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July 9, 2002


Mrs. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

RE: Docket No. 960786B-TL; 981834-TP

Pursuant to the Notice of Commission Workshop issued June 28, 2002, AT&T hereby submits its Questions for the Workshop to Review the Draft Final Report Submitted By KPMG Consulting and Notice of Company Representative for discussion at the workshop currently scheduled for July 12, 2002.

If you have any questions, please call me on 404-810-4922.

Sincerely,

*Virginia C. Tate*  
Virginia C. Tate 

Enclosures

cc: Parties of Record

DOCUMENT NUMBER-DATE  
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FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Consideration of BellSouth Telecommunications, )  
Inc.'s entry into interLATA services pursuant to ) Docket No. 960786B-TP  
Section 271 of the Federal Telecommunications )  
Act of 1996 (Third Party OSS Testing) )  
)  
In Re: Petition of Competitive Carriers For Commission )  
Action To Support Local Competition In BellSouth ) Docket No. 981834-TP  
Telecommunications, Inc.'s Service Territory )

Filed: July 9, 2002

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**RESPONSE OF AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC TO  
THE COMMISSION'S REQUEST FOR QUESTIONS FOR THE WORKSHOP TO  
REVIEW THE DRAFT FINAL REPORT SUBMITTED BY KPMG CONSULTING ON  
JUNE 21, 2002**

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AT&T of the Southern States, LLC submits the following questions to be considered as part of the workshop to review the Draft Final Report submitted by KPMG Consulting on June 21, 2002. The questions are organized by test domain. AT&T will be represented by Tami Azorsky, Jay Bradbury, Robert Bell and Sharon Norris at the Workshop.

**DOCUMENT CONTROL**

The Statement of Limiting Conditions (DC-4) states that “[c]ertain information and assumptions were presented to [KPMG Consulting] by the management of BellSouth and other third parties. We have relied on this information in our analysis and in the preparation of this report, and have not independently verified the accuracy or completeness of the information provided; accordingly, we express no opinion on such data.” What types of information were provided and relied upon without independent verification?

**EXECUTIVE SUMMARY**

In the Statement of Limiting Conditions (DC-4) the Report states that “any attempt to determine an overall ‘score’ based on percentage of evaluation criteria that are satisfied is strongly discouraged.” Then, in the High Level Test Results section of the Executive Summary, the Report lists the percentage of evaluation criteria satisfied, not satisfied and not complete. (EX-10.)

- Why are the percentages listed if determination of an overall score is “strongly discouraged”?
- What conclusions, if any, can the Commission draw from the Results Summary in the High-level Test Results section of the report? (EX-10.)

When does KPMG Consulting expect to complete the testing necessary to issue version 2.0 of the Report?

## **RELATIONSHIP MANAGEMENT AND INFRASTRUCTURE**

In the Relationship Management and Infrastructure test domain, of the seventy-four (74) evaluation criteria, sixty-seven (67) were satisfied and seven (7) were not. The unsatisfied criteria are primarily in the areas of change management and release management. (EX-10 to 11.) Are the unsatisfied criteria of greater or lesser importance than the satisfied criteria?

For the following documents and/or procedures listed in various portions of the RMI Domain report please identify which ones are publicly available to ALECs. For each document not publicly available, please explain how ALECs can determine the need for the document and how ALECs can determine whether their activities comply with the document. The documents and/or procedures are:

- BellSouth End-to-End Process Flow, Version 1.0
- Type 6 Job Aid
- End-to-End Process Flow, Version 2.1 (draft delivered 6/10/02)
- The Account Team and CLEC Care Team Methods and Procedures for determining which issues must be reviewed by the ERT
- The BellSouth Account Team/CLEC Care Team Methods and Procedures – Account Team Information Package
- Electronic Commerce Support Group-Customer Support Procedures
- EC Support Capacity Plan for 2002
- Requirement Development Process, Version 2a, 5/19/99
- BellSouth Requirements Process Flow
- ENCORE EIO Overall Test Strategy (T911), Version 2.0, 11/10/01
- ENCORE EIO Test Approach Document (T910) for EDI Version 1.0, 9/21/00
- TAG and RoboTAG Quality Assurance Plan Version 3, 4/17/01
- Electronic Interface Testing Guidelines, Version 4.0, dated April 2002
- Release management End-to-End Process Flow, Version 1.2, dated 1/15/02
- TAG Testing Plan and Guidelines, dated 10/12/98
- CLEC Testing Process, dated May 1999
- CLEC Technical Support Handbook, dated 1/22/00
- Electronic Interface Implementation and Upgrade Communications Plan, Version 4.0, dated March 2002
- CAVE One-Hop Testing Guide, Version 3.0, March 8, 2001
- CAVE Test Readiness Review (TRR) Guide, Version 0.2 Draft, March 7, 2001

