. According to BellSouth, this volume demonstrates that it is reasonable for BellSouth to not have immediately dedicated resources to electronic ordering for this product.

KPMG Consulting Analysis
KPMG Consulting issued orders through three electronic interfaces (EDI, TAG and LENS) and also submitted a variety of transactions via fax and e-mail. Interface selection was based on the documented functionality of the interface as well as product and ordering information provided by BellSouth to ALECs. In the event a product was electronically order able KPMG Consulting, as part of the POP Functional Evaluation (TVV1), attempted to submit orders through each interface as well as manually.

KPMG Consulting issued an Exception 49 due to the inability to issue orders for certain products for ALEC-to-ALEC migrations. BellSouth offered an electronic process for Resale and UNE-P and

provided instructions for issuing ALEC-to-ALEC migrations of Loops via the manual process. In addition, Exception 16 was issued due to the lack of process for issuing Partial Migrations of Loops. BellSouth is implementing this functionality in the July 16th release. Exception 16 remains open until retesting can occur.

Exception 17 was issued due to a lack of documented process to migrate an Enhanced Extended Loop (EEL). BellSouth responded by clarifying that this process is not available in the BellSouth footprint. Observation 48 detailed issues with Migrations of DS1s with LNP. BellSouth responded again that this activity was not allowed in BellSouth.

h. *Hunting*

Issue
Defects in ordering Hunting cause delays and customer dissatisfaction.

ALEC Summary
ITC states it experiences chronic problems when ordering the Hunting feature, and has been working on the problem for about 11 months. According to ITC, Hunting is consistently among it highest reject areas. ITC further offers that most of its programming and support changes relate to the Hunting product. ITC also points out that although it submitted this problem to the UNE-P user group as early as March, 2001, it is just now getting some resolution. (ALEC Experience Workshop TR, p. 94.) ITC states the situation with Hunting is so bad it has its service manager physically take lists of orders with Hunting and physically walk them into the LCSC to be worked. In sum, ITC states it believes there are things that are not clearly documented and difficult to work with regarding Hunting.

BellSouth Response
BellSouth states it addressed the issues surrounding Parsed CSR-Hunting in Change Request CR0651, which was implemented in Release 10.4 on March 23, 2002. Due to technical issues, BellSouth states it was not able to provide all the fields, requested by the ALECs, in the parsed format - that is, extract information directly from the CSR in response to a pre-order query and return it in LSOG Version 4 format. As a result, BellSouth states it continued to investigate ways to translate information from the CSR, which it

could then translate into LSOG 4 format and provide to the ALECs.
BellSouth states that as a result, it developed a means to
translate the hunting fields, as reflected in CR0651, and
successfully implemented that functionality in Release 10.4 on
March 23, 2002. The User Requirements for Hunting (CR065 1), as
provided in Release 10.4.

BellSouth states in its Georgia/Louisiana order:

> [W]e note that parsed hunting information,
> claimed by AT&T to be valuable in competing
> for business customers, was implemented on
> March 23. ' Accordingly, we find BellSouth
> provides competing carriers with the tools
> necessary to integrate their ordering and
> pre-ordering functions, both with and without
> a parsed CSR.

In regards to all other matters regarding Hunting, BellSouth
states it has been working with ITC to address those issues.
BellSouth states its customer service manager worked with ITC in
mid-December 2001, when some of the issues Ms. Conquest raises did
exist. BellSouth states these incidences occurred when Hunting was
dropped off of a CSR after the order was completed. BellSouth
states that when it was alerted to this, its personnel monitored
ITC's orders and the LCSC to ensure that Hunting was working on the
customer's records. According to BellSouth, the necessity for this
type of monitoring ended by end of March 2002. In its investigation
to resolve this issue, BellSouth says it discovered a defect with
Hunting in Local Exchange Service Order Generator (LESOG).
According to BellSouth, it immediately submitted Change Request
0706 with a high impact level on March 15,2002. Change Request 0706
was implemented in Release 10.4 on March 23, 2002. According to
BellSouth, Subsequent to that implementation two production defects
were identified regarding hunting and were corrected in Emergency
Maintenance Release 10.4.1 on March 28,2002. Carrier Notification
Letter No. SN9108, was issued to the ALECs on March 26, 2002 that
described these defects and explained that they were not detected
during pre-release testing by BellSouth and the ALECs.

BellSouth states that Ms. Conquest mentioned several Change
Requests in her handout under the Pre-Ordering and Ordering
sections. According to BellSouth, Change Request CR0462 was

submitted as a high priority with an August 27,2001 due date. According to BellSouth, the request stated that "LENS will not pull up the Hunting information on an order after a clarification has been made to the order." BellSouth responded on August 22, 2001, that BellSouth's analysis of the PONS submitted by ITC indicated that BellSouth's systems clarified the PONS correctly and determined this was not a defect. BellSouth states that ITC eventually cancelled CR0462 on April 18, 2002. According to BellSouth, Ms. Conquest also mentions Change Request 0606, which was submitted January 10, 2002. BellSouth accepted this request as an Expedited Feature on January 11, 2002 because it was negatively impacting the ALEC's end-user customer and the bill. This change request was scheduled for Release 10.3.1, and on February 2, 2002, prior to the workshop in Florida. Change Request 0606 was implemented as scheduled. Therefore, BellSouth believes it has addressed ITC's issues with Hunting.

KPMG Consulting Analysis
KPMG Consulting issued Observation 172 to address the issue of the Hunting Sequence field requirements for Delete or Remove activity. KPMG Consulting is awaiting a BellSouth fix (release 10.5), which is expected to correct the defects. Observation 172 remains open.

In addition, Exception 112 was issued by KPMG Consulting to address provisioning issues related to customer service record updates. In Exception 112, there were discrepancies caused by errors in updating the hunt groups on the CSR.

During retesting activity related to Exception 112, KPMG Consulting reviewed 113 CSRs from April – May 2002. BellSouth provisioned 105 (93 percent) CSRs accurately. Although the test percentage is below the benchmark of 95 percent, the statistical evidence is not strong enough to conclude that the performance is below the 95 percent benchmark with confidence. The inherent variation in the process is large enough to have produced the substandard result, even with a process that is operating above the benchmark standard. The p-value, which indicates the chance of observing this result when the benchmark is being met, is .2049. This value exceeds .0500, which is the threshold to determine a statistical conclusion of failure. Based on these results, Exception 112 was closed.

i.   *Due Date Calculator Not at Parity*

Issue
BellSouth's due date calculator continues to return improper (longer) intervals for various Req Type/Act Type combinations.

ALEC Summary
According to AT&T, BellSouth's due date calculator returns improper (longer) intervals for various Req Type/Act Type combinations. AT&T states that multiple attempts to correct this defect, first noted in February of 2001, have only been partially successful. AT&T further states the most recent attempt originally scheduled for February 2, 2002 was rescheduled to February 9, 2002, with additional corrections scheduled for April 2002. AT&T states it has implemented internal work around with its ordering processes to avoid defective Req Type/Act Type combinations.

BellSouth Response
BellSouth states that as of the date of the last release that had due date calculator effects (February 9, 2002), the company has not been aware of any system defects on the due date calculator.

In its overhead slide presented at the ALEC Commercial Experience Workshop, BellSouth indicated it first provided a due date calculator in November 1988, for LENS and in December, 1999 for TAG. BellSouth indicated it has continued to add functionality for UNEs and enhance functionality and intervals as retail analogs determined.

Specifically, BellSouth indicated the following changes:

December 18, 2000	Reduced due date interval from 7 to 5 days to support SL1 and SL2 loops.
June 2, 2001	Updated the due date calculator for shorter intervals for applicable Request Types (ReqTyp), Activity Types (ActTyp), and Type of Service combinations.

June 3, 2001	Updated the due date calculator for SL1 and non-SL1 loops with LNP. • This was backed out of production on June 8 due to system technical issues, then restored on 7/1/01.
July 28, 2001	Updated the due date calculator for Non-Complex UNE-P to provide a zero-to-one due date.
February 2&9, 2002	Releases 10.3.1 (2/2/02) and 10.3.2 (2/9/02) completed due date calculator enhancements for double FOCs.

BellSouth refers to its February 18, 2002 Workshop Presentation for its response to this issue. BellSouth provided a chronology of the handling of the Due Date Calculator (DDC) issue through February 9, 2002. BellSouth states that subsequent to that presentation, BellSouth has presented its testimony to the Federal Communications Commission, in its application for approval to provide long distance in Georgia and Louisiana. BellSouth states that in its approval of that application issued on May 15, 2002 (Georgia/Louisiana; 131), the FCC stated that, "We find that BellSouth offers nondiscriminatory access to due dates." BellSouth states the FCC elaborates by explaining that:

> We find that BellSouth provides reliable due dates to competitors, and in a manner equivalent to what BellSouth provides its retail services." [Further, the Commission] reject[s] AT&T's assertion that BellSouth does not provide equivalent access to due dates. Although AT&T complains about the previous state of this functionality, AT&T appears to recognize that BellSouth has implemented software change to fix the problem. Because no other competing carrier raises a new complaint about this same problem, and one of the objectors from the previous application,... affirmatively now states that the due date calculator problem it experienced is no longer a problem, we are assured that the due date functionality problem has been resolved and that competing carriers have equivalent access to due dates. [Furthermore,] we find that AT&T has not demonstrated that a systemic

problem exists with BellSouth's due date calculator that
warrants a finding of checklist noncompliance.

BellSouth states that the FCC also addressed WorldCom's
complaints about supplemental due dates by stating that, "We also
reject WorldCom's contention that when it submits a supplemental
order to change a due date, BellSouth's OSS improperly sends them
a second Firm Order Confirmation (FOC) that does not indicate the
new requested due date.

BellSouth states that as it explained to the FCC in its
application, it provides ALECs with due date information in
substantially the same time and manner as it does for itself.
Information required to obtain a due date calculation is contained
in LENS, TAG, or EDI. According to BellSouth, ALECs obtain an
estimated due date by initiating either a pre-order request in LENS
or TAG or a calculated due date by initiating a firm order request
in LENS, TAG, or EDI.24 BellSouth's response to the ALEC provides
the due date calculation based upon established time lines
governing the provision of the type of service ordered. According
to BellSouth, the ALEC query is submitted through TAG to the
Distributed Support Application Program ("DSAP"). DSAP contains the
available due dates and dates unavailable due to the provisioning
load, special events, or restricted serving areas, etc. DSAP
returns an appropriate due date for the product and services
requested, based upon all information in DSAP, including the
unavailability factors.

BellSouth states that due date intervals are determined by
standard "business rules" that have been provided to ALECs through
industry letters and the BellSouth Product and Services Interval
Guide ("Interval Guide") which contains intervals for resale
services, complex services, and UNEs. The intervals in the Interval
Guide, according to BellSouth, are the same intervals used for
BellSouth retail customers, except those for UNEs, which BellSouth
does not use in its retail operations. BellSouth states that
standard intervals apply, for example, when an existing customer is
switching from BellSouth to an ALEC, when the customer orders a new
service where facilities are already connected through to the
customer's premises, or when a customer requests changes such as
adding or changing features to existing service.

However, if a customer is requesting a project or project management of an order, then the due date may have to be negotiated, according to BellSouth. BellSouth states that a project is defined as a customer request for service where the quantity is greater than the BellSouth standard, the request is for nonstandard equipment, or the request is for nonstandard facilities. According to BellSouth, any time a project manager is involved in the negotiation of a service request the request will be identified as a project. BellSouth states this could include negotiation of a due date, or being the single point of contact if problems occur during service order processing or provisioning. BellSouth states that ALECs should refer to the BellSouth Products and Services Interval Guide to determine if a service request meets project criteria. Products/services that do not meet project criteria will be considered for project management on an individual case basis upon request to a BellSouth project manager, according to BellSouth.

BellSouth states, as information, in the pre-ordering mode of LENS, ALECs may also view the installation calendar. BellSouth states the installation calendar provides the estimated working schedule of BellSouth's central office specific to the end-user's address. The calendar provides a convenient means of estimating due dates prior to a final order being placed, according to BellSouth.

BellSouth states that no due date is ever "guaranteed" for ALECs or for BellSouth's retail units. BellSouth states it considers the due date satisfied when the orders are provisioned for both the ALEC's and BellSouth's retail customers. According to BellSouth, it uses its best efforts to meet the due dates. According to BellSouth, actual fulfillment of due dates can be affected by many things, including the availability of facilities and workforce, and weather. This is true for ALEC services, just as it is for BellSouth retail services, according to BellSouth.

KPMG Consulting Analysis

KPMG Consulting issued Observations 145 and 146, which addressed Calculate Due Date issues experienced in both the Local Exchange Navigation System (LENS), and Robust Telecommunications Access Gateway (RoboTAG) interfaces. An enhancement was issued on February 2, 2002, with release 10.3.1 to address the issue. KPMG Consulting issued ten orders and determined that the Due Date Calculation problem has been corrected. The observations were

subsequently closed.

KPMG Consulting's understanding is that BellSouth commits to return to the ALEC the first available due date for the activity requested. KPMG Consulting reports results of Desired Due Date vs. Actual Due Date in the Final Report although this information is not associated with an Evaluation Criteria.

Initial test results show that BellSouth returns a Firm Order Confirmation Due Date (FOC DD) equal to the Desired Due Date (DDD) 75.70 percent in the EDI interface and 85.84 percent for the TAG interface. The first retest results show that BellSouth returns a Firm Order Confirmation Due Date (FOC DD) equal to the Desired Due Date (DDD) 70.00 percent in the EDI interface and 73.73 percent for the TAG interface. The second test results show that BellSouth returns a Firm Order Confirmation Due Date (FOC DD) equal to the Desired Due Date (DDD) 73.10 percent in the EDI interface and 79.15 percent for the TAG interface.

j. *Disparate Flow-Through*

Issue
ALEC Flow-through is lower when compared to retail, indicating the ordering process is not functioning at parity.

ALEC Summary
AT&T points to flow through data for March 2000, and 2001 indicating ALEC aggregate flow-through rate has remained essentially the same for the two reporting periods (55 and 57 percent respectively, including both ALEC and BellSouth-caused errors). According to AT&T, the primary reason there was no improvement, is there was no improvement in the two components of fall-out BellSouth is totally responsible for-designed fall-out, and system error.

One of the main problems with orders falling out for manual handling (both planned fall-out, and errors) is that the orders go to the LCSC where 69 percent of the load is from fall-out from electronic ordering, according to AT&T. AT&T states the results are longer intervals (up to 18 hours verses 15 minutes with proper flow-through).

BellSouth's Flow-through Task Force has had no significant impact and is unlikely to do so in the near future. According to AT&T, there was no improvement in flow through or the design and operation of BellSouth's ALEC ordering interfaces in 2001. AT&T states 23 of 32 Flow Through Task Force change requests have no scheduled implementation dates.

According to AT&T, the Flow-through Task Force manager for BellSouth has indicated on two occasions recently that the ALECs can simply expect more of the same as they grow their markets.

