BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of

CONSIDERATION OF BELLSOUTH   DOCKET NO. 960786B-TL
TELECOMMUNICATIONS, INC.'S
ENTRY INTO INTERLATA SERVICES
PURSUANT TO SECTION 271 OF THE
FEDERAL TELECOMMUNICATIONS ACT
OF 1996 (THIRD PARTY OSS TESTING).

PETITION OF COMPETITIVE CARRIERS   DOCKET NO. 981834-TP
FOR COMMISSION ACTION TO SUPPORT
LOCAL COMPETITION IN BELLSOUTH
TELECOMMUNICATIONS, INC.'S SERVICE
TERRITORY.
_____/

            ELECTRONIC VERSIONS OF THIS TRANSCRIPT ARE
                A CONVENIENCE COPY ONLY AND ARE NOT
               THE OFFICIAL TRANSCRIPT OF THE HEARING,
            THE .PDF VERSION INCLUDES PREFILED TESTIMONY.

PROCEEDINGS: WORKSHOP

BEFORE: CHAIRMAN LILA A. JABER
                      COMMISSIONER J. TERRY DEASON
                      COMMISSIONER BRAULIO L. BAEZ
                      COMMISSIONER MICHAEL A. PALECKI
                      COMMISSIONER RUDOLPH "RUDY" BRADLEY

DATE: Friday, July 12, 2002

TIME: Commenced at 8:39 a.m.
                      Concluded at 3:35 p.m.

PLACE: Betty Easley Conference Center
                      Room 148
                      4075 Esplanade Way
                      Tallahassee, Florida

REPORTED BY: JANE FAUROT, RPR
                      LINDA BOLES, RPR
                      Official FPSC Reporters
                      Division of Commission Clerk and
                         Administrative Services

                FLORIDA PUBLIC SERVICE COMMISSION

IN ATTENDANCE:

WILLIAM H. WEBER, 1230 Peachtree Street, NE, 19th Floor, Atlanta, Georgia 30309-3574, representing Covad Communications Company.

JOSEPH A. McGLOTHLIN, 117 South Gadsden Street, Tallahassee, Florida 32301, representing MPower Communications Corp.

DONNA C. McNULTY, 325 John Knox Road, Suite 105, Tallahassee, Florida 32303-4131, and SHERRY LICHTENBERG and DULANEY L. O'ROARK, III, representing MCI WorldCom.

TAMI AZORSKY, 1900 K Street, N.W., Washington, DC 20006, and BOB BELL, JAY M. BRADBURY and SHARON NORRIS representing AT&T.

LISA FOSHEE, c/o Nancy H. Sims, 150 South Monroe Street, Suite 400, Tallahassee, Florida 32301-1556, representing BellSouth Telecommunications, Inc.

DAVID B. WIRSCHING, LINDA BLOCKUS, DR. ALAN SALZBERG and MICHAEL WEEKS, KPMG Consulting, One Radnor Corporate Center, 100 Matsonford Road, Radnor, Pennsylvania 19087, representing KPMG Consulting.

BRENT McMAHAN and KYLE KOPYTCHAK, Network Telephone Corporation, 815 South Palafox Street, Pensacola, Florida 32501-5937, representing Network Telephone Corporation.

FLORIDA PUBLIC SERVICE COMMISSION

1   ATTENDANCE (continued):

2   BETH KEATING, Florida Public Service Commission,

3   Division of Legal Services, 2540 Shumard Oak Boulevard,

4   Tallahassee, Florida 32399-0870, and LISA HARVEY representing

5   Commission Staff.

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1   P R O C E E D I N G S

2   CHAIRMAN JABER: Good morning. Let's go ahead and

3   get started. We apologize for the delay. Ms. Keating, you

4   want to go ahead and read the notice?

5   MS. KEATING: By notice issued June 28th, 2002, this

6   time and place have been set for a Commission workshop in

7   Dockets Numbers 960786B and 981834. The purpose is as set

8   forth in the notice.

9   CHAIRMAN JABER: Thank you, Ms. Keating.

10   Let me start by saying on the serious side that we

11   know we have a long day ahead of us and we welcome everyone's

12   input. We appreciate that all of the parties and the

13   stakeholders are here today.

14   I want to recognize, also, the hard work of KPMG and

15   welcome you all always to the PSC. We appreciate the quality

16   of the report and the hard work your team has put into, into

17   the report, Dave.

18   The way I intend to go forward with the workshop this

19   morning is we're going to let our test manager, Lisa Harvey,

20   begin the workshop and sort of outline the report and the

21   purpose of the workshop, and then we're going to turn it over

22   to Dave Wirsching and his team. And we'll walk very patiently

23   through the questions, and I encourage as much input as

24   possible. So with that, we'll get started. Lisa?

25   MS. HARVEY: Thank you, Commissioner Jaber. I'd like

1 to echo your sentiments and your appreciation for KPMG.

2 I've -- having worked with Dave Wirsching and his team for the

3 past two and a half years, I can honestly say that I really

4 appreciate their diligence and their professionalism and I

5 think that they've done an excellent job for the State of

6 Florida on this project.

7 Additionally, I'd like to commend BellSouth for their

8 cooperation through this project and appreciate the ALECs for

9 their participation as well. Officially this test began

10 January 2000 with the approval of the Master Test Plan or MTP.

11 The Master Test Plan was the guiding document that the

12 Commission and KPMG used to manage the test with.

13 As you, as you recall, all the parties had input into

14 the development of the Master Test Plan. Two and a half years

15 have now passed and we have a final draft report before us that

16 was published June 21st, 2002. To get to the point of this

17 final draft report, KPMG Consulting has issued over 380

18 Observation and Exceptions, of which BellSouth has implemented

19 the vast majority. There have been approximately 130 weekly

20 status calls and twice as many Observation and Exception calls

21 in which parties, both BellSouth and the CLECs, have been able

22 to participate.

23 Additionally, there have been 15 face-to-face

24 meetings or workshops held to discuss various issues or project

25 status. An OSS web site was maintained by our Division of

1 Consumer Affairs, who did an excellent job of posting this

2 information such as the Observations and Exceptions and the

3 monthly reports within hours of receipt.

4 KPMG additionally e-mailed all parties of changes in

5 status and status updates. All of these activities culminate

6 in the fact that this test process has been an extremely open

7 one and, as a result, the test report before us today contains

8 no surprises to any of us.

9 The objective of this test was to determine if

10 BellSouth is providing nondiscriminatory access to its OSS

11 systems and the documentation. The FCC has repeatedly stated

12 that the 271 checklist does not require perfection. That being

13 said, we're here today to allow the parties the opportunity to

14 ask questions of KPMG regarding the draft final report. The

15 questions which you have before you were submitted on Tuesday

16 of this week to allow KPMG the time for research.

17 Parties have asked if they will have the opportunity

18 to ask follow-up questions. My suggestion is that the specific

19 party asking the original question may ask a follow-up to that

20 question within their allotted time slot. However, any

21 additional follow-up by other parties should be held until the

22 end of the day, if time permits.

23 The agenda distributed yesterday is slightly

24 different from our original intent of going domain by domain.

25 Upon review of the questions that were submitted, Staff felt it

1 would be more expedient to allow each party to ask all their

2 questions in one turn.

3   Following KPMG's overview of test results which they

4 will give next, we will proceed with Covad's questions,

5 followed by MPower's, then MCI WorldCom's and then AT&T. And

6 now I'd like to hand it over to Dave to give us an overview of

7 what the test report contains.

8   MR. WIRSCHING: Thank you, Lisa. Good morning, Madam

9 Chair, Commissioners. I want to thank the Chair and the Staff

10 for their kind words and add that KPMG Consulting has been very

11 pleased to work with the Florida Commission and Staff during

12 these last two and a half years and has also enjoyed working

13 with all the other stakeholders in this, in this endeavor.

14   I am Dave Wirsching. I'm a Managing Director with

15 KPMG Consulting. My responsibility for this test has been the

16 overall management and quality oversight of this test.

17   To my right is Linda Blockus. She's a Senior Manager

18 with KPMG Consulting. She's been the Engagement Manager who's

19 been responsible for the day-to-day operations and

20 administration of the test.

21   Joining us slightly later this morning will be

22 Mr. Michael Weeks, who is also a Managing Director who's been

23 involved with the test since its inception and will provide

24 some additional perspective.

25   Also with me today are a number of KPMG Consulting

1 staff who have been key members in conducting this test over

2 the last two and a half years. They're here to provide history

3 and detail as necessary. So throughout this morning's

4 proceedings I may have to refer to them for some specific

5 history or detail.

6 To recap briefly the test structure and overview, our

7 involvement in this phase, which is referred to as Phase 2,

8 began with the approval of the MTP in January of 2000 and we

9 were selected as a Phase 2 test manager.

10 As we started into the testing, the MTP defined some

11 basic structure for the test. I'd like to review that so

12 everyone has a common understanding. There were three types of

13 test families that are available in the test: Procedures and

14 policy reviews, which you'll hear us refer to in the shorthand

15 as PPR tests; transaction, validation and verification reviews,

16 which will be referred to as TVV reviews; and performance

17 metrics and reporting reviews, which will be referred to as PMR

18 reviews.

19 In addition, to better manage our test, we have

20 created several what we refer to as test domains to organize

21 and structure our testing activities. Test domains are

22 relationship management in infrastructure and they're

23 responsible for conducting the majority of the process testing,

24 and their focus was primarily on account establishment and

25 maintenance relationships.

1   The second domain was preordering and ordering. We

2   will refer to that as preorder order or order management. They

3   were responsible for the submission and tracking of local

4   service requests and any other order activity.

5   The next domain was provisioning, which will

6   sometimes be referred to as RPM, which stood for repair

7   provisioning and maintenance -- at one time we included that

8   with the maintenance and repair function -- or just

9   provisioning. They're responsible for the validation,

10   verification of provisioning activities and the observance of

11   provisioning processes.

12   The next domain was maintenance and repair, commonly

13   referred to as M&R. It may also be referred to in some pieces

14   of early test communication as RPM. They're responsible for

15   review of maintenance and repair processes and transactions.

16   The next domain was billing, which was responsible

17   for observation of billing processes and billing transactions.

18   And the final domain was metrics, which was

19   responsible for the testing of the performance metrics programs

20   which are referred to as SQMs here in Florida.

21   There are two major types of tests that we conducted.

22   First were transaction-type tests referred to as the TVVs.

23   They're supposed to give us first-hand knowledge of ALEC

24   experience in Florida. To accomplish that, we built several

25   electronic interfaces and also used a number of manual

1 interfaces or BellSouth-provided interfaces; for example, the

2 LENS Graphical Interface System.

3   To execute the test we developed a number of

4 scenarios. These scenarios were based and drawn from the

5 direction provided in the MTP. This now allowed us to develop

6 and define our activities and structure our activities as we

7 went through the test.

8   The scenarios were typically focused on a

9 domain-by-domain basis. For example, we had billing scenarios,

10 we had ordering scenarios. There were several end-to-end tests

11 where we did attempt to test the entire process from

12 identifying a new customer, a pseudo customer, all the way

13 through into maintenance and repair activities, the entire life

14 cycle.

15   From those scenarios we developed expected results,

16 which is how we judged the performance of BellSouth on these

17 tests. Included in that it's important to note that we also

18 included planned errors to simulate real life experiences and

19 also to fully test and exercise the systems to make sure that

20 we get error responses as appropriate.

21   In some cases where it wasn't feasible for KPMG

22 Consulting to either create test cases or execute test cases we

23 did use cooperative ALECs to assist us. Some of the examples

24 of that were local number portability testing where we had to

25 rely on the ALECs to do that since KPMG Consulting was not

1 going to be able to set up the appropriate structure for local

2 number portability.

3   In addition to the transaction tests, we had a number

4 of process tests. These were designed to observe the

5 day-to-day operations and interactions that BellSouth had with

6 the ALECs. We used traditional consulting and operational

7 analysis methods, which included interviews, observations,

8 documentation reviews. We are primarily focused on the

9 existence of these processes and BellSouth's adherence to the

10 processes.

11   One of the terms that you'll see in the MTP and in

12 the final report is the concept called "Military Style

13 Testing." Military Style Testing has sometimes been referred

14 to as test until you pass, which is probably a little bit of an

15 oversimplification. It's to test until we've reached an

16 exhausted result, either a satisfied result or at the direction

17 of Florida Staff to cease testing.

18   Just to briefly describe, if KPMG Consulting

19 discovered a problem during the test, we informed the parties

20 by either creating an Observation or an Exception. You'll hear

21 both of those referred to.

22   An Observation was developed if KPMG Consulting

23 determined that there was a deficiency, defect or an error that

24 may result in a negative finding in the final report. An

25 Exception was created if KPMG Consulting determined that the

1 results that we had discovered would result in a negative

2 finding in the report.

3   Not all Exceptions started as Observations, but a

4 number of Observations were made into Exceptions as we

5 discovered more information or the severity increased.

6   On a regular basis, as described by Ms. Harvey, we

7 had Observation/Exception calls mostly scheduled weekly for a

8 chance for all the interested parties to discuss the status and

9 the details behind the Observations/Exceptions in our interim

10 findings. Those Observations and Exceptions were posted to the

11 FPSC web site.

12   BellSouth responded to the Observations and

13 Exceptions both on the status calls but also in writing, and

14 those responses are also contained on the FPSC web site.

15   KPMG Consulting was responsible to determine if an

16 Exception or Observation resolved, if we determined it was

17 resolved, we forwarded it to the Florida Public Service

18 Commission Staff for their concurrence and, with their

19 concurrence, we closed the Observation or Exception.

20   If we were unable to resolve the Exception, the cycle

21 would, testing would continue until closure was reached,

22 indicate that there was no further action warranted or if

23 directed by Staff to cease testing. As of the 21st of June,

24 which is the edition of this report, there were 31 Exceptions

25 and 20 Observations still open on the Florida test.

1   CHAIRMAN JABER: How many observations?

2   MR. WIRSCHING: 20 observations.

3   CHAIRMAN JABER: 20?

4   MR. WIRSCHING: We have continued to work as we, as

5 we moved forward after the 21st. At this point there are 26

6 Exceptions and 9 Observations open in the Florida test.

7   One other concept I'd like to discuss is blindness.

8 In order to get the best results possible, KPMG took great

9 steps to ensure the blindness of this test; in other words,

10 that BellSouth did not realize that the pseudo CLEC that had

11 been set up by KPMG Consulting was actually conducting the

12 transactions.

13   We had several procedures. One of those procedures

14 was planned errors. By submitting planned errors, we wanted to

15 make sure that we got the response everyone else did. We also

16 did a number of site visits during our testing to ensure that

17 we were receiving comparable treatment to other ALECs during

18 the period of testing.

19   CHAIRMAN JABER: Mr. Wirsching, I'm sorry. I'm

20 having a lot of trouble hearing you and I'm sure it's me, but

21 you said --

22   COMMISSIONER BRADLEY: I am, too.

23   CHAIRMAN JABER: Okay. You said there are now --

24 your microphone is on, Dave; right?

25   MR. WIRSCHING: Yes, ma'am.

1   CHAIRMAN JABER: Okay.

2   COMMISSIONER BRADLEY: Ask him to put it down, pull

3   it, get a little closer to it, because I'm having a problem

4   hearing, also.

5   CHAIRMAN JABER: There you go. Did I hear you

6   correctly that between the report and now there are 20

7   Exceptions now and 9 Observations?

8   MR. WIRSCHING: 26.

9   CHAIRMAN JABER: 26. Thank you. Go ahead, Dave.

10   MR. WIRSCHING: In addition, to ensure blindness the

11 Florida Public Service Commission Staff was heavily involved

12 and monitored all of our visits and conference calls and

13 interviews.

14   To develop our results we produced a series of

15 evaluation criteria, which are provided here in the evaluation

16 report. Primarily those evaluation criteria were based on SQM

17 criteria that had been accepted by the Florida Public Service

18 Commission for purposes of this test. Where there was no SQM

19 present, in our professional judgment we developed a benchmark,

20 a standard.

21   There were three categories in this report of KPMG

22 Consulting's findings: Satisfied, in which we were satisfied

23 that the evaluation criteria had been met by BellSouth; not

24 satisfied, in which we felt that BellSouth had not met the

25 evaluation criteria; and testing and progress. And those were

1   cases where as in discussion with Staff we continued testing

2   after the publication of this draft report, typically to wait

3   for additional information or transactions to complete.

4   One of the tools that we used to, to conduct this

5   test was a concept known as "test bed." Because KPMG

6   Consulting's pseudo ALEC did not have actual customers, we

7   needed to create a number of test accounts in a test facility

8   so that we could conduct transactions. That test bed was

9   developed jointly with Staff and then executed by BellSouth.

10   So at times you'll hear us refer to the test bed and the test

11   bed setup.

12   Note some limitations of our testing methodology.

13   Because we tried to represent the entire ALEC community, our

14   activities are much broader than any single ALEC. So in that

15   respect we don't reflect a single ALEC or a single type of

16   ALEC.

17   There are literally hundreds of thousands of

18   permutations and combinations of possible test scenarios that

19   would be available in Florida. Obviously that's not feasible

20   for any one entity in a reasonable amount of time to interact.

21   We, in joint development with Staff and interested parties,

22   developed a list of available test cases and, with Staff

23   concurrence, conducted the test that way.

24   When it wasn't practical to simulate transactions or

25   conduct transactions either because of high volumes or

1 potential impact to customers, we looked at alternatives such

2 as involving cooperative CLECs for live commercial data

3 transactions.

4   Additionally, there was no desire on the part of KPMG

5 Consulting to disrupt or interfere with service to customers in

6 Florida or elsewhere in the BellSouth region.

7   Real quickly I will summarize the results of the

8 different test areas just so everyone has a common

9 understanding. Overall there were 1,026 evaluation criteria.

10 Of those 1,026, 542 were in the metrics domain and they are all

11 marked as testing in progress. As the parties are aware,

12 BellSouth has moved from their previous metric system, PMAP

13 2.6, to an upgrade to PMAP 4.0. And while they're conducting

14 that upgrade, which was just recently, we are still testing.

15   Of the remaining 484 evaluation criteria; 546 (sic.)

16 were satisfied, 13 were testing in progress and 15 were not

17 satisfied, details of which obviously are contained in the

18 final report.

19   On a domain-by-domain basis there were 74 criteria in

20 the RMI domain; 67 of those were satisfied, 7 were not

21 satisfied.