- CAVE Help Desk Defect Management Process, Version 0.3 draft, March 7, 2001
- ENCORE Electronic Interface Ordering (EIO) Application Rolling Release Plan, Version 12, dated 6/11/01
- CAVE User Acceptance Testing Plan, Version 4, dated 4/20/01
- Guide to Operational Understanding, Issue 2, dated July 2001
- Capacity Planning Methodology, Practices and Requirements, dated June 1, 2001
- Capacity Planning Management Activity Definitions

### **PPR-1-Change Management Practices Verification and Validation Review**

How did KPMG Consulting develop the evaluation criteria for PPR-1? (RMI-9). Did KPMG review BST change management practices for its retail operations?

Did KPMG Consulting evaluate BellSouth's characterization of changes to its OSS as "CLEC-affecting"? Did KPMG calculate whether BellSouth's definition of "CLEC-affecting" changed over time?

Figure 1-1 is a schematic of the Change Control Process. (See p. RMI-5.) Where is Change Control Process, version 3.1, does that schematic appear? Is Change Control Process, version 3.1, publicly available?

Describe who or what is "BTSI."

The report describes different processes for BellSouth-Initiated Changes and CLEC-Initiated changes. (See p. RMI-6 to -7.) Where in the publicly available Change Control Process document do these differences appear?

What was BellSouth's rationale for its unilateral decision not to implement ELMS-5?

Page RMI-8 states that "BellSouth publishes an annual release schedule to the ALECs." When in 2000 and 2001 did BellSouth publish that schedule?

Did KPMG interview ERB, BTG or BTSI? Why or why not?

Did KPMG assess the adequacy of BellSouth's implementation timeframes, *i.e.*, how long it took to implement a change request? For example, if BellSouth's release management strategy and its rate of defects caused the highest rated CLEC change request not to be implemented for two years, was this an issue that KPMG would have identified in its evaluation?

Although KPMG Consulting determined that BellSouth had satisfied the evaluation criteria for PPR1-1 (RMI-10 to 12) and PPR 1-2 (RMI-12 to 14), the comments reference Exception 123 which is still open. (RMI-12 and RMI-14). Please explain the deficiency that resulted in Exception 123 and how it relates to PPR-1 and PPR-2.

For evaluation criteria PPR1-3, KPMG Consulting concluded that BellSouth's "change management process does not have a complete framework to evaluate, categorize and prioritize change requests." (See RMI-14.)

- Is additional testing planned?
- What must BellSouth change to address this deficiency?

For evaluation criteria PPR1-4, KPMG Consulting concluded that BellSouth's "change management process does not have a procedure to allow input from all interested parties." (RMI-16.)

- Is additional testing planned?
- What must BellSouth change to address this deficiency?

For evaluation criteria PPR1-6, KPMG Consulting concluded that BellSouth's "change management process does not provide documentation of proposed changes on a timely basis." (RMI-18.)

- When will the retest be concluded?
- Will the retest evaluate whether BellSouth is appropriately identifying Type 6 defects?

For evaluation criteria PPR1-8, KPMG Consulting concluded that the criteria for prioritization and assignment of severity codes to Change Requests "does not allow ALECs to prioritize, assess the impact of, and plan resources for all Change Requests impacting the ALEC community." (RMI-20 to 21.)

- Is further testing planned?
- What must BellSouth do to correct this deficiency?

### **PPR-2 Account Establishment and Management Process**

Did KPMG's analysis review the quality and adequacy of responses and information provided by BellSouth's account team to ALECs?