Network Telephone points to flow through results for April through December 2001 indicating BellSouth achieves a higher flow-through percentage than it. Network Telephone claims this difference is indicative of disparate treatment of it and other ALECs by BellSouth. Network Telephone further offers PMAP data indicating total system fall-out numbers for April in which of 444 orders that fell out for manual handling, 357 (79 percent) were BellSouth-caused errors, while only 90 LSR fall-outs or 21 percent were caused by Network Telephone. BellSouth caused errors (such as improper rejections and clarifications) play a major part in low ALEC flow-through. Network Telephone also complains that despite repeated requests for BellSouth help in identifying the reason for this disparity, BellSouth cannot help, and is unable to decipher its own data to explain why.

Network Telephone complains that it suffers from disparate total system fallout due in large part by BellSouth caused errors. Network Telephone points to data from April through December 2001, indicating that for both Network Telephone and BellSouth, the majority of fallout was due to BellSouth caused system errors. (Network Telephone, ALEC Experience Workshop, Handout, p. 8) Summing up the information presented, Network Telephone states that while BellSouth is affecting 26 percent of Network Telephone's total LSRs, it is affecting 79 percent of the overall fallout.

Network Telephone identified six specific BellSouth error codes associated with fall-out of its orders (7110, 7465, 7645, 7718, 8820, and 8825, with the last two making up the bulk of the errors). (Network Telephone Slide 10, Network Telephone 64) Network Telephone complains that over the period April through December 2001, the frequency of these errors has increased,

surmising the Flow Through Task Force has not improved these internal system errors identified by BellSouth.

BellSouth Response

This assertion is flawed at face value. The comparison of ALEC flow-through rates to those of BellSouth's retail unit is inappropriate for parity purposes. The correct performance standard is to measure BellSouth's flow-through performance for ALEC service requests against Commission-approved benchmarks.

BellSouth recently provided information to the FCC in response to similar complaints by AT&T in the Georgia/Louisiana 271 proceeding. Using the time frame provided by AT&T in its allegations (January 2001 through January 2002), BellSouth not only showed significant improvement in three of the four important measurement segment levels (Business Resale, UNE and LNP), but the flow through rate in the remaining segment, Residential Resale, remained nominally stable.

The following results were provided to the FCC, and the numbers reflect the improvement from January 200 1 to January 2002:

```
Business Resale:   64.9% to 74.6%
UNE:               80.9% to 85.5% (Exceeds 85% Benchmark)
LNP:               40.1% to 92.8% (Exceeds 85% Benchmark)
```

(BellSouth, Document No. 05769-02, pp. 36-38.)

BellSouth explained that the Residential Resale segment's reduction in flow-through rate from 91.4 to 88.6 percent during this time frame is justified by the significant shift in ALEC requests for resale products to UNE products. That shift, according to BellSouth, has resulted in a reduction in the number of resale products as a percentage of total ALEC requests issued electronically.

BellSouth further provided a more current view of its performance to the FCC, including the measurements for March 2002 as follows:

    Residential Resale: 86.5%
    Business Resale: 73.6%
    UNE: 83.9%
    LNP: 92.3% (Exceeds 85% Benchmark)

(BellSouth, Document No. 05769-02, pp. 36-38.)

According to BellSouth, there has been a slight decrease in the flow-through performance since January 2002, but that decrease is within acceptable deviation parameters when looking at a single month's performance versus what BellSouth refers to as an "exceedingly positive" trend developed over 15 months (January 2001 to January 2002).

BellSouth states it has introduced new products and has experienced volume growth in other products (most significantly UNE-P), giving rise to additional LSR scenarios that initially can be ordered electronically, but may not be able to flow through at introduction. BellSouth claims it has been proven that, over time and particularly for high-volume request types, its ability to electronically generate orders for these types of requests will be developed and implemented in its software releases to meet ALEC needs and to sustain the improving trend for flow-through performance. BellSouth states that the FCC in its Georgia/Louisiana 271 application approval "reject[ed] arguments that too many orders fall out by design or cannot be ordered electronically," finding "as did the Georgia and Louisiana Commissions, that BellSouth properly designs its systems so that a minimal number of orders cannot be ordered electronically."

Further, BellSouth states it has incentive to not only sustain those trends that exceed benchmarks, but to improve those that do not currently exceed benchmarks. According to BellSouth, state commissions have provided substantial penalty sanctions that dissuade BellSouth from accepting marginal performance.

KPMG Consulting Analysis
KPMG Consulting's flow-through review evaluates the ability of

test ALEC orders to flow-through BellSouth's systems as designed. The Order Flow-Through Evaluation (TVV3) test compares test ALEC order performance against the benchmarks set in Ordering measure SQM O-3 of the Interim Performance Measures. As a result of KPMG Consulting's evaluation, Exceptions 86, 121, and 136 are open. Exception 86 notes that BellSouth's performance on residential and business flow-through was below the SQM O-3 benchmark. Exception 122 reports that BellSouth's performance on Local Number Portability (LNP) flow-through was below the SQM O-3 benchmark. Exception 136 observes that BellSouth's performance on UNE flow-through was below the SQM O-3 benchmark. The most relevant flow-through data can be calculated as defined in SQM O-3. KPMG Consulting conducted a retail-wholesale functionality comparison as required by the Master Test Plan. This comparison found that BellSouth retail orders cannot fall out for manual handling, as customer contact representatives have direct access to BellSouth ordering systems. The wholesale equivalents of the BellSouth retail representatives are the representatives in the LCSC, who have direct access to BellSouth ordering system.

4. Provisioning ALEC Experience Detail

a. *Provisioning Accuracy*

Issue
BellSouth provisioning has resulted in an unacceptably high number of lines provisioned incorrectly, which negatively impacts ALECs and their customers.

ALEC Summary
WorldCom asserted that a random sample of 500 customers for one month revealed that at least 2.5 percent of the lines had provisioning errors such as wrong IntraLATA, wrong InterLATA, wrong features, missing features, loss of dial tone during or as a result of BellSouth switch translations, and subsequent receipt of DUF (daily usage feed) records for lines that were on line loss reports. WorldCom explained some of the impacts of such provisioning errors can be large or erroneous bills, having to issue trouble tickets on customer features not working but being later informed it was not provisioned or was provisioned incorrectly, and having to file a billing dispute with BellSouth for resolution of amounts over billed or billed erroneously.

(WorldCom, Document No. 01320-02, p. 11; ALEC Experience Workshop TR, p. 162.)

BellSouth Response
Regarding WorldCom's analysis of their 500 lines sample, BellSouth responded that this reported only a 2.5 percent error rate, which would mean that BellSouth had achieved a 97.5 percent accuracy rate on WorldCom's own audit sample. BellSouth represented that its order provisioning works 99 percent of the time without any interruption of service. In reviewing WorldCom's experience comments as related to examples provided, BellSouth responded that less than 1 percent were not provisioned without interruption of service and specifically reported that an analysis of maintenance reports for WorldCom, from July 18, 2001 through December 31, 2001, indicated that BellSouth did not encounter a service affecting problem in 99.44 percent of migrations. In BellSouth's responses to a KPMG Consulting third-party OSS test results exception relating to BellSouth's use of proper codes in switch translations, BellSouth asserted it had provisioned 99.4 percent correctly. (ALEC Experience Workshop TR, p. 137, 195, 201; BellSouth, Response to 2nd Amended Test Exception 84, p. 11)

KPMG Consulting Analysis
KPMG Consulting conducted multiple tests to ascertain BellSouth's ability to provision services and features. KPMG Consulting identified provisioning issues during third-party OSS testing in the following areas: (1) switch translation records (Exception 84), (2) directory listing records (Exception 171), (3) customer service records (Exception 112, Observation 82), (4) disconnect orders (Exception 76), and (5) OS/DA (Exception 156). Based on the latest retesting activity, BellSouth satisfied testing criteria associated with customer service records (Observation 82 and Exception 112), disconnect orders (Exception 76), and OS/DA (Exception 156). Observation 82, Exception 112, Exception 76, and Exception 156 have all been closed. BellSouth did not satisfy criteria associated with switch translations (Exception 84) and directory listings (Exception 171). Exceptions 84 and 171 remain open.

b.   *Incomplete Firm Order Confirmations (FOCs)*

Issue
ALECs state that BellSouth provides incomplete FOCs that provide insufficient data, specifically circuit IDs that ALECs need to reference for status inquiries and that the omission of which could cause database discrepancies.

ALEC Summary
KMC stated that it has been getting incomplete FOCs, in that, although the order has been accepted by BellSouth, its FOC does not contain all of the necessary or pertinent information to begin the provisioning process or to be able to reference when requesting status or assistance with coordination of due dates and installations. KMC asserted that this can cause a work around involving additional telephone calls to the Local Carrier Service Center (LCSC) and increased ALEC costs.

AT&T reported that BellSouth is not providing the circuit identification on the FOC returned to it on EDI orders. AT&T asserts that this can cause potential errors in databases and a mismatch between ALEC and BellSouth data as well as delays in customer orders that follow.

BellSouth Response
BellSouth said that the issues of reference data on FOCs would be discussed directly with ALECs individually - with KMC particularly.

(NOTE: Change request 621, reflecting ALEC desires as expressed by Covad for the inclusion of circuit IDs on FOCs, was opened in the Change Control Process with the ALEC community, to which BellSouth responded that this defect would be addressed in the 11.0 release that is scheduled for December 8, 2002.)

KPMG Consulting Analysis
KPMG Consulting reviewed a sample of FOC responses to determine if they were accurate and complete. A sample of 681 FOCs was reviewed of which 157 had data that was missing. KPMG Consulting issued Observation 183 detailing issues with FOC responses for Resale and UNE-p. BellSouth implemented a fix on May 19, 2002. After retesting and further evaluation, Observation 183 was subsequently closed on May 29, 2002.

c. *UNE Loop (UNE-L) Issues*

Issue
ALEC orders are being rejected in error due to circuit
identification (ID) discrepancies and incorrect facilities
assignments within BellSouth, for which Computer System for
Mainframe Operations (COSMOS) reports deliver insufficient research
help and for which better research capabilities afforded by access
to Local Facilities Assignment and Control System (LFACS) has not
been provided by BellSouth.

ALEC Summary
KMC stated that it has had many cases where orders have
rejected in error by BellSouth. An example presented entailed a
reject for invalid circuit ID of the one the ALEC specified for
disconnection, after which the ALEC investigates on its own via a
BellSouth back office system known as COSMOS and validates that the
circuit ID it is looking to disconnect is correct, in fact. Then,
the ALEC has to make additional phone calls until the LCSC
eventually acquiesces, finally acknowledging that an appropriate
circuit ID was specified but that BellSouth rejected the order in
error. This, asserted KMC, causes delays for the provisioning
process.

AT&T stated that BellSouth, even after having sent out a Firm
Order Confirmation, has sent out jeopardy notices on the day of a
UNE-L cut that disrupts all parties' plans and has sent order
rejections because of "busy pair" or facilities that appear as in
use, which causes extra expense for the ALEC and delays in its
customer requests for service being provisioned. AT&T asserted
that BellSouth's Web-based report tool, known as COSMOS, although
providing a number of informational items, still does not give
sufficient information about facility assignments and busy pairs to
identify with a specific customer. This, it reported, results in
the ALEC being unable to ascertain where there might be a database
discrepancy, the ALEC having a lot of facilities in collocation
cages that aren't serving any customers, overbuilding of the
network, and proving COSMOS impractical as a tool to precheck
facilities or reconcile database mismatches. AT&T has negotiated
with BellSouth to be provided real time access to LFACS, which it
expects would better enable the ALEC to determine if there is a
discrepancy plus enable it to address specific pairs versus a whole

database reconciliation. AT&T reported BellSouth is said to be updating LFACS with access expected but that no details had as yet been made available on it.

BellSouth Response
Regarding AT&T's request for LFACS access for status of Connecting Facility Assignments (CFAs), BellSouth asserted that these are in the realm of ALEC responsibility to assign and that ALECs should have their own facility inventory records. BellSouth represented that when processes are identified where LFACS or COSMOS issues are run into, such as require monitoring or manual actions to be taken, such issues are being addressed directly and are being taken as action items to the in-progress development processes of BellSouth product teams so that, when their products roll out, those situations will be resolved. (ALEC Experience Workshop TR, p. 198, 205)

KPMG Consulting Analysis
KPMG Consulting observed Address Facility Inventory Group (AFIG) personnel using back-end facilities systems to manually assign facilities to ALEC and BellSouth orders that had either incorrect facility assignments or were missing necessary facility assignments. (NOTE: No test observations or exceptions resulted.)

Within the scope of the POP Functional Evaluation (TVV1), KPMG Consulting received jeopardy notifications due to busy circuits and invalid cable and channel pairs; however, it did not use the COSMOS report to validate the accuracy of the facilities status. BellSouth had provided to KPMG Consulting facilities information for third-party OSS test accounts prior to the start of testing. This information was kept in a database and referenced when discrepancies between BellSouth and KPMG Consulting arose.

d.   *Line Loss Reporting*

Issue
BellSouth's failure to provide complete line loss reporting results in critical problems due to being uninformed of ALEC customer departures, which can result in double billing of customers.

ALEC Summary

WorldCom raised concerns over the fact that they still are unable to obtain complete and timely line loss information from BellSouth reports available for ALECs to examine and act upon. WorldCom reported that this problem has impacted thousands of former customers and that WorldCom has received at least 1,285 customer complaints of continued local billing. WorldCom stated that complete information on all customers and lines that have migrated to another company is critical to avoid double billing of customers through no fault of the ALEC. Additionally, the timeliness and accuracy of the information on line loss reports is critical to the appropriate flow of daily usage file (DUF) records to the correct carrier.

BellSouth Response

BellSouth has represented that the vast majority of service orders are posted for billing in less than three days after completion. Nonetheless, to apparently mitigate concerns relative to data completeness as well as potential time lags in Line Loss Reporting due to updating of CSRs (Customer Service Records) being delayed until billing impactive errors are corrected, BellSouth has stated that it would implement changes to the standard Web-based Line Loss Reporting mechanism for the general ALEC community in order for it to then reflect all telephone numbers (TN's) that will be qualified for line loss notification after the ordering, provisioning, and billing processes have been completed. BellSouth issued Carrier Notifications SN91082946 on March 21, 2002, and SN91082945 on March 22, 2002, for such enhancements. BellSouth reported that it has been working with WorldCom relative to refining the unique specifications for its contractually tailored version of a Line Loss Report and, as of implementation of WorldCom agreed upon additions to its NDM (Network Data Mover) fed Line Loss Report on February 2, 2002, asserts that this issue is believed resolved and should not be one going forward.

KPMG Consulting Analysis

KPMG Consulting analyzed both the timeliness and accuracy of BellSouth's Line Loss Report. In the absence of a documented BellSouth standard for timeliness and accuracy of provisioning, KPMG Consulting applied a benchmark of 95 percent.

During initial third-party OSS testing, KPMG Consulting reviewed 455 commercial entries from December 2001 to determine if

BellSouth updated the Loss of Line report in a timely manner.
BellSouth updated 323 (71 percent) commercial entries on the Loss
of Line report in a timely manner. As a result, KPMG Consulting
issued Exception 158.

As a result of this exception, BellSouth updated the ALEC Web
site to accurately reflect the time interval for the posting of an
entry to the Line Loss Report. Based on the time interval changes,
KPMG Consulting analyzed 451 commercial entries from December 2001.
BellSouth updated 438 (97 percent) entries to the Line Loss Report
in a timely manner. Based on these results, Exception 158 was
closed.