22   In the ordering and preordering domain there were

23 110 criteria; 106 were satisfied, 3 were not satisfied and 1 is

24 testing in progress.

25   In the provisioning domain there were 113 criteria;

FLORIDA PUBLIC SERVICE COMMISSION

1 102 were not -- were satisfied, excuse me; 4 were not

2 satisfied; 7 are testing in progress.

3   In the M&R domain there are 100 criteria; 100 were

4 satisfied. 52 were marked by KPMG Consulting as unable to

5 currently access the performance due to the elapsed period of

6 time since our results were collected.

7   For billing there were 87 criteria; 81 were

8 satisfied, 6 were marked testing in progress.

9   And I believe we're ready for questions.

10   CHAIRMAN JABER: Is that it? Ms. Harvey?

11   MS. HARVEY: Chairman, we're ready to start with,

12 with Covad's questions.

13   CHAIRMAN JABER: Okay. Mr. Weber.

14   MR. WEBER: Thank you, Madam Chairman and

15 Commissioners. Good morning, Mr. Wirsching. My name is Bill

16 Weber and I'm with Covad Communications. I know you've seen

17 the, had the opportunity to look at these questions in advance.

18   Our first questions concern problems with BellSouth's

19 manual process in the preorder order and provisioning

20 functional evaluation, and this would be the TVV1 and TVV2 test

21 areas.

22   These two test areas accounted for more than

23 one-third of all Exceptions logged during the evaluation

24 process. Why did these test areas account for such a

25 disproportionate share of all logged Exceptions?

1   MR. WIRSCHING: I believe there's a couple of reasons

2   for that. One, the vast majority of activity in this test

3   centers around ordering and preordering activities, inclusion

4   activities. So that's one reason.

5   As to any other reasons, I don't believe that any

6   analysis we conducted discovered anything.

7   MR. WEBER: A large percentage of the Exceptions open

8   in these areas concern problems related to BellSouth's manual

9   processes involved in the ordering and provisioning of ALEC

10 orders; for example, Exception 70, 72, 90, 91, 92, 93, 116,

11 117, and there are also others. Why were the manual processes

12 so disproportionately represented?

13   MR. WIRSCHING: One of the things that KPMG

14 Consulting did not do is do root cause analysis on these

15 problems. So that's a piece of the analysis that we, we don't

16 have. We do agree that these were all involved with the manual

17 process, but we did not go to the next step and do a cause

18 analysis.

19   MR. WEBER: Is it fair to state that BellSouth had

20 more problems with its manual and semi-mechanized processes

21 involved in the ordering and provisioning portions of the test

22 than it did with its fully mechanized processes?

23   MR. WIRSCHING: At this point we wouldn't be able to

24 do that without further analysis. Counting just the number of

25 Observations/Exceptions is probably not exactly a fair

1 representation. It obviously involves the amount of

2 transactions of each different type that were sent in the

3 Florida area and the impact of those, and that's a pretty

4 difficult analysis.

5   MR. WEBER: Do you plan to do that as part of your

6 analysis?

7   MR. WIRSCHING: No, we do not.

8   MR. WEBER: Is it fair to state that Exceptions

9 related to fully mechanized processes were generally closed

10 more quickly than Exceptions related to partially mechanized or

11 manual processes?

12   MR. WIRSCHING: We did a quick analysis of that.

13 Partially mechanized resolution time for

14 Observations/Exceptions was 121 business days. Fully

15 mechanized was 88 business days. Obviously there is a

16 difference there.

17   We have not done any analysis, one, towards root

18 cause and, two, if this would be of any further analytical

19 value. Observations and Exceptions take different amounts of

20 time due to the complexity of the problem and nature of the

21 problem and our ability to retest. So for some of these the

22 time line in an Observation/Exception resolution may be the

23 amount of time it took to establish test bed for the retest and

24 conduct the retest.

25   MR. WEBER: If we could, I'd just like to follow-up

1   in this area a little bit and hopefully maybe clarify the

2   question a little bit, if it wasn't clear.

3   MR. WIRSCHING: Sure.

4   MR. WEBER: If we could turn first to Page POP195.

5   This is the TVV2-4-3 test.

6   MR. WIRSCHING: I'm sorry. What was that reference

7   again?

8   MR. WEBER: POP195 is the page.

9   MR. WIRSCHING: Thank you.

10   MR. WEBER: TVV4-2-3. I mean, I'm sorry, 2-4-3.

11   This evaluation criteria was evaluating BellSouth's

12   EDI interface providing fully mechanized firm order

13   confirmations, errors and clarifications.

14   Now looking down your comments for this, which is a

15   satisfied criteria, I see that right off the bat they're -- in

16   the first test that KPMG ran, you identified a problem in that

17   91.8 percent of the orders were performing as expected and you

18   had a 99 percent criteria there.

19   And if you follow this down, I mean, BellSouth's

20   performance -- they, they corrected the defect, they thought it

21   was a problem with the, within the software. And then as you

22   just run down the page, they had a 99.55 percent rating, 99.07,

23   you flip over to the next page at the top, 99.5 percent and

24   98.32 percent. Actually retested this a number of times and

25   those were very high order volumes.

1   With that 98.32, although still a high number, that

2 bumped them back out of the 99 percent. BellSouth identified

3 another problem. And then as you continue on to the end,

4 without reading all the numbers out, they had very good

5 performance all the way through.

6   Is the fact that they were able to get such good

7 performance after problems were identified with their fully

8 mechanized processes due to the fact that those processes are

9 fixed when a software problem is identified and, once that's

10 been done, they're fixed permanently?

11   MR. WIRSCHING: Typically the fixes that were

12 involved in most of these tests were around software problems.

13 Software tends to stay fixed once it is fixed. But I think it

14 would be an oversimplification to just look at software. There

15 could have been hardware impacts potentially on this or other

16 processing downstream communications impacts. I know that's

17 happened on a number of occasions.

18   MR. WEBER: When you mentioned those, those sorts of

19 other problems that could have been fixed, whether it's

20 hardware or software, it's a fully mechanized process --

21 generally, I think you'd agree, that once the process, the

22 problem has been identified and BellSouth fixes that problem,

23 it remains fixed; correct?

24   MR. WIRSCHING: I'm not sure I'd agree totally. It

25 depends on the input and, again, on the volumes associated with

1   it. But, in general, software problems, once the code has been

2   changed, tend to remain stable.

3   MR. WEBER: Thank you. I'd just like to then compare

4   this now to beginning on Page POP207, and this is TVV2-5-4.

5   And this evaluation criteria is for BellSouth's manual ordering

6   process providing accurate firm order confirmations, errors and

7   clarifications. So I guess it's the manual side of this same

8   process.

9   Again, looking down the comments, you'll see that the

10   first test BellSouth got 100 percent, and then the next test

11   they dropped down to 72.09 percent. Now the benchmark here

12   instead of being 99 percent was 95 percent. Why is there a

13   difference in the benchmark?

14   MR. WIRSCHING: That's because they're two different

15   measures: One is functional acknowledgment, and the other one

16   is accuracy and completeness.

17   MR. WEBER: And was that true throughout, whether it

18   was the manual process or it was --

19   COMMISSIONER BRADLEY: Excuse me. Would you speak

20   into the mike? I am having a problem hearing.

21   MR. WIRSCHING: Sure.

22   MR. WEBER: Was that true throughout that if it was

23   a, just a, returning an answer, whether it was a manual process

24   or a fully mechanized process, it was 99 percent was the

25   benchmark, and if it was a little bit more complex, that it was

1 a 95 percent benchmark?

2 　　　　MR. WIRSCHING: I think that would probably be an

3 oversimplification. The benchmarks are all outlined here. For

4 functional acknowledgment, that was the 99 percent benchmark

5 that we established. For the majority, but not all, of other

6 transactions a 95 percent benchmark was in place.

7 　　　　MR. WEBER: All right. So then continuing, once

8 BellSouth got this 72.09 percent on this one, when you read

9 down, you discover that their response indicated that there

10 were employee errors because this is a manual process and

11 that's why it happened. And they did retraining and after the

12 retraining they got a little better. When you turn the page,

13 their accuracy rate increased 84 percent. Once again, they

14 indicated that there were employee training problems, they did

15 retraining. Apparently the retraining actually made things

16 worse; they dropped down to 77.78 percent. You kept amending

17 the Exceptions here and they kept retraining.

18 　　　　And then on the top of Page POP209 you conducted a

19 retest and they got a 97.15 percent rating, which was above the

20 benchmark. You retested about three weeks later on March 13th.

21 They had now dropped down to 68.52 percent. I don't want to

22 belabor this point too much more, but there was a lot of

23 bouncing around and it went up, it went down, they trained, it

24 got a little better, it got worse again. And finally the page,

25 top of Page POP210 you see that they got a 96.67 percent rating

1   and the Exception was just closed. Were you directed by the

2   Staff to stop testing those manual processes there?

3   　　　　MR. WIRSCHING: We stopped testing because the

4   evaluation criteria was satisfied.

5   　　　　MR. WEBER: And in your view when they've gone up and

6   down and up and down and then they get up one time there at the

7   end, is it your view that that's a level that they're going to

8   permanently maintain?

9   　　　　MR. WIRSCHING: It's been our testing methodology

10 when they satisfy the criteria that testing ceases as part of

11 the Military Style Testing philosophy. The reason we had --

12 　　　　MR. WEBER: Well --

13 　　　　MR. WIRSCHING: Go ahead.

14 　　　　MR. WEBER: No. Go ahead. I think you anticipate my

15 question.

16 　　　　MR. WIRSCHING: Well, I'd rather hear the question,

17 so.

18 　　　　MR. WEBER: Well, on the February 20th test, which is

19 at the very top of POP209, they had a 97.15, and yet retesting

20 was continued to be done after that. I don't believe these

21 were situations where you were actually retesting another

22 process and you happened to capture additional data from this.

23 　　　　MR. WIRSCHING: Hang on for one second while I check

24 on something.

25 　　　　I just needed to make sure my understanding is correct.

1 In our volume testing methodology we actually do two days of

2 normal volume testing. It's outlined in the MTP and the final

3 report. So they had satisfied the first day with the result of

4 97.15. On the second day when we conducted the second normal

5 day volume test they did not satisfy the criteria. That's why

6 you see a second retest on that even though they satisfied it.

7   MR. WEBER: Is that reflected in the report? I

8 don't -- you say they reported 97.15 percent on February 20th

9 and then the next mention of a date is March 13th. It doesn't

10 look like it's two consecutive days. Or is that what that is,

11 those are the two days of testing?

12   MR. WIRSCHING: Those are the two days: Normal Day

13 1, normal Day 2.

14   MR. WEBER: So it's not consecutive days. You just

15 picked two?

16   MR. WIRSCHING: Right. In fact, they were blind

17 days, so.

18   MR. WEBER: Okay. Now back on the questions that I

19 had originally submitted, moving on to KPMG's measurements of

20 BellSouth's OSS performance for line shared loops, and these

21 questions really relate across a number of the domains.

22   Covad's commercial experience indicates that

23 BellSouth does not return what's referred to as a pseudo

24 circuit number with a FOC for line shared loop orders and this

25 prevents Covad from being able to validate BellSouth's bills

1 for those circuits without resorting to manual processes to

2 obtain the pseudo circuit number from BellSouth's CSOTS

3 database. And, in fact, this problem has been classified as a

4 defect by BellSouth within its own OSS in Change Request 621.

5   KPMG's testing did not identify or evaluate this

6 problem. Do you know why that problem was not caught?

7   MR. WIRSCHING: Yes. We were aware of the problem,

8 we were aware of the defect noticed. When we sampled the firm

9 order confirmations that we received in the BellSouth area, the

10 problem was identified during that sampling but it was not

11 significant enough to cause a not satisfied result. So that

12 specific issue, when combined with all other FOCs, did not

13 cause a not satisfied result.

14   MR. WEBER: Is KPMG aware of what the pseudo circuit

15 number is needed for by ALECs?

16   MR. WIRSCHING: I believe it's outlined here in your

17 question. Correct. You're using it for bill validation.

18   MR. WEBER: Right. I mean, in other words, BellSouth

19 issues its bills for line shared loops and they tie the billing

20 information to the pseudo circuit number in the same way that

21 if you use your credit card to get dinner at a restaurant, when

22 you get your credit card bill, it lists the name of the

23 restaurant so you can go back and check your receipt.

24   Why is it that ALECs' inability to be able to

25 validate BellSouth's bills based on not getting this

1 information on the FOC would be considered insignificant?

2   MR. WIRSCHING: As KPMG Consulting ALEC we were able

3 to validate our bills using the workaround to provide it.

4   MR. WEBER: Did you consider being forced to use

5 workarounds manual -- I'm assuming manual workarounds in the

6 same way that Covad has to do it -- that didn't seem to be a

7 significant, have a significant impact on your ALECs'

8 experience?

9   MR. WIRSCHING: In our experience it was not a

10 significant impact.

11   MR. WEBER: Now BellSouth has delayed fixing this

12 defect for more than six months. Does Covad's commercial

13 experience with this BellSouth OSS defect reflect some of the

14 same concerns that KPMG has with BellSouth's change management

15 process as reflected in PPR1-4, which is a not satisfied

16 criteria and the still open Exception 88?

17   MR. WIRSCHING: Actually KPMG outlined their concerns

18 in Exception 123, which is another RMI Exception, and resulted

19 in a not satisfied for the criteria in PPR1-6.

20   MR. WEBER: And I just want to be clear because maybe

21 I didn't understand, you know, what criteria were accounted for

22 in which PPRs. Is it -- is what you're telling me that the, in

23 fact, BellSouth has not satisfied the criteria that would have

24 measured that difficulty?

25   MR. WIRSCHING: That's correct.

1   MR. WEBER: Thank you. And maybe this takes care of

2   my next question, but KPMG states that PPR1-1, which is on Page

3   RMI10 if anyone wants to look at it, has been satisfied. And

4   I'm curious about why, if this Change Request, 621, hasn't been

5   implemented yet, they were able to satisfy PPR1-1. And maybe

6   my problem here is that I don't understand exactly what it was

7   you were measuring in that criteria versus the 1-6 criteria.

8   MR. WIRSCHING: Hang on for a second. Let me get to

9   that.

10 MR. WEBER: Sure.

11 MR. WIRSCHING: What page?

12 MR. WEBER: I'm sorry. It's Page RMI10.

13 MR. WIRSCHING: A PPR1 evaluation criteria,

14 PPR1-1 evaluation criteria is "change management processes and

15 responsibilities and activities are defined." In KPMG

16 Consulting's opinion those were defined, so that would be

17 satisfied. And I think the issue you raised doesn't have

18 anything to do with definition of process or definition of

19 change management process responsibilities or activities.

20 MR. WEBER: So, in other words, the process is

21 defined but not followed.

22 MR. WIRSCHING: That's correct.

23 MR. WEBER: Thank you. A further defect in

24 BellSouth's OSS causes it to begin billing CLECs -- ALECs for

25 orders before it's completed the provisioning of a loop, and

1 that was recorded in Change Request 779. Once again, KPMG's

2 test did not identify, at least it appears that it didn't

3 identify or evaluate this defect. Why is that?

4   MR. WIRSCHING: Our methodology is to validate the

5 billing against the reported service order completion dates,

6 and during our test we found no inconsistencies with that.

7   MR. WEBER: Was Change Request 779 taken into account

8 or looked at in any way by KPMG during the testing process?

9   MR. WIRSCHING: KPMG Consulting reviewed Change

10 Requests as the course of our change management review. I'd

11 have to look back to take a look at whether specifically

12 779 was in the period of our review.

13   And, yes, we had looked at that.

14   MR. WEBER: And did that also, the existence of that,

15 did that contribute to the not satisfied criteria in PPR1-6?

16   MR. WIRSCHING: Hang on for one second.

17   Just as a way of clarification, what -- could you

18 describe Covad's concern with 779? Is it the timeliness?

19   MR. WEBER: No, it's not the timeliness. What

20 happens is -- I'll try and make this as simple as possible.

21 When Covad places a line shared loop order, BellSouth

22 internally generates two separate orders; one goes to billing,

23 and then one goes to the central office where the line shared

24 loop is actually provisioned. In our experience, the billing

25 part of that order is filled in about 24 hours and they begin

1 billing us for the loop. Central office though, and your own

2 measurements show this, the work there generally takes four or

3 more days but in the vicinity of four days. So we wind up

4 getting billed for the loop for three days when the loop

5 actually hasn't been delivered to us.

6   MR. WIRSCHING: Okay.

7   MR. WEBER: So that's the problem, when a Change

8 Request is put in, has been put in and it hasn't been

9 scheduled -- and I'm wondering -- a repair for that has not

10 been scheduled even though it has been classified by BellSouth

11 as a defect.

12   MR. WIRSCHING: And just to be clear on our process,

13 when we review Change Requests, we're reviewing that they move

14 through the process as defined. And based on our current

15 review of this Change Request, it is moving through the process

16 as the process has been defined.

17   MR. WEBER: And was it your experience as a pseudo

18 ALEC that you were actually billed properly for line shared

19 loops based on the day in which those loops were actually

20 delivered to the pseudo ALEC, or was that even measured by your

21 testing?

22   MR. WIRSCHING: I think my previous answer, which was

23 that our methodology is to look at billing as far as -- let me

24 go back and refer to my previous answer.

25   As I said before, billing is validated against the

1 service order completion date, not the date of provisioning.

2 So, no, we didn't test that.

3   MR. WEBER: So -- and I just want to make sure this

4 is clear. Assuming that defect is actually a defect and that's

5 not what we're here today to talk about, that is not something

6 that KPMG would have measured in the testing process.

7   MR. WIRSCHING: That's correct.

8   MR. WEBER: Continuing just with one follow-up with

9 line shared loops and what was measured and what was not. Did

10 KPMG do any testing of loop delivery times metrics with regard

11 to required delivery times within interconnection agreements?

12   MR. WIRSCHING: Where those kind of, of intervals

13 were available in our interconnection agreement, we most

14 definitely would evaluate it against our interconnection

15 agreement.

16   MR. WEBER: And do you know what the loop delivery

17 time for line shared loops was in your interconnection

18 agreement?

19   MR. WIRSCHING: No, sir. I'd have to do further

20 research on that.

21   MR. WEBER: So, in any event, to the extent it was

22 measured, it was measured based on your interconnection

23 agreement and not anyone else's?

24   MR. WIRSCHING: Right.

25   MR. WEBER: Covad's commercial experience with line

1 shared loops has also indicated that despite the fact that

2 BellSouth is supposed to test those loops before they're

3 delivered to us, they're often provisioned within central

4 offices even though those loops are loaded. In other words,

5 they have load coils on them that will prevent DSL signals from

6 being passed over them.