- If yes, based on what criteria. If no, why not?

Did KPMG's analysis review the timeliness of responses and information provided by BellSouth's account team to ALECs?

- If yes, based on what criteria?
- If no, why not?

Did KPMG solicit ALEC input regarding their level of satisfaction with Account Teams?

- What role, if any, did ALEC satisfaction or dissatisfaction play in your analysis?

In your professional opinion, could BellSouth meet the evaluation criteria for the following items and still not be meeting the needs of their customers? Why or why not?

- *Account establishment and management responsibilities and activities are defined*
- *Account management staff is organized to provide account coverage.*
- *A description of the account establishment and management process is documented*
- *Instructions for contacting Account Managers are published*
- *Procedures for receiving, managing and resolving customer inquiries are defined*
- *Procedures for escalating time-sensitive and unresolved customer issues are defined*
- *Procedures for emergency notifications and communications to customers are defined*
- *BellSouth has procedures for out of office coverage*
- *Calls are returned the same day or next day*

Based on your review of retail account teams, could a retail account team refuse to answer escalated questions of its customer (who is worth millions of dollars in revenue) for months with no negative consequence to those account team employees?

#### **PPR3-OSS Interface Help Desk Functional Review**

Evaluation criteria PPR3-10 evaluates whether BellSouth's process includes procedures for obtaining ALEC feedback.

- What use does the help desk make of ALEC feedback it receives?
- What use, if any, did KPMG make of the ALEC feedback?

#### **PPR-5 Interface Development Verification and Validation Review**

KPMG Consulting determined that BellSouth does not consistently follow its software/interface development methodology (see PPR5-2 at RMI-81 and PPR5-17 at RMI-101) and that BellSouth does not consistently follow the Quality Assurance Process in its interface development methodology (see PPR 5-3 at RMI-84).

- Are these three determinations based on defects that occurred in Releases 10.2, 10.3 and 10.5?
- Did BellSouth make any changes to its processes for interface development and release between Release 10.3 and Release 10.5?
- Has KPMG Consulting continued to identify defects in Release 10.5 subsequent to publication of the Report?
- Are additional modifications to the processes for interface development and release planned by BellSouth?
- Is additional testing planned?
- What corrections must BellSouth make to correct the deficiencies that resulted in these “not satisfied” findings?

Is there a plan in place for resolving Exception 157? Did KPMG Consulting as a pseudo-ALEC test any interface releases in CAVE?

KPMG has stated that it made use of the Capability Maturity Model for Software Development published by Carnegie Mellon University. Please describe the five levels in that model? Did KPMG consider that BellSouth’s OSS is at Maturity Level 2?

What is the basis for KPMG’s opinion that significant issues remain unresolved in the PPR-5 testing area? (RMI-105).

### **PREORDER AND ORDERING**

In the Preordering and Ordering test domain, of the 110 evaluation criteria, 106 evaluation criteria were satisfied, three were not satisfied, and one is still being tested. The evaluation criteria that are not satisfied are primarily in the areas of flow-through performance and accuracy of responses. The evaluation criteria still being tested is Centrex ordering capability. (EX-11.)

- When will the testing in progress be completed?
- What is necessary to complete the evaluation of the testing in progress?
- Is BellSouth’s performance in the areas of the unsatisfied criteria of greater or lesser importance to ALECs attempting to compete than BellSouth’s performance in the areas of the satisfied criteria?

### **POP Manual Order Processing Evaluation (PPR-7)**

For the evaluation of Manual Order Processing KPMG Consulting conducted a parity evaluation. Please define the parity standard KPMG applied. Please describe in detail the factors that led

KPMG Consulting to conclude that the functionality of ROS is at parity with the functionality of DOE. (POP-19).

Please describe all differences between the upfront edit capability of ROS and the upfront edit capability of DOE.

When conducting the parity evaluation of Escalation Procedures (POP-20), did KPMG Consulting conduct a comparison of “the time it took to resolve order concerns in the Retail Service Centers with the time it took to resolve order concerns in the LCSC”?

KPMG Consulting found that the procedures and objectives used for performance measurement for BellSouth’s Retail Manual Order Processing were similar to the procedures and objectives used for performance measurement of Wholesale Order Processing.

