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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

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RECORDS AND
REPORTING

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

DOCKET NO. 981834-TP

FILED: 6/16/99

**SUPPLEMENT TO MOTION FOR INDEPENDENT THIRD PARTY TESTING
OF BELL SOUTH'S OPERATIONAL SUPPORT SYSTEMS ("OSS")**

AT&T Communications of the Southern States, Inc. ("AT&T") and the Florida Competitive Carriers Association ("FCCA") hereby file this supplement to their motion for independent third party testing of BellSouth Telecommunications, Inc.'s ("BellSouth") operational support systems ("OSS") provided for Alternative Local Exchange Carriers ("ALECs"). In support, AT&T and FCCA show the following:

1. On May 28, 1999, Movants filed a Motion in this docket requesting the Commission to initiate an independent third party testing program of the operational support systems provided by BellSouth to ALECs in Florida. On page 7 of the Motion, Movants briefly discussed shortcomings of the test plan that would be filed in Georgia. BellSouth subsequently filed its Georgia plan on June 1, 1999.

2. In order to further describe the deficiencies of BellSouth's Georgia test plan,

attached hereto and incorporated herein is AT&T's Supplement to Motion for Reconsideration of

- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG 3
- MAS _____
- OPC _____
- RPR _____
- SEC 1
- WAV _____
- OTR _____

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the Commission's Order for Third Party Testing, which was filed with the Georgia Public Service Commission on June 14, 1999.

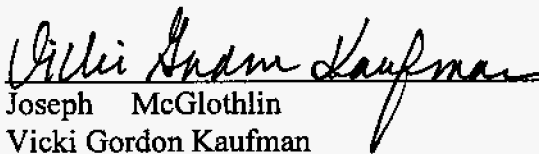
WHEREFORE, AT&T and FCCA respectfully file this supplement to their request for the Commission to order independent third party testing of BellSouth's OSS consistent with the plan filed May 28, 1999.

Respectfully submitted this 16th day of June, 1999.



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June 14, 1999

BY HAND DELIVERY

JUN 14 1999

Helen O'Leary
Executive Secretary
Georgia Public Service Commission
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**Re: Investigation Into Development of Electronic Interfaces for BellSouth's
Operational Support Systems; Docket No. 8354-U**

Dear Ms. O'Leary:

Enclosed please find an original and twenty-seven (27) copies of AT&T's Supplement to the Motion for Reconsideration of the Commission's Order for Third Party Testing in the above-referenced docket. I have also enclosed a diskette containing the document on Word 6.0. After filing the originals, please return two additional copies stamped "filed".

Thank you for your assistance in this matter.

Very truly yours,


Suzanne W. Ockleberry

Enclosures
cc: Parties of Record



**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

**In re: Investigation into Development)
Of Electronic Interfaces for BellSouth's)
Operational Support Systems)
)**

Docket No.: 8354-U

**SUPPLEMENT TO MOTION FOR RECONSIDERATION
OF THE COMMISSION'S ORDER
FOR THIRD PARTY TESTING**

Comes AT&T Communications for the Southern States (AT&T), pursuant to Rule 515-2-1.08, and files this supplement to its previously-filed Motion for Reconsideration of the Commission's Order on Petition for Third Party Testing. In support, AT&T shows this Commission as follows:

1.

After AT&T filed its Motion for Reconsideration, BellSouth filed its Plan for evaluating certain OSS functions and auditing certain flow-through calculations. The Plan, as written, will not provide the information necessary for this Commission to evaluate the service provided to new market entrants or to compare such performance to that received by BellSouth's retail customers. The Plan, therefore, will not evaluate nondiscriminatory access, which is the primary purpose of rigorous testing by an independent third party, nor will it ensure that CLECs have the OSS they need to compete in the local market. Effective third party testing is essential to opening the Georgia local telecommunications market.

2.

AT&T has identified a number of significant deficiencies in BellSouth's Test Plan, all of which should be corrected in order to ensure the integrity of the test. A brief explanation of some of the most crucial deficiencies is attached hereto and incorporated herein. AT&T expects, however, that the implementation of the two steps requested herein will go a long way toward remedying crucial deficiencies, which include:

- The roles of the testers are limited and they lack independence.
- The test is limited to those circumstances and scenarios prescribed by BellSouth.
- Only a few of the UNEs and interfaces used by competitors will be tested, drastically limiting the test's usefulness to regulators and competitors.
- The test plan provides no way to assess parity.

3.