7   I did not see that anywhere in the test. Did KPMG

8 have that experience with line shared loops or would you have

9 been able to measure that in the way that the testing was done?

10   MR. WIRSCHING: Our experience wouldn't show that as

11 most of our test cases were on pseudo accounts. In other

12 words, there, there were not a significant number of cases

13 where there would be live customers on the end. In fact, for

14 the KPMG Consulting CLEC we did not have live customers, save

15 where we worked with ALECs.

16   MR. WEBER: So for line shared loops, when BellSouth

17 reported to you the delivery of a loop, that's where the

18 process stopped and you would not have measured whether or not

19 that loop actually worked?

20   MR. WIRSCHING: That's correct.

21   MR. WEBER: Moving on then to a little bit of

22 discussion of the unbundled copper loop nondesign, which is

23 referred to as the UCL nondesign loop, I think most of these

24 questions potentially would relate to TVV1 and TVV2 domains.

25   Were test areas TVV1 and 2 designed to include the

1 testing of loops capable of supporting xDSL services? And by

2 xDSL, I just mean a variety of DSL services other than line

3 sharing.

4   MR. WIRSCHING: Yes. That was part of the scope.

5   MR. WEBER: And did KPMG do any testing related to

6 the UCL nondesign loop?

7   MR. WIRSCHING: No, we did not.

8   MR. WEBER: And why is that?

9   MR. WIRSCHING: That was not in the scope of the

10 Florida MTP.

11   MR. WEBER: Now when you say it was not in the scope,

12 there were several changes made to the scope of the test to

13 take account for new things that needed to be tested like line

14 shared loops were added and the unbundled digital channel loop

15 was added after the tests began; correct?

16   MR. WIRSCHING: That's correct.

17   MR. WEBER: Why was the UCL nondesign loop not also

18 added?

19   MR. WIRSCHING: Additions to scope were requested by

20 stakeholders. To my knowledge that was not requested by

21 stakeholder.

22   MR. WEBER: Were the line sharing -- was the addition

23 of line sharing and the unbundled digital channel loop, were

24 those both done by shareholders or did the Florida Staff

25 initiate changes like that as well?

1   MR. WIRSCHING: I'd have to go back and look at my

2   notes to see exactly how those were initiated.

3   MR. WEBER: The provisioning process for the UCL

4   nondesign loop is currently 100 percent manual. Would it be

5   fair to say that, with regard to preordering and ordering

6   functionalities, findings of the test with regard to manual

7   processes for other types of fully manual loops would carry

8   over to the UCL nondesign loop?

9   MR. WIRSCHING: No, I don't believe that would be

10 fair. We'd have to take a look at the process to see if there

11 were similarities and how they were handled. So without

12 further analysis, I couldn't, could not draw that conclusion.

13   MR. WEBER: And there is, in fact, though nothing

14 that would prevent the UCL nondesign loop from actually being

15 tested in the same way that the other loops were tested;

16 correct?

17   MR. WIRSCHING: That's correct.

18   MR. WEBER: Those are all the questions I have.

19 Thank you very much.

20   MR. WIRSCHING: Thank you.

21   CHAIRMAN JABER: Thank you, Mr. Weber.

22   Mr. McGlothlin?

23   MR. McGLOTHLIN: Mr. Wirsching, my name is Joe

24 McGlothlin. I'm here today on behalf of MPower Communications.

25   MPower's questions stem from its own commercial

1   experience and the comparison of that experience with the

2   information contained in the draft report. So for your benefit

3   and for the benefit of the Commissioners and Staff, I'd like to

4   give a quick background that would explain the purpose of the

5   questions.

6   MPower uses BellSouth's TAG electronic ordering

7   system to submit orders and receives from BellSouth firm order

8   commitments. One piece of information that Mpower needs is the

9   circuit identification. It's necessary before Mpower can

10 perform the cross-connect and use that circuit.

11   Until a point, the firm order commitments received by

12 Mpower included the circuit identification information, but

13 after a Change Request submitted by BellSouth, from that point

14 forward the FOCs no longer included the circuit identification.

15 It became necessary for Mpower to overlay the electronic

16 process, which I suppose you could call a manual workaround,

17 requiring Mpower to devote time and personnel who would contact

18 BellSouth representatives in pursuit of the circuit ID

19 information.

20   And Mpower's experience has been that the ability of

21 the particular persons on the BellSouth end to assist in that

22 workaround effort varies widely, indicating to Mpower that

23 there's no consistent level of training with respect to that

24 particular effort.

25   We think this has two dimensions with respect to the

1 draft report. First of all, the workaround adds about 12 hours

2 to the interval necessary to, from Mpower's perspective,

3 receive a complete firm order commitment. Secondly -- and that

4 interval is very different than what appears to be reported in

5 the report.

6   Secondly, the workaround adds time and expense to

7 Mpower's experience, which we suspect indicates that it's less

8 than parity of treatment with respect to what BellSouth can do

9 for itself.

10   Now with that background we see in the draft report,

11 for instance, in the, in the report of the interval, the KPMG

12 report indicates that the interval necessary to receive FOCs is

13 on the order of three hours. The first question is whether the

14 fact that the FOCs do not, no longer contain the circuit

15 identification information is known to KPMG.

16   MR. WIRSCHING: To answer your question, and maybe to

17 start off with some of the statements that you made to preface

18 the question, KPMG Consulting did not have direct experience

19 with this issue, and it was primarily due to the time in which

20 the testing occurred. We had a series of tests that started in

21 2001, early summer, actually late spring of 2001. At that

22 time, when we tested this functionality and for this particular

23 field, we did not discover any issues.

24   Going forward in our retest we focused our retest on

25 areas with known issues. Since there was no known issue, we

1 | did not focus our retesting on this. Based on the time line

2 | you've provided, it appears that this issue developed sometime

3 | in the January time frame of this year; is that correct?

4 | MR. McGLOTHLIN: I believe that's correct. The

5 | Change Request was forwarded --

6 | MR. WIRSCHING: And, therefore, we do not have any

7 | direct experience with the issue you've brought up.

8 | MR. McGLOTHLIN: Would you agree with my

9 | characterization of a FOC that does not contain circuit ID

10 | information is an incomplete FOC?

11 | MR. WIRSCHING: Yes, sir.

12 | MR. McGLOTHLIN: And if a workaround is required,

13 | that last 12 hours before the information is then complete,

14 | would that bear on the interval that KPMG would assign to the

15 | ability of BellSouth to complete the FOC process?

16 | MR. WIRSCHING: Without actual access to the data

17 | that you're referring to, I'm not sure I can draw any

18 | conclusions per se. So taking on face value that additional

19 | time was required, I still would have to look at how much

20 | additional time and how that affected the interval for the

21 | transaction in question.

22 | MR. McGLOTHLIN: Okay. Assume for purposes of this

23 | question that the workaround required an additional 12 hours.

24 | MR. WIRSCHING: On the part of?

25 | MR. McGLOTHLIN: On the part of BellSouth to complete

1   the process of providing the circuit ID information. If that

2   is the case, would that bear on the interval that KPMG would

3   assign to BellSouth's ability to return complete FOC in

4   response to a service order?

5   MR. WIRSCHING: It would depend on whether BellSouth

6   was inside or outside the published interval. And so I'm not

7   sure from your question whether they're within the interval or

8   not. Intervals in this test are established from anywhere from

9   hours to days, so --

10   MR. McGLOTHLIN: I'm looking at Page POP220 of the

11   draft report.

12   MR. WIRSCHING: Uh-huh.

13   MR. McGLOTHLIN: In the right-hand column, second

14   entry, I see the statement, "The 0-9SQM standard for FOCs is

15   95 percent received within three hours." Is that an example of

16   the interval, published interval to which you referred?

17   MR. WIRSCHING: That's correct. But that may not be

18   the interval for this particular transaction type. We're

19   required to do further research to determine if that's covered

20   in this particular metric.

21   MR. McGLOTHLIN: In any event, whatever the published

22   standard interval is, it would be necessary to relate that not

23   to the point in time which the incomplete FOC had returned but

24   to that point in time when the workaround process, after having

25   added 12 hours, completes the information necessary to complete

1 the FOC; right?

2   MR. WIRSCHING: No. The interval is typically

3 established from time of receipt until time of completion. So

4 I would assume that any kind of workaround would be included

5 inside that interval from the time --

6   MR. McGLOTHLIN: I don't understand your answer.

7 When you say inside the interval --

8   MR. WIRSCHING: Right. It's from the time of

9 BellSouth's receipt until the time BellSouth returns a response

10 is typically the intervals for these transactions.

11   MR. McGLOTHLIN: To the time it returns the complete

12 response?

13   MR. WIRSCHING: That's correct. Until the time it

14 returns a response.

15   MR. McGLOTHLIN: Okay. Assume the response does not

16 have the circuit ID information. Is that when you would

17 conclude the interval?

18   MR. WIRSCHING: When we receive the response, we

19 would conclude the interval there. There would be an issue

20 obviously with accuracy of the response.

21   MR. McGLOTHLIN: Would there be an issue of

22 completeness?

23   MR. WIRSCHING: Yes. Accuracy and completeness

24 typically.

25   MR. McGLOTHLIN: And yet you would still assign --

1 let's assume that the incomplete FOC is received in three

2 hours. Is that the interval you would assign to it?

3   MR. WIRSCHING: That is correct.

4   MR. McGLOTHLIN: And what, to what extent and how

5 does KPMG then factor in the additional workaround time before

6 the information is provided?

7   MR. WIRSCHING: That would be in an accuracy and

8 completeness metric where we would take a look at the FOC that

9 was returned. If it was not accurate or complete, then that

10 would be measured in that metric bucket.

11   MR. McGLOTHLIN: In terms of the metric that's used,

12 would that show up in the percentage of FOCs that are accurate

13 as opposed to the, compared to the full universe, or would it

14 show up in terms of additional time required to provide all the

15 information?

16   MR. WIRSCHING: The way the Florida SQMs are

17 designed, that would show up in the bucket of accuracy. I

18 don't believe there's any metric on additional time in Florida

19 SQMs.

20   MR. McGLOTHLIN: Would you agree that the purpose of

21 the electronic ordering system is to enable an ALEC to submit

22 an order and receive a complete response without the

23 requirement of a workaround, manual workaround?

24   MR. WIRSCHING: I would say that the purpose of the

25 ordering system is to allow ALECs to submit transactions and

1 receive responses.

2 MR. McGLOTHLIN: Submit transactions and receive

3 responses. Is it implicit in your answer that the response

4 would be complete and provide all the information?

5 MR. WIRSCHING: Their metrics were complete and

6 accurate, yes.

7 MR. McGLOTHLIN: Would you believe that the necessity

8 of a manual workaround adding 12 hours and the devotion of

9 personnel has a bearing on whether the electronic ordering

10 process is operating as it's designed?

11 MR. WIRSCHING: Based on the information you're

12 providing me, if there was a manual workaround that required

13 extra time and effort, that would have an impact to the ALEC

14 experience.

15 MR. McGLOTHLIN: Do you think that a metric which

16 captures only percentage accuracy effectively measures the

17 ability of the ordering process to perform its role as

18 designed?

19 MR. WIRSCHING: In exclusion to timeliness?

20 MR. McGLOTHLIN: Yes.

21 MR. WIRSCHING: If it was only accuracy? I believe

22 that both timeliness and accuracy are key components to

23 measuring a process.

24 MR. McGLOTHLIN: All right. I'll change subjects.

25 The last question that Mpower submitted is based on another

1   area of its commercial experience. Mpower has the need to

2   convert special access ordered from BellSouth's tariff to an

3   unbundled network element, transport element, and its

4   experience has been that BellSouth fails to relate the tariff

5   transport item to the UNE in a way that would enable MPower to

6   have continuity of service. There are, there are network

7   interruptions because of the inability or refusal to relate the

8   tariff transport to the UNE transport.

9   Does that commercial experience relate in any way to

10 any of the parameters of the test that KPMG performed?

11   MR. WIRSCHING: No, it does not. It was not in the

12 scope.

13   MR. McGLOTHLIN: Those are all the questions I have.

14 Thank you.

15   CHAIRMAN JABER: Thank you, Mr. McGlothlin.

16   Commissioners, we were supposed to take a break after

17 Mr. McGlothlin's questions. If it's all right with you all,

18 I'd like to plug along and have WorldCom start their

19 questioning.

20   Well, Mr. Wirsching, do you need a break?

21   MR. WIRSCHING: Five minutes would be good.

22   CHAIRMAN JABER: Okay. We'll take a five-minute

23 break for you.

24   (Recess taken.)

25   CHAIRMAN JABER: Let's get back on the record.

1 WorldCom?

2   MS. LICHTENBERG: Yes. Sherry Lichtenberg for

3 WorldCom. Good morning.

4   Let me start right out with our first question. You

5 say in this report that BellSouth uses a batch-driven EDI

6 process, and I think that's the first time that I've read this

7 anywhere in your reports. Can you tell me what that means and

8 whether this is any different from other ILECs?

9   MR. WIRSCHING: I can most definitely explain what

10 the batch-driven process is. Transactions -- BellSouth -- this

11 would be ordering transactions, are batched in groups and sent

12 as a batch, which then are processed by the BellSouth front-end

13 processing system then as individual transactions. So it's

14 just an efficiency mechanism.

15   MS. LICHTENBERG: Is that the same as the way other

16 ILECs do business, Verizon or SBC or --

17   MR. WIRSCHING: My experience with some of the other

18 ILECs is limited. I do know that Verizon does have a

19 batch-oriented system. I can't speak for the other ILECs.

20   MS. LICHTENBERG: Okay. And this batch-driven

21 system, I know that in, on POP76, in the previous discussion we

22 were talking, there was some question about -- oh, I'm sorry.

23 POP-196, there was some, there was a discussion of problems

24 that happened in the volume testing. And one of the answers

25 you give, and, again, that's Page POP196, talks about

1 saturation in the BellSouth back-end systems. What does that

2 mean and is it related to this? That would be the third

3 paragraph based on, in January -- this was when you issued

4 Exception 137 and about flow-through responses. And then your

5 answer is that there were network element, "there was network

6 element saturation in the data center." Is that related to

7 this or what is it?

8 　　　　　MR. WIRSCHING: Actually that's not the KPMG

9 Consulting response. That's BellSouth's response, BellSouth's

10 response indicated. So I can't speak to the BellSouth issue at

11 hand. As I stated before, we don't do root cause analysis on

12 these. It was enough for us to realize that that was a not

13 satisfied result to initiate a retest.

14 　　　　　MS. LICHTENBERG: And can you help me out with that?

15 I guess that's another thing that I guess I don't understand.

16 And maybe I'm just misunderstanding the way your other tests

17 have gone.

18 　　　　　There was a problem and BellSouth said it had to do

19 with network element saturation in our back-end data center. I

20 don't know what that means. Do you know what that means?

21 　　　　　MR. WIRSCHING: I have an understanding that their

22 systems did not operate as designed.

23 　　　　　MS. LICHTENBERG: So they couldn't handle the volume?

24 　　　　　MR. WIRSCHING: They couldn't -- that would be

25 shorthand.

1   MS. LICHTENBERG: And you didn't go to a root cause
2 analysis, but they said, it's okay, we fixed it?
3   MR. WIRSCHING: And then we would start a retest.
4 Our methodology is to retest when the ILEC declares that they
5 have developed a solution.
6   MS. LICHTENBERG: But you didn't look at that
7 solution. I mean, that problem could still be sitting out
8 there and, you know, maybe it happens when orders reach a
9 certain threshold.
10   MR. WIRSCHING: We continued volume testing and did
11 not see that problem again.
12   MS. LICHTENBERG: Okay. But you don't know what
13 caused it. So if I'm not receiving service order completions
14 or transactions back, could it possibly be from that problem as
15 opposed to other problems?
16   MR. WIRSCHING: I wouldn't be able to speculate on
17 that.
18   MS. LICHTENBERG: Okay. BellSouth says that they're
19 going to implement interactive agent in 2003. Assuming that
20 the top three Change Requests actually get implemented in 2003,
21 will that make any changes to this batch-driven methodology?
22   MR. WIRSCHING: We've done no work with interactive
23 agents, so I couldn't speak to the impacts to the ordering
24 systems.
25   MS. LICHTENBERG: Would you assume that changing to

1 something like interactive agent -- which just to make sure the

2 Commission understands so I'm not talking EDI shorthand,

3 interactive agent is the ability to send data not in a batch

4 mode but one transaction at a time the way you send E-mail

5 using the TCPIP format. Will -- do you think that will have

6 some impact on the BellSouth ordering systems? Will there need

7 to be some changes to accept interactive agent transactions?

8   MR. WIRSCHING: I wouldn't be able to speculate on

9 that without knowing more about interactive agent.

10   MS. LICHTENBERG: You all looked at interactive agent

11 in every other test you did. Why is it that you don't

12 understand it at this moment? Is there someone else on your

13 team who's more familiar with it?

14   MR. WIRSCHING: There very well may be in some other

15 jurisdiction. But this was a Florida test and interactive

16 agent wasn't available for Florida, so, therefore, we did not

17 study it in the context of BellSouth.

18   MS. LICHTENBERG: Okay. Thank you. On Page

19 POP263 you provide an explanation of the BellSouth ordering

20 systems and process, and I really, really appreciate it because

21 it's really the first time I've seen one.

22   CHAIRMAN JABER: Ms. Lichtenberg, may I interrupt you

23 for just a minute?

24   MS. LICHTENBERG: Uh-huh.

25   CHAIRMAN JABER: Our page numbers don't match up your

1 page number, but I can find it if you also give me --

2   MS. LICHTENBERG: It's Figure 3-2 and it's just above

3 2.1.1, which is LSR submissions.

4   CHAIRMAN JABER: Thank you.

5   MS. LICHTENBERG: You're welcome.

6   I see something called LSRR. It's here in the

7 middle. It seems to come between EDI and LEO. What is LSRR?

8   MR. WIRSCHING: LSRR stands for local service request

9 router.

10   MS. LICHTENBERG: Is it the same as EDI Central?

11   MR. WIRSCHING: I do not believe so.

12   MS. LICHTENBERG: Is it a new system?

13   MR. WIRSCHING: No.

14   MS. LICHTENBERG: This is -- is it the EDI

15 translator?