- Did KPMG compare the standards for the respective centers for each of the items measured? For example, did the required level of service order accuracy for retail compare to the required level of service order accuracy for wholesale?
- Were there customer satisfaction requirements for both retail and wholesale?
- If so, did those requirements differ?
- Were there speed of answer requirements for both retail and wholesale?
- If so, did those requirements differ?
- Did KPMG measure differences between speed of answer in retail centers and speed of answer in wholesale centers?
- Were there hold time targets for calls, once answered, for both the retail and wholesale centers?
- If so, did they differ?
- Did KPMG Consulting measure differences in hold time for calls, once answered, in the retail centers versus the wholesale centers?

**POP Work Center Evaluation Support (PPR-8)**

Did KPMG Consulting interview ALECs or consider comments of ALECs in conducting this review?

Did KPMG evaluate the performance of the work centers in addition to evaluating the documentation?

- If so, how did KPMG conduct the evaluation?



- What standards were used?
- Did KPMG track ALEC orders through the process?

**Pre-Order, Order And Provisioning (POP) Functional Evaluation (TVV1)**

How did KPMG select sample sizes for the various tests in TVV1? How did KPMG ensure that the results would have statistical power? What sample size is necessary for the test to have statistical power?

If Exception 16 is still open, on what basis did KPMG Consulting conclude that TVV1-1-3 was satisfied?

- Please describe the basis for KPMG Consulting’s conclusion that the ALEC community prioritized Change Request #0029 such that it would not be implemented during the OSS evaluation.
- What consideration did KPMG give to still-open Observations 49 and 87 when determining that TVV1-1-3 was satisfied?
- Do those observations – 49 and 87 – address LENS deficiencies?

Does Table 1-19 (POP-106) reflect the last retest for evaluation criteria TVV1-3-4?

- In the applicable standard for return of fully mechanized FOC’s 95% within three hours?
- Does this Table show that for UNE-Loops, BellSouth returned less than 94% within three hours?
- If so, how did BellSouth satisfy the evaluation criteria?
- Similar results appear on Tables 1-22 (POP-108), 1-55 (POP-128) and 1-59 (POP-130) where one product type does not meet the standard, but BellSouth satisfied the evaluation criteria. Did KPMG aggregate product types for purposes of evaluating BellSouth?

KPMG concluded that significant issues remain unresolved in the TVV1 testing area. (POP-139.)

- Is BellSouth taking action to correct the significant issues that remain unresolved?
- Is further testing planned?

## **Pre-Order, Order And Provisioning (POP) Volume Performance Test (TVV2)**

The description of this test states that performance of BellSouth's systems was compared to service quality measurement ("SQM") standards approved by the Florida Commission. (See POP-43.)

- Did KPMG Consulting modify the Florida Commission's SQM standards of parity + 2 seconds for evaluation criteria TVV2-3-2, TVV2-3-3, TVV2-3-4, TVV2-3-5, TVV2-3-6, TVV2-3-9, TVV2-3-10, TVV2-3-11, TVV2-3-12, TVV2-3-13, and TVV2-3-14?
- Are these all pre-order inquiries?
- How did KPMG determine how many pre-ordering transactions to perform during volume testing?
- Did KPMG examine historical commercial data to determine the ratio of pre-ordering transactions to LSRs? If not, why not?
- What were the volume projections that KPMG used? How did KPMG develop these projections? What "historical ALEC ordering data" was used to determine test volumes?
- Currently, EDI accounts for approximately 25 percent of the LSR volumes, TAG accounts for approximately 12 percent of LSR volumes, and LENS accounts for approximately 63 percent of LSR volumes. During the volume tests, EDI accounted for approximately 89 percent of the LSR test volumes, TAG accounted for approximately 1 percent of LSR test volumes, and LENS accounted for approximately 10 percent of LSR volumes. Why did the distribution of test volumes not reflect the distribution of current commercial volumes?

Why did KPMG Consulting determine that BellSouth satisfied TVV2-3-8 when the most recent retest results revealed a response time of 20.43 seconds for ALECs compared to a response time of 1.18 seconds when BellSouth performs for itself?