During the testing of Line Loss accuracy, KPMG Consulting
determined that 736 lines should appear on the Line Loss Report,
but BellSouth's Line Loss Report only contained 455 of those lines.
The discrepancies were addressed in Exception 139. In response to
Exception 139, BellSouth implemented system fixes to correct the
problems.

During the retest of Line Loss accuracy, KPMG Consulting
reviewed 5,469 commercial orders from May 2002 to determine if
BellSouth accurately updated the Loss of Line report. BellSouth
updated 4,744 (87.3 percent) orders accurately within the Loss of
Line report. KPMG Consulting updated Exception 139 to reflect the
additional discrepancies found during the retest.

(NOTE: After resolution of KPMG Consulting's data omission
experience in the first retest and its obtaining of actual data
from three representative ALECs, a second retest, which encompassed
174,110 service orders, resulted in a success rate that was
statistically satisfactory enough that Exception 139 was closed on
July 17, 2002.)

e.   *Line Sharing*

Issue
Line sharing provisioning has ALEC experience involving
excessive intervals, significant troubles and repeat troubles
resulting from BellSouth tests not catching loops made up
inaccurately.

ALEC Summary

Covad reported several provisioning problems with line
sharing, for which it said BellSouth's only work to do is actually
only in the central office involving existing loops. One problem
cited was that experience showed order completion intervals of five
days, per the November 20, 2001 Monthly State Report , versus
BellSouth contract interval of three days. Covad reported further
that 36 percent of its line shared orders had troubles within 30
days and that 30 percent have repeat troubles. Related to those
troubles, Covad said that BellSouth missed 18 percent of repair
appointments and the average repair duration is 14 hours.
Additionally, Covad said that BellSouth has provisioned and closed
line sharing orders that had loops made up with load coils on them,
against which BellSouth's processes are supposed to test to prevent
from happening. In an effort to avoid this, Covad reported it has
asked BellSouth to develop a process to allow pre-authorization for
conditioning (e.g., have the load coil removed) and to be allowed
"blanket" conditioning up-front, such as it said other ILECs have
in place. Another issue related to Line Sharing that Covad raised
is the circumstance of WorldCom processing the billing for it
before the provisioning of it is complete.

BellSouth Response

BellSouth states that it has demonstrated commitment to ensure
both manual and electronic Line Sharing orders are successfully
processed, and it reported statistical measurement results such as
BellSouth having met retail analogues in January and February 2002
for order completeness intervals and in January and March 2002 for
provisioning troubles within 30 days.

(NOTE: Change request 779, reflecting ALEC desires as
expressed by Covad for sequencing the billing portion of Line
Sharing orders to be completed after the order's provisioning work
is physically completed, was opened in the Change Control Process
with the ALEC community, to which BellSouth responded that this
defect would be addressed in the 11.0 release that is scheduled for
December 8, 2002.)

KPMG Consulting Analysis

KPMG Consulting has conducted a number of third-party OSS
testing initiatives to ascertain BellSouth's ability to provision
ALEC ADSL Line Sharing orders accurately and in a timely manner.
The investigation has involved reviewing live commercial orders
being installed in a number of BellSouth central offices, as well

as parity reviews between ALECs operating in Florida, and BellSouth retail affiliate to measure loop qualification accuracy, 30 day trouble history for installation quality, jeopardy notification, Service Order Confirmation accuracy and missed appointments. KPMG Consulting has found through these reviews that parity exists between the service provided to the ALEC community and the BellSouth affiliate.

f. *Integrated Digital Subscriber Line (IDSL)*

Issue
Frequently occurring ALEC experiences with BellSouth provisioning of IDSL (Integrated Services Digital Network [ISDN] Digital Subscriber Line [DSL]) loops include such things as high repeat trouble tickets, missed installation appointments, and problems with option settings and line card settings that do not match.

ALEC Summary
Covad reported that IDSL loop problems originally identified in 1999 continue to still frequently occur such as missed installation appointments by BellSouth (11 percent in November 2001) and issues of line card setting match up between central office and remote terminal as well as getting them situated correctly.

BellSouth Response
BellSouth states that it has demonstrated commitment to ensure that such unbundled local loops are successfully processed, and it reported statistical measurement results such as BellSouth having met retail analogues in January and February 2002 for provisioning troubles within 30 days.

KPMG Consulting Analysis
There were no IDSL orders available for KPMG Consulting to assess during the xDSL third-party OSS test window. KPMG Consulting observed 101 commercial xDSL orders from January 16, 2001, through February 1, 2001 and from November 26, 2001 through December 5, 2001. Of these, 100 were ADSL and 1 was HDSL.

The third-party OSS test included a commercial data review that included, for those measures having ALEC activity during January through March 2002, results showing BellSouth met the

standard for xDSL relative to order completion intervals, missed installation appointments, 30 day trouble history, repeat troubles, and all service order accuracy measures. Those results, as reported by KPMG Consulting, confirm BellSouth's representation of the existence of parity between BellSouth's retail business and service provided to the ALEC community.

5. Maintenance and Repair ALEC Experience Detail

a. *Dial Tone Outages*

Issue
BellSouth creates no dial tone trouble outages and closes them to "no trouble found".

ALEC Summary
The consensus among Florida ALECs is that dial tone loss is the most significant maintenance and repair issue facing them today. ALECs also contend that BellSouth is the source of most of these problems. Network Telephone complains that in December 2001, the company experienced 245 total outages and over half were caused by BellSouth.

Florida Digital Network (FDN) asserts that BellSouth technicians cause dial tone loss problems. For example, FDN claims that after testing and identifying valid repair troubles through its own test devices, it sent valid troubles to BellSouth only to see a repair ticket opened, testing completed, and tickets improperly closed. FDN further contends that BellSouth technicians pull jumpers in the field causing ALEC services to go down. Later, when the BellSouth technician is sent back out to the field to repair the problem, the technician puts the jumpers back in place and closes the repair ticket to no trouble found. According to ALECs, these tickets are usually closed to no trouble found or customer premises equipment codes, which exclude the problem from the trouble within 30 days performance measure. Network Telephone contends they experience the same problems as FDN and believes they are attributed to the manner in which BellSouth closes some repair tickets.

During the FPSC workshop, AT&T presented BellSouth with a list of 19 PONS representing problems experienced by their customers as a result of UNE-P conversion. AT&T contends that these customers

lost dial tone due to one of four BellSouth problems: 1) a
disconnect (D) order was processed without an associated new (N)
service order; 2) mistakes were made by the LCSC agent when orders
were retyped; 3) technicians did not provision the service as
indicated on the order; or 4) the customer's facilities were
changed by BellSouth.

On March 1, 2002, AT&T and BellSouth met to identify and
resolve these problems, as directed by Commissioners during the
workshop. AT&T states that BellSouth admitted indeed 15 of the 19
problems within the sample PONs were created by the LCSC. While
three of the four problem types observed by AT&T represented
ordering and provisioning issues, the fourth type was caused by
changing customer facilities.

WorldCom also took issue with BellSouth for loss of dial tone
experienced during UNE-P migrations and provided BellSouth with 11
dial tone loss examples to research.

ALECs believe that BellSouth must adequately map and tag its
facilities to prevent ALEC jumpers from being erroneously removed
and prevent the loss of ALEC customer dial tone.

BellSouth Response
BellSouth contends that it analyzes UNE-P results on a daily
basis and it is looking for feedback on issues that may further
reduce UNE-P service outages. (TR, p. 201) A BellSouth review of
11 WorldCom UNE-P dial tone loss examples revealed that less than
one percent of the problems were attributed to UNE-P.

BellSouth further supports its position by pointing to an
analysis of the five-month period July 18 through December 31,
2001, in which only .56 percent of UNE-P migrations completed had
service-affecting problems. In other words, BellSouth did not
encounter a service affecting problem in 99.44 percent of the
migrations completed during the period. BellSouth believes these
examples show the loss of dial tone issue is a small one, impacting
less than one percent of ALEC migrations.

Since it implemented several edits to reduce UNE-P dial tone
loss over a year ago and continued to enforce and improve the
process throughout 2001, loss of dial tone problems have
significantly decreased. BellSouth reports that over a year ago it

added a process to direct ALEC precompletion service issues to the CWINS center, as a means of improving UNE-P related orders experiencing problems. Whether the problem arises with a provisioned order or a completed order, the CWINS center has procedures and processes in place to resolve whatever issue is encountered.

KPMG Consulting Analysis
KPMG Consulting did not observe the problem identified above. During the testing period (December 2000 through February 2001) for End-to-End Trouble Report Processing (TVV9), KPMG Consulting worked from a previously established test bed, not newly provisioned or newly transitioned lines.

b. *Chronic Repair Troubles On Designed Services*

Issue

ALECs have experienced high levels of repeat troubles within 30 days after installation of designed circuits.

ALEC Summary
ALECs believe that BellSouth does not properly repair troubles the first time a ticket is issued, and thus creates a high level of chronic repeat repair conditions. ALECs contend that a high level of repeat troubles are experienced on IDSL loops. An ALEC investigation into repeat trouble tickets revealed that many are closed prematurely as no trouble found. ALECs contend that once BellSouth closes the ticket as no trouble found no further action is taken to resolve the repair problem. As a result, ALECs must open another trouble ticket to resolve the problem not resolved by the original ticket.

Covad complains that, in November 2001, 36 percent of their line sharing orders experienced troubles within the first 30 days after installation. Further, 30 percent of those orders experienced repeat troubles. Covad contends that BellSouth also missed 18 percent of all repair appointments and the trouble report average duration was 14 hours.

KMC states that, on average, one in four BellSouth DS-1 circuits fail within 30 days of installation, compared to the same BellSouth retail offering failure rate of less than one percent.

This disparity creates a negative consumer impression for KMC and creates customer doubt about the reliability of their service. KMC contends that more recently they have experienced eight percent of the DS-1 circuits provisioned by BellSouth fail within the first 30 days after installation. KMC claims that BellSouth is installing the service incorrectly and, when maintenance is requested, BellSouth is not adequately repairing the problem. To work around this problem, KMC has decided to order DS-0 level circuits as a backup because DS-0 circuits are the best of the worst with regards to maintenance.

ALECs assert that BellSouth's own data reveals the magnitude of the problem. They point to November 2001 results to show one in every five two-wire analog loop design troubles requiring dispatch was a repeat trouble from the preceding 30 days. ALECs contend that BellSouth across-the-board performance for various loops is equally alarming because almost every loop type falls into the 15-30 percent repeat trouble range.

ALECs contend that, while faulty repair is part of the problem, BellSouth further discriminates against them by assigning loop facilities to ALECs it knows to be trouble-prone. As a result, ALEC loops, even when properly repaired, are more prone to have repeat problems than those BellSouth assigns for its own use.

ALECs propose that BellSouth contact the ALEC prior to closing a trouble ticket. More specifically, for xDSL orders, BellSouth should adhere to its own policy and provide joint acceptance of loops before closing the trouble ticket. ALECs contend that BellSouth should assume responsibility for repeat troubles undetected at the time of the initial trouble ticket and credit the affected ALEC. Additionally, ALECs believe the Commission should ensure BellSouth ceases discriminatory loop facility assignment by requiring a remediation program of employee training, performance measures and remedies for noncompliance. ALECs also request that the Commission order BellSouth to switch ALEC facilities following the second circuit outage within a given period.

BellSouth Response
BellSouth believes there could be some ALEC misunderstanding regarding the issue of contacting ALECs after completed repairs but offers some clarification. According to BellSouth, the CWINS center takes the trouble reports for all UNE and resale

maintenance. However, it is not the contact bureau that calls the ALEC after every trouble completion.

Design and special services require engineering and coordinated design repairs. The responsibility of coordinating maintenance and closeout of design circuits rests within the CWINS as the Maintenance Control Office (MCO) for design circuits. For design troubles, ALECs should receive a contact from the CWINS center as notification of the completed repair. However, nondesigned services, including POTS and UNE-P repairs, are closed out by the field technician or network technician assigned the trouble ticket. Therefore, it is the responsibility of the technician to notify the ALEC of the closeout for nondesigned services.

BellSouth further stated that normally in the nondesign world, technicians make one attempt to contact the ALEC for closeout of the repair ticket and then will close the ticket. However, if the ALEC uses Trouble Analysis Facilitation Interface (TAFI), the closeout will feed back to TAFI and the repair status is available through TAFI.

BellSouth contends that ALEC situations where repeat repair conditions are experienced can be handled through the chronic group in the CWINS center. According to BellSouth, a chronic group has always existed in the CWINS center and has been enhanced. BellSouth contends that ALECs, including KMC, have been invited to visit the center and discuss the technical aspects of the chronic group. BellSouth notes that this group goes into more extensive detailed testing for no trouble found reports. The chronic group specializes in repeat troubles that continue beyond 30 days.

KPMG Consulting Analysis

XDSL: KPMG Consulting observed 85 Standalone ADSL and 1 HDSL (all commercial) from January 16, 2001 through February 1, 2001, and from November 26, 2001 through December 7, 2001. During this test period, there were two troubles attributed to the BellSouth network. During the same test period BellSouth's retail results were 9.4 percent.

DS1: KPMG Consulting observed 91 commercial DS1-Loop circuit installations in July 2001 and April 2002 to determine if a trouble report was opened for each circuit provisioned, within 30 days of

the service order completion. Of these, five (5.5 percent) had trouble reports generated within 30 days of the service order completion. As of June 10, 2002, KPMG is still waiting for the retail May 2002 results to perform a wholesale/retail comparison.

ADSL Line Sharing: KPMG Consulting observed ten commercial Line Sharing Installations between January and March of 2001. KPMG Consulting also took a random sample of 140 Data LEC LS orders. KPMG Consulting then examined trouble histories 30 days subsequent to installation for 150 commercial LS circuits. There were five (3.3 percent) troubles attributed to the BellSouth network. During the same test period, BellSouth's retail results were 7.0 percent.

c. *Excessive New Install Failures For DS-1*

Issue
ALECs are experiencing higher failure rates than retail for newly installed DS-1 circuits.

ALEC Summary
ALECs contend that BellSouth discriminates against ALECs by assigning them second rate problematic facilities not used for BellSouth retail DS-1 facilities. These facilities frequently require repair within 30 days of their installation and reflect negatively on ALECs because their customers experience more outages than BellSouth retail customers using the same service.

KMC states that the failure rate for BellSouth DS-1s is one out of every four circuits installed. Furthermore, KMC contends that eight percent of the DS-1 circuits that BellSouth provides them fail within the first 30 days after installation. KMC complains that, for the same DS-1 service, BellSouth retail is only experiencing a one percent failure rate. Therefore, ALECs believe that BellSouth DS-1 circuits must be installed incorrectly and are often repaired incorrectly.

When ALEC circuits fail within the first thirty days of the new customer relationship, irreparable damage is done to the relationship. Failures within the first 30 days create a customer impression that the ALEC is an unreliable supplier of DS-1 service, and improves BellSouth's image as a more reliable supplier.

ALECs conclude that remedy payments alone will not prevent the type of discriminatory service experienced from continuing. Thus they propose that BellSouth be made to provide nondiscriminatory access to loop facilities and, and that it not be considered to be checklist compliant until performance demonstrates parity.