16   MR. WIRSCHING: I do not believe so.

17   MS. LICHTENBERG: This is the first time that I've

18 seen LSRR, and I also don't see EDI Central on this figure.

19 And so I guess I'm confused about what I've been told about how

20 these requests go through and what you're seeing. This is, to

21 your knowledge, exactly how orders are processed in BellSouth?

22   MR. WIRSCHING: Yes, it is.

23   MS. LICHTENBERG: Thank you. When you discuss

24 flow-through in POP274 -- and I will give you the better

25 numbers so that we can stay together. That is TVV3-1. You

1 talk about the closure of Exception 86 and you talk about some

2 changes made in May that added more exclusions to the

3 flow-through list. Could you tell me what was added that

4 allowed you to bring the flow-through numbers up to the

5 standard?

6   MR. WIRSCHING: I'm sorry. Could you rephrase the

7 last part of that question?

8   MS. LICHTENBERG: Yeah. You said that you relooked

9 at the numbers and that there were some additional, that

10 BellSouth said that there was some additional planned manual,

11 manual fallout items. This is the third paragraph, for me it's

12 on POP271.

13   It says, "Based on retesting results through

14 March 31st, 2002, you issued Third Amended Exception 86, and it

15 showed that residential flow-through was below the standard."

16   Then BellSouth responded and said, "Some of what was

17 planned manual should be excluded from your calculations," and

18 you changed your calculations. Could you help me understand

19 what happened there?

20   MR. WIRSCHING: Hang on for one second.

21   To answer your question, BellSouth provided us with

22 additional data concerning the transactions in which we thought

23 had inappropriately fallen out. Based on the additional data

24 provided by BellSouth, we agreed with BellSouth that we had

25 misclassified those transactions.

1   MS. LICHTENBERG: So just so I can understand,

2   because I get very confused in terms of flow-through, is this

3   additional data that shows what orders are supposed to be

4   handled manually, I think that's what you're referring to here,

5   things that will be excluded from this measurement, is this

6   data posted for CLECs on the BellSouth web site?

7   MR. WIRSCHING: To answer your question: One, the

8   exclusions are available and published as part of the SQMs;

9   then, two, the data that was provided to us is normally

10 available as part of the LSR detail.

11   MS. LICHTENBERG: I'm sorry. I didn't hear you.

12   MR. WIRSCHING: The data that was provided to us is

13 normally provided during, as part of the LSR detail report

14 which is available to ALECs.

15   MS. LICHTENBERG: So I would need to go into my LSR

16 detail report, look at it to see what failed the manual, write

17 down all the reasons, as opposed to -- there's also, you know,

18 posted on the web I believe there are 13 flow, exclusions from

19 flow-through listed. Is this on that list or is it in some

20 deeper pocket that I need to go research?

21   MR. WIRSCHING: No. I believe -- hang on for one

22 second.

23   Just to clarify my initial statement, the exclusions

24 did not change. We had misclassified the transactions. When

25 we had additional data, we recognized that they were part of an

1 exclusion and then classified them appropriately. So there's

2 no change of exclusions, there's no additional information.

3   MS. LICHTENBERG: Okay. If I could just follow on in

4 that same paragraph. Apparently a documentation defect was

5 also corrected in May 2002 that may have contributed to your

6 misunderstanding of the exclusions. Could you give me the

7 accessible letter, the notification, carrier notification

8 letter number for that documentation defect correction?

9   MR. WIRSCHING: Hang on for one second.

10   The document control number is not available. It's

11 posted on the PMAP web site, which doesn't fall under that

12 system.

13   MS. LICHTENBERG: So what was issued was a

14 documentation correction in PMAP but not, but not a change in

15 documentation showing CLECs that there was a change in the way

16 this was calculated? So this is really a PMAP issue, it's not

17 a flow-through issue?

18   MR. WIRSCHING: It's -- the PMAP defines the

19 flow-through, the exclusions. So, yes, it was handled through

20 PMAP.

21   MS. LICHTENBERG: Now you continue on here and you

22 get very statistical on me. And I'm going to defer most of the

23 statistics questions to AT&T because I really don't want to do

24 numbers today, but we're talking about residential orders and

25 we're talking about residential orders that fall to manual.

1 And I think you started today in some of the earlier

2 questioning about talking about manual orders having a higher

3 incidence of Errors/Exceptions or however we want to call them.

4 Is that the case? Is manual work more prone to causing

5 problems?

6   MR. WIRSCHING: I think that's a pretty general

7 question.

8   MS. LICHTENBERG: Let me get really specific.

9   MR. WIRSCHING: Okay.

10   MS. LICHTENBERG: If an, if an order for a

11 residential customer falls to manual in the BellSouth centers,

12 is it more likely that that customer's order will be delayed or

13 that that customer will get the wrong features or that that

14 customer's order may be rejected incorrectly? Is that, is that

15 more likely with manual, with orders that fall to manual.

16   MR. WIRSCHING: That's a piece of analysis that we

17 did not do.

18   MS. LICHTENBERG: So when I look, and we'll get to it

19 in a minute, when I look at your -- the questions I've got on

20 your provisioning and translation errors, you don't look at

21 that as whether the manual process might have driven those

22 problems?

23   MR. WIRSCHING: That's correct.

24   MS. LICHTENBERG: Okay. Can you explain to me why,

25 just very, very high level, you say the flow-through

1 performance was 94.13, 95 percent is the benchmark. And then

2 you say, "The inherent variation is large enough to have

3 produced the substandard result even with a process that is

4 operating above the benchmark." Could you explain that to me,

5 because it looks to me like it's operating below the benchmark?

6   MR. WIRSCHING: Hang on one second.

7   MR. WEEKS: My name is Mike Weeks. I think that's

8 on. Yes. Sorry I'm late. Airplane problems last night.

9   Fundamentally, as one does sampling of the

10 population, one makes an assumption or makes a hypothesis about

11 what that sampling distribution or what the population

12 distribution looks like and one does sampling. When one takes

13 a sample, by definition there is a probability that the sample

14 that one takes is not representative of the population as a

15 whole. So it is absolutely possible that you could have a

16 sample, the mean for which was different than the mean of the

17 population as a whole, and the mean of the sample could be

18 smaller or larger than the mean of the population. So it is

19 statistically possible for you to derive a sample with a mean

20 below 95 percent when, in fact, the true population mean is

21 95 percent or larger. And that's what we're saying here.

22   MS. LICHTENBERG: So basically you're saying we

23 tested a lot, they changed their metric or helped us to

24 understand that the documentation of the metric was wrong, and

25 we retested and, therefore, everything is good.

1   MR. WEEKS: No. I'm saying there was a mistake of

2 fact on our part. And when we made the correction of the error

3 that we had made so that the information that we had and that

4 we analyzed was properly following the business rules and then

5 we took the results that we analyzed that were now correct,

6 which were previously incorrect on our part, that when you

7 applied statistical analysis techniques to that sample data,

8 that the variability of the population was such that you could

9 derive a sample mean of 94 point whatever it was percent when,

10 in fact, the population was operating at 95 or above. And so

11 we gave them, therefore, a pass using statistical techniques as

12 compared to stare and compare.

13   MS. LICHTENBERG: Okay. No stare and compare, and I

14 understand that. But I still don't understand why they changed

15 their documentation and why they trained, retrained their

16 representatives who handled LSR as an error. That's the other

17 answer, the second part of your answer on Exception 86. So I

18 don't get it. If the problem was just that you misread the

19 business rules, why did people need to be retrained and why did

20 there need to be new documentation?

21   MR. WIRSCHING: Again, back to our discussion of root

22 cause analysis. We saw a result that didn't meet the standard,

23 and BellSouth provided some explanation information and then we

24 retested.

25   MS. LICHTENBERG: So you just don't -- you didn't

1   look at the root cause of these problems. You just assumed

2   that when they were better, they were fixed?

3   MR. WIRSCHING: That's our testing methodology, yes.

4   MS. LICHTENBERG: Thank you. Let me move along, and

5   I want to go back for a minute. I want to talk about, just

6   finish -- let me ask about OLNS and then I want to talk a

7   little bit about provisioning.

8   Did you -- you talk about in Provisioning 18, which

9   is PPR6-23, you talk about the use of, you looked at the line

10   class codes for branding. Did you also look at OLNS, which is

11   originating line number screening, as a method of providing

12   operator services, directory assistance branding?

13   MR. WIRSCHING: Yes, we did.

14   MS. LICHTENBERG: And do you know whether ALECs are

15   primarily using line class codes or OLNS?

16   MR. WIRSCHING: We did not do that analysis.

17   MS. LICHTENBERG: Did you look at the process that

18   BellSouth uses to handle orders for OLNS?

19   MR. WIRSCHING: We reviewed BellSouth documentation

20   around OLNS, yes.

21   MS. LICHTENBERG: So did you look at whether

22   BellSouth followed the documentation and ALECs got branding on

23   their lines when they entered the state?

24   MR. WIRSCHING: Hang on one second.

25   Our test method on this was actually to go, to

1   establish OLNS in a central office and make test calls on KPMG

2   test circuits in that.

3   MS. LICHTENBERG: And they all worked and everything

4   was fine?

5   MR. WIRSCHING: Yes, ma'am.

6   MS. LICHTENBERG: Thank you. Did you -- let me go

7   back for a minute. That's it for OLNS.

8   I want -- before I start getting deeply into

9   provisioning, on, on Page POP76 on my copy you talk about

10 completion notices. And I don't think I understand your

11 language and I will give you a better reference. That is

12 TVV1-3-6, and that's, "BellSouth's EDI interface provides

13 timely completion notifications."

14   Let me start out by asking what is time -- what do

15 you mean by this criteria?

16   MR. WIRSCHING: Draw your attention to the next

17 paragraph. I'll read it to you.

18   "The expected interval for CNs is 95 percent received

19 by 12:00 p.m. of the business day following the receipt of

20 provisioning completion date."

21   MS. LICHTENBERG: Excellent. Then if you could

22 explain to me at the very end of this Exception, of this

23 paragraph, "BellSouth delivers completion notices upon the

24 conclusion of provisioning activities as well as all subsequent

25 downstream listing and billing provisioning activities." Does

1 that mean that the completion notice is the equivalent of a

2 notice that says the order has been physically completed, the

3 billing system has been updated and the customer service record

4 is updated?

5 MR. WIRSCHING: No. Actually that's a mistake in

6 this report. It's a typographical error, and it's going to be

7 fixed in the final version.

8 MS. LICHTENBERG: Can you tell me when a completion

9 notice is actually issued?

10 MR. WIRSCHING: On provisioning completion.

11 MS. LICHTENBERG: And what do you mean by

12 "provisioning completion"?

13 MR. WIRSCHING: Wait one second, please.

14 When work is actually completed on provisioning the

15 service.

16 MS. LICHTENBERG: So that's when the switch

17 translations are done essentially?

18 What happens if a completion notice is issued to an

19 ALEC but the CSR is not updated -- can the -- yet? Can the

20 ALEC make subsequent changes to that customer's account? For

21 instance, if the customer calls up two days later and says, I

22 really want, wanted to have Caller ID, can an ALEC issue a

23 subsequent order to get that, assuming that the CSR has not yet

24 been updated?

25 MR. WIRSCHING: That was -- those sort of

1   dependencies we did not test in this test.

2   MS. LICHTENBERG: So you don't know or you didn't

3   look at the impact of this completion notice maybe not tracking

4   with complete completion. That was why I was so surprised at

5   this factual error in this statement. And if you didn't look

6   at it, we'll get back to it in a minute.

7   You talk in Provisioning 56 about problems with

8   Exception 171 and directory listing problems, and I'm wondering

9   what system fix was made to correct that problem.

10   MR. WIRSCHING: Hang on for a second.

11   MS. LICHTENBERG: It's TVV4-1.

12   MR. WIRSCHING: And your question was to?

13   MS. LICHTENBERG: My question was that you, you

14 looked at -- there's apparently a problem in updating the

15 directory listings, and BellSouth provided information that

16 there was supplemental training and the business rules were

17 updated and that the problem was fixed. But then you

18 retested -- and I take it it is actually still outstanding that

19 directory listings are still not updated properly?

20   MR. WIRSCHING: The Exception is still open, yes.

21   MS. LICHTENBERG: Okay. And what is the impact to

22 customers if their directory listings are not properly updated,

23 in your opinion?

24   MR. WIRSCHING: I'll read to you from our impact

25 statement.

1   MS. LICHTENBERG: That would be excellent.

2   MR. WIRSCHING: "BellSouth's inability to accurately

3   update information directory listing data bases may result in

4   mishandling of customer requests and cause a decrease in CLEC

5   customer satisfaction."

6   MS. LICHTENBERG: And what it might -- if we would

7   just sort of put that in simple terms. If I'm trying, if I'm

8   stuck on the highway and I dial 411 to try to get the phone

9   number for AAA or the tow company and it's updated, not updated

10 properly because that customer decided he wanted to come to an

11 ALEC, I'm going to be stuck on the highway for a long time;

12 right?

13   MR. WIRSCHING: Wouldn't know about that specific

14 scenario.

15   MS. LICHTENBERG: Well, I mean, if it's wrong, I'm

16 going to keep getting wrong information; right?

17   MR. WIRSCHING: If the information in the directory

18 listing is incorrect, there is the potential to get incorrect

19 information, yes.

20   MS. LICHTENBERG: Are you -- what is the progress

21 towards closing this Exception? Are you going to test it

22 again?

23   MR. WIRSCHING: There are no plans for continued

24 testing.

25   MS. LICHTENBERG: So -- and it's 85 percent, so it

1   is, it was correct, correct 85.5 percent of the time. This

2   kind of brings me to a question I'm never sure how to ask or

3   what your answer would be.

4   I certainly think, having broken down recently, that

5   this would have been a really big problem for me. When an

6   Exception remains open or when we look at the statistics that,

7   that show there were this many test points and this many

8   Exceptions and this many stayed open, how do we judge the

9   impact of the open Exceptions and the impact of the failed test

10 points on consumers and, therefore, on the ability of ALECs to

11 compete?

12   MR. WEEKS: Well, I think the answer to that is it

13 depends on the nature of the problem and the way the problem

14 visited itself on particular customers or particular ALECs.

15 There's not a general answer to that question. And I think as

16 finders of fact our responsibility is to sort of turn over the

17 rocks, figure out what we see, what we saw, report that to the

18 authorities, and it is the Solomon-like duty of the Commission

19 and parties to assess the impact.

20   I've been in situations before where there was very

21 little impact to open Exceptions because, for example, pricing

22 was such that no one was going to do that particular line of

23 business in that particular jurisdiction anytime soon, so the

24 fact that there were problems in an area was somewhat moot.

25 I've been in other situations where the potential for a great

1   deal of impact as the result of an open Exception was there.

2   So one cannot generalize and should not generalize

3   about counts and numbers and things. One needs to take the

4   specifics of what competition is like here in Florida, what the

5   consumers need in order to have meaningful competition, what

6   the ALECs need to operate, and I think it's really the company

7   and the advocates that need to come to the table and make that

8   case. We're not in sort of a position to do that for parties.

9   MS. LICHTENBERG: Thank you, Mr. Weeks. I appreciate

10   that.

11   Let me move to another open Exception, which is

12   Exception 84, the problems with incorrect switch translations.

13   Just to make sure -- and that for me is on Provisioning 58 and

14   it is TVV4-3. Is that -- what that says, just to bring it down

15   to the consumer level, is that there is an open problem with

16   BellSouth's ability to give the customer what the customer

17   ordered. In MCI's experience that is if the customer wants to

18   have his calls to 900 numbers blocked -- very often -- it may

19   not happen. A switch translation issue would allow those calls

20   to still be made even though we ordered it not to be made. Or

21   a customer may ask for Call Waiting or Caller ID and they don't

22   get it, or they may ask to have their long distance service

23   with MCI and their intraLATA service with MCI, but it stays

24   somehow on the BellSouth network. The change isn't made

25   correctly.

1   Where are we on Exception 84?

2   MR. WIRSCHING: Exception 84 remains opens.

3   MS. LICHTENBERG: Are you retesting?

4   MR. WIRSCHING: There are no plans for a retest.

5   MS. LICHTENBERG: So when the Commission looks at

6 this issue, it's similar to what we just talked about, that

7 they have to look at the impact to consumers on not getting

8 what they ordered and, you know, letting their kids dial

9 976 calls even though they asked me to block them and things

10 like that; is that correct? Is that, Mr. Weeks, what you said?

11   MR. WEEKS: Or getting features that you didn't

12 order.

13   MS. LICHTENBERG: Or getting -- I haven't found any

14 yet where the customers got extra features. That would be

15 nice. I guess I'd get charged for them though, wouldn't I?

16   MR. WEEKS: One would think.

17   MS. LICHTENBERG: So I guess I'll add that to what I

18 better start looking for.

19   Just to continue for a minute with provisioning

20 issues. On Provisioning 69, which talks about CSRs, we're

21 talking about -- this sort of goes back to the first problem,

22 which is the completion notice doesn't refer to the CSR being

23 updated and all the billing records being created. That was a

24 typo in the text. And CSRs -- just to make sure we're on the

25 same page, ALECs cannot issue a subsequent order for a customer

1   if the CSR hasn't been updated because the BellSouth systems

2   think there's a pending order, so we kind of get stuck in this

3   endless loop of rejects.

4   Can you discuss for me the statistical evidence that

5   leads you to believe that in the second retest where we were at

6   93 percent accurate, that we should have closed Exception 112?

7   Are CSRs being updated timely and accurately here? That's

8   TVV4-24, the last, the next to the last paragraph. "During the

9   second retest KPMG reviewed 113 CSRs from April to May."

10   105 or 93 percent were accurate and the Exception was amended,

11   and then you decide -- then the Exception was closed and it's

12   probably some long statistical explanation again.

13   MR. WIRSCHING: First up, point of clarification,

14   this evaluation criteria is only about accuracy, not about

15   timeliness, and I believe in your question you referenced

16   timeliness.

17   MS. LICHTENBERG: Oh, so -- I appreciate that. So

18   they're accurate 93 percent of the time, which is good enough?

19   MR. WIRSCHING: Based on -- and if you'd like, I'll

20   read the statement again.

21   CHAIRMAN JABER: Ms. Lichtenberg, let's not

22   characterize his answer. Let's just ask the question.

23   MS. LICHTENBERG: I apologize.

24   CHAIRMAN JABER: All right.

25   MS. LICHTENBERG: No, you don't have to read the

1   statement again. I think I understand that.

2   Do you also have a place where you've looked at

3   whether CSRs are updated on a timely basis? I obviously

4   misread this part of the report.