What is a P-value as that term is used in footnote 237 under evaluation criteria TVV2-4-2?

- Why did KPMG use P-values instead of a 2-sided confidence interval?
- Did KPMG apply P-values to reach satisfied results for evaluation criteria TVV2-4-2, TVV2-4-4, TVV2-4-5, TVV2-4-6, and TVV2-6-7? Any others?

Footnotes on various pages of the Reports discussion on TVV1 and TVV2 refer to "abnormal parity data." (POP-92, 97, 138-39, 160, 163, 168, 171, 178-79, 182, 185, 187, 238-241, and 248-51.)

- What was abnormal about the parity data?

- Was this abnormal parity data used for the parity evaluations under BellSouth's SQM that appear in Appendix G?

### **ORDER FLOW-THROUGH EVALUATION (TVV-3)**

Was KPMG aware that BellSouth collected state-specific commercial flow-through data?

- Did KPMG examine BellSouth's Florida-specific commercial flow through data (March and April 2002) for residential resale before closing Exception 86? If not, why not?
- Did KPMG examine BellSouth's Florida-specific commercial flow through data (March and April 2002) for business resale and UNEs before closing Exception 86? If not, why not?

In the parity evaluation for TVV3 (see POP-278), KPMG states that "[s]ince retail orders do not require a translation process, retail orders do not experience fallout that can be compared to the fallout experienced by wholesale orders."

- Did KPMG investigate whether information input by BellSouth's retail representatives is edited and processed by BellSouth's retail interfaces (RNS and ROS) into a service order format that can be transmitted directly to SOCs?
- If so, please explain KPMG's understanding of the editing and processing performed by RNS and ROS.
- Also, please explain why the editing and processing of input information by RNS and ROS is not comparable to the editing and service order generation process that is applied to LSRs.

What is the basis for KPMG Consulting's opinion that significant issues remain unresolved in the TVV3 testing area?

- What impact will the identified deficiencies have on ALECs?
- Is BellSouth modifying its OSS to improve performance?
- Is retesting planned?

### **PROVISIONING**

In the Provisioning test domain, of the 113 evaluation criteria, 102 were satisfied, four were not satisfied, and seven are still being tested. The evolution criteria that are not satisfied are primarily in the areas of directory listing, switch translation and intercept messaging. The evaluation criteria still being tested are in the area of line loss reporting and high capacity circuit provisioning. (EX-11.)

- When will the testing in progress be completed?
- What is necessary to complete it?
- Are the unsatisfied criteria more or less important to ALECs attempting to compete than the satisfied criteria?

Is the Local Interconnection Service Center (LISC) escalation list posted on BellSouth's website? If it is not posted on the website, why not? (See PPR6-5.)

What are BellSouth's procedures for resolving instances of blocking on the network? How does BellSouth resolve instances of blocking behind the tandem? (See PPR6-22.)

The comments for evaluation criteria PPR9-2 state that both wholesale and retail orders are prioritized according to due date, and without consideration of the order's wholesale or retail origin. (Provisioning-34.) What analysis did KPMG conduct to assess the parity of due date assignment by BellSouth between wholesale and retail?

In determining that evaluation criteria PPR9-11 was satisfied, KPMG found that the order processing centers are staffed with personnel who have comparable skills for wholesale and retail. (Provisioning-37.)

- What is the average length of service for the agents in the retail work centers? What is the average length of service for the agents in the wholesale work centers?
- How are agents in the retail work centers trained and compensated? How are agents in the wholesale work centers trained and compensated?

In determining that evaluation criteria PPR9-14 was satisfied, KPMG found that the order processing centers are staffed with personnel who have comparable skill sets for retail and wholesale. (Provisioning-38.)

- What is the average length of service for the agents in the order processing centers? What is the average length of service for the agents in the wholesale order processing centers?
- How are agents in the order processing centers trained and compensated? How are agents in the wholesale order processing centers trained and compensated?

In determining that evaluation criteria PPR9-17 was satisfied, KPMG found that the problem resolution centers are staffed with personnel who have comparable skill sets for retail and wholesale. (Provisioning-39.)

- What is the average length of service for the agents in the problem resolution centers? What is the average length of service for the agents in the wholesale problem resolution centers?