BellSouth Response
When ALECs provision designed circuits, they go through a turn-up process with BellSouth. The turn-up process gives an ALEC the ability to jointly test the circuit before acceptance. BellSouth believes this process solidifies the end-to-end process for ALEC validation of the circuit. The process assures both ALEC and BellSouth technicians that the circuit is up and functioning correctly.

KPMG Consulting Analysis
KPMG Consulting reviewed 91 commercial DS1-Loop circuit installations in July 2001 and April 2002 to determine if a trouble report was opened for each circuit provisioned within 30 days of the service order completion. Of these, five (5.5 percent) had trouble reports generated within 30 days of the service order completion. As of June 10, 2002, KPMG Consulting is still waiting for the retail May 2002 results to perform a wholesale/retail comparison.

This is related to M&R Item 2. The five troubles attributed to the BellSouth Network were:
  1.) Demarcation incorrectly grounded
  2.) Defective Smart Jack
  3.) Co Wiring
  4.) Re-termination of Outside Wiring
  5.) Defective Drop Wire

There were an additional 11 trouble reports that were not attributed to the BellSouth network (six information, one incumbent interexchange carrier facility trouble, three customer premise equipment troubles, and one cancelled ticket).

d.   *Excessive Repair Average Duration*

Issue
BellSouth average duration intervals for ALECs should be reduced.

ALEC Summary

ALECs believe BellSouth maintenance and repair intervals should be reduced. More specifically, the average duration for ALEC outages appears to be greater than for BellSouth outages. Covad complains that BellSouth not only missed 18 percent of its line sharing repair appointments, but that the average duration for line sharing repairs was 14 hours.

Network Telephone has developed their own in-house tracking system for all repair problems. Based on Network Telephone repair data provided during the workshop, BellSouth takes three times longer to fix BellSouth-caused troubles for Network Telephone customers. Network Telephone estimates it takes about 11 hours to resolve Network Telephone-caused outages and 31 hours to resolve BellSouth caused outages.

Network Telephone data reveals there were a total of 488 trouble tickets in December 2001 attributable to BellSouth. The average resolution duration for BellSouth repairs was 31.33 hours. For the same time frame, Network Telephone logged a total of 279 repairs attributable to themselves. The average resolution time for those repairs was 11.78 hours. ALECs believe their data shows that BellSouth takes considerably longer to resolve ALEC troubles than it does to resolve its own.

Network Telephone also states that they believe BellSouth is prolonging the average outage time for DS-0 service by closing out the trouble ticket within their six-hour window without a repair resolution. Network Telephone is forced to reopen the trouble ticket to assure proper resolution. This lets BellSouth off the hook for the six-hour measurement, but the ALEC customer problem still remains. Network Telephone data shows longer resolution times for all repair tickets than those reported by BellSouth.

ALECs believe this problem can be improved by BellSouth contacting ALECs to receive concurrence before closing out a trouble ticket. This will assure that both ALECs and BellSouth use the same time frame for reporting and tracking end user trouble resolution.

BellSouth Response

BellSouth contends that the CWINS center does a very good job processing repair troubles impacting duration time and clearing

time in a timely manner. (ALEC Experience Workshop TR, p. 196.)

KPMG Consulting Analysis
During the *End-to-End Maintenance and Repair (M&R) Process Evaluation (PPR14)*, KPMG Consulting found SL1 loops being given a 24 hour appointment rather that the stated Retail Comparison. Observation 44 was issued to address this concern. BellSouth made changes to this process resulting in the closure of Observation 44.

In conducting the *End-to-End Trouble Report Processing (TVV9)* transaction test, KPMG Consulting worked from a predeveloped test bed. Faults were inserted on circuits, then troubles were opened through TAFI or the CWINS Center and repairs completed by BellSouth technicians. After the troubles were cleared, KPMG Consulting measured the on time repairs for Resale, UNE and Special circuits as compared with that of retail. Additionally, KPMG Consulting compared the receipt to clear duration times with that of retail. KPMG Consulting found that there was parity between wholesale and retail maintenance average duration for on time repairs and average durations. KPMG Consulting did not find evidence of the above stated problem.

e.   **Improperly Closed Repair Tickets**

Issue
BellSouth technicians close valid repair tickets as no trouble found and fail to notify ALECs when repairs are closed.

ALEC Summary
ALECs accuse BellSouth of providing inaccurate repair reports and of improperly closing valid trouble tickets to a no trouble found code. Network Telephone reports a recent case where despite the pleas of its repair supervisor to fix an out of service condition for a customer and to receive a callback, BellSouth closed six consecutive repair tickets for the same customer to no trouble found. BellSouth allegedly did this without speaking to Network Telephone personnel or to the customer. Network Telephone also contends that BellSouth closes DS-0 designed trouble reports prior to the six-hour window and forces the ALEC to reopen the ticket before there is resolution to the repair problem.

ALECs believe the practice of BellSouth technicians closing trouble tickets to a no trouble found status has grown to epidemic

proportions. Furthermore, ALECs contend the improper closing of repair tickets masks BellSouth maintenance performance and faulty procedures. (Ibid.)

Additionally, ALECs believe BellSouth technicians close out trouble tickets before calling ALECs with the closure. AT&T asserts that BellSouth maintenance technicians have closed out repair tickets without calling to assure the customer is back in service. Network Telephone complains that the BellSouth CWINS center is not providing closeout calls to them and it is apparently supposed to make those calls on every ticket. ALECs contend this practice causes further delays in getting repair problems resolved to the customer's satisfaction. Furthermore, if BellSouth closure notification calls are not made to the ALEC, unnecessary and expensive additional research must be done. Without timely notification, ALECs cannot verify the repair completions and inform their customers. To resolve improper no trouble found closures ALECs believe BellSouth should receive approval from the ALEC before closing out a trouble ticket, and should be required to track no trouble found conditions disputed by ALECs.

BellSouth Response
BellSouth acknowledged it is investigating information filed by the ALECs through the CWINS center and is very interested in whether ALEC pretested trouble reports are being completed as a no trouble found.

BellSouth contends that it has asked ALECs to provide examples of trouble reports supposedly prematurely closed. However, BellSouth has not yet received any documentation of specific instances from ALECs. BellSouth also agreed to investigate specific examples of the alleged premature closing of trouble tickets discussed by Network Telephone during the February 18, 2002 workshop. BellSouth further contends that it requested Network Telephone to provide specific examples on two different dates, February 20, 2002, and again on March 11, 2002, and that, to date, no specific examples have been provided. BellSouth asserts that it stands ready to conduct a review of any Network Telephone examples and will conduct the investigation as soon as the examples are provided.

Normally, when the trouble report comes to BellSouth and a technician is dispatched, if no trouble is found once the

technician arrives, the proper code would be a no trouble found. There are properly handled situations when the trouble would be closed to no trouble found after a test indicated a possible field problem. BellSouth notes that those situations are the same for both retail and wholesale customers. When BellSouth identifies a repetitive repair condition, it handles the report through the chronic group to eliminate the need for additional reports.

According to BellSouth, the CWINS center takes trouble reports for all UNE and resale maintenance. However, it is not the contact bureau that calls the ALEC after every trouble completion.

Design and special services require engineering and coordinated design repairs. The responsibility of coordinating maintenance and design circuit closeouts rests within the CWINS, as the maintenance control office (MCO) for design circuits. For design troubles, ALECs should receive a contact from the CWINS center as notification of the completed repair. Nondesigned services, including POTS and UNE-P repairs, are closed out by the field technician or network technician assigned the trouble ticket. Therefore, it is the responsibility of the technician to notify the ALEC of the closeout for nondesigned services. BellSouth representatives also explained that, normally in the nondesign world, technicians make one attempt to contact the ALEC for closeout of the repair ticket and then close the ticket.

KPMG Consulting Analysis

During the period of December 2000 through February 2001, KPMG Consulting conducted the transaction test *End-to-End Trouble Report Processing (TVV9)*. KPMG Consulting worked from a test bed where faults of a specific type were placed on the circuits. KPMG Consulting reported troubles on each line after the faults were placed. Once they were repaired, KPMG Consulting evaluated report accuracy for the following designated fields: Trouble Type, Disposition and Cause codes for Loop Maintenance Operating System (LMOS) based services, and Trouble Type and Analysis codes for Work Force Administration/Control (WFA/C) based services. Close out codes were able to be evaluated because the faults were manually inserted in the circuits and testers could compare the fault repaired to the code used by BellSouth. KPMG Consulting applied a benchmark of 95 percent accuracy for evaluating this criterion. KPMG Consulting evaluated 105 Resale codes, 174 UNE/UNE-P codes 123 special circuit codes and did not experience the above stated

situation with no trouble found reports.

Trouble close out notification was not a specific test criterion for the KPMG test ALEC testing. KPMG Consulting received direct calls from technicians and the CWINS Center as well as messages left on the contact number answering service; however, failure to notify was not considered an issue with the test circuit troubles.

Additionally, to observe process flow activity blind to BellSouth employees, KPMG Consulting testers observed from "creation to closeout" a number of troubles from a commercial ALEC maintenance call center. Of the troubles observed, in excess of 95 percent received notification calls from BellSouth at the close of the reports.

f. *Repair Reports For Impaired Migrations*

Issue
BellSouth CWINS will not take a repair report until after 5 p.m. for customers impaired by a migration.

ALEC Summary
AT&T contends it has experienced problems with the BellSouth CWINS Center not taking a trouble report until after 5:00 p.m. for a customer impaired during a migration of service, even when BellSouth has incorrectly provisioned the order. Early morning migration difficulties may last all day, leaving the ALEC customer without service for a considerable length of time and leaving the ALEC powerless to resolve the problem. The ALEC again is made to appear as an inefficient, unreliable and powerless supplier in front of the customer. Accordingly, ALECs believe BellSouth should be required to accept and resolve the call immediately, whether it is a provisioning or repair problem.

BellSouth Response
Precompletion service issues are directed to the CWINS center, which has the responsibility to coordinate the resolution of all reported problems. If the order is complete and a problem arises with the service, it is considered to be a maintenance issue resolved through the CWINS center. During provisioning, prior to the completion of the order, the CWINS has a process in place to

work with the LCSC to resolve whatever issue is encountered by the ALEC.

KPMG Consulting Analysis

During the period December 2000 through February 2001, while conducting the *End-to-End Trouble Report Processing (TVV9)* test, KPMG Consulting did not experience the above stated problem. During Hot Cut testing the two participating ALECs did not raise this issue. KPMG Consulting observed 372 Hot Cut circuits from December 6, 2000 through January 31, 2001 and December 4, 2001 through December 18, 2001. KPMG Consulting examined trouble histories that occurred within seven days and 30 days after the installation. For seven-day trouble histories, BellSouth's performance was 99.8 percent, which exceeded the SQM P-7C benchmark of 95 percent. For troubles within 30 days there were a total of 15 troubles attributed to the BellSouth network for a failure rate of 4.1 percent, which exceeded the retail performance of 5.7 percent.

g.   *Intentional After-Hour Repair Attempts*

Issue

BellSouth maintenance technicians intentionally attempt to repair after hours without prior arrangements to closeout repairs as no access or no trouble found.

ALEC Summary

ALECs insist that BellSouth maintenance technicians purposefully go to the customer's premise after hours to repair reported troubles and do not make arrangements for access. According to ALECs, technicians knowingly do not make arrangements for after hours access or disregard comments on the repair ticket and close the ticket to no access or no trouble found. The ALEC must then issue another repair call and begin the process again, delaying the customer's repair further.

More specifically, AT&T notes that BellSouth technicians try to go to the customer's premise outside of business hours to clear the maintenance ticket without making any arrangements for access to the appropriate equipment. Then the trouble ticket is closed to no access by the technician, saying that there was no access to the building or equipment.

To ensure trouble tickets are processed, coded correctly, and not improperly closed, ALECs believe BellSouth should train its technicians and discipline any employee closing a trouble ticket to no access when the time noted on the log is outside customer business hours and no access arrangements are noted on the ticket. Further, ALECs believe BellSouth should be required to provide the Commission and ALECs audit procedures and results used to ensure tickets are processed and coded correctly.

BellSouth Response
If after hours repair tickets are expected to be worked accordingly, they should be so noted before BellSouth makes contact for the repair. If after hours work is to be completed, BellSouth should be notifying those ALECs when the work is to occur and have instruction on where to gain access whether it is a business or residential customer.

KPMG Consulting Analysis
During the execution (December 2000 through February 2001) of the *End-to-End Trouble Report Processing (TVV9)* test, KPMG Consulting did not experience the above out of hour repair situations.

6. **Billing ALEC Experience Detail**

a. ***Delayed Orders Pending Billing Completion***

Issue
ALECs cannot make corrections or changes to a pending order.

(NOTE: Staff did not include this issue in its ALEC Experience recommendation because the parties are currently resolving the issue in the BellSouth Change Control forum in Change Request 0443. If resolution is not reached in a timely manner staff will bring the matter to the Commission for a resolution.)

ALEC Summary
ALECs cannot make changes or modifications to an order or report a trouble until pending billing completion is final. This causes even small changes to the order to be postponed for up to 30 days. ALECs propose that BellSouth should provide a weekly report of orders held in billing and a measure should track this process to assure it does not recur. In addition, ALECs believe BellSouth

should also provide a billing completion notification to inform ALECs when orders have cleared billing systems.

BellSouth Response
One of the concerns BellSouth has with creating a billing completion notice, as requested by ALECs, is that the issue has not been addressed by the Ordering and Billing Forum (OBF) to make it an industry standard process. However, BellSouth is willing to reconsider the billing completion notice as part of the change control process if requested by ALECs.

KPMG Consulting Analysis
KPMG Consulting did not experience this issue.

b.   *Billing Errors Cause Significant Problems*

Issue
BellSouth billing includes format and other errors that create significant problems for ALECs.

ALEC Summary
WorldCom complains of significant problems in auditing its wholesale bill due to format and other errors. WorldCom further comments that it cannot simply assume charges are correct and must ensure the bill matches circuits and features provided to its end use customers. A review of WorldCom's January Georgia bill revealed that three percent of the billed lines for WorldCom did not include a billing telephone number (BTN). WorldCom contests that it cannot determine whether the charge or credit relates to the bill for an existing customer, much less compare charges and credits against the amount WorldCom expects from the customer.

WorldCom states that it has had a longstanding problem with BellSouth not providing Billing Telephone Numbers on the bill. According to WorldCom, BellSouth did not look into the problem, but instead, threatened to cut off WorldCom service if bills were not paid as a result of this billing issue. Therefore, WorldCom paid the majority of their bill and continues to raise this dispute with BellSouth. More recently, BellSouth responded that WorldCom could extract the BTNs in a left-hand Feature Identifier. WorldCom contends that its ability to audit and justify billing is extremely important to assure it is billed correctly by BellSouth, and in turn, that WorldCom can bill its customers accurately.

BellSouth Response

From the combined ALEC comments filed in March 2002 it appears that this issue is limited to a WorldCom claim that the bills are missing the BTNs on three percent of the lines.