5   MR. WIRSCHING: Hang on for one second.

6   We did not look at CSR timeliness.

7   MS. LICHTENBERG: I'm sorry?

8   MR. WIRSCHING: No, we did not look at CSR

9   timeliness.

10   MS. LICHTENBERG: Thank you. If we go to

11   provisioning on Pages 71 and 72, which is TVV4-28 -- actually

12   it's -- the not satisfied for TVV4-28, which is the switch

13   translations, when I look at the, at the retest, it looks like

14   things got worse instead of better. Am I correct there? It

15   went from 82 -- first we were at 27.

16   MR. WIRSCHING: You're talking about the second

17   retest, not the first retest?

18   MS. LICHTENBERG: Yes. Yes.

19   MR. WIRSCHING: Okay.

20   MS. LICHTENBERG: In the second retest we were down

21   at 79 percent.

22   MR. WIRSCHING: That's what the report states.

23   MS. LICHTENBERG: And this Exception remains open?

24   MR. WIRSCHING: That is correct.

25   MS. LICHTENBERG: And the criteria remains not

1 satisfied?

2   MR. WIRSCHING: That is correct.

3   MS. LICHTENBERG: Thank you. Why is TVV4-24

4 satisfied? I always get confused about how these things relate

5 to each other. That is that -- that's the accuracy of the CSR

6 versus the accuracy of the translation in the switch.

7   MR. WIRSCHING: The criteria in 4-28 is part of our

8 end-to-end test.

9   MS. LICHTENBERG: I'm sorry. I didn't hear you.

10   MR. WIRSCHING: It's part of our end-to-end testing.

11 If you look at the title right above 4-28, "End-to-end

12 validation". So while a specific element as evidenced in 4-24

13 may be satisfied, the end-to-end result was not.

14   MS. LICHTENBERG: That makes very good sense. Thank

15 you.

16   Provisioning 77, we talk about the line loss testing,

17 which is TVV4-39. Why is 95 percent the KPMG benchmark?

18   MR. WIRSCHING: We established that in our

19 professional judgment.

20   MS. LICHTENBERG: I know, I know that you, you

21 establish benchmarks when there isn't a benchmark established

22 either by the Commission or internally by BellSouth. I was

23 surprised to see that BellSouth had no internal benchmark. Did

24 I misread that?

25   MR. WEEKS: We've never used BellSouth internal

1 benchmarks as our standards. We use SQMs when there are

2 relevant SQMs and we will apply those. In the absence of that,

3 then we will apply our professional judgment and use the

4 standard that we establish. But we never adopt the company's

5 internal standards that they might have for management

6 oversight and adopt those as ours.

7   MS. LICHTENBERG: So when I read "in the absence of a

8 documented BellSouth standard," what that means is because

9 there's no SQM?

10   MR. WEEKS: Correct.

11   MS. LICHTENBERG: I just misread that.

12   You say that testing is in progress. What testing is

13 still in progress or is it completed now?

14   MR. WIRSCHING: It is, as of now it is completed.

15 That criteria is satisfied. Exception 139 was closed this

16 week.

17   MS. LICHTENBERG: And did you look at how that was

18 corrected?

19   MR. WIRSCHING: We analyzed the data during the

20 retest and it was, it was satisfied.

21   MS. LICHTENBERG: Do you believe that the problem

22 with missing line loss reports here had to do with the

23 implementation of a single "C" order process as we saw in

24 Georgia?

25   MR. WIRSCHING: Since we did not do root cause

1 analysis on this problem, I couldn't comment on that.

2 MS. LICHTENBERG: Thank you. Let me finish up by

3 talking about billing.

4 What did you review? Did you review the electronic

5 BOS/BDT billing records?

6 MR. WIRSCHING: Yes, we did.

7 MS. LICHTENBERG: And also paper bills?

8 MR. WIRSCHING: Yes, we did.

9 MS. LICHTENBERG: And what is the bill of record in

10 Florida?

11 MR. WIRSCHING: The bill record in Florida is paper,

12 with the exception of CABS bills, which are on CD.

13 MS. LICHTENBERG: I'm sorry. I didn't hear you.

14 MR. WIRSCHING: With the exception of CABS bills,

15 which are available on CD.

16 MS. LICHTENBERG: So the BOS/BDT bill is not the bill

17 of record?

18 MR. WIRSCHING: That is not -- yeah, that is our

19 understanding.

20 MS. LICHTENBERG: Cannot be. Okay.

21 I think I'm done, Donna, Dave. Thank you very much.

22 CHAIRMAN JABER: Thank you, Ms. Lichtenberg.

23 AT&T, are you ready?

24 MR. WIRSCHING: Madam Chair, could we have another

25 five-minute break? Thank you very much.

1   CHAIRMAN JABER: Thank you, Mr. Wirsching.

2   (Recess taken.)

3   CHAIRMAN JABER: Mr. Wirsching? Mr. Weeks, do you

4 need a few more minutes? Do you all need a few more minutes?

5   MR. WIRSCHING: No.

6   CHAIRMAN JABER: Okay. Let's go ahead and get back

7 on the record, and AT&T.

8   MS. AZORSKY: Good morning. I'm Tami Azorsky,

9 counsel for AT&T, and with me is Sharon Norris, Jay Bradbury

10 and Bob Bell, all AT&T employees. And Jay, I'm sure, will be

11 joining us in a moment. There he is.

12   I wanted to start out by just talking about a couple

13 of the statements at the very beginning of the test report. In

14 the document control section on Page DC4 you have a statement

15 that certain information and assumptions were presented by the

16 management of BellSouth and that you relied on that information

17 to prepare the report and didn't independently verify the

18 accuracy and completeness of that information. And what I'd

19 like to understand are what types of information were there

20 that you did not verify, independently verify the accuracy and

21 completeness of?

22   MR. WIRSCHING: Sure. I think a great example both

23 from BellSouth and the ALECs are volume test statistics,

24 historical and forecast. For example, BellSouth provided us

25 historical levels of transactions both by product type over

1   periods of months. We took that information at face value. In

2   addition, ALECs provided us forecasts in which they forecast

3   their projected order volumes. Again, we did not verify those

4   forecasts.

5   MS. AZORSKY: What about -- in some of the instances

6   that you were talking about with some of the other ALECs this

7   morning you mentioned changes that BellSouth made to its

8   systems or its documentation. Were there any instances in

9   which you did not go in and verify those changes?

10   MR. WIRSCHING: For documentation changes, if it was

11   a document where we discovered an area, we most definitely did

12   review the changes to ensure that they had taken place. For

13   systems changes our testing methodology is not to review system

14   code, so we would not be able to verify that in this test.

15   MS. AZORSKY: Okay.

16   MR. WEEKS: If I can amplify on that. In those cases

17   on system changes what we did is observed that a system was

18   dysfunctional by submitting transactions and not getting the

19   expected behavior and inferred a change to the system because

20   we would submit subsequent transactions and see the correct

21   behavior. So it was our inference that this system had been

22   changed. But the statement that we actually didn't inspect the

23   change is a correct one.

24   MS. AZORSKY: So in those instances where there were

25   system changes and you did a retest, that was the mechanism for

1   verifying the system change?

2   MR. WEEKS: We didn't actually verify the change. We

3   verified the change in behavior as opposed to the change in the

4   software.

5   MS. AZORSKY: All right. Thank you. If you didn't

6   do -- if there was a system change that's referenced in the

7   report and you didn't conduct a retest after that system

8   change, does that, does it follow that you did not then verify

9   a change in behavior as a result of that system change?

10   MR. WEEKS: That would be correct.

11   MS. AZORSKY: Okay. In both of the test report at

12   the beginnings and ends of the various test domains and in the

13   executive summary on Page DC4 you list percentages of

14   evaluation criteria that were satisfied and not satisfied and

15   testing is in progress. You don't intend, by stating those

16   percentage criteria, for this Commission or the Staff to make

17   any determinations on BellSouth's compliance with checklist

18   Item 2 in the 271 checklist, do you?

19   MR. WEEKS: No, not at all. In fact, I would make

20   the statement that since all evaluation criteria are not

21   created equal, a mere add, subtract, multiply and divide sort

22   of exercise on criteria is probably a little bit dangerous.

23   We've only done that because we know parties are going to do

24   that based on our experience, and so we're just saving them the

25   mathematics.

1   But one should not make any inferences by the sheer

2   numbers that they're there. One has to look at the underlying

3   report and the evaluation criteria and what was satisfied and

4   what was not satisfied and what kind of problems and issues

5   were highlighted in our comments section to really understand

6   and grasp the significance of a particular criterion, and then

7   taking them as a whole is maybe not a useful exercise even.

8   MS. AZORSKY: Okay. Taking, for example, on, in

9   the -- in the executive summary on Pages 10 and 11 you

10 mentioned -- let's take, for example, 2.0 on EX10 where you say

11 for the Relationship Management Infrastructure Test 67

12 evaluation criteria were satisfied, 7 criteria were not

13 satisfied, and then you state that the evaluation criteria that

14 are not satisfied are primarily in the areas of change

15 management and release management.

16   Did KPMG do any analysis of whether the unsatisfied

17 criteria were of greater or lesser importance than the

18 satisfied criteria?

19   MR. WEEKS: No. We don't attempt anywhere in the

20 report to weight in any way, shape or form one criteria versus

21 another or assign any kind of scale that would help a party

22 understand which criterion were more or less important than

23 others. They're all important in some regard or they wouldn't

24 be in the test at all, but they don't all have necessarily the

25 same weight. And as I testified earlier, the sort of gravity

1 of the issue is content sensitive to what's actually going on

2 at the time in the state.

3   MS. AZORSKY: So -- I'm not sure I understand that

4 last question. When you say contact sensitive to --

5   MR. WEEKS: Content sensitive.

6   MS. AZORSKY: Content. Okay. So, for example, if

7 the criteria that are not satisfied are things that are

8 important to ALECs in the state and important to the regulators

9 in the state, those evaluation criteria should be weighted more

10 heavily, is that what I understand you to say?

11   MR. WEEKS: I wouldn't say they'd be more heavily.

12 The fact that they were not satisfied is the issue. And the

13 question then is what is the impact of that potential problem

14 that was identified during the test on competition, and are

15 there other factors that need to be considered that aren't in

16 evidence in our test that would weigh that issue as being more

17 important or less important or more impactful or less

18 impactful? So there's a lot of sort of exogenous variables

19 that could impact the ultimate decision that you can't get

20 exclusively from our report.

21   MS. AZORSKY: I think I, I think I understand that.

22 It boils down to it is, it's the Commission's and the Staff's

23 decision on whether these criteria that are not satisfied, what

24 the impact on ALECs is and how important that is to

25 competition.

1   MR. WEEKS: Right. And I would think it would be the

2 parties that would need to help the Commission understand that

3 and help them form their opinion in your advocacy cases.

4   MS. AZORSKY: One more issue on these preliminary

5 questions, which is there are a number of things that are

6 testing in progress. For example, in the summary that

7 Mr. Wirsching gave at the beginning, 542 of the tests in the

8 metrics domain are still testing in progress and there are

9 various tests throughout, some of the validation and

10 verification reviews that are still testing in progress. When

11 will those be completed?

12   MR. WIRSCHING: Obviously it varies by evaluation

13 criteria. A number of them have been completed. There are a

14 number that are still pending completion in the next week or

15 so. There will probably be one or two that don't, the testing

16 data isn't available by the time we publish the final version,

17 Version 2.0, which will be published at the end of this month.

18   MS. AZORSKY: Will the metrics evaluation be

19 completed by the time you publish 2.0 at the end of this month?

20   MR. WIRSCHING: No, it will not. No.

21   MR. BRADBURY: Commissioners, Jay Bradbury of AT&T.

22 Gentlemen, good morning.

23   In our questions we had a rather lengthy list of

24 documents that were cited in the RMI section and we asked if

25 you could identify which of those documents were generally

FLORIDA PUBLIC SERVICE COMMISSION

1 available to CLECs and which were proprietary to BellSouth, and

2 then we were interested in how an ALEC would know if a document

3 was necessary and how the ALEC would know that they were, they

4 were complying with the document or that BellSouth was

5 complying with the document.

6   Is there an easy way to identify which of these

7 documents are proprietary to BellSouth, that might be the

8 easiest, or are not?

9   MR. WIRSCHING: Yes. Start with that as the first

10 question. With the exception of one document, these are all

11 proprietary documents. The publicly available document is

12 Electronic Interface Testing Guidelines, Version 4.0, dated

13 April 2002.

14   MR. BRADBURY: Let me find that.

15   MR. WIRSCHING: On the, it's available on the web

16 site. Sorry. And there is a second one.

17   MR. BRADBURY: So of all of these documents, that's

18 the only public document?

19   MR. WIRSCHING: There's a second one. Sorry. I

20 misspoke. The Electronic Interface Implementation Upgrade

21 Communication Plan, Version 4.0, is also publicly available.

22   MR. BRADBURY: Okay. Okay. So the vast majority are

23 not available to the CLECs on a regular basis, proprietary to

24 BellSouth. How then do the ALECs know that the document

25 exists, that the document is needed, that their actions are

1 complying with the document or that BellSouth's actions are

2 complying with the document?

3   MR. WIRSCHING: BellSouth provides ALEC facing

4 documentation that provides the ALECs with their roles and

5 responsibilities.

6   MR. BRADBURY: Is there a mapping of these documents

7 to the public documents that BellSouth provides?

8   MR. WIRSCHING: No.

9   MR. BRADBURY: Could one be developed?

10   MR. WIRSCHING: In theory, I believe so.

11   MS. AZORSKY: Did KPMG evaluate whether the

12 information in all of these BellSouth proprietary documents was

13 available in an ALEC facing document?

14   MR. WIRSCHING: KPMG Consulting did evaluate that the

15 ALEC facing documents contained all the required information

16 for ALECs to interface with BellSouth.

17   MR. WEEKS: I think, you know, just the general

18 answer to this question is that there are numerous cases in

19 this test where we examined, in the course of our work, MMPs

20 documentation and so on that the company uses to conduct its

21 day-do-day business operations. That's a normal activity that

22 we do in all of our process style tests, this being one of

23 those tests.

24   And in all cases our objective in those tests is to

25 find out whether the process is well formed and the documents

1 that, and job aids and so on that the company has to support

2 those internal methods and procedures are well formed and exist

3 and are used. And so it is not a test objective.

4 In fact, we wouldn't expect it to be the case that

5 those specific internal MMPs were visible to the ALECs and that

6 there was a one-to-one mapping between those and documents that

7 are visible to the ALECs any more than we would expect the

8 ALEC's internal documentation of how they operate their

9 business to be tracked and mapped into the roles and

10 responsibility documents that are part of the ALEC interface

11 for the company. So it's expected that each company will have

12 its own way of doing what it does in its own internal processes

13 and, when the two need to come together in some way, that there

14 is a publicly available document and that that document is well

15 formed and it meets its intended purpose. And so the way that

16 we organize our testing reflects that philosophy.

17 MR. BRADBURY: Are any of these documents that are

18 proprietary to BellSouth used in their BellSouth retail

19 operations?

20 MR. WIRSCHING: Hang on for one second.

21 We didn't do that sort of analysis, so we're unaware.

22 MR. BRADBURY: Okay. So you don't know whether any

23 of these are used in retail or not.

24 MR. WIRSCHING: That's correct. This is typically a

25 relationship management infrastructure. This is a CLEC account

1 relationship. So I would tend to say that most of these

2 aren't, but, again, we did not do the analysis.

3 MR. WEEKS: Just looking at the titles to some of

4 these documents without trying to contradict what was just

5 said, by the nature of some of the definitions of some of these

6 documents, they would appear to be documents that are unique to

7 the interface definitions of the wholesale operations. To our

8 knowledge, for example, TAG isn't used by the retail operation.

9 So a document that describes something about TAG wouldn't be

10 relevant to retail.

11 MR. BRADBURY: Thank you. In developing your

12 evaluation criteria for PPR1, which appear on Page RMI9, did

13 KPMG review any BellSouth change management practices for its

14 retail operations?

15 MR. WIRSCHING: No, we did not.

16 MR. BRADBURY: On our Page RMI3 at Footnote 1 you

17 provide a definition for CLEC affecting changes. During the

18 course of your investigation of the change control process, did

19 the definition of CLEC affected changes change over time?

20 MR. WIRSCHING: Yes, it did.

21 MR. BRADBURY: When did this particular definition

22 become effective?

23 MR. WIRSCHING: Hang on for one second and I'll get

24 that date.

25 That definition changed with Version 2.7 of the

1 change control process. Our final evaluation was based on

2 Version 3.1, which has the same definition.

3   MR. BRADBURY: Do you remember the date for --

4   MR. WIRSCHING: No, I do not.

5   MR. BRADBURY: It was this year, was it not?

6   MR. WIRSCHING: Again, since I don't remember the

7 date, I couldn't answer that.

8   MR. BRADBURY: Okay. Does the previous definition

9 prohibit any changes from being submitted that are covered by

10 the existing definition? In other words, was the old

11 definition more restrictive than the current definition?

12   MR. WIRSCHING: Yes.

13   MR. BRADBURY: Is that --

14   MR. WEEKS: The old definition was more restrictive

15 than the current definition.

16   MR. BRADBURY: Okay. I wish I had brought that one

17 with me. Failure on my part.

18   So it's the CLECs' interpretation that that's not

19 true, that the previous definition was open ended. But

20 certainly it's KPMG's opinion, they're welcome to have it. And

21 I'll provide what the old definition was.

22   On Page RMI8 you used an acronym that I didn't

23 recognize: BTSI. I think it may be a duplication of a

24 different group, but I'd like you to identify it for me.

25   MR. WIRSCHING: BTSI stands for BellSouth Technology

1 Systems Integration. It's now referred to as BTG, BellSouth

2 Technologies Group.

3 　　　　MR. BRADBURY: Okay. I thought that was probably

4 what it was, but I wanted to be certain. Thank you.

5 　　　　On Page RMI6 at Footnote 6 you indicate that the

6 Change Review Board may not deny an industry standard Change

7 Request by citing a failure to follow general industry

8 direction. Technical feasibility or high cost of

9 implementation may be a reason for a CRB denial of an industry

10 standard.

11 　　　　Do you know what BellSouth's reason was for the

12 deferral of the implementation of the industry standard release

13 known as ELMS 5?

14 　　　　MR. WIRSCHING: No, we don't.

15 　　　　MR. BRADBURY: Do you know if that decision was made

16 unilaterally with BellSouth or in consultation with the ALECs?