- How are agents in the problem resolution centers trained and compensated? How are agents in the wholesale problem resolution centers trained and compensated?

In determining that evaluation criteria PPR9-20 was satisfied, KMPG found that the facilities centers are staffed with personnel who have comparable skill sets for retail and wholesale. (Provisioning-39 to 40.)

- What is the average length of service for the agents in the facilities centers? What is the average length of service for the agents in the wholesale facilities centers?
- How are agents in the facilities centers trained and compensated? How are agents in the wholesale facilities centers trained and compensated?

In determining that evaluation criteria PPR9-23 was satisfied, KMPG found that the engineering centers are staffed with personnel who have comparable skill sets for retail and wholesale. (Provisioning-40.)

- What is the average length of service for the agents in the engineering centers? What is the average length of service for the agents in the wholesale engineering centers?
- How are agents in the engineering centers trained and compensated? How are agents in the wholesale engineering centers trained and compensated?

In determining that evaluation criteria PPR9-26 was satisfied, KPMG found that the dispatch centers are staffed with personnel who have comparable skill sets for retail and wholesale. (Provisioning-40.)

- What is the average length of service for the agents in the dispatch centers? What is the average length of service for the agents in the wholesale dispatch centers?
- How are agents in the dispatch centers trained and compensated? How are agents in the wholesale dispatch centers trained and compensated?

In determining that evaluation criteria PPR9-29 was satisfied, KMPG found that the inventory centers are staffed with personnel who have comparable skill sets for retail and wholesale. (Provisioning-41.)

- What is the average length of service for the agents in the inventory centers? What is the average length of service for the agents in the wholesale inventory centers?
- How are agents in the inventory centers trained and compensated? How are agents in the wholesale inventory centers trained and compensated?

In determining that evaluation criteria PPR9-31 was satisfied, KMPG found that methods and procedures in the order-processing center are comparable for retail and wholesale. (Provisioning-41.)

- What steps are taken to insure that the agents in the order-processing center follow the methods and procedures on a regular basis?
- How are the published methods and procedures used as a reference tool by agents in the order-processing center?

For evaluation criteria PPR9-34, PPR9-35, PPR9-36, PPR9-37 and PPR9-38, KMPG found that methods and procedures in various centers are the same for retail and wholesale. What steps are taken to insure that the agents in the centers follow the methods and procedures on a regular basis?

For evaluation criteria PPR9-46, KMPG evaluated BellSouth's documented capacity management process. What is BellSouth's process for collecting and using the CLEC forecasts?

KMPG concluded that BellSouth did not satisfy TVV4-1 and Exception 171 remains open. (Provisioning-57.)

- Is BellSouth making modifications to correct the deficiencies in provisioning directory listing orders?
- Will KMPG conduct a re-test?

KMPG concluded in evaluation criteria TVV4 –3 that BellSouth has not provisioned the switch translations accurately and Exception 84 remains open. (Provisioning-58 to 59.)

- What impact does this deficiency have on ALECs?
- Will KMPG conduct a re-test?

For evaluation criteria TVV4-14, KMPG found that BellSouth provisioned 98.6% of the hot cuts on the scheduled due date. What was their performance on time-specific hot cuts?

In determining that BellSouth satisfied TVV4-23, KMPG found that completion notices accurately reflect the due date. What was the interval between the completion of the order and the time BellSouth sent the completion notice?

In determining that BellSouth satisfied TVV4-24, KMPG found that the post-order customer service records ("CSRs") contain field inputs from LSRs. How long did it take BellSouth to update CSRs after the Completion Notice was issued?

KMPG Consulting concluded in evaluation criteria TVV4-28 that BellSouth does not properly provision switch translations and update customer service records. (Provisioning-71 to 72).

- What impact does this deficiency have on ALECs?
- What modifications is BellSouth making to correct these deficiencies?
- Will a retest be conducted?

TVV4-5, TVV4-6, TVV4-7, TVV4-8, TVV4-9, TVV4-10, and TVV4-39, reflect that testing is in progress.

- Why is testing not complete?
- When will testing be complete?

What is the basis for KPMG’s opinion that “significant issues remain unresolved in the TVV4 testing area?” (Provisioning-79.)