WorldCom claims that the invoices are flawed because a billing telephone number was not provided on three percent of the lines that were billed. BellSouth's position on this issue has never changed. BellSouth reviewed the OBF specifications for supplying telephone numbers for services provided on UNE bills. The specifications call for BellSouth to indicate which USOCS and charges appear for each telephone number by use of an electronic record providing this information. The specifications do not require that a BTN be placed on each record. On March 4, 2002, representatives of the BellSouth billing team talked with Ms. Cindy West of the WorldCom billing staff. The parties discussed the industry specifications, and BellSouth explained the exact location within the records where WorldCom could find the telephone numbers for each line. Ms. West seemed to be satisfied with this information. Ms. Lichtenberg's continued insistence that BellSouth has a problem to "fix" is not correct. Moreover, WorldCom raised this issue in the Georgia/Louisiana application, and the FCC still found BellSouth in compliance with Checklist Item 2.

KPMG Consulting Analysis

KPMG Consulting evaluates the format and content of each bill in its test bed. No issues like those described by WorldCom were noted in bills examined to date, which includes 51 Resale and 39 UNE paper invoices. The Resale and UNE billing invoices were found to be in line with industry standards for format and content reporting.

c. *ALECs Continue To Receive Usage Records After ALEC Loss*

Issue

Some ALECs continue to receive BellSouth usage records for accounts lost to another ALEC or back to BellSouth.

ALEC Summary

WorldCom stated that daily usage records are still being sent from BellSouth for customers whom WorldCom has received a line loss report. WorldCom contends that the reason for this error is that the BellSouth switch has not been translated correctly. WorldCom

estimates hundreds of calls, for up to two months after the line loss report, have been received.

BellSouth Response

Suppose an ALEC serves a line with UNE-P on Monday but loses the customer effective Tuesday to another UNE-P ALEC. The issue is that until all of the ordering processes have finished (into billing), the first ALEC will continue to receive DUF records (since the billing records have not switched over as yet). This same issue appears when BellSouth has reacquired a customer.

How does BellSouth address this:

1. As shown previously, BellSouth updates the CSR with service order data generally (about 75 percent of the time) within one business day and, therefore, the issue never appears. In the example above, a service order effective on Tuesday to move a line from one LEC to another will be posted to billing on Wednesday in time to direct the DUF records to the new ALEC (or BellSouth).

2. On occasion, due to service order errors or when the order is processed around the bill period, additional time will be required to post the CSR. When this occurs, DUF records will be sent to the old ALEC until the order posts in the billing system. However, BellSouth will provide ALECs with a special type of DUF record called a "cancel record" for these cases. The cancel records in effect negate the effect of the original record being sent.

As an *example*:

- Suppose a line is served by a ALEC via UNE-P.
- On Monday, service orders are received to disconnect the UNE-P and to set the line up as a BellSouth retail customer effective Tuesday (the last day the ALEC will serve the customer).

- On Tuesday, an error is detected on the service order and is not corrected until Thursday.

- Beginning on Wednesday, all calls originating from the line should be billed by BellSouth to the end user as a retail service and **no** DUF should be sent to the ALEC.

- However, due to the service order error, all of the Wednesday calls are treated as if the ALEC was providing the service via UNE-P (since the order to change the line to BellSouth was still being processed) and DUF records were being provided (on the Wednesday DUF).

- When the order is posted on Thursday, cancel records are provided to the ALEC on the Thursday DUF for calls originated on Wednesday (and included on the Wednesday DUF improperly).

KPMG Consulting Analysis

KPMG Consulting has not noted this issue during the testing under Billing Functional Usage Evaluation (TVV10).

d. *Usage Billed To the Wrong BAN*

Issue

Usage is billed to the wrong BAN, making bill auditing and record tracking difficult.

ALEC Summary

WorldCom claims that BellSouth continues to bill the wrong billing account number. WorldCom contends that its January 2002 bill had 23 percent of the Automatic Number Identifications in Georgia billed to the wrong BAN. This problem continues to create difficulties in maintaining and tracking records. ALECs believe BellSouth should be required to fix its billing process to assure usage is billed to the correct BAN.

BellSouth Response

WorldCom complains that BellSouth is not using the correct billing number to bill for UNE-P services. WorldCom explains that accounts established with the 770 area code are actually appearing on a billing account that is set up with area code 678. This is not true. WorldCom uses two billing numbers in Georgia, one for the Atlanta metropolitan area (with an area code of 770) and another billing account for all of the remaining areas in Georgia (area code 706) to which the charges for UNE-P will be included.

The fact is that WorldCom itself has become confused about what will be on the Atlanta bill. This Atlanta billing account includes UNE-P charges for lines in all area codes in the Atlanta metropolitan area (area codes 404, 770 or 678). In fact, WorldCom does not have a billing account for UNE-P with an area code of 678. Accounts from a number of area codes (including area code 770) are billed on the account. The other billing account number in Georgia, which contains is a 706 area code may also include lines from multiple area codes outside of Atlanta. This mix of area codes on a single bill is nothing new and is the same manner in which charges for retail services are billed to multi-location business or residence customers. BellSouth has created a document which can assist ALECs better understand the bills provided by BellSouth. The document is called "Understanding Your Bill," and it can be found on the BellSouth Web site. WorldCom raised this issue in the Georgia/Louisiana proceeding and the FCC found it was not a problem.

KPMG Consulting Analysis

KPMG Consulting evaluates ALEC test invoices for accuracy. This includes ensuring that all charges are posted to the bills on time and under the proper billing account number with the correct charge. No issues like those described by WorldCom were noted in bills examined to date, which include 51 Resale and 39 UNE paper invoices.

e. *Manual Billing Controls*

Issue
Manual handling of billing errors leads to double billing.

ALEC Summary
ALEC orders sometimes drop into various billing states requiring manual work to correct and complete the order before BellSouth billing systems are updated, which can lead to double billing. WorldCom believes in many instances the cause of the problem is that orders fall into manual billing discrepancy files.

BellSouth Response
WorldCom raises an issue with what is called the "hold file" process. The hold file is a term used to describe an error correction process that is performed on roughly one half of one percent of service orders as error situations are found. This

process is used on all types of orders for retail customers, interexchange carriers and ALECs. The orders are processed using the same systems and processes and the timing of updating the information to the CSRs for all customers is the same. The plain fact is that, when errors occur on service orders (for any customer), it will take some amount of time to make the corrections. While some exceptions do occur, the vast majority of service orders that contain these types of errors are corrected in one or two business days. Since these correction activities are performed on retail as well as ALEC orders, the ALECs are provided with an opportunity to compete with BellSouth. WorldCom raised this issue in the Georgia/Louisiana proceeding and the FCC found it wasn't a problem. Also, this is tied in with the CSR posting timeliness which was addressed many times before.

KPMG Consulting Analysis

KPMG Consulting did not experience delayed orders when posting to billing. It continues to examine test cases to ensure order activity is timely and retail bills show termination on time.

f. *Improperly Routed IntraLATA Calls*

Issue

Improper routing of IntraLATA calls denies customers service from the carrier of choice and ALECs associated revenues.

ALEC Summary

WorldCom accuses BellSouth of improperly routing tens of thousands of ALEC intraLATA calls through its own switches, rather than the customer-selected ALEC carrier. According to WorldCom, the alleged misrouting denies ALECs revenues that could have otherwise been captured by hauling intraLATA traffic through their switches. WorldCom complains that BellSouth switch translation was identified as the problem and it is concerned about possible recurrences.

BellSouth Response

BellSouth did not respond directly to this issue during the workshop or in post-workshop supplemental comments.

KPMG Consulting Analysis

KPMG Consulting primarily uses BellSouth as the Local Primary Interexchange Carrier (LPIC) for testing during the Billing

Functional Usage Evaluation (TVV10).   As a nonfacilities-based
ALEC, an LPIC of other than the ILEC would cause category 11 on
access Daily Usage Feed (DUF) records on UNE-P accounts and no
records for intraLATA toll on resale accounts.   These access
records on UNE-P accounts would be marked with the carrier
identification code (CAC) of the Interexchange Carrier (IXC) that
was LPIC'd.   These records would simply indicate that the call was
transported out to the IXC's point-of-presence on the ILEC network
and would give limited insight into the actual network routing of
the call.

g.   *No Out Collection Process*

Issue
BellSouth has no mechanism to return and research erroneous
usage records to ALECs.

ALEC Summary
WorldCom states that it has requested that BellSouth create an
out collect process, which would allow it to return incorrect usage
records to BellSouth for further research.   WorldCom contends that
BellSouth has improperly transmitted thousands of intraLATA calls
that should have been routed through WorldCom.   WorldCom wants to
research appropriate Daily Usage File (DUF) credits for the
intraLATA call traffic.   ALECs believe the WorldCom situation may
also happen to others and believe BellSouth should develop an out
collection process at no charge to ALECs.

BellSouth Response
WorldCom raises an issue about a usage process known as out
collects.   What WorldCom is really looking for is a way to submit
a usage bill dispute electronically.   BellSouth does not provide
that capability to any customer, retail ALEC or Interexchange
Carrier. BellSouth does, however, provide ALECs with an efficient
process to report issues with BellSouth's DUF records.   The
BellSouth billing documentation (*The BellSouth ALEC Billing Guide*,
chapter four, available to all ALECs via the BellSouth Web site
which contains a form to report such cases and provides that each
reported trouble will be acknowledged within 24 hours.   WorldCom
contends this method is not effective because the form used to
report issues can only be used for single records and not for
issues that affect thousands of records.   WorldCom does not
understand the process.   An ALEC can report a trouble that impacts

entire files (containing hundreds of thousands of records), thousands of individual records or, if the ALEC wishes, a single record. WorldCom's justification of the electronic returns process is that BellSouth would then have the records to be repaired. This makes no sense because BellSouth, as the supplier of the records, already has the records and another copy is unnecessary. The current process provides an effective means by which an ALEC can report usage problems directly to the subject matter experts at BellSouth who can rapidly respond to any issues that arise. The FCC considered this issue in the Georgia/Louisiana application and did not find it to be a problem.

KPMG Consulting Analysis

BellSouth does have an out collect process via Centralized Message Distribution System (CMDS) and does not use a DUF returns process. DUF issues are dealt with through the Account Manager or directly with DUF subject matter experts.

h. *Numerous Bills Impair Timely ALEC Bill Payment*

Issue

The number and frequency of bills makes managing timely payment difficult for ALECs.

ALEC Summary

Covad noted in its workshop handouts that the number and frequency of bills makes timely payment difficult. Covad contends that dispute acknowledgments also do not reference claims numbers and this makes it difficult to match the bill to Covad dispute amounts. Covad further contends that bill credits are not listed on bills and no notification of credits applied are made, which further creates difficulties in bill balancing.

BellSouth Response

BellSouth provides billing in the same manner (frequency and number of bills) as that provided to retail or IXC customers. Industry guidelines call for different services to be included on different bill types (resale, local interconnection, UNE-P, loops, etc.). Collocation bills are separated by location (end office). This accounts for the vast majority of bills being provided to Covad. BellSouth will complete a BAN or bill period consolidation at a customer's request. BellSouth completed a billing period consolidation for Covad in January 2002.

KPMG Consulting Analysis

KPMG Consulting has noted that the new Tapestry system includes an invoice number on its bills that may help ALECs handle and track their bills more efficiently.

i. *Miscellaneous Billing Is Difficult to Audit*

Issue

Miscellaneous billing amounts are difficult to audit.

ALEC Summary

Covad contends that BellSouth dumps old bill charges into a 0000 invoice, making it impossible to audit the detail of charges, and then offers to assist by charging for an explanation of what is in the invoice. Covad estimates such charges total approximately $62,000 and continue to grow.

BellSouth Response

The issue here is that Covad wants BellSouth to detail the charges on the miscellaneous invoice. BellSouth provides ALECs with CABS bills including separate "invoices" for each month. Therefore, if the current bill has balances due from prior months, then the balance for each of the months is tracked by invoice number (i.e., unpaid April charges are separated from current charges for May, etc. by use of an invoice number). Once charges get to be 12 months old or beyond, the system lumps them in under the "0000" invoice and they are not broken out by individual month (we feel enough is enough). Covad requested a break out of these old charges. BellSouth's position is that these charges were separately identified on the original bills provided by BellSouth (when they were first incurred) and that Covad should pay for being provided copies of the previous bills.

KPMG Consulting Analysis

KPMG Consulting did not experience this issue in bills examined to date, which include 51 Resale and 39 UNE paper invoices.

7.   Performance Measures ALEC Experience Detail

a.   *Missing Raw Data*

Issue
LSRs classified as "projects" and "dummy FOCs" are excluded from the Performance Measurement Analysis Platform (PMAP) raw data.

ALEC Summary
The ALECs contend that LSRs classified as "projects" and "dummy FOCs" (confirmation of cancelled LSRs) should be included in BellSouth's PMAP raw data.   Although these orders are in the exclusions to BellSouth's Performance Measures, these type of orders should be in the raw data so the ALECs can perform their own analysis. For example, if a customer places an order for 15 lines or greater, BellSouth classifies the order as a "project." Without the raw data related to the project, an ALEC cannot identify or monitor the service its largest customers receive from BellSouth.

BellSouth Response
BellSouth argues that "projects" and "dummy FOCs" should be excluded from BellSouth's PMAP raw data because these type of orders are not used in the calculation of the performance measurement in question. According to BellSouth, the raw data should only contain ALEC orders used to calculate the performance measurements. BellSouth noted that, as of August 2001 data, "Dummy FOCs" are included in the FOC Timeliness performance measure and the supporting raw data.

KPMG Consulting Analysis
Data Integrity tests are incomplete, therefore, KPMG Consulting does not have test results at this point for missing raw data. Based upon the current business rules, KPMG Consulting does not expect to find "project" data included in the performance reporting data set.

From a replication perspective, there is not an identifier defined in the Raw Data User Manual (RDUM) to use to determine if the "project" and dummy FOC information is included in the data set.   Currently, there are several clarification issues to determine why the data sets do not reproduce the BellSouth values. This could be an indication that dummy FOC data is included in the data set.

b.   *Acknowledgment Message Timeliness Data Flawed*

Issue
BellSouth   is   inaccurately   reporting   data   for   the
Acknowledgment Message Timeliness and Completeness performance
measure.

ALEC Summary:
According to AT&T, the order volumes in the raw data to the
Acknowledgment Message Timeliness performance measure are not
consistent with the order volumes in the PMAP flow-through report.
In Attachment 4 to the ALECs post-workshop comments, BellSouth
indicated that EDI returns one acknowledgment per transmission and
a transmission may contain multiple LSRs, whereas the flow-through
report gives detail at the LSR level.   Therefore, it can be
inferred that the volume in the flow-through report will be greater
than or equal to the volume of EDI LSRs shown in the raw data for
Acknowledgment Message Timeliness. AT&T states that this is not
true when they compared the Acknowledgment Message Timeliness raw
data to the October 2001, snapshot data for flow-through.
Similarly, when comparing the November 2001 data, results showed
little difference in order volumes between the two measures.

Additionally, according to AT&T, BellSouth states, "TAG
returns acknowledgments on messages related to pre-order activity
and will not be reflected in the flow-through report. Similarly,
LSRs fatally rejected by TAG will receive an acknowledgment but
will not be counted in the Flow-through report."   Both of these
explanations suggest that the TAG volume in the Acknowledgment raw
data should be significantly greater than the TAG and LENS volumes
in the Flow-through Report.   When AT&T compared the October 2001
snapshots, the results showed the opposite scenario to be true--the
TAG   and   LENS   volumes   in   flow-through   were   greater   than
Acknowledgment Message Timeliness.