17 　　　　MR. WIRSCHING: Hang on for a second.

18 　　　　It is our understanding that that was made by

19 BellSouth.

20 　　　　MR. BRADBURY: Thank you.

21 　　　　Okay. On Page, Pages RMI6 and RMI7 you're discussing

22 how both BellSouth- and CLEC-initiated changes enter into the

23 process, and there are, there are significant differences at

24 the front end of the process. It indicates that for a

25 BellSouth-initiated change on Page 6 that the requests are

1 introduced at the CRB step of the process; whereas, for a CLEC

2 they are introduced by the CLEC sending a Change Request to

3 BellSouth.

4 Can you identify in the existing public document

5 where that change or where that difference in flows is

6 identified?

7 MR. WIRSCHING: To our knowledge there is no publicly

8 facing document that describes that.

9 MR. BRADBURY: And, therefore, where is that

10 document?

11 MR. WIRSCHING: Excuse me?

12 MR. BRADBURY: If it's not in the public document,

13 where is it documented?

14 MR. WIRSCHING: It's a proprietary document.

15 MR. BRADBURY: Would that be the end-to-end process

16 flow document?

17 MR. WIRSCHING: Hang on for a second.

18 That's correct.

19 MR. BRADBURY: So then the proprietary document

20 conflicts with the public document?

21 MR. WIRSCHING: I don't believe it's a conflict. The

22 public documentation is mute on these steps.

23 MR. BRADBURY: Pardon me?

24 MR. WIRSCHING: It's not a conflict. The public

25 document is mute on those steps.

1   MR. BRADBURY: I don't believe that it is. The

2   public document describes both Type 4 and Type 5 changes and it

3   indicates that both are submitted directly to the BCCM.

4   MR. WIRSCHING: Sir, it's our understanding that's a

5   very high level description in the public document.

6   MR. BRADBURY: Okay. Thank you.

7   On Page RMI-8 there is the statement that BellSouth

8   publishes an annual release schedule to the ALECs. Can you

9   identify when such a annual release schedule was published to

10 the CLECs in 2000 and 2001?

11   MR. WIRSCHING: The 2000 schedule was published on

12 August 16th. The release schedule for 2001 was published in

13 July 13th of 2001, November 9th of 2001 and December 18th of

14 2001. That also included 2002 information.

15   MR. BRADBURY: Okay. Let me make sure I understood.

16 The 2000 schedule was published on August 16th of 2000?

17   MR. WIRSCHING: That's correct.

18   MR. BRADBURY: And the 2001 schedule was published

19 first on July?

20   MR. WIRSCHING: That's the information we have.

21   MR. BRADBURY: July of 2001?

22   MR. WIRSCHING: Yes.

23   MR. BRADBURY: So they were not published in advance

24 of the year they were referring to? They were well into the

25 year that they were actually dealing with; is that correct?

1   MR. WIRSCHING: During those years, yes.

2   MR. BRADBURY: Okay. Thank you.

3   On Page RMI8, RMI9 you list a number of groups that

4   you conducted interviews as part of your data sources. I

5   noticed that the Executive Review Board, the BTG group,

6   BellSouth Technologies, were not listed as interviews for this

7   portion of the test. Is it true that you did not interview

8   those groups who played a role in this, in this process?

9   MR. WIRSCHING: That's true. We did not interview

10 those groups.

11   MR. BRADBURY: Okay. Does the Executive Review Board

12 play a significant role in the change control process?

13   MR. WIRSCHING: In our opinion, no. That's why we

14 didn't interview them.

15   MR. BRADBURY: Is the Executive Review Board referred

16 to in the public document?

17   MR. WIRSCHING: Hang on for a second.

18   It's our understanding that is not referred to in the

19 external documentation.

20   MR. BRADBURY: Is it referred to in the proprietary

21 end-to-end process flow document?

22   MR. WIRSCHING: Yes, it is.

23   MR. BRADBURY: Is it your view that in that document

24 the Executive Review Board plays only a minor role or a

25 significant role?

1   MR. WIRSCHING: In our opinion they play a minor and

2   not a significant role.

3   MR. BRADBURY: Hang on a minute.

4   I'm not sure how to handle this proprietary document,

5   so I'll just talk about it. There's a table here called the

6   "Prioritization Process."

7   CHAIRMAN JABER: Mr. Bradbury, let's take a minute to

8   allow you and your attorney to understand what it is you're

9   about to say, because the way you handle that is very

10 carefully. So do you want -- do you know what it is he's about

11 to ask?

12   Ms. Foshee, you can come up to the microphone.

13   MS. FOSHEE: Commissioner, not knowing what

14 Mr. Bradbury is about to ask, I don't know that I have an

15 objection, but I think we would like to understand the way in

16 which this document was obtained and whether it's governed

17 under a protective agreement before it's used.

18   CHAIRMAN JABER: Yeah. And I'm not sure I know what

19 the document is. So let's let the AT&T counsel understand

20 first what the question is, and I'm sure she'll confer with

21 you.

22   (Discussion held off the record.)

23   MS. AZORSKY: The document that Mr. Bradbury is

24 referring to is the document that's been submitted to the

25 Commission by BellSouth to support the resolution of Exception

1 88.

2 CHAIRMAN JABER: Was it afforded confidential

3 classification?

4 MS. AZORSKY: I believe it was.

5 CHAIRMAN JABER: Okay.

6 MS. AZORSKY: So we're trying to think of how he can

7 do this without revealing the document.

8 CHAIRMAN JABER: Okay. And you -- it looks like Ms.

9 Foshee -- say your last name again for me.

10 MS. FOSHEE: Foshee.

11 CHAIRMAN JABER: Foshee -- is willing to assist you,

12 Ms. Azorsky.

13 MS. FOSHEE: If it would help, if they could move on

14 to a different area and maybe we would talk over the lunch

15 break, if there's a way they can ask their questions, if that

16 would help move things along.

17 MR. WEEKS: I might be able to help as well.

18 MS. AZORSKY: That's fine. We will move on and

19 Mr. Bradbury can come back to this after lunch.

20 CHAIRMAN JABER: Thank you. Good idea.

21 MR. BRADBURY: Let me look at reorganizing my

22 questions here a minute.

23 Okay. In conducting your evaluation of the change

24 control process, did you ever assess the adequacy of

25 BellSouth's implementation time frames; you know, how long it

1 | actually took to implement a Change Request?

2 | MR. WIRSCHING: What we assessed was the process

3 | around the implementation of the Change Requests, and during

4 | that assessment we found a number of issues which were detailed

5 | in Exception 88.

6 | MS. NORRIS: Is that a yes or a no? I mean, did you

7 | look at -- did you make some qualitative determination about

8 | how long a Change Request would take and whether or not

9 | BellSouth was implementing Change Requests in what you

10 | considered to be a timely manner?

11 | MR. WIRSCHING: If you're asking if we did an

12 | interval analysis --

13 | MS. NORRIS: Yes.

14 | MR. WIRSCHING: -- no, we did not do an interval

15 | analysis.

16 | MS. NORRIS: So you didn't -- there's nothing in your

17 | test report that says they met things, they did things on time,

18 | timely, any CLEC impact or anything like that on the

19 | implementation schedule?

20 | MR. WIRSCHING: Anything that would deal with an

21 | interval analysis, no, there's nothing in the report.

22 | MS. NORRIS: Thank you.

23 | MR. BRADBURY: Okay. You've determined that

24 | BellSouth satisfied the evaluation criteria for PPR1-1, which

25 | you can find on RMI Pages 10 and 12, PPR1-2, which is on RMI

1 Pages 12 and 14. In both of those cases the comments reference

2 to Exception 123, which is still open.

3   Can you explain how the deficiency that resulted in

4 Exception 123 came about and how it relates to PPR1 and 2 and

5 how they can be satisfied in the face of the open Exception?

6   MR. WIRSCHING: Sure. Exception 123 had two

7 components: A process component and a performance component.

8 BellSouth had provided updated documentation that described the

9 internal process, and on the basis of that documentation we

10 were able to satisfy PPR1-1 and PPR1-2.

11   MS. AZORSKY: Is it PPR1-6 that looks at whether

12 BellSouth follows that documentation and that is the test that

13 is not satisfied, Section 123?

14   MR. WIRSCHING: That is the component, that is the

15 component of 123 that remains to be satisfied.

16   MS. AZORSKY: Okay. Thank you.

17   MR. WIRSCHING: Thank you.

18   MR. BRADBURY: For evaluation PPR1-3, you've

19 concluded that BellSouth's change management process does not

20 have a complete framework to evaluate, categorize or prioritize

21 Change Requests, and that's on Page RMI14. Do you plan to do

22 any additional testing on that, and what must BellSouth do to

23 address this deficiency?

24   MR. WIRSCHING: To answer your first question first,

25 we will continue to monitor activities around Exception 88

1 until the publish, the publication date of Version 2.0, which

2 is the end of this month.

3   To answer your second question, Exception 88 is

4 fairly wide ranging. Do we want to go through the remaining

5 open issues in 88, is that what you're asking for?

6   MR. BRADBURY: I'd like to do it in piece parts

7 relative to the criteria that's here.

8   MR. WIRSCHING: Okay. So why don't you go there and

9 we'll talk each, through each one.

10   MR. BRADBURY: Okay. Okay. PPR1-3 runs over several

11 pages, and your, your reference to Exception 88 starts on Page

12 17 -- I'm sorry, 15. And I think this reference appears in

13 several of the PPR evaluation criteria.

14   One question: The last official BellSouth response

15 to Exception 88 was dated May the 1st; is that correct?

16   MR. WIRSCHING: Wait one second while we check the

17 date on that document.

18   That is correct.

19   MR. BRADBURY: Okay. And in that response BellSouth

20 did describe splitting equally between the CLECs and BellSouth

21 the releases on a going-forward basis?

22   MR. WIRSCHING: Hang on while I go back and look

23 exactly at the response.

24   Yes. That is on Page 8 of the BellSouth response in

25 Exception 88.

1   MR. BRADBURY: Okay. And they also talked about a

2 hierarchy of implementation of the various types of Change

3 Requests; is that correct?

4   MR. WIRSCHING: That's correct.

5   MR. BRADBURY: How do either of those relate to the

6 prioritization of individual Change Requests by the CLECs and

7 BellSouth jointly?

8   MR. WIRSCHING: Those specific circumstances,

9 instances do not.

10   MR. BRADBURY: Okay. So the response in May does not

11 address or resolve PPR1-3?

12   (Pause.)

13   CHAIRMAN JABER: It looks like we need an early lunch

14 break.

15   MR. WIRSCHING: This should only take us another

16 second.

17   CHAIRMAN JABER: Oh, but it's really okay if you want

18 an early lunch break.

19   MR. WIRSCHING: I defer.

20   MR. BRADBURY: Commissioner, before we do that, my

21 next question in this would refer to their entry on Page RMI16

22 that on June 10th BellSouth provided a draft of the End-to-End

23 Process Flow, Version 2.1, the proprietary document they were

24 talking about earlier today.

25   CHAIRMAN JABER: Okay. Thank you.

FLORIDA PUBLIC SERVICE COMMISSION

1   MR. BRADBURY: So we do need a lunch break to sort

2   that out because --

3   CHAIRMAN JABER: I was trying to accommodate.

4   MR. BRADBURY: -- I had a lot of questions about that

5   document.

6   CHAIRMAN JABER: I was trying to accommodate. So we

7   will come back at 12:30 and finish up with AT&T.

8   (Lunch recess.)

9   - - - - -

10   CHAIRMAN JABER: Ms. Azorsky, we were trying to

11 follow the list of questions that you presented to the

12 Commissioners before today. Can you give us an indication of

13 where you believe you left off? I know that you all were

14 skipping around a little bit.

15   MS. AZORSKY: We are skipping around a little bit.

16 Mr. Bradbury has a few more questions on the issues we were

17 just discussing. And I'm happy to say that we can go through

18 what he wanted to find out when he referenced the proprietary

19 document without referencing anything within that document and

20 I don't think the answers will require anything within that

21 document, either.

22   CHAIRMAN JABER: Great. Good job.

23   MS. AZORSKY: But then we will be on Page 4, account

24 establishment and maintenance process is generally where we

25 will be after that.

1   CHAIRMAN JABER: Bottom of Page 4, Commissioner

2   Bradley. PPR-2?

3   MS. AZORSKY: Yes.

4   CHAIRMAN JABER: Okay. Go ahead.

5   MR. BRADBURY: Good afternoon.

6   MR. WIRSCHING: Good afternoon.

7   MR. BRADBURY: Was one of the issues that led to

8   Exception 88 a concern that the then existing BellSouth change

9   management process did not provide adequate information to the

10 ALECs for them to conduct mutual impact assessment and resource

11 planning.

12   MR. WIRSCHING: That is correct.

13   MR. BRADBURY: Okay. We had a discussion before

14 lunch about the BellSouth end-to-end process flow Version 2.1

15 that was presented to you folks on June the 10th. Is that the

16 document that is currently under consideration to modify

17 BellSouth's change management process to resolve some of the

18 issues in Exception 88?

19   MR. WIRSCHING: That is our understanding.

20   MR. BRADBURY: Okay. Did KPMG consider the ALEC

21 proposal of January 2000 for a modified change management

22 process as a potential resolution of Exception 88?

23   MR. WIRSCHING: I don't believe that was submitted to

24 us as a potential resolution.

25   MR. BRADBURY: Is KPMG aware of that proposal from

1 its observations of the process?

2 MR. WIRSCHING: Yes.

3 MR. BRADBURY: PPR1-3, 1-4, 1-6, and 1-8 are all

4 currently shown as not satisfied, is that correct?

5 MR. WIRSCHING: That is correct.

6 MR. BRADBURY: Are all of these dependent on the

7 resolution of Exception 88?

8 MR. WIRSCHING: 1.6 is dependent on the resolution of

9 Exception 123, the others are dependent on the resolution of

10 Exception 88.

11 MR. BRADBURY: Thank you very much. And I will turn

12 it over to Ms. Norris.

13 MS. NORRIS: Good afternoon, Commissioners, and

14 Mr. Wirsching and Mr. Weeks. I just have a few questions

15 around account establishment. Account establishment is pretty

16 much what you could call account management and it has changed

17 its name to CLEC CARE Team, so if you see that in the

18 documentation it is really the same thing. And what I'm

19 seeking to clarify this afternoon is what exactly was

20 considered, what the scope was, things that maybe were not

21 within the parameters or were within the parameters of your

22 test.

23 For example, did your analysis look at the quality

24 and the adequacy of BellSouth's responses to ALECs when they go

25 to the account team?

1   MR. WIRSCHING: Our review did look at the adequacy

2   and quality of responses provided to KPMG Consulting as an

3   ALEC. It did not look at responses provided to other ALECs.

4   MS. NORRIS: All right. Thank you, I think that's

5   clear. A similar question is did you look at how quickly, for

6   example, BellSouth's account team got back to commercial ALECs?

7   MR. WIRSCHING: Again, we did look at how quickly the

8   responses were provided back to KPMG Consulting, but we did no

9   analysis on how quickly responses were provided back to other

10 ALECs.

11   MS. NORRIS: Okay. Thank you. Did you solicit ALEC

12 input regarding their level of satisfaction with the account

13 team?

14   MR. WIRSCHING: We solicited input from the ALECs

15 about general account interface. We did not specifically

16 solicit satisfaction input.

17   MS. NORRIS: Let me just follow up on that if I may.

18 You didn't specifically, but you may have gotten some level of

19 information as a part of your investigation?

20   MR. WIRSCHING: That is correct.

21   MS. NORRIS: Did that information that you may have

22 gotten play any role in your criteria or your analysis?

23   MR. WIRSCHING: Yes. As with all interviews with the

24 ALECs, we took that information as an input into our design

25 structure or test and the focus of interviews and document

1 reviews.

2   MS. NORRIS: For example, if an ALEC was dissatisfied

3 with the account team process, where would that have shown up,

4 in what evaluation criteria?

5   MR. WIRSCHING: Again, we would have taken it as an

6 input as we went through and studied our own experience. For

7 example, if an ALEC identified a specific area of

8 dissatisfaction in the test, we would then monitor that area in

9 our own experience to see if we had similar experiences.

10   MS. NORRIS: Okay. Just to make sure I understand,

11 you didn't take the ALEC input and use that as part of your

12 evidence, but you went to see if you would have the same

13 problem?

14   MR. WIRSCHING: Exactly.

15   MS. NORRIS: But if you didn't, then the ALEC's

16 problem was not part of your analysis beyond that point?

17   MR. WIRSCHING: That is correct. We only commented

18 on what we experienced.

19   MS. NORRIS: Okay. Thank you. On Page 5, there is a

20 list of items which for the Commission's benefit I'm sure KPMG

21 recognizes is a listing of the evaluation criteria, I believe,

22 that you have. And my page numbers may be different than

23 yours.

24   MR. WIRSCHING: Yes, ours are a little different.

25 But that's okay, I have the list.

1   MS. NORRIS: You understand where I am.

2   MR. WIRSCHING: Yes, I do.

3   MS. NORRIS: Hopefully on your document you see a

4   bullet point list of items.

5   CHAIRMAN JABER: I do.

6   MS. NORRIS: These are evaluation criteria that are

7   taken from your report, and my question, again, just to get

8   clarify on how you conducted your analysis of account teams,

9   was to ask you is it possible for the following events or

10 evaluation criteria to be met, and BellSouth still not be

11 meeting the needs of their customers. And we will just take

12 them one at a time. The first one says that account

13 establishment and management responsibilities and activities

14 are defined.

15   MR. WEEKS: Yes. The types of -- three fundamental

16 types of activity or testing that we do, evaluation criteria

17 that we do is does something exist, is it well formed, and is

18 it adhered to. So this is an example of an evaluation

19 criterion that is more focused on existence. And so something

20 could exist and not be followed as an example of a situation

21 where you could have a successful evaluation criteria, get it

22 satisfied, but not have people follow those procedures in the

23 normal course of business and, therefore, not have an ALEC be

24 happy with the level of service they are receiving.

25   MS. NORRIS: Okay. Thank you. I won't belabor all

1 of them if that -- does that generally apply to all the ones

2 that we are talking about?

3 MR. WEEKS: Yes. And so could you go down through it

4 and as a general principle of the test what one could say if we

5 saw a process, it either existed or didn't exist. And if it

6 didn't exist we would have written in an exception or an

7 observation if we felt it should exist. If it existed, we

8 would look to see if it was well formed. If it was not well

9 formed, we would write observations and exceptions about that

10 and then we would look for process adherence.