- Is BellSouth making modifications to address the deficiencies?
- Will a retest occur?

### **MAINTENANCE AND REPAIR**

Of the 100 evaluation criteria in the Maintenance and Repair test domain, KPMG Consulting stated that it is unable to assess the current performance of the underlying systems or processes for 52 of the evaluation criteria. (EX-11.)

- Were underlying systems or processes modified during the test?
- If so, would the modifications impact performance?

For evaluation criteria PPR14-5 (M&R-13 to 14) and evaluation criteria PPR15-6 (M&R-37 to 38), KPMG evaluated percentage repeat trouble reports for Designed Services for DSO only. In workshops ALECs have complained that services for greater than DSO have prevalent chronic troubles. Why did KPMG Consulting not measure BellSouth’s performance in this area?

In the parity evaluation for PPR14, KPMG stated “In the event that a customer requests an earlier appointment both the wholesale and retail centers contact the WMC for approval before providing the customer with an earlier appointment.” (M&R-20.) Did KPMG conduct any analysis to ensure parity treatment by the WMC in granting earlier appointments?

### **BILLING**

Of the 87 evaluation criteria in this test domain, six are still being evaluated. The area still being evaluated is UNE rate accuracy. (EX-11.)

- What issues related to UNE rate accuracy are being evaluated by those six evaluation criteria?
- Why has the evaluation not been completed?
- When will the evaluation be complete?
- What must be done to complete the evaluation?
- Is there a schedule?

The report states that “[t]he Billing Work Center/Help Desk Support Evaluation (PPR-10) included a checklist of evaluation criteria developed by KPMG Consulting during the initial phase of the BellSouth OSS Evaluation.” (Billing-6.) How were those criteria developed?

Tables TVV10-4, TVV10-5, and TVV10-6 indicated that KPMG knew in advance how many test scripts were expected to produce DUF records. Did KPMG know in advance how many DUF records the test scripts (individually and collectively) were expected to produce? If not, how did KPMG know whether it received the appropriate number of DUF records?

### **PERFORMANCE METRICS**

In this test domain all 542 evaluation criteria are still being tested because of BellSouth’s conversion to PMAP 4.0. (EX-12.) When will the testing be complete?

- Will all tests be completed on same date?
- What is necessary to complete this test domain?

KPMG describes numerous measures in which it validated the evaluation criteria for PMAP 2.6. For these measures, KPMG Consulting notes that it will conduct additional testing to ensure that PMAP 4.0 also meets the evaluation criteria. (See e.g., PMR5-2-58, PMR5-4-3, ) Please explain the testing process KPMG Consulting will employ for these criteria and when such testing will be completed?

KPMG Consulting describes the PMAP 4.0 environment as a “major metrics system upgrade”. (Metrics-41.) Based on this description, can the Commission reach any conclusions based on test results from analysis of PMAP 2.6?

Is KPMG conducting any analysis of the calculation and reporting of penalty plan performance?

Why did you decide to test PMAP 4.0?

Is it your understanding that the following items were replaced as a result of the move to PMAP 4.0?



- Barney Server replaced with RADS
- NODS data warehouse was replaced with the 4.0 Warehouse
- Datastage software code was replaced with PL/SQL

Throughout the comments on PMR1, KPMG Consulting states that the “points of data collection have changed for PMAP 4.0” (Metrics-10 through 25.) Please describe what you mean by this phrase.

What is the impact of the move to PMAP 4.0 on the manual metrics?

To what extent did KPMG Consulting rely on the Georgia OSS Test or data collected for the Georgia OSS Test in connection with its evaluation of BellSouth’s data collection and storage processes (PMR1)? (Metrics-8.)

Please describe all documents you reviewed as part of PMR2.

Please describe any data analysis you conducted as part of PMR2.

Please describe the checklist criteria KPMG Consulting developed that provided the “framework” for its analysis of PMR2 and whether BellSouth or the FPSC assisted in developing the criteria. (Metrics-28.)

The discussion of evaluation criteria PMR2-3 states that “Documented metrics calculations are consistent with documented metrics definitions.” Are you referring to the metrics calculations and definitions documented in the SQM, or do you include other documents in your review for consistency?