BellSouth's Response
According to BellSouth, AT&T is making an invalid comparison
due to multiple reasons. First, EDI returns one acknowledgment per
transmission (or a "envelope"), even though the transmission may
contain multiple LSRs.   Given this, AT&T is correct in its
assumption that the volume for EDI LSRs shown in the flow-through
report should be greater than or equal to the volume for EDI LSRs
in the Acknowledgment raw data files.   However, AT&T found the

opposite to be true when using the October 2001 snapshot data.
AT&T neglected to take into account those LSRs that were fatally
rejected. When factoring in fatal rejects, the volume of EDI LSRs
in the October flow-through report is greater than or equal to the
volume of EDI LSRs in the acknowledgment raw data files.

Second, for TAG, acknowledgments on messages related to pre-
order activity are not reflected on the flow-through report but are
included in the Acknowledgment raw data files. Similarly, LSRs
fatally rejected by TAG will not be counted in the flow-through
report, but they will be included in the acknowledgment raw data
files. As stated by AT&T, both of these explanations suggest that
the TAG volume in the Acknowledgment raw data should be
significantly greater than the TAG volumes in the Flow-through
Report. However, AT&T found the opposite to be true. BellSouth
discovered that PMAP was not receiving feeds from two of its four
TAG processors prior to November 7, 2001, which resulted in the
acknowledgment count from TAG being understated. BellSouth stated
that this issue was a reporting issue only and did not affect
BellSouth's ability to receive and respond to LSRs submitted via
TAG or any other interface. This issue was resolved on November 7,
2001, which was after BellSouth reported October 2001 results upon
which AT&T relied on.

In addition to the discrepancies mentioned above, BellSouth
noted that LNP acknowledgments are included in the raw data for the
Acknowledgment measures, but are reported separately on the LNP
Flow-through report.

It is BellSouth's position that ALECs should not expect to see
the number of LSRs reported in the flow-through report to match the
number of LSRs in the raw data files for the Acknowledgment Message
Timeliness measure, due in part to the reasons explained above.

KPMG Consulting Analysis

Volume comparisons between Acknowledge Message Timeliness and
Flow-through would not have been made within the scope of either
Data Integrity or replication. However, there are currently
several outstanding issues related to both AMT and Flow-through for
Data Integrity and Test ALEC replication. Testing will continue in
Performance Measure Analysis Platform (PMAP) 4.0. The Metrics Data
Integrity Verification and Validation Review (PMR4) will test the
accuracy and completeness of all transactions used in the

calculation of the AMT performance measure, which would indicate if a problem exists for a volume comparison.

c.   *Data Replication*

Issue
ALECs cannot replicate FOC and Reject Interval from PMAP raw data.

ALEC Summary
The raw data for the FOC and Reject Interval performance measure contains the LSR received data, LSR FOC/reject data, and FOC/reject interval. The interval is reported in hours and minutes, but BellSouth only provides the dates of the endpoints, not the *time stamps*. AT&T noted in its post-workshop comments that BellSouth alleges that it corrected this problem as of December 2001 for AT&T and as of January 2002 for other ALECs. It is not clear to AT&T whether the January fix will resolve this problem for all ALECs.

BellSouth Summary
Database fields are created in the PMAP raw data for the FOC Timeliness and Reject Interval performance measures to capture the received and FOC/Rejected dates for different types of LSRs (e.g., fully mechanized and nonmechanized).   These fields are not internally used by BellSouth to retrieve the time stamps for the FOC and Reject Interval PMAP reports. For example, the PMAP raw data field "CREATE_TS" shows the date the LSR was created, but not the corresponding time. Similarly, the field "TD_STATUS_UPDATE" shows the date the LSR was FOC/Rejected, but not the corresponding time.   However, as noted by AT&T above, BellSouth began providing the time stamps in the PMAP raw data fields for each type of LSR as of December 2001 for AT&T and January 2002 for other ALECs.

KPMG Consulting Analysis
Upon reviewing the February and March 2002 data for the Test ALEC for FOC Timeliness, KPMG Consulting found that BellSouth did provide dates and time stamps for when the LSR was received and FOC'd and/or Rejected.   Therefore, KPMG Consulting has not identified this as an issue.

d. *Monthly Carry Over of LSR*

Issue

ALECs cannot replicate the FOC and Reject Interval performance measurements from PMAP raw data for LSRs that are submitted in one month but FOC'd/rejected in a different month.

ALEC Summary

Within the raw data for FOC and Reject Interval performance, there are two records for each LSR. One record contains the received date of the LSR. The other record contains the FOC or rejected/clarification date of the LSR. If the LSR was received in one month, but FOC'd or rejected/clarified back to the ALEC in the following month, the ALEC is unable to replicate the interval being calculated by BellSouth. According to AT&T, BellSouth is excluding the record that contains the date when BellSouth received the LSR. (AT&T, Document No. 01467-02, p. 5; ALECs, Document No. 03114-02, p. 61.)

BellSouth Response

According to BellSouth, the FOC Timeliness PMAP report has always included all FOCs sent within the reporting month, regardless of when the LSR was received. However, for the Reject Interval PMAP report, prior to August 2001, an LSR must have been both received and rejected within the reporting month to be included in the report. Beginning with the August 2001 data, the Reject Interval report now includes all LSRs regardless of when they were received. If an LSR is received by BellSouth towards the end of the month and the FOC or the reject doesn't get returned until the next month, AT&T would have to pull the raw data for both months and compare the LSRs receipt dates in month one to the FOC/reject dates in month two.

KPMG Consulting Analysis

The raw data set provided monthly to ALECs contains (according to the SQM and business rules) all records that were FOC'd or rejected in a given reporting period regardless of when an LSR was sent (prior to the reporting month). KPMG Consulting has verified that there are FOC'd or rejected records included in a given month's raw data set that were sent in a prior month. KPMG Consulting is currently in the process of testing whether all such records are included.

e. *Orders Incorrectly Coded and Excluded from Performance Measures*

Issue
L-Coded orders are incorrectly coded and subsequently excluded from the Order Completion Interval Performance measure.

ALEC Summary
Covad found numerous instances where PONS were incorrectly coded as "L" and subsequently excluded from the Order Completion Interval performance measure. An "L" coded order is one that takes longer to complete than the offered interval.

In an August 8, 2001 letter to BellSouth, Covad provided BellSouth with a list of 15 PONs which had been incorrectly coded "L" and excluded from the Order Completion Interval performance measure. This resulted in an incorrect (downward bias) Order Completion Interval report. Covad stated that its corporate policy is to always request a due date that is exactly the standard loop delivery in compliance with BellSouth's business rules. If the customer cannot be available on the due date, Covad supplements the order and requests a different due date. If the order is supplemented with a different due date, the order is appropriately coded "L" and excluded from the performance measure.

According to the BellSouth Products and Services Interval Guide, the BellSouth standard interval for delivering stand alone xDSL loops (ADSL, HDSL, and UC loops) is five business days. For IDSL loops, the standard interval is ten business days. An LSR submitted before 10:00 a.m. must use the standard interval for the desired due date. If an LSR is submitted after 10:00 a.m., the ALEC must request the standard interval plus one day for the FOC. Thus, an ALEC must request a desired due date of the standard interval plus one day. According to Covad, the standard loop delivery interval was appropriately requested for the 15 PONS listed in the August 8, 2001 letter.

In addition to the 15 August PONS submitted for evidence in this docket, Covad claims that 23 percent of its July 2001 and 33 percent of its November 2001 "L" coded orders (orders requiring either a longer or shorter completion interval) were excluded from BellSouth's Order Completion Interval (OCI).

Covad believes KPMG Consulting needs to investigate the validity of the process involved with excluding "L" coded orders. In response, KPMG Consulting said that the "L" coded order issue is not part of the measures test because they're not looking at their own (KPMG's) orders and how they are coded.

BellSouth Response

BellSouth's response to Covad's 15 PONS in question is provided in Exhibit 1 to Covad's Comments Requesting Investigation of Excluded "L" Coded Orders, November 16, 2001. BellSouth was able to perform an analysis on 11 of the PONS and unable to locate the remaining four. BellSouth requested Covad to provide additional information on the four missing PONS, such as service order number and completion date.

According to BellSouth, six PONS were for ADSL loops and five were UNE Capable Loops (IDSL). BellSouth stated that all six ADSL loops had an original due date interval of six business days and were appropriately "L" coded since the standard provided in BellSouth's Interval Guide is five business days. Similarly, three of the five IDSL loops were given a 13 business day interval and two were given an interval of 12 business days, whereas, the standard is ten business days. In sum, BellSouth stated that "L" codes are properly being placed on Covad's orders.

KPMG Consulting Analysis

The Metrics Data Integrity Verification and Validation Review (PMR4) examines the accuracy and completeness of performance measurement data. Since the "L" code is assigned further upstream in the process, KPMG Consulting, would only test to ensure that the contents of the field were transferred completely and accurately through the data process. KPMG Consulting would not have the transaction-specific knowledge available in the Metrics Data Integrity Verification and Validation Review (PMR4) that is available in the POP Functional Evaluation (TVV1) to determine whether the "L" code was applied correctly. While Covad's issue pertains to a performance measure, it, as noted above, is not an issue that can be tested by KPMG Consulting.

f. *Flow-Through Reliability*

<u>Issue</u>
PMAP flow-through reports are not reliable.

<u>ALEC Summary</u>
According to Network Telephone, the December 2001 PMAP reposting of Flow-through data showed 73 TAG orders submitted by Network Telephone. However, Network Telephone does not submit LSRs via TAG.

Additionally, AT&T stated that the raw data that BellSouth provides to the ALECs is incomplete for the flow-through reports. According to AT&T, BellSouth does not provide a LSR detail for the LNP flow-through report.

<u>BellSouth Response</u>
In BellSouth's post-workshop comments, BellSouth states that Network Telephone is incorrect in its conclusion. The Network Telephone LSRs shown as submitted via TAG in the December 2001 flow-through report were actually xDSL LSRs submitted via LENS. BellSouth explained that all xDSL orders not submitted via EDI were shown as having been submitted via TAG rather than being separated out between TAG and LENS. This occurred because LSRs submitted via LENS are actually processed through TAG and there is a "common message" created for both LENS and TAG LSRs. It is BellSouth's contention that the flow-through report is reliable since the xDSL orders were shown on the report as having been submitted through TAG, instead of specifying LENS.

In response to AT&T's concern regarding incomplete raw data for the LNP flow-through report, BellSouth indicated that a form of underlying raw data was now available upon request. AT&T requested the underlying data in February 2002.

<u>KPMG Consulting Analysis</u>
As part of the Metrics Data Integrity Verification and Validation Review (PMR4), KPMG Consulting has issued Exception 113 to address missing xDSL transactions as part of the completeness analysis for transfer of data into the performance measurement database. KPMG Consulting also issued Exception 124, which deals with the accuracy of the BellSouth reported results for the

Flow-through performance measurement. Exception 124 remains open. As part of the Performance Measurement test KPMG Consulting does not validate or test issues related to design and understanding of the system architecture.

g.   *ACNI Performance Measure is Incomplete*

Issue
The BellSouth self-reported ALEC data provided in PMAP for the Average Completion Notice Interval (ACNI) is incomplete.

ALEC Summary
For the Average Completion Notice Interval (ACNI) performance measure, AT&T stated that the raw data is incomplete. Specifically, AT&T raised the following six issues:

Issue 1:   Completion notices issued in one month for orders completed in a previous month are excluded from the ACNI calculation and raw data.

Issue 2:   Orders submitted directly into SOCS do not receive completion notices.

Issue 3:   Null/blank values in the notice interval field are being excluded from the ACNI measure calculation and raw data. [ALECs contend that BellSouth has provided ALECs with flawed explanations and nonresponsiveness answers regarding the completeness of BellSouth's acknowledgment data and regarding completion notices submitted directly into SOCS.]

Issue 4:   Completion notices for standalone LNP orders are being excluded from the ANCI measure and raw data

Issue 5:   Completion Notices for LSRs classified as projects are being excluded from the ACNI measure and raw data.

Issue 6:   The data is incorrect because multiple entries are being recorded for the same completion notice and applied in the calculations. (AT&T, Document No. 01467-02, p. 4.)

BellSouth Response

Issue 1: According to BellSouth, there is a difference in interpretation of the ACNI SQM as to whether or not to include completion notices that straddle a month. If the order is completed in month one and the completion notice is provided to the ALEC in month two, BellSouth only reports the data if both ends of the activity (completed order and notice) occurred in the same month. AT&T requests for those completion notices that straddle a month not be excluded from the ACNI measurement. In the workshop hearing transcripts, BellSouth stated that it would implement the change to ACNI to include completion notices that straddle a month. A fix is targeted for May 2002 data and will be reflected in the June 2002 report.

Issue 2: For orders submitted directly into SOCS that do not receive completion notices, BellSouth contends that these orders should not receive a completion notice because they are categorized as "administrative". According to BellSouth, "administrative" orders are those that are issued by BellSouth as a correction to an order that has already been completed.

Issue 3: For null/blank values in the notice interval field that are being excluded from the ACNI calculation and raw data, BellSouth implemented a fix to this issue in the October 2001, data, and the corresponding Raw Data Users Manual (RDUM) with January 2002, data. RDUM instructions prior to January 2002 excluded records where ACNI was null or blank (would not be in denominator in calculation of the performance measure. In February 2002 RDUM, BellSouth added Null/Blank values at default value of .02 hours—in other words, null values would fall in 0<5 hours bucket. Fix appears to be implemented.

Issue 4: For completion notices for standalone LNP orders that are being excluded from the ACNI measure and raw data, BellSouth contends that standalone LNP orders categorized as "trigger" orders do not

carry an Operating Company Number (OCN) with the order. A "trigger" order is a type of order that can be added to LNP standalone to allow it to operate automatically. Without being able to identify the OCN for the associated "trigger" order, BellSouth cannot identify carrier that placed the order. Hence, BellSouth contends that the order is not excluded from the ACNI, it just cannot be identified appropriately.

Issue 5: For completion notices for LSRs classified as projects being excluded from the ACNI measure and raw data, BellSouth argues that "projects" are excluded from the Ordering measures thus completion notices for these type of orders would not be captured in the raw data or the ACNI measure since they are not used in the calculation of Ordering measures.

Issue 6: In the case where ALEC data provided in PMAP is incomplete because multiple entries are being recorded for the same completion notice and applied in the ACNI calculation, BellSouth stated that a fix to this issue was implemented with August 2001 data; however, the error occurred again in the November data and was fixed again with the December 2001 data. (ALEC Experience Workshop TR, pp. 263-264; BellSouth, ALEC Experience Workshop, Varner handout, p. 20-25.)

KPMG Consulting Analysis
Issue 1: Addressed by BellSouth prior to KPMG Consulting conducting the Metrics Data Integrity Verification and Validation Review (PMR4). PMAP Version 4.0 will test the stated fix.

Issue 2: Not tested by KPMG Consulting from a data integrity perspective but rather from the perspective of the stated business rules. The assumption is that those records would not be included in the data transformation process and therefore would not be included within the data set for calculating the performance measures values.

Issue 3: Addressed by BellSouth prior to KPMG Consulting completing the Metrics Data Integrity Verification and Validation Review (PMR4). Retest will occur within the PMAP Version 4.0 environment.