Although BellSouth's Test Plan provides an excellent starting point, this Commission should require modifications to the Plan. The changes, as outlined on the attached matrix, would ensure that the Test Plan meets the needs of competitors for nondiscriminatory access to the operational support systems, of regulators who must evaluate the systems for performance parity, and of consumers, who will be denied competitive options if BellSouth's OSS is insufficient to support true competition. Accordingly, the Commission should remedy the flaws in BellSouth's Test Plan.

4.

The Commission should require KPMG Peat Marwick (KPMG) and Hewlett Packard (HP) to provide a written evaluation of the test plan. In New York, KPMG proved itself an able and independent third party tester, but BellSouth's Test Plan does not appropriately utilize KPMG and HP's considerable expertise and skill. The roles assigned to KPMG and HP, in the Test Plan as proposed by BellSouth, differ significantly from their respective roles in New York. In fact, BellSouth's Test Plan severely limits KPMG's role, such that it acts as a mere auditor of data. BellSouth's plan also fails appropriately to utilize the expertise and skill of Hewlett Packard (HP); rather than build interfaces, BellSouth's plan calls for HP to conduct the test using BellSouth's interfaces, and to fulfill roles outside its area of expertise and beyond those required in the New York test of Bell Atlantic's OSS. KPMG and HP should evaluate BellSouth's plan and modify the test so that it addresses the business needs of CLECs and evaluates BellSouth's obligations to provide non-discriminatory service under the Act. The independent review by KPMG and HP of BellSouth's Test Plan should ensure that it accomplishes three essential tasks. Those tasks are as follows:

- Evaluate BellSouth's retail OSS, supporting processes and measurements so that a determination of parity can be made;
- Evaluate the OSS systems, interfaces and processes offered by BellSouth that CLECs require for entry into the local market; and
- Require BellSouth to correct fully any deficiencies revealed by the test.

The independent input obtained by fully utilizing KPMG and HP's expertise will result in a plan that provides adequate breadth and depth to evaluate the CLEC - BellSouth relationship under realistic conditions.

5.

Secondly, in order to mitigate BellSouth's authority and influence over the test and testers, KPMG and Hewlett Packard should work solely at the direction of the Commission. The value of third party testing can only be achieved if the third parties are truly unbiased and independent. The current scheme - in which the testers are hired by, report to, and work at the direction of BellSouth - seriously compromises the independence of test and the testers.

WHEREFORE, AT&T moves this Commission to reconsider its Order dated May 20, 1999 and implement the two steps described herein.

Respectfully submitted this 14th day of June 1999.

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**A Brief Overview of BellSouth's GA Test Plan:
Benefits and Concerns**

Essential Elements of a Third Party Test Plan	Benefits of BellSouth's GA Plan	Concerns with BellSouth's GA Plan
<p>There should be a neutral, independent tester. The value of third party testing can only be achieved if that party is seen as credible and its evaluation will be seen as objective and unbiased.</p>	<p>BellSouth has selected skilled testers. KPMG Peat Marwick and Hewlett-Packard conducted the well-respected test of Bell Atlantic's New York OSS.</p>	<p>The roles of the testers are limited and lack independence.</p> <ul style="list-style-type: none"> • BellSouth engaged the third party testers (TPTs) and prepared the test plan, eliminating independence. The TPTs merely follow BellSouth's plan. • The roles of the TPTs are different – and more limited – than in the NY test. • In NY, for example, KPMG prepared and managed the test, and also fulfilled the functions of the pseudo-CLEC's marketing, sales and customer service organizations, preparing and making all test case inputs for the interface systems. In contrast, the GA plan does not provide for a Test Manager other than BellSouth, and KPMG functions as an auditor. • In NY, HP's role was that of the pseudo-CLEC's Information Technology group, building and maintaining the interfaces and inputting the KPMG-prepared test cases when required. The GA plan calls for HP

		to conduct the test using BellSouth's interfaces, rather than building its own, and to fulfill roles outside its area of expertise and beyond those played in NY, including acting as a surrogate marketing, sale and customer service organization by preparing and constructing test case inputs.
The neutral, independent third party should develop the test plan. The third party responsible for monitoring and evaluating BellSouth's performance should be the party responsible for developing the test plan, after taking input from all parties, including BellSouth.	The GA test plan incorporates elements of the NY plan, which was prepared by a neutral, independent third party.	E&Y appears to have developed the test plan on BellSouth's behalf. There was no input to the plan development from the named testers, or the CLEC community. Therefore, the parties responsible for implementing the plan or who would benefit from a comprehensive plan have not been involved in its design.
The test must be conducted by the third party, not just monitored by it. Using existing new entrants to conduct the test, with their specific market plans and interfaces, will not test the broad range of functionality and support required of an RBOC, nor will it test the RBOC's current state of readiness.	HP, rather than BellSouth, will initiate test orders.	The roles of the TPTs are circumscribed by the plan, limiting the test to these circumstances and scenarios prescribed by BellSouth. Additionally, the plan includes conflicting information regarding whether HP will build an interface or use BellSouth test facilities. <ul style="list-style-type: none"> • KPMG's assigned roles are to approve the test plan and to audit, monitor, evaluate and report, while HP is to conduct feature, function and volume testing using BellSouth's interfaces. These are not the roles performed by these parties in the NY test, and the assigned roles fail to utilize their expertise. • The test plan does not address the test manager role.