For evaluation criteria PMR2-4, KPMG states that “Documented metrics exclusions are appropriate...within the context of the metrics definition.” KPMG found (for the 2.6 environment) that the FOC Timeliness Measure met this criteria. The definition for this measure is “the interval for return of a Firm Order Confirmation is the average response time from receipt of valid LSR to distribution of a Firm Order Confirmation” However, project orders (which receive FOCs) are excluded from this measure. Please describe how this exclusion of FOCs is appropriate in the context of this metrics definition.

The LCSC (an order processing center) is referred to in the exclusions section of the FOC Timeliness metric. In its response to Exception 90, BellSouth explained that the CRSG (another LSR processing group) whose orders did not require a service inquiry were not included in the FOC Timeliness measure. Please describe how this exclusion of FOCs is appropriate in the context of this metrics definition.

The comments on evaluation criteria PMR3-7, state “There is no process that allows an ALEC to track proposed metric changes until they are implemented.” (Metrics-40.)

- Please confirm that this finding is not part of the findings in Exception 119.
- Does KPMG intend to address this issue in its future testing?

The Report states that “BellSouth uses the term raw data to describe the performance measurement data at the stage where it enters into the SQM calculations.” (Metrics-41, fn. 5.)

- Did you conduct any analysis to ensure that BellSouth’s definition was consistent with FPSC orders?
- Did you conduct any analysis to determine if BellSouth applied this definition consistently to all metrics?
- Did you conduct any analysis to determine if the raw data explicitly excluded from metrics calculations by SQM business rules is included in the raw data provided to ALECs, e.g., so that an ALEC could determine if the PONS BellSouth designated as projects and excluded from ordering metrics calculations are available in raw data for ALEC verification that these PONS are project LSRs?

Please describe the 4 source systems indicated in PMR4-1-1 and PMR4-1-2.

Please describe how KPMG obtained raw data for orders from BellSouth’s legacy systems and the Barney snapshot tables and whether ALECs have access to such information. (Metrics-43.)

Please explain whether KPMG Consulting considers one month of data a sufficient confirmation that BellSouth resolved significant data discrepancy problems. (See, e.g., PMR4-30-1, PMR5-2-67.)

Sixty-two of the 160 evaluation criteria in PMR4 stated “[t]his criterion could not be tested in the PMAP 2.6 environment because accurate and complete transformation documentation for data between staging to NODS steps was unavailable.” (See, e.g., PMR4-30-1 at Metrics-62.) However, PMR4-30-1 and PMR4-30-2 report both this circumstance and the presence of Exception 125. Please describe in more detail the level of work that could or could not be done in the absence of the noted documentation.

Please explain why in PMR-5, KMPG Consulting was having difficulty determining whether BellSouth’s reports were properly disaggregated. (See, e.g., PMR5-2-9; PMR5-2-13; PMR5-2-17; PMR5-2-25; PMR5-2-45; PMR5-2-45; PMR5-3-1; PMR5-3-5; PMR5-3-9; PMR5-3-21; PMR5-3-29.)

### **COMMERCIAL DATA STUDY – APPENDIX G**

What is KPMG’s opinion regarding the current usability of the commercial data given that the results are based on data whose accuracy has not been validated?

Does KPMG have any concerns about the statistical power of volume sizes in the MSS report?

In Table ES-1 (See pp. G-7 to G-10.) BellSouth met standards as follows:

|              |     |      |
|--------------|-----|------|
| OSS          |     | 86%  |
| Ordering     |     | 72%  |
| Provisioning |     | 80%  |
| M&R          |     | 80%  |
| Billing      | 73% |      |
| OS/DA        |     | N/A  |
| Database     |     | 75%  |
| E911         |     | N/A  |
| Trunking     |     | N/A  |
| Collo        |     | 100% |
| Change Mgmt. | 40% |      |
| BFR          |     | 100% |

Taking this information at face value, does the commercial experience of the ALECs differ from the results of the third party test?

- Did BellSouth perform better or worse in the test when compared to the commercial experience?
- If there is a difference, has KPMG analyzed why that difference exists?

RESPECTFULLY SUBMITTED this 9th day of July, 2002.

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