11 And as Mr. Wirsching just testified, if we

12 experienced that it was followed and adhered to then we would

13 have given it a satisfied. Obviously your mileage may vary.

14 You may have a different experience than we had, but we can

15 only report what we saw and what we experienced, and our report

16 reflects what we saw and what we experienced.

17 MS. NORRIS: Okay. Just for the Commission, I

18 thought it might be helpful to confirm my understanding if the

19 Commission understood that that may be different. Our mileage

20 may vary and our experience may be different, and because they

21 were satisfied as an ALEC which were easily identifiable, the

22 CLECs may be experiencing a very different process under

23 account teams and how they react and respond to CLEC needs.

24 MR. WEEKS: In point of fact, different account teams

25 may deliver levels of service to different ALECs, as well. So

1 you may have one ALEC that has a really good account team and

2 gets really good service, and you may have another ALEC that

3 doesn't have such a good account team and doesn't get quite as

4 good of service. So that is just the law of variability.

5   MS. NORRIS: Okay. I think that is all I have on

6 that topic. And moving on the next item, which PPR-3, which is

7 the interface help desk, really where ALECs go for questions

8 about their interfaces if they have problems, I just have a

9 couple of questions. And the first one is what use does the

10 help desk make of ALEC feedback it receives?

11   MR. WIRSCHING: During our process reviews we

12 observed the BellSouth team making use of that as an input into

13 their planning decisions and management decisions.

14   MS. NORRIS: Can you be a little bit more specific?

15   MR. WIRSCHING: For example, if there was a specific

16 issue that was feedback that was provided by a CLEC that had to

17 do with a issue of management, and I'm trying to think of a

18 good what if, that was referred to the appropriate manager for

19 action. So, I mean, it was used as an operational tool, I

20 think, is the best way to refer to that.

21   MS. NORRIS: And the second question in that regard

22 is what use, if any, did KPMG make of ALEC feedback as part of

23 your testing?

24   MR. WIRSCHING: We made no use of it.

25   MS. NORRIS: No use of it. Okay. That's it for

1 those two areas.

2   MR. BRADBURY: We'll talk a little bit now about

3 PPR-5, the interface development verification and validation

4 review. It's the bottom of Page 5 in our question list if you

5 have that. There at the bottom we indicate that KPMG has

6 determined BellSouth does not consistently follow its software

7 and interface development methodology. That is noted in

8 PPR5-2, PPR5-17. And additionally then that BellSouth does not

9 consistently follow the quality assurance process in its

10 interface development methodology, and that is indicated at

11 PPR5-3. For these three determinations, were they based on the

12 defects that occurred in Releases 10.2, 10.3 and 10.5?

13   MR. WIRSCHING: Yes.

14   MR. BRADBURY: Were there any other additional bases

15 for these findings?

16   MR. WIRSCHING: No.

17   MR. BRADBURY: Has BellSouth made any changes to its

18 processes for interface development and release management

19 between Release 10.3, which is January of this year, and

20 Release 10.5 in June?

21   MR. WIRSCHING: To our knowledge, no changes were

22 made between 10.3 and 10.5. BellSouth's response to Exception

23 157 indicated that there were changes being made subsequent to

24 Release 10.5.

25   MR. BRADBURY: So no changes in that interval, but

1 changes planned in the future?

2   MR. WIRSCHING: That is correct.

3   MR. BRADBURY: Has KPMG continued to identify

4 additional defects in Release 10.5 since the publication of the

5 report?

6   MR. WIRSCHING: Yes, we have. We have identified

7 nine additional defects that have been published since the June

8 21st date.

9   MR. BRADBURY: Okay. And in the report you indicated

10 that there were 18 software defects and six documentation

11 defects. You have now identified nine more software defects?

12   MR. WIRSCHING: Hang on on the breakout for that.

13 That would be four software and five documentation.

14   MR. BRADBURY: Four software, five documentation.

15 Have those defects to your knowledge been posted to BellSouth's

16 change control defect log?

17   MR. WIRSCHING: Yes.

18   MR. BRADBURY: Okay. Are you aware of additional

19 modifications to the process for development and release

20 planned by BellSouth specifically?

21   MR. WIRSCHING: As described in their response to

22 Exception 157.

23   MR. BRADBURY: Is there additional testing planned by

24 KPMG?

25   MR. WIRSCHING: KPMG Consulting at this point is not

1 | planning on additional testing.

2 | MR. BRADBURY: Are you monitoring the process?

3 | MR. WIRSCHING: Yes, we are, until final Version 2.0.

4 | MR. BRADBURY: What form does that monitoring take?

5 | MR. WIRSCHING: We are looking at, as we have been,

6 | additional defects that are posted and the other information

7 | publicly available.

8 | MR. BRADBURY: Are you monitoring the process

9 | associated with the release of Release 10.6, which is scheduled

10 | for August?

11 | MR. WIRSCHING: At this point, no.

12 | MR. BRADBURY: What corrections does KPMG believe

13 | that BellSouth must make to clear the deficiencies in these not

14 | satisfied findings?

15 | MR. WIRSCHING: As these are adherence deficiencies,

16 | in other words, adherents to the process, there would be an

17 | improvement in quality of the next release.

18 | MR. BRADBURY: Is it limited to adherence or are

19 | there not issues with the actual process itself being well

20 | formed?

21 | MR. WIRSCHING: In our opinion the process is well

22 | formed.

23 | MR. BRADBURY: Well formed, but not being followed?

24 | MR. WIRSCHING: That has been our experience.

25 | MR. BRADBURY: Did the KPMG ALEC test any interfaces

1 in the CAVE test environment?

2   MR. WIRSCHING: No, we did not conduct any

3 transactions into the CAVE environment, but we did observe

4 other entities submitting transactions into the CAVE

5 environment.

6   MR. BRADBURY: In those observations did you note any

7 deficiencies in the CAVE environment?

8   MR. WIRSCHING: No, we did not.

9   MR. BRADBURY: During one of the conference calls

10 that we had on a weekly basis, KPMG indicated that it was using

11 a model for software development known as the capability and

12 maturity model, which was developed by Carnegie Mellon

13 University. Can you all describe the five levels that are in

14 that?

15   MR. WIRSCHING: Maybe I should start out with a

16 little bit of clarification. We did not perform a CMM

17 assessment, per se. In other words, we used the CMM levels and

18 models as a part of our basis of developing a standard for good

19 software development practices, but we did not do a CMM

20 assessment, and it would be wrong to lead anybody to believe

21 that we did do a CMM assessment.

22   MR. BRADBURY: Okay. So you have no idea, based on

23 your work, what maturity level BellSouth is at?

24   MR. WIRSCHING: That is correct.

25   MR. BRADBURY: Okay. But you would not argue with a

1 BellSouth person who said they were at MaturIty Level 2?

2   MR. WIRSCHING: We would have no basis to agree or

3 disagree.

4   MR. BRADBURY: Can you briefly explain what the five

5 levels are?

6   MR. WIRSCHING: The CMM levels are Level 1, initial;

7 Level 2 is repeatable; Level 3 is defined; Level 4 is managed;

8 and Level 5 is optimizing.

9   MR. BRADBURY: Okay. And Level 1 is at a level where

10 things are ad hoc and possibly even chaotic, is that not

11 correct?

12   MR. WIRSCHING: That would be a layman's definition

13 of Level 1 --

14   (Simultaneous conversation.)

15   MR. BRADBURY: I'm sorry, I didn't mean to interrupt

16 you, sir.

17   MR. WIRSCHING: That's okay. I don't think that is

18 the CMM definition, but I believe that would be a layman's

19 interpretation.

20   MR. BRADBURY: And at Level 2, isn't that generally

21 classified as software development and operation that is able

22 to repeat a success it has had in the past?

23   MR. WIRSCHING: That is correct.

24   MR. BRADBURY: And at Level 3 is where you finally

25 find a firm that has things that are defined, well formed?

1   MR. WIRSCHING: Yes.

2   MR. BRADBURY: Was that a yes?

3   MR. WIRSCHING: Yes, sorry.

4   MR. BRADBURY: The last question in this area, then,

5   is what is the basis for KPMG's opinion that significant issues

6   remain unresolved in the PPR-5 testing area, which is interface

7   development?

8   MR. WIRSCHING: Those significant issues are outlined

9   in the open exceptions in that area.

10   MR. BRADBURY: Thank you.

11   MS. NORRIS: Hi. Sharon Norris again with a couple

12   of questions. Moving on to the bottom of Page 6 and the

13   question which is the manual ordering process in PPR-7. As

14   part of this evaluation you did a parity analysis between the

15   wholesale operation and the retail operation, and what I would

16   like to understand a little better is what were your standards

17   for determining parity? I have got your documentation, but

18   what were you looking for in terms of before you saw that it

19   was a parity operation?

20   MR. WEEKS: We started with the baseline of the

21   evaluation criteria that we would use to evaluate the wholesale

22   center and applied those similar criteria to the retail center.

23   MS. NORRIS: Okay. Let's go over to the parity

24   evaluation, which I think starts on Page 18. And first you say

25   that there was no retail analog. If you go over to order entry

1   and service order generation, which is on 19, top of 19, you

2   say the processes and systems used for order entry and service

3   order generation are similar. Could you help me a little bit

4   understand what similar would be as opposed to dissimilar?

5   MR. ATKINSON: That at a very high level of

6   functionality and performance these activities are alike or

7   similar.

8   MS. NORRIS: At a high level of functionality and --

9   MR. WIRSCHING: Yes.

10   MS. NORRIS: Okay. And maybe that gets to the next

11 questions that we had about that, because we had asked you to

12 describe in detail the factors that led to KPMG to conclude

13 that the functionality of ROS was at parity with the

14 functionality of DOE. For the benefit of the Commission, DOE

15 is -- they are both ordering systems. DOE was used for awhile

16 by BellSouth and the ALEC community, the wholesale group

17 serving the ALEC community. BellSouth has since introduced a

18 new system called ROS for its retail unit, so they made a

19 change but you are saying they are still similar, and I just

20 wondered the basis for that.

21   MR. WIRSCHING: Again, it would be at a fairly high

22 level of functionality. In other words, information can be

23 entered, it is edited, it allows certain types of information

24 to be entered into the back end systems.

25   MS. NORRIS: Just to try to get a sense of that, let

1 me give you an example. If DOE had a capability of 500 edits

2 built into it, and ROS had 1,000, and I have no idea of how

3 that really worked, would that be similar?

4 　　　　　MR. WIRSCHING: No. We didn't go into that level of

5 detail, so that would not be -- I mean, we were looking for the

6 ability to enter local service request information and could

7 that information be entered in both systems, for example.

8 　　　　　MS. NORRIS: Okay. Because further in that language

9 you said they both have up-front edit checks, but you didn't

10 make --

11 　　　　　MR. WIRSCHING: We didn't make a qualitative or

12 quantitative assessment of up-front edits.

13 　　　　　MS. NORRIS: About how good one's edit checks were

14 over the other?

15 　　　　　MR. WIRSCHING: That is correct.

16 　　　　　MS. NORRIS: Okay. Thank you. Some additional

17 questions, and I will just kind of go down the list here. When

18 you were looking at your parity evaluation for the escalation

19 procedures, which is on Page 20, did it include a comparison of

20 the time that it took to resolve the issue that was raised in

21 the escalation?

22 　　　　　MR. WIRSCHING: No. This was one of our existence

23 tests, so we looked for the existence of procedures in both

24 places.

25 　　　　　MS. NORRIS: Okay. Thank you. And I think we have

FLORIDA PUBLIC SERVICE COMMISSION

1 covered the next question. Well, focussing on trying to
2 understand what similar was and maybe we will look at a couple
3 of more.
4   MR. WIRSCHING: Okay.
5   MS. NORRIS: Did you compare the standards of the two
6 centers, the wholesale center and the retail center for the
7 items measured, because you do talk about that you looked at
8 the -- let me make sure I'm in the right place here. For
9 example, did you look at the service order accuracy for retail
10 versus service order accuracy for wholesale?
11   MR. WIRSCHING: No, we did not do a quantitative
12 analysis.
13   MS. NORRIS: Okay. Were there customer satisfaction
14 requirements for both retail and wholesale?
15   MR. WIRSCHING: Hang on for a second. Yes.
16   MS. NORRIS: Did you look to see how those were being
17 met respectively among the two centers?
18   MR. WIRSCHING: No. Again, we were doing a process
19 parity review, not a quantitative review.
20   MS. NORRIS: Okay. Did you notice when you were
21 looking at the existence of those if the requirements were
22 different? For example, if one required 95 percent customer
23 satisfaction and the other one required 100, or did you --
24   MR. WIRSCHING: We were looking for existence, again.
25   MS. NORRIS: Okay. So I think rather than go over

1 the rest of these, would it be fair to say then the rest of

2 these, and I know you have already reviewed them, that you were

3 looking for the existence and not if they had different

4 standards or if the standards were being met?

5   MR. WEEKS: Yes, I think we were looking for parallel

6 structure in the definition and description and design of the

7 process and the function as opposed to trying to monitor the

8 performance actually delivered onto the wholesale community or

9 delivered onto the retail community.

10   MS. NORRIS: And I was curious on those points, too.

11 That was a good distinction. Both in terms are the standards

12 for the performance the same and is the performance the same,

13 and it sounds like you didn't look at either one of those two.

14   MR. WEEKS: Correct. We said do standards exist in

15 both cases, but we didn't ask the question are the standards

16 identical between the two.

17   MS. NORRIS: Okay. I think that kind of takes care

18 of that bullet point. Rather than going through them all, it

19 sounds like your answer would be the same for all of them.

20 Moving on to PPR-8. And I will flip over there myself. Sorry,

21 we had a little momentary confusion among ourselves, but I will

22 continue now.

23   Did KPMG interview ALECs or consider comments of

24 ALECs in conducting this review?

25   MR. WIRSCHING: Yes. At the beginning of the test we

1   solicited ALEC input and throughout the test we requested and

2   received additional information from the ALECs.

3   MS. NORRIS: When we were talking about ALEC input

4   earlier you described the way you used it, which was that you

5   looked to see if you as a pseudo-CLEC had the same problem, and

6   then if you did, then that led you to investigate further. If

7   you didn't, that stopped your use of the ALEC input. Is the

8   same thing true here?

9   MR. WIRSCHING: That is correct. That is consistent.

10   MS. NORRIS: Okay. So If I was having problems and

11 you were not, that didn't have a mechanism for finding its way

12 into your results?

13   MR. WEEKS: We went looking for it. If we couldn't

14 find it in our own experience, no there was --

15   MS. NORRIS: You went looking for it in your own

16 experience?

17   MR. WIRSCHING: Yes.

18   MS. NORRIS: Thank you. And, again, I think the

19 answers may be the same, but I will make sure. It says did

20 KPMG evaluate the performance of the work centers in addition

21 to evaluating the documentation?

22   MR. WIRSCHING: No, this was in existence.

23   MS. NORRIS: Okay. Thank you. I think that's all I

24 have in this area unless one of my colleagues has another

25 question.

1   MS. AZORSKY: If I could just clarify, for both PPR-7

2 and PPR-8 you reviewed whether parallel standards -- you

3 reviewed the standards and the documentation, but you did not

4 review adherence to those standards?

5   MR. WEEKS: We verified that when it was a parity

6 comparison between wholesale and retail that there was parallel

7 structure between the two in terms of how they did their work,

8 how they measured the performance of their work, but we did

9 not -- it was oriented towards understanding if the processes

10 as they were defined were at parity, not the processes as they

11 were operated at parity.

12   MS. AZORSKY: Okay. And then similarly for PPR-8,

13 you were looking only at the documentation, not for adherence

14 to the documentation?

15   MR. WIRSCHING: That is correct.

16   MR. BELL: Good afternoon, Commissioners. I'm Bob

17 Bell from AT&T. Good afternoon, Mr. Wirsching and Mr. Weeks.

18 I have a few questions about sample size selection in the test.

19   MR. WEEKS: Okay.

20   MR. BELL: How did KPMG select sample sizes for the

21 various tests in TVV1?

22   MR. WEEKS: Doctor Salzberg is our statistical -- I

23 won't put a label on it, but he is going to talk to us about

24 statistics.

25   DR. SALZBERG: We had an initial set of meetings I

1 think about two years ago where the ALECs, CLECs, BellSouth,

2 and the Commission talked about statistical issues, and then

3 there were subsequent discussions about sample size. And as I

4 recall, because we didn't have direct data measure-by-measure,

5 we looked at some data that some other Bell -- we didn't have

6 direct data for Florida. We, in consultation with the

7 Commission, looked at data from other states and BellSouth and

8 selected sample sizes that would roughly balance Type 1 and

9 Type 2 error at some level of precision. I don't remember the

10 exact level of precision we dealt with. I do know that the

11 sample sizes we selected were generally larger than what we

12 ended up -- generally larger for aggregated measures than the

13 140 that we had used in other jurisdictions, which the

14 precision for that was about .28 standard deviations. But I

15 don't remember the exact -- whether we decided on a number of

16 standard deviations here or not. Actually we have something in

17 the appendix which refers to 20 percent as what we looked at as

18 the precision.

19   MR. BELL: Okay. Let me step back a bit. You talked

20 about balancing Type 1 errors and Type 2 errors. Could you say

21 a little bit more explicitly what you mean by that, and then I

22 have a follow-up question on precision.

23   DR. SALZBERG: I was just looking at some of the

24 wording for Appendix A there. Maybe I should say something

25 briefly about what Type 1 and Type 2 error are. Type 1 error

1   is the potential error that you could make if you fail or if

2   you create an exception when one wasn't actually warranted. So

3   your test performance is such that you feel that there should

4   be a exception but, in fact, that test performance was an

5   anomaly. Type 2 error is the opposite situation, where the

6   test performance was such that you pass them, but, in fact,

7   that test performance was an anomaly and they actually aren't

8   performing that well, you should have failed them. So we tried

9   to balance those two errors at some level of precision. And

10 what I mean by precision is at some failure level we try to

11 balance them.

12   MR. BELL: Now, when you say balance them, are you

13 meaning equate the probabilities of the two types of errors?

14   DR. SALZBERG: Right.

15   MR. BELL: And then by precision are you referring to

16 what is often called the alternative hypothesis?

17   DR. SALZBERG: Yes.

18   MR. BELL: And is that referring to a difference, an

19 amount by which the standard is not being met?