<p>The test should cover all OSS and support processes needed by the new entrant to enter the market. Operations support systems include systems, information and personnel that support network elements or services. They are the automated and manual processes required to make resale services and unbundled network elements, among other items, meaningfully available to competitors.</p>	<p>UNEs, including some combinations, will be tested. EDI and TAG will be tested.</p>	<p>The test plan is severely limited in scope and scale, and will only test a few of the UNEs and interfaces used by competitors, drastically limiting the test's usefulness to regulators and competitors.</p> <ul style="list-style-type: none"> • Only five UNE products will be tested, although the test plan states that BellSouth offers 80 UNEs. • Functionality testing will occur only within the 2-wire analog world, which represents only 5-7% of the products CLECs currently order. • There is no testing of resale functions, despite the fact that most CLECs currently compete via resale. • There is no testing of manual ordering despite the fact that BellSouth requires that the majority of the products and services it offers CLECs be ordered manually. • The plan does not call for testing interconnection OSS, or the majority of BellSouth information and services that CLECs rely upon to enter the market. • LENS will not be tested, despite the fact that the majority of competitors use it to order service today. • It appears that the 3PT tester will not build an interface to test BellSouth's OSS, but will instead will use BellSouth provided test tools. • It appears that EDI-mainframe will not be
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<p>The test plan should allow the TPT to 'stand in the shoes' of a CLEC entering BellSouth's market, so it will be able fairly to evaluate BellSouth's performance with regard to all tasks normally performed in conjunction with a CLEC's market entry, including such areas as:</p> <ul style="list-style-type: none"> • Interconnection, and network planning • Account management process • Training • Interface development, including BellSouth's documentation, with review of such items as technical specifications, business rules, CLEC handbooks, etc. • Change Control Processes – all changes to systems, processes and documentation during the test must be made through the established Change Control or Account Management Process, whether initiated by BellSouth or requested by the TPT or a CLEC • Test plan should include an evaluation of BellSouth's compliance with its established procedures. 		<p>tested.</p> <p>The test plan will not allow the TPT to assess BellSouth's performance on most areas critical to CLECs' ability to enter the local market, which have been the subject of much dispute at state commissions. Unlike the NY plan,</p> <ul style="list-style-type: none"> • The business needs of CLECs are not represented in the GA test, since CLECs were not polled during plan development, nor are they a part of the implementation of the test. • There is no evaluation (not even a document review) of the processes necessary to establish a CLEC account and business relationship with BellSouth; instead, the testers will be provided with a pre-existing set of identifiers, authorizations and passwords. • There is no evaluation of processes necessary to conduct business with BellSouth on an on-going basis through an assigned account team. • No test activities address network design, collocation, or interconnection planning, which are areas of great concern to CLECs. • HP will use BellSouth's internal systems testing tools, including BellSouth's internal sending and receiving simulators, but the functionality of BellSouth's internal simulators (unlike its interfaces) is
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		<p>not at issue.</p> <ul style="list-style-type: none"> • BellSouth's plan to review change control is inadequate. Not only is BellSouth's decision to "maintain a stable OSS environment for the duration of the test" inconsistent with CLEC's experience of constant change, its change control proposal is designed to ignore the way changes are made. By focusing only on the Electronic Interface Change Control process, the review will not address the manner in which most changes are made to interfaces and related documentation needed by CLECs. Further, the review of the change management process involves only document review and interviews, with no observation or usage of the process.
<p>The test must be designed to determine parity. The test must not only be designed to objectively and accurately capture and analyze performance data that reveals how BellSouth is providing service to new entrants, but also how those results compare to the service BellSouth provides itself and its affiliates.</p>	<p>Flow-through generated by the test will be audited and test performance data will be reviewed.</p>	<ul style="list-style-type: none"> • The test plan provides no way to assess parity. • The plan will not allow an independent assessment of BellSouth's internal performance and does not provide for validation of BellSouth's existing performance measures and results for either retail or wholesale performance. No performance standards are established for the test. • There is no review of or comparison to any aspect of BellSouth's retail operations. • Thus, the test will not allow CLECs or regulators to determine the relative level of