Issue 4: Will be tested within the PMAP Version 4.0 environment.

Issue 5: Will be included in PMAP Version 4.0 test. Scope of this test includes raising issues in which differences between the applied transformation rules and stated SQM exist.

Issue 6: Was addressed by KPMG Consulting during the Metrics Data Integrity Verification and Validation Review (PMR4). Exception 125 identified that BellSouth applied multiple instances of the same service order number in the Average Completion Notice Interval SQM. BellSouth made modifications, which were retested. Exception 125 was subsequently closed.

h. *Jeopardy Notice Interval Performance Measure is Incomplete*

Issue
The BellSouth reported ALEC data provided in PMAP for Jeopardy Notice Interval is incorrect.

ALEC Summary
According to AT&T, the ALEC data provided in PMAP for the Jeopardy Notice Interval performance measure is incorrect. In Georgia Docket 7892-U, BellSouth stated that it corrected this issue in its October data, but AT&T disagrees based upon a review of the November PMAP report.

BellSouth Response
BellSouth acknowledges that this measurement is incorrect and has been since June 2001. BellSouth is presently working on targeted fix date of June 2002 data.

KPMG Consulting Analysis
This will be tested in PMAP Version 4.0 during August 2002.

i. *Exclusion of Directory Listings*

Issue
BellSouth excludes directory listing orders from some performance measurements.

ALEC Summary
BellSouth responded to this issue in the December Georgia Performance Measures Workshop that it now includes directory listing orders in the Percent Rejected Services Request, Reject Interval, FOC Timeliness, and FOC /Reject Response Completeness measures. However, the ALECs want to know if BellSouth includes directory listing orders in the PMAP flow-through report and if directory listing orders are included in the raw data for all measures, whether or not excluded from the calculation.

BellSouth Response
BellSouth states that it properly excludes directory listing orders except where the SQM provides a level of disaggregation to include them. To address this issue, BellSouth began reflecting directory listing orders in the UNE-Other Non-Design level of disaggregation for the following performance measures; Percent Rejected Services Request, Reject Interval, FOC Timeliness, and FOC /Reject Response Completeness.

Additionally, in Exhibit 4 of the ALECs post-workshop comments, BellSouth states that directory listing orders are included in the flow-through report. BellSouth further stated that directory listings are included in the raw data files for each of the ordering performance measures to the extent they are not excluded from the calculation of the measure.

KPMG Consulting Analysis
Exception 114 addresses the issues of missing transactions which include the Directory Listing transaction types. While BellSouth has stated that the Directory Listing issues have been fixed, KPMG Consulting has not retested to confirm this due to the other outstanding issues covered in Exception 114. Retesting will occur using the July 2002 data within the PMAP Version 4.0 environment.

j. _UNE-P Data for ALECs is Incomplete_

Issue

BellSouth is inaccurately reporting UNE-P data for all the ALECs.

ALEC Summary

According to AT&T, BellSouth's ALEC data is inaccurate for the UNE-P level of disaggregation. AT&T stated that BellSouth has duplicate reporting for UNE-P. The data is being reported under the UNE-Loop and Port Combo category and the UNE Other Non-Designed disaggregation level.

BellSouth Response

According to BellSouth, the coding problem that was causing UNE Loop/Port combinations to appear in the UNE Other Non-Design category on ALEC PMAP reports was corrected with the December 2001 data. The same problem was corrected for ALEC aggregate purposes in June 2001 for the Monthly State Summary (MSS) report.

KPMG Consulting Analysis

The scope of the performance metrics test does not test the composition of the levels of disaggregation. From a replication perspective, the levels of disaggregation and product roll-up are used as stated in the SQM.

k. *Service Order Accuracy*

Issue

BellSouth's manually rekeying of service orders at the LCSC may result in errors in provisioning of customer orders, which in turn, would not be captured in the Service Order Accuracy performance measurement reported by BellSouth.

ALEC Summary

AT&T stated that BellSouth's internal quality control checks only compare the service order to the BellSouth retyped order and not all the way back to the LSR (Local Service Request) or to the order as it was originally submitted by the ALEC.

AT&T reported that this process is allowing errors from BellSouth's manual retyping process to not be caught and those errors to be thus introduced into the orders, which can result in

the customer getting something completely different, not getting what they ordered, getting something wrongly taken out of service, not getting billed for the right thing, experiencing service disruptions and business impacts, and having the potential for mismatches between ILEC and ALEC databases.

BellSouth Response

BellSouth has agreed that there have been some instances of human errors where the post-provisioning CSR record does not match up precisely with the LSR as specified, such as when the contact name has been omitted, but assured that BellSouth employees were being retrained and that service representative errors coverage with employees would be completed by 4/5/02. (BellSouth, Response to Amended Test Exception 112, p. 16.) BellSouth reported that its Service Order Accuracy SQM (Service Quality Measurement) results were 96.28 for November 2001 and 95.79 for December 2001.

Specifically, relative to a WorldCom 500 line data analysis, BellSouth responded that it revealed only a 2.5 percent error rate, which means BellSouth had a 97.5 percent accuracy rate on WorldCom's sample, and asserted that only a small portion of those errors were related to the service order.

Regarding AT&T's list of 19 service order errors, BellSouth responded that if determined only eight of them had actual service order errors. In a BellSouth meeting with AT&T on March 1, 2002 regarding UNE-P provisioning it was reported that both parties came to an agreement on 16 of the service orders with three still in question as to whether there had been an LCSC error involved. Based on the order volume for AT&T, BellSouth asserted that AT&T's list of service orders for the period from June 2001 through December 2001 would represent a very insignificant number of errors.

KPMG Consulting Analysis

The ALEC summary is incorrect based upon KPMG Consulting review/interpretation of the Service Order Accuracy. The SQM states that "A statistically valid sample of service orders, completed during a monthly reporting period, is compared to the original account profile and the order that the ALEC sent to BellSouth." Therefore a comparison is made between the completed Service Order and the LSR.

KPMG Consulting has tested and confirmed that the process as stated in the SQM is correct.

C. *GLOSSARY OF TERMS*

Term	Definition
271 Application	An application to offer long distance services from an RBOC to a state or federal regulatory agency. In order to grant this application, the agency must find the applicant is in compliance with the 14 point competitive checklist described in the 1996 Telecommunications Act.
Access Daily Usage File (ADUF)	Billable call events and Inter-Exchange Carrier (IXC) access events result in the creation of an Optional Daily Usage File (ODUF) or an Access Daily Usage File (ADUF). The Daily Usage File (DUF) consists of outbound local usage, intra-LATA toll usage, BellSouth operator-handled calls and Interexchange Carrier (IXC) originating and terminating access records.
Access Service Request (ASR)	Form used to order dedicated facilities such as interoffice facilities.
Account Team	A BellSouth Account Team is assigned to support those ALECs that purchase premium and complex resale products. Account Teams are sales oriented to identify and incorporate these products into ALEC offerings. Account Teams are responsible for ongoing account management and facilitation of issue resolution with internal BellSouth groups which are not otherwise identified as having separate contact procedures to be used by an ALEC. The methods and procedures used by Account Teams are identical to those used by CLEC Care Teams (described above).
Address Facility Inventory Group (AFIG)	The Address Facility Inventory Group (AFIG) is part of BellSouth's Network Infrastructure Support Center (NISC). The primary function of the AFIG is to assign facilities, such as loops, switch ports and cables pairs, to all types of wholesale and retail service orders.
ADUF	Is the Access Daily Usage File which contains originating and terminating access messages associated with UNE switch ports.
Alternative Local Exchange Carriers (ALECs)	Alternative Local Exchange Carriers (ALECs) is the term used in Florida for the more broadly used term, Competitive Local Exchange Carriers (CLEC).

Term	Definition
Application Program Interface (API)	BellSouth provides a standard Application Program Interface (API) from which ALECs can develop their own software applications to obtain information from BellSouth's pre-order and order systems.
Assignment	Assignment is the BellSouth process of applying the designated telephone numbers, office equipment, and facilities required for the service ordered.
Asymmetrical DSL (ADSL)	A DSL offering providing greater speed and capacity for the downstream portion of data flow inbound to the customer than for the upstream data flow outbound from the customer.
Automatic Call Distributor (ACD)	A specialized telephone system designed to route a center's incoming calls to all available personnel so that calls are evenly distributed. Also used in some centers to manage outgoing calls.
Auto-Clarification (CLR)	If data on the LSR is not correct, the ALEC may receive an Auto-Clarification (CLR), which is a system response requesting corrections or additional information.
Billing Account Number (BAN)	A Billing Account Number (BAN) is used in the Carrier Access Billing System (CABS) to bill ALEC charges associated with accessing the BellSouth network.
BARNEY	The data captured in the Legacy/Source systems for Service Quality Measurement (SQM) reports is transferred daily to the Interexchange Carrier Analysis and Information System (ICAIS) data warehouse, more commonly referred to as Barney (not an acronym).
BellSouth Technology Systems Integration (BTSI)	BellSouth Technology Systems Integration (BTSI) is the liaison between BellSouth and the OSS development vendors.
Bill Cycle	A grouping of customers that are selected according to a predetermined schedule for billing, generally monthly. Customers are assigned to a bill cycle by BellSouth to distribute accounts in a manner to allow efficient use of resources. Alternatively, customers' are allowed to select a bill cycle. These principles apply to both wholesale and retail billing.
Bill Period	The period of time covered by a customer bill. Each end user has one bill per bill period.

Term	Definition
Billing & Collection Center (B&CC)	The B&CC is a center designed to handle billing disputes.
Billing Control Group	The Billing Control group is responsible for monitoring bill-balancing activities to ensure data completeness, rating accuracy, billing accuracy and system change control.
Billing Telephone Number (BTN)	The number to which charges from a given telephone service is billed.
Business Office Customer Record Inventory System (BOCRIS)	Provides service order information including Name, Address, Class of Service, Maintenance Plan, Restrictions, Features, and Preferred Interexchange Carrier (PIC).
Customer Access Billing System (CABS)	One of three BellSouth billing systems used to bill BellSouth retail and wholesale customers. The Customer Access Billing System (CABS) processes billing information for access services and designed (SL2) unbundled network elements (UNEs).
Central Office (CO)	Central office is a telephone company building where subscribers lines are joined to switching equipment for connecting other subscribers to each other, either locally or long distance.
Change Control Board	The Change Control Board (CCB), which is comprised of BellSouth managers, makes decisions about change requests to the Service Quality Measurement (SQM) reports, systems, and process.
Change Control Manager (CCM)	BellSouth's Change Control Manager (CCM) examines the accuracy, completeness, and scope of the change requests to Service Quality Measurement (SQM) reports, systems and processes, and determines whether additional information or clarification is required before proceeding through the process.
Change Control Process (CCP)	The Change Control Process (CCP) is used to manage all changes to the current BellSouth OSS interfaces that impact ALECs.
Change Management	The process by which changes to systems and processes are introduced at BellSouth.

Term	Definition
Change Request	Changes to BellSouth systems and processes are initiated through Change Requests. The CCP supports the following types of Change Requests: Type 1 – System Outages; Type 2 – Regulatory Changes; Type 3 – Industry Standard Changes; Type 4 – BellSouth-Initiated Changes; Type 5 – ALEC-Initiated Changes; and Type 6 – Correction of System and Documentation Defects.
Circuit Provisioning Group (CPG)	Designed orders flow to the Circuit Provisioning Group (CPG) for circuit design.
CLEC Application Verification Environment (CAVE)	The CLEC Application Verification Environment (CAVE) test environment is used to test new software releases for ALECs and Vendors that have completed certification testing and are already in production with BellSouth.
CLEC Care Team	A BellSouth CLEC Care Team is assigned to support ALECs prior to the issuance of orders and pre-orders for simple resale and UNE (described below)products. This support is focused on both helping ALECs understand business rules and also in reviewing interconnection issues and concerns. The BellSouth CLEC Care Team is responsible for either resolving the ALEC inquiry or facilitating its resolution through other BellSouth functional groups.
CLEC Test Environment (CTE)	In order to properly test and enhance their EDI and TAG interface capabilities, ALECs are provided access to the CLEC Test Environments (CTEs); these environments are separate from production and are specifically designed for ALEC testing.
Collocation	An ALEC can locate its telecommunications equipment within an ILEC central office to allow the ALEC to interconnect with the ILEC switch. A collocation can take two general forms: virtual or physical. A virtual collocation consists of an ALEC providing and transferring ownership of their telecommunication equipment to BellSouth for a fee. A physical collocation provides a secure area in a central office for the ALEC to own, install, maintain, and administer its own telecommunications equipment.
Commercial Data	The measurement data resulting from the ALEC use of BellSouth OSS, which is used to determine compliance with standards.

Term	Definition
Completion Notice	BellSouth transmits a Completion Notice (CN) to the ALEC indicating successful activation of an order.
Complex Resale Support Group (CRSG)	The Complex Resale Support Group (CRSG) provides work center support for ALEC customers with Complex Resale and Unbundled Network Elements (UNE) orders that require pre-order activity such as facilities assignment.
Computer System for Mainframe Operations (COSMOS)	Provides frame data used in problem analysis.
Conditioning	Ensuring that a loop is free of impediments to the type of service to be provided over that line.
Connecting Facility Assignments (CFA)	Designation of available cables and connections available to be utilized for service orders which require certain network facilities in order to be provisioned.
Corporate Order Gateway (COG)	Digital Subscriber Line (xDSL) orders enter BellSouth's OSS through LEO, where they are routed to the Corporate Order Gateway (COG), where they undergo all required edits. The orders then travel to SOCS for processing.
Customer Contact Team (CCT)	After a metrics change is implemented, BellSouth's Customer Contact Team (CCT) provides notification of the implemented metrics change to the FPSC, ALECs, and internal BellSouth customers.
Customer Record Information System (CRIS)	System used in the customer billing process.
Customer Service Record (CSR)	The record of the fixed monthly charges billed by the local telephone company to a specific customer.
Customized Large User Bill (CLUB)	A paper bill format generated by the CRIS billing system.
Customer Wholesale Interconnection Network Services (CWINS) Center	The Customer Wholesale Interconnect Network Services (CWINS) Center has three locations: Birmingham, Alabama; Duluth, Georgia; and Jacksonville, Florida. All three centers are redundant from a functional perspective, with each center serving specific ALECs within a defined geographic region. The centers are divided into a Screening Group, a Provisioning Group, and a Maintenance & Repair (M&R) Group.

Term	Definition
Daily Usage File (DUF)	A daily download of usage data from the switch that is delivered to BellSouth's message processing system and subsequently sent to the ALEC. Sometimes referred to as Daily Usage Feed.
Demarcation Point (D - Mark)	The point of a demarcation and/or interconnection between telephone company facilities and terminal equipment or wiring at a subscriber's premises.
Diagnostic Measure	A performance measurement that does not have an associated standard but is used for trend analysis only.
Digital Subscriber Line (DSL)	A service involving transmission of bits of data over telephone lines utilizing one of several data communication protocols.
Direct Inward Dialing (DID)	The ability for a caller outside a company to call an internal extension without having to pass through an operator or attendant.
Disaggregation	The level in which BellSouth's service quality measurements (SQMs) are broken down to provide meaningful direct comparisons between the performance BellSouth gives its customers and that provided to ALECs and their customers. Disaggregation can be by product, time, mechanization, design, and dispatch.
Diskette Analyzer Bill (DAB)	A paper image bill in a CD-ROM format generated by the CRIS billing system.
Due Date (DD)	The Due Date (DD) is the date on which BellSouth commits to completing a request for service.
Dummy FOC	A BellSouth confirmation of a cancelled order.
Electronic Communications (EC) Support Group	The Electronic Communications (EC) Support Group is the single point of contact for BellSouth wholesale customers who require technical support related to the BellSouth OSS.
Electronic Communication Trouble Administration (ECTA)	An electronic bonding system that provides connectivity to BellSouth's backend Loop Maintenance Operating System (LMOS) and Work Force Administration (WFA) systems.