		<p>BellSouth's performance.</p> <ul style="list-style-type: none"> • The flow-through audit does not comply with the GA PSC's order in that it provides only for a self-contained audit of the transactions generated by the test, rather than an audit of the last three months of the operational flow through data currently reported monthly by BellSouth to the GA PSC. • BellSouth ensures its success by structuring the test so that if it cannot perform the function or perform it effectively, it declares that the outcome to be the expected result, or declares the function outside the scope of the test. For example, billing-; usage accuracy is tested not by whether the data is accurate, but how fast it is sent, the evaluation of the Maintenance and Repair processes does not test the actual maintenance and repair of service, etc.
<p>All Operations Support Systems and OSS versions that actually will be used should be tested. All OSS functions, (i.e., pre-order, ordering, provisioning, billing and repair) must be tested. Omission of any of these items leaves critical gaps in the processes necessary to provide service to the customer. For example, if a service can be provisioned but billing information is inaccurate or untimely, the CLEC receives discriminatory treatment. This comprehensive testing necessarily</p>	<p>The GA plan will address each of the five OSS areas, including pre-ordering, ordering, provisioning, billing and repair.</p>	<p>The limited interfaces, processes and product types being tested, discussed above, severely limit the usefulness and effectiveness of the test.</p> <ul style="list-style-type: none"> • Additionally, the test does not cover critical improvements needed by CLECs in the OSS 99 upgrade. • LENS is not tested, although it is the sole interface used by the majority of CLECs. • The test covers only a small subset of BellSouth's OSS.

<p>includes all operational support systems, including all procedures, processes and systems offered by BellSouth for use by new entrants.</p>		
<p>The test must cover the full range of products, including services BellSouth offers or is required to offer, but is not providing today. Any limitation on testing runs the risk of favoring one market entry mode over another. As BellSouth is required to support all forms of market entry, all forms should be tested. And because these processes constantly being modified, BellSouth's change control processes must also be subject to review.</p>	<p>The test provides for some functionality testing.</p>	<p>Functionality testing is limited to 2-wire analog loops and ports, separately and in combination with number portability.</p> <ul style="list-style-type: none"> • Testing of these limited numbers of UNEs is further limited in that they will not be tested over the full range of pre-ordering, ordering, provisioning, billing, maintenance and repair processes. • Since BellSouth will "maintain a stable OSS environment" during the test, the test results cannot be extrapolated to predict BellSouth's continued ability to process even these limited types of orders unless its change control process is reviewed.
<p>Test the ability of BellSouth to provide non-discriminatory support at commercial volumes. The goal of testing is not simply to confirm that a particular functionality or new methodology exists, but to determine if new entrants can use these items to create meaningful competition. Therefore no test is complete without simulating the demands of a robust marketplace on BellSouth's operations support systems, including its procedures and its people who perform the work.</p>	<p>The test includes volume testing of some interfaces.</p>	<p>The test plan allows BellSouth to determine what constitutes normal and peak transactions of volumes and numbers of users.</p> <ul style="list-style-type: none"> • The plan is extremely vague on this subject. • Additionally, the test clearly is not "blind", so BellSouth would be well able to prepare for test dates and volumes/types of orders that will arrive on any given date. Thus, it cannot neither simulate nor test BellSouth's performance in a production environment.

Don't just test it, fix it. The purpose of the test is to facilitate market entry. BellSouth therefore should be required to promptly correct all deficiencies uncovered by the test.

The plan requires re-testing of program failures or defects that reach a specified severity level.

The plan only requires re-testing of failures or defects related to program errors. Thus, if the program works as designed, but the design is flawed, no re-testing is required. Similarly, if the program works as designed but BellSouth's documentation is incorrect, no re-testing is required.

- The test plan is designed to "prove the existence" of specified functionalities, with no provision for correction of deficiencies unrelated to program or system errors. Basic design or execution flaws would be neither detected nor corrected.

CERTIFICATE OF SERVICE - Docket No. 8354-U

This is to certify that a copy of AT&T's "Supplement to the Motion for Reconsideration of the Commission Order for Third Party Testing" has been served upon the parties of record by depositing a copy of same in the U.S. Mail, postage prepaid, addressed as follows:

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This 14th day of June, 1999.



Suzanne W. Ockleberry

CERTIFICATE OF SERVICE
DOCKET 981834-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via
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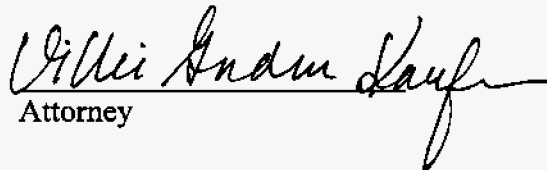
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