Term	Definition
Electronic Data Interchange (EDI)	The Electronic Data Interchange (EDI) is a batch driven machine-to-machine interface, which uses industry standards as its foundation. Business files are exchanged between BellSouth computer applications and ALEC computer applications that are encoded to comply with standard EDI transaction set for data transmission.
Electronic Technicians (ET)	Electronic Technicians (ETs) are responsible for taking trouble reports from ALECs, performing required testing to isolate the fault, and dispatching trouble reports to the appropriate group if the trouble reported cannot be cleared by the ET.
Entrance and Exit Criteria	The necessary conditions for starting or completing individual tests described in the Master Test Plan.
Evaluation Criteria	Discrete set of measures applied to specific test components.
Exchange Access and Control Tracking (EXACT)	BellSouth's Exchange Access and Control Tracking (EXACT) system an automated system used to process customers' access service requests to SOCS.
Exchange Message Interface (EMI)	A guideline published by the Ordering and Billing Forum (OBF), an industry wide billing group, that shows the format in which usage data is passed to the ALEC.
Fatal Reject	An order that is returned to the ALEC for modifications.
Firm Order Confirmation (FOC)	The Firm Order Confirmation (FOC) is generated by SOCS and is delivered to the ALEC. The FOC is confirmation that the LSR was validated by BellSouth and also contains the Due Date (DD) on which BellSouth commits to completing the request.
Flow-Through (FT)	An order placed by an ALEC that has the potential to be provisioned correctly without manual intervention by BellSouth.
Florida Interim Performance Measures	The BellSouth OSS Test SQM Plan, Florida Interim Performance Measures document defines each of the SQMs included in the OSS test. The specific exclusions, business rules, levels of desegregation, calculation description, and other information pertaining to report structure, data retention, and evaluation standards are identified in this document.

Term	Definition
Florida Public Service Commission (FPSC)	The Florida Public Service Commission (FPSC) regulates ILECs and ALECs, as well as other companies in the telecommunications industry operating in Florida, to safeguard both the utilities and citizens of Florida. The FPSC protects consumers from unreasonable rates and terms of service, encourages maximum efficiency in utility company operations and management, helps the public deal with regulated companies, and establishes regulatory standards and applies them in a fair and consistent manner.
Functional Acknowledgment (FA)	Upon receipt of a Local Service Request (LSR), BellSouth returns a Functional Acknowledgment (FA), indicating that the file was received.
Graphical User Interface (GUI)	A computer interface that allows users to access programs and enter data such as direct order entry by ALECs.
High-density DSL (HDSL)	A DSL offering that involves a high data rate of transmission across the line.
Hot Cut	A term used to describe the work done at the main distribution frame during the transfer of live service from one service provider to another service provider. Also referred to as Loop Migrations or Loop Conversions.
Incumbent Local Exchange Carrier (ILEC)	The local exchange carrier for a particular area.
Integrated Billing System (IBS)	Also known as Tapestry, was implemented in February 2002, to bill certain UNE (switch ports), UNE-P and non-design (SL1) loops.
Integrated DSL (IDSL)	A DSL offering that utilizes BellSouth's Integrated Services Digital Network (ISDN).
Integrated Services Digital Network	An integrated digital network in which the same digital switches and transmission paths are used to establish connections for different services.
Interoffice Facilities (IOF)	A high capacity digital transmission path that is dedicated for the transport of local, toll, and/or access traffic between central offices. IOF can be dedicated to BellSouth, an Alternative Local Exchange Carrier (ALEC) or shared among numerous carriers. The ALEC can purchase IOF in DS1 through DS3 transport levels.

Term	Definition
Interim Performance Measures Work Group	The Florida Public Service Commission (FPSC) established an Interim Performance Measures Work Group, comprised of representatives from the FPSC staff, BellSouth and the ALEC community, and initiated a process for obtaining input regarding measures for use in OSS testing.
L-Coded Order	An order that takes longer to complete than the offered interval.
Line Loss Report	A BellSouth provided Web-based mechanism for reporting ALEC telephone numbers migrating away from or otherwise being disconnected from its customer accounts
Line Sharing	Allowing service over the high frequency portion of a loop that is not being utilized by regular telephone service already being delivered on that particular line.
Local Access and Transport Area (LATA)	A geographic area established by law within which an ILEC may offer telecommunications services.
Local Carrier Service Center (LCSC)	The Local Carrier Service Centers (LCSC) are the primary BellSouth work centers for providing ALEC support for pre-order and order processing.
Local Exchange Navigation System (LENS)	The Local Exchange Navigation System (LENS) is a Graphic User Interface (GUI) that connects directly into BellSouth's OSS and is based on the TAG architecture. This interface was developed to provide ALECs with an alternative method of connection to BellSouth through the internet.
Local Exchange Ordering (LEO)	Following entry of orders into the OSS, flow-through eligible orders travel through the Local Exchange Ordering (LEO) system and the Local Exchange Service Order Generator (LESOG) to receive a Firm Order Confirmation (FOC) without human intervention from the Local Carrier Service Center (LCSC).
Local Exchange Service Order Generator (LESOG)	Following entry of orders into the OSS, flow-through eligible orders travel through the Local Exchange Ordering (LEO) system and the Local Exchange Service Order Generator (LESOG) to receive a Firm Order Confirmation (FOC) without human intervention from the Local Carrier Service Center (LCSC).
Local Interconnect Service Center (LISC)	Orders for local exchange trunks and facilities are processed at the Local Interconnect Service Center (LISC).

Term	Definition
Local Primary Inter-Exchange Carrier (LPIC)	Pre-designated Intra-LATA Carrier is the telephone company chosen by the end user as being the default carrier for calls outside the local calling area, but within the same LATA.
Local Service Request (LSR)	Form sent from an ALECs to an ILEC initiating an end user requested change to local telephone service.
Local Service Request Router (LSRR)	Orders sent through EDI enter BellSouth's OSS through the Local Service Request Router (LSRR).
Loop	A transmission path from a central office to a customer's premises.
Loop Facility Assignment and Control System (LFACS)	Provides facility data used in problem analysis.
Loop Facility Assignment and Control System (LFACS)	A facility assignment and inventory data base
Loop Maintenance Operations System (LMOS)	A maintenance management and repair delivery system used by BellSouth for M&R activities related to POTS services.
Loop Migrations	Loop Migrations (Hot Cuts) -During the provisioning process, loop migrations (also referred to as hot cuts) occur when live service from one service provider is transferred to another service provider. Frame technicians migrate the lines at the main distribution frame (MDF) on the committed due date. The hot cut is expected to start at the Frame Due Time (FDT) as indicated on the LSR.
Local Number Portability (LNP)	Local Number Portability (LNP) is the process that allows customers to retain their existing telephone number when they migrate to an ALEC. During this process, BellSouth coordinates actions with the ALEC acquiring the account and the Number Portability Administration Center (NPAC is the agency that maintains LNP databases).
Local Ordering Imaging System (LOIS)	Manual orders may be sent via faxes that are automatically imaged, assigned an image number, and stored in the Local Ordering Imaging System (LOIS) fax server as they are received at the LCSC.

Term	Definition
Master Account	BellSouth's ALEC bills are structured in a hierarchical manner. At the top of the hierarchy is the Master Account or "Q" account. Charges are aggregated under the Master Account, which also identifies each type of service.
Master Test Plan (MTP)	Identifies the overall framework and structure of the OSS test.
Maintenance Control Office (MCO)	The control location responsible for identifying, diagnosing and resolving designed circuit repair problems.
Mechanized Loop Test (MLT)	A loop test used to initially test a POTS loop during trouble shooting. Provides loop testing on the customer's line and diagnostic recommendations.
Memory Administration Recent Change History (MARCH)	A system that implements Central Office translations changes. As an example, it provides the mechanism to add or delete features to or from a line.
Monthly State Summary (MSS) Report	BellSouth's monthly state summary report used for regulatory purposes which contains BellSouth retail and ALEC aggregate performance results.
Network Data Mover (NDM)	A mechanism that produces BellSouth network system data that can be fed as input for other uses such as reports.
Network Design	The network design process allows an ALEC to establish a presence in a BellSouth switch.
Non-Flow-Through (NFT)	An order placed by an ALEC that can be provisioned correctly only with manual intervention by BellSouth.
Normalized Operational Data Store (NODS)	The Normalized Operational Data Store (NODS) is used to maintain data in preparation for generating the monthly SQM reports.
Optional Daily Usage File (ODUF)	Is the Optional Daily Usage File which contains usage and event billing records used by ALECs to bill its end users.
Operating Company Number (OCN)	A four character code to identify any service provider.
Operation Support Systems (OSS)	Systems used to perform pre-ordering, ordering, provisioning, maintenance and repair, and billing.

Term	Definition
Optional Daily Usage File (ODUF)	Billable call events and Inter-Exchange Carrier (IXC) access events result in the creation of an Optional Daily Usage File (ODUF) or an Access Daily Usage File (ADUF). The Daily Usage File (DUF) consists of outbound local usage, intra-LATA toll usage, BellSouth operator-handled calls and Interexchange Carrier (IXC) originating and terminating access records.
P-Value	The frequency that the test result would be observed, given the benchmark. When the p-value is low, it means either that BellSouth is not meeting the benchmark or that the result was an anomaly. To guard against the latter, that is referred to as Type I error, the p-value is set to 5% for all KPMG Consulting's quantitative tests.
Performance Measurements Analysis Platform (PMAP)	Performance Measurements Analysis Platform (PMAP) is the process of extracting, staging, selecting and transforming data for use in generating monthly SQM reports.
Plain Old Telephone Service (POTS)	The basic service supplying standard single line telephones, telephone lines and access to the public switched network.
PMAP Raw Data Files	Detailed information about specific LSRs, service orders, trouble tickets, and other items used to generate performance measurement reports posed by BellSouth on the PMAP Web site.
Predictor	A system used to query central office translations; it identifies and verifies line features present on the customer's line.
Presale Quality Team (PQT)	The initial point of contact for an ALEC interested in obtaining access to the BellSouth OSS is the BellSouth Account Team or the Presale Quality Team (PQT).
Primary Interexchange Carrier (PIC)	The long distance company to which interLATA traffic is automatically routed based on the dialing customers choice of carriers.
Provisioning	The act of supplying telecommunications services.
Q Account	BellSouth's ALEC bills are structured in a hierarchical manner. At the top of the hierarchy is the Master Account or "Q" account. Charges are aggregated under the Master Account, which also identifies each type of service.

Term	Definition
Raw Data User Manual (RDUM)	BellSouth publishes and posts a Raw Data User Manual (RDUM) monthly with Service Quality Measurement (SQM) changes listed in the Version Change Log on the BellSouth Web site. The RDUM documents the process to manipulate the raw data to recreate the SQM reports.
Relationship Management Infrastructure (RMI)	Relationship Management Infrastructure (RMI) supports the establishment and maintenance of relationships between BellSouth and its ALEC customers. RMI processes include the management of changes to BellSouth's OSS and business processes, account establishment and maintenance, training programs for ALECs, forecasting and development of interfaces, and help desks for ALEC customers.
Robust Telecommunications Access Gateway (RoboTAG)[1]	The Robust Telecommunications Access Gateway (RoboTAG) is a GUI that allows for bi-directional flow of information between BellSouth OSS and ALEC systems. The RoboTAG interface was developed by BellSouth and connects through the TAG interface.
SEEM Plan	Self Effectuating Enforcement Mechanism is a plan issued by BellSouth pursuant to FPSC Order PSC-01-1819-FOF-TP. BellSouth is required to pay penalties to ALECs or the state of Florida when BellSouth wholesale service level to ALECs fall below a Commission ordered standard.
Service Level 1 (SL1)	Service Level 1 services are POTS and non-designed services.
Service Level 2 (SL2)	Service Level 2 services are designed services requiring engineering.
Service Order Communication System (SOCS)	Issues a service order when adding a new feature to a customer's line and verifies the status of an order. This is the BellSouth Service Order Processor.
Service Quality Measurement (SQM)	Service Quality Measurement (SQM) reports are based on raw data generated in BellSouth's legacy/source systems during the course of BellSouth's business operations. The reports, which are jointly defined by the FPSC and BellSouth, measure all aspects of the service provided to ALECs.

---

[1] As of April 3, 2002, the FPSC has removed RoboTAG from the Florida OSS test (Order No. PSC-02-0450-PCO-TP).

Term	Definition
TeamConnection	The change management process for SQM reports begins when a change request initiated by BellSouth is logged into BellSouth's internal change control database called TeamConnection, which tracks measure changes from initiation to completion.
Telecommunications Access Gateway	The Telecommunications Access Gateway (TAG) interface is a CORBA-based environment that allows for bi-directional flow of information between BellSouth's OSS and ALEC systems.
Test Bed	A set of fictitious customers that are designed to assist with testing. The test bed consists of working, virtual and physical lines and provisioned products, although the owning customer is fictitious. The test bed is used to test BellSouth system functions.
Translation	Translation is the programming of BellSouth services and features into the switch.
Trigger Order	A type of order that can be added to an LNP standalone order to allow for the order to operate automatically.
Trouble Analysis Facilitation Interface (TAFI)	TAFI is a rules-based system that provides automated trouble receipt and screening functionality to both ALEC and BellSouth retail repair center users.
Unbundled Loop (UNE-L)	A transmission channel between an end-user location and the ILEC main distributing frame within the central office.
Unbundled Network Element (UNE)	One of the network elements defined by the Telecommunications Act of 1996.
Unbundled Network Element – Platform (UNE-P)	This consists of a loop and access to the ILEC switch sold in combination to an ALEC. UNE-P service provides all network elements necessary for providing service to the customer without requiring the ALEC to combine the elements themselves through collocation or to own any network facilities itself. Also referred to as Network Switched Combinations.
Unbundled Port	An interface on a local switching system that is not bundled with a loop or transport facility, and provides access to and from the switch and the functionality of the local switching system.

Term	Definition
Uniform Service Order Code (USOC)	Uniform Service Order Code is a structured language that allows for the development of software to support service order systems in the telephone industry. The service order process uses the USOC, along with field identifiers, to provision, bill, and maintain services and equipment.
Wholesale Billing Support (WeBS)	The Wholesale Billing Support (WeBS) group is an extension of the ALEC's account manager for order processing issues.
Work Force Administration	The principal maintenance and repair management, provisioning management, and tracking system used by BellSouth coordination centers to deliver and maintain telecommunications services.
Work Management Center (WMC)	The Work Management Centers (WMC) are the dispatch centers for BellSouth.