20   DR. SALZBERG: Right. The amount that -- right,

21 that's right.

22   MR. BELL: And in Appendix A there is a statement on

23 Page A3 of Appendix A, I believe in Footnote Number 2, the

24 second sentence looks to be a definition of precision, but I am

25 not able to follow it. I think there might be a typo. Could

1 you look at that and explain that to me.

2 　　　　DR. SALZBERG: There is some kind of typo there. We

3 are trying to figure out what it is.

4 　　　　MR. BELL: If you prefer, you could try to provide an

5 explicit definition in your own words.

6 　　　　DR. SALZBERG: An explicit definition of what?

7 　　　　MR. BELL: Of precision.

8 　　　　DR. SALZBERG: The precision that we are talking

9 about as I recall is the standard error divided by the average.

10 I don't know what it is with respect to benchmark measures. It

11 looks like that footnote is trying to explain it. I don't

12 remember it, and I can't figure it out from -- the

13 typographical error is such that I can't figure it out. I

14 think there is like half a sentence missing there or something.

15 　　　　CHAIRMAN JABER: I assume it will be fixed for the

16 final report?

17 　　　　MR. WEEKS: Yes, it will.

18 　　　　MR. BELL: In that particular sentence it does talk

19 about a ratio of a standard error to the average for that same

20 measure. In the case of a 90 percent benchmark, would that

21 mean that the precision would be the ratio of the standard

22 error to 90 percent?

23 　　　　DR. SALZBERG: That's the problem. I think that for

24 averages that is what the 20 percent is, it would be the

25 average, which is say three days or something would be in the

1 denominator, and the numerator would be the standard error that

2 you would compute based on the sample size. For percentages, I

3 don't think it was that equivalent ratio. I think it was some

4 analogous ratio, and I don't know sitting here what it was. I

5 will have to go back and look at that and figure out where the

6 typo was.

7   MR. BELL: Is there some sort of documentation that

8 you could go back and look at and find particular calculations

9 that did lead to the sample sizes that were used?

10   DR. SALZBERG: I believe that there is in our work

11 papers.

12   MR. BELL: Looking at -- if you have in front of you

13 the section on preordering and ordering, I'm looking at Page

14 POP-103, which has Tables 1-12 and 1-13. Actually, before I

15 ask that question, the footnote also refers to sample sizes

16 that were used in some other states were typically 140. And I

17 believe you said that the calculations done for Florida

18 typically led to larger sample size requirements than that, is

19 that correct?

20   DR. SALZBERG: Yes, that is correct.

21   MR. BELL: Okay. So looking at these two tables, I

22 see -- the sample sizes seem to be in the first column of

23 numbers, and I see several numbers less than 140 in the first

24 table and -- well, all except for the total column row are, and

25 the same thing in the second table, including a couple of

1 numbers that are as low as 16.

2 MR. WEEKS: Yes. Rejects by their nature we have no

3 control over. We weren't sampling rejects. Rejects are

4 created by BellSouth, not by us. So we are at the mercy of

5 BellSouth when they create rejects.

6 MS. AZORSKY: Earlier this morning, Mr. Wirsching,

7 didn't you say that you included planned errors in some of the

8 tests that you did?

9 MR. WIRSCHING: Yes.

10 MS. AZORSKY: Was there a reason you didn't include

11 planned errors for rejects?

12 MR. WIRSCHING: Again, given the period of the test,

13 we may or may not have included -- as we mixed our planned

14 errors, we did not include extremely large numbers of planned

15 errors because that would be counter-productive. I also want

16 to add that our target for something over 140 was at the level

17 of aggregation, not at the level of disaggregation. So as we

18 look at specific items like resale business, resale residence,

19 UNE loop, or UNE-P, they may be less that the target number at

20 the disaggregated level like that, but at the aggregate level I

21 want to point out that the total is 220, which is well above

22 the 140.

23 MS. AZORSKY: If you evaluated it on the

24 disaggregated level, did you have a process for determining

25 that you had the right mix of product types, what was similar

1   to what ALECs are actually ordering?

2   MR. WIRSCHING: Yes.

3   MS. AZORSKY: How did you go about doing that?

4   MR. WIRSCHING: We did an analysis to be similar to

5   what ALECs were ordering based on experience in data provided

6   of historical transactions.

7   MS. AZORSKY: And that information was provided by

8   BellSouth?

9   MR. WIRSCHING: That is correct.

10   MS. AZORSKY: And was that among the information that

11 you did not independently validate?

12   MR. WIRSCHING: That is correct.

13   MR. WEEKS: I would also add that because of the

14 nature of the test, when we are doing feature function testing

15 we also test a number of products and services that aren't

16 necessarily widely used by the wide CLEC community. The

17 definition of this test was very broad in terms of the kinds of

18 products and services. So in some cases in order to accomplish

19 feature function testing and making sure the different aspects

20 of the system worked, actually wound up running transactions in

21 a mix or a ratio that doesn't reflect what CLECs are currently

22 doing, because we had to cover off some of these things that

23 aren't often done.

24   MS. AZORSKY: Were you aware when you were doing your

25 analysis that this Commission requires that BellSouth perform

1 at a disaggregated level of performance for the commercial

2 market? That they don't require that they perform at an

3 aggregate level for rejections, they require that they perform

4 at a disaggregated level, and what they require BellSouth to

5 do?

6 MR. WEEKS: Right. But that's what they require them

7 to do in their normal performance reporting they do then. That

8 wasn't necessarily the design of the test, per se, to operate

9 at that level of the SQMs.

10 MS. AZORSKY: Right. But the point would be if they

11 failed UNE loop rejection intervals, that is the criterion that

12 this Commission is holding them to in their day-to-day

13 operations, but that is not a criterion you held them to in the

14 test, right?

15 MR. WEEKS: I think it would be fair to say it was

16 not a designed objective of the test to hold the company to

17 performance at the same levels of disaggregation as the SQMs

18 do.

19 MS. AZORSKY: Thank you.

20 MR. BELL: I think that is all -- oh, I had one other

21 question about sample sizes. In certain cases there was an

22 initial sample taken which BellSouth failed and then some sort

23 of exception, or I don't know difference between exceptions and

24 observations or whatever, and then a retest. Were the same

25 criteria used for selecting sample sizes for retests as for

1 | initial tests?

2 | MR. WIRSCHING: Yes, it was.

3 | MR. WEEKS: I think that the general answer that

4 | Mr. Wirsching gave is probably inaccurate, and I think there is

5 | a more specific answer that may be a bit more accurate. It

6 | depends on the nature of the failure. Oftentimes when we

7 | executed a test it was covering off a wide range of issues and

8 | a number of evaluation criteria. If during that testing we

9 | identified a specific type of problem that was much more

10 | narrowly focused than the broad problem that we were testing

11 | for, then in cases where we had narrowly defined, very specific

12 | retests, we didn't always re-execute that retest with the same

13 | exact volume that we executed the initial test with. So if

14 | there were -- I'm trying to think of a good example. If we

15 | were executing a particular type of preorder, mix of preorder

16 | transactions in our initial test, trying to go through and see

17 | if each of the individual preorder types worked and there was a

18 | sample size of 140 -- I'm making up numbers here -- associated

19 | with those preorders, if we found one out of ten that didn't

20 | work, we wouldn't run 140 of just that one transaction the next

21 | time when we tried to retest it. We would have a smaller

22 | sample size associated with letting us understand whether that

23 | particular transaction was now working or not.

24 | MR. BELL: So in that particular situation where you

25 | choose that smaller sample size, wouldn't it be that you would

1 not achieve the sort of balancing that Doctor Salzberg

2 described as the goal of the initial sample?

3 MR. WEEKS: We had two different types of purposes

4 for testing. We used large sample sizes when we were

5 attempting to gather performance information, what was the

6 average time for a particular preorder query or something like

7 that where you needed a large number of observations in order

8 to create a sample that hopefully balancing the two types of

9 errors would let you come to an acceptable level of risk with

10 respect to the average of time over a reasonably large number

11 of transactions.

12 If the nature of the problem that we found was that a

13 particular transaction just didn't work, it wasn't a

14 performance issue, it wasn't an average of transactions over

15 time, it's that a particular preorder query didn't work at all,

16 then a sample size of one or two is sufficient to establish

17 what we call feature function testing, that that function works

18 or that function does not work. And so there are different

19 test objectives that have different goals in mind.

20 If we were attempting to develop performance data, we

21 used large sample sizes. If we were attempting to do feature

22 function testing, we did very small sample sizes, because

23 things either work or they don't. And so then what we would

24 decide is did we have enough transactions taking those together

25 that we could come back and make the calculations that we

1 needed to for our average intervals and average response times

2 and those sorts of things.

3   So it depends on what the nature of the failure was.

4 Had the nature of the failure been that the average response

5 time for a particular preorder type was higher than it should

6 have been, then our sample size would have been larger in order

7 to collect more observations, but not necessarily the 140 that

8 represented a mix of perhaps 12, 10 or 12 different transaction

9 types.

10   MS. NORRIS: Do your tables include like the average

11 for the overall preorder response, or do you just do it by

12 subcategory? What you are saying leads me to believe that you

13 are looking at it as an overall level because that is where you

14 were trying to find out if it could perform. But my

15 recollection is that your evaluation criteria was at the actual

16 preorder response type, AAQ, BBQ.

17   MR. WEEKS: We did collect, we did report at that

18 level so that we could see if there is a difference in the

19 various preorder transaction types as an example. But we

20 didn't -- I think if you look at the sample sizes on preorder

21 transaction -- we will turn to that particular table in a

22 minute, we will give you a reference.

23   MS. NORRIS: Okay. I'm just trying to understand

24 your principles and your methodology as I see it applied.

25   MR. WEEKS: The top of Page 137, for example.

1   MS. NORRIS: Okay. Yes, that's a good example.

2   MR. WEEKS: You can see that the quote, unquote,

3 sample size varies widely from transaction type to transaction

4 type. Now, some of that is a function of the fact that we are

5 doing a wide number of scenarios here. Each scenario is a

6 particular pattern of execution over the different business

7 pattern ordering a new loop or migrating a customer as is or as

8 specified. In connection with doing those various scenarios

9 for the feature function testing, we ran one or more preorder

10 queries as part of the universe of multi-step activities that

11 are involved in each scenario. And what we did then is bring

12 all of those together and analyze those as a population, or as

13 a sampling effect of a population. And so we ran many more

14 ABQs as we ran through all of our scenarios than we ran LMUWLs.

15   So what you are seeing here in this column in terms

16 of transaction counts represent the number of instances of each

17 type that we ran, not in a stand-alone preorder test

18 necessarily, but as part of the integrated preorder order

19 activity that we did in executing scenarios.

20   MS. NORRIS: There were a lot of words there, I'm

21 going to try to boil down my question just a little.

22   MR. WEEKS: Okay.

23   MS. NORRIS: I mean, I understood everything you

24 said, but I pay more attention to this than the average bear,

25 so let me ask a question. Did you evaluate these individually

1 or collectively?

2   MR. WEEKS: There are benchmarks as the right-hand

3 column says.

4   MS. NORRIS: Individually?

5   MR. WEEKS: Individually.

6   MS. NORRIS: Right.

7   MR. WEEKS: And so if we were to come through, for

8 example, let's pick ABQ, which is the second one. There were

9 282 transactions in the sample that we analyzed. The average

10 response time we observed for those was 5.61 seconds. The

11 benchmark that was established, that we measured that ABQ

12 against was 3.22 seconds. And so at that level we looked at

13 those individual transactions and got an average and compared

14 it to the benchmark and said it was good or it was bad.

15   MS. NORRIS: Right. And thank you for that

16 clarification. I guess in all of wanderings we need to bring

17 it back for those folks who don't live this stuff every day.

18 And for my own clarification, so you did measure these things

19 separately and in order to measure them separately based on the

20 dialogue between the two statistical folks that I won't even

21 attempt to get into, you need to have an adequate sample size?

22   MR. WEEKS: For the objective of the test. And so

23 what I'm saying is the objective of this test that this table

24 represents the results of wasn't to develop statistically

25 significant measures for each individual preorder transaction.

1   It was to test the functionality of the system for each of

2   these preorder types, and to collect as a side effect the

3   response time of the system as we observed it at the time. And

4   to figure out whether the system worked in a feature function

5   test or not, I don't need 140 ABQs to figure out if they work

6   or not.

7   MS. NORRIS: But you were measuring not only did it

8   return them, what was the time frame, and for that you do need

9   it, don't you?

10   MR. WEEKS: You do not need it in order to report

11 what you observed.

12   MS. NORRIS: But you were not only reporting what you

13 observed, you were benchmarking that against the standard.

14   MR. WEEKS: We compared what we observed to the

15 standard.

16   MS. NORRIS: And either they passed or failed based

17 on your observation.

18   MR. WEEKS: We would have either said they have a

19 problem with AVQ timeliness or they don't have a problem with

20 AVQ timeliness based on that result. But the design of this

21 portion of the test wasn't to develop a statistically

22 significant sample size for AVQs as a stand-alone event.

23   CHAIRMAN JABER: Mr. Weeks, does the likelihood that

24 you will have problems with the test increase when you increase

25 the sample size? Isn't just the law of probabilities you

1 said -- is the focus on the sample size directly related to the

2 probability of problems with the test?

3 MR. WEEKS: If you are doing a feature function test

4 you only need a couple of transactions to say whether this

5 works or not and you are done. You don't need a statistically

6 significant sample size. If you are trying to assess what the

7 performance of a system is over a large number of transactions,

8 then you do need a statistically significant sample size. This

9 particular test was a feature function test, not a performance

10 test.

11 MS. NORRIS: I want to make sure your question was

12 answered before I go back.

13 CHAIRMAN JABER: Okay.

14 MR. WEEKS: And to make sure that I answer

15 explicitly, and Mr. Salzberg will tell me if I say the wrong

16 thing here, I believe that there is a strong correlation

17 between the sample size and the level of risk that you take in

18 making the wrong inference. And so in general the larger the

19 sample size, in general the less the risk. But you never drive

20 the risk to zero.

21 MS. NORRIS: Would you have more confidence in the

22 11, that the 11 were repeatable or the 282?

23 DR. SALZBERG: I wanted to kind of complete the

24 answer to the question or add to what Mike said. There are two

25 types of risk that I mentioned earlier, or I think Mr. Bell

1 might have mentioned them first, Type 1 error and Type 2 error.

2 The way this test is designed, the bigger the sample size, the

3 risk of improperly passing them, that is going to go down. The

4 risk of improperly failing them is not going to change because

5 that is fixed just as part of the design of the test.

6   MS. NORRIS: So the risk of improperly passing them

7 is less for the 282 than it is for the 11?

8   DR. SALZBERG: You can't say that, but because all

9 else is not equal. But all else being equal you could say

10 that.

11   MS. NORRIS: What else is not equal?

12   DR. SALZBERG: Well, in order to determine that

13 probability --

14   MS. NORRIS: I'm just trying to understand that from

15 a layperson's perspective. At some point you guys are saying

16 it is important to have sample size and we had adequate ones

17 and we measure at this level, but it didn't matter here when

18 you are doing a preorder query. And I will turn it back over

19 to the statistician to see if he has anything else before I

20 confuse.

21   COMMISSIONER BRADLEY: I have a question. We were

22 talking about sample sizes and the possibility of us increasing

23 the probability of a mistake. To what extent would that

24 probability be also from your side as you input the data? It

25 would seem to me that both sides possibly could make some

1 | mistake somewhere along the line, BellSouth as well as KPMG.

2 | MR. WEEKS: Commissioner, this isn't about mistakes

3 | made by KPMG Consulting in data entry or mistakes made by

4 | BellSouth in processing. The type of error that we are talking

5 | about is not that type of error, it is the fact that we are

6 | doing a sample of all possible transactions over a wide range

7 | of time and space. And what we are trying to do with the

8 | sample that we gather is to say we are going to with our sample

9 | predict what the true performance of the company is across all

10 | of the transactions by just looking at some of them.

11 | And the risk that we are talking about is the risk

12 | that we say that things are good when they are not or that we

13 | stay are broken when they are really not. It is the risk that

14 | the fact that you picked a sample rather than looking at every

15 | single transaction leads you to draw the wrong conclusion as a

16 | tester. That you say that the company's performance is good

17 | when it is not, or you say the company's performance is bad

18 | when it is not. It's a testing risk, not errors made by human

19 | beings or by computer systems.

20 | COMMISSIONER BRADLEY: I'm still not following your

21 | logic, though.

22 | MR. WIRSCHING: Before we jump off on this, we have

23 | gotten way down in the weeds looking at this table.

24 | COMMISSIONER BRADLEY: No, wait a minute. Don't

25 | move. What you're saying is you are doing sampling, so how are

1 you using the sampling to determine the validity of your

2 conclusions?

3   MR. WEEKS: All testing -- not all testing, almost

4 all testing with which I am familiar is by its nature looking

5 at a sample or a subset. With large populations that run into

6 the thousands and hundreds of thousands it is not possible to

7 inspect everything. So you pick some out of the pot, and you

8 try to look at those and you try to say, what do I observe in

9 this sample. If I run a transaction and it works, then I have

10 some assurance that the system that I'm testing works. If I

11 run that same type of transaction multiple times and it works

12 every time, I can get more confident that that system really

13 works. I won't as a tester necessarily look at every

14 transaction that ran through a system over a long period of

15 time, because the time and labor and energy to do that isn't

16 cost justifiable.

17   If I can make samples and make inferences from those

18 samples and I'm willing to accept the risk that there is a

19 small probability that I will be wrong, that what I will say,

20 the conclusion I will draw is wrong, then I can move forward.

21 And in most of the testing that I have been familiar with for

22 the last 30 years in a variety of different scenarios, that's

23 what we have done as testers.

24   MS. NORRIS: I don't have any other questions of

25 mine. Did you have something you wanted to say if we are

1 finished with Commissioner Bradley?

2   MR. WIRSCHING: Just to add a little bit of clarity

3 here. If I could draw your attention to evaluation criteria

4 TVV1-9-8, which is on Page POP-98, I think some of the

5 confusion was in linking this table which is at a very low

6 level of detail to allow people to look at as a good level or a

7 more raw level of our data. But our evaluation criteria that

8 is outlined in 1-9-8 is for loop makeup in general, and that

9 includes both LMUWL that is outlined in the table and LMU --

10   MS. NORRIS: I'm sorry to interrupt you, but for

11 whatever reason, across the board here we seem to be missing

12 that particular page in our binder.

13   MR. WIRSCHING: That would explain some of our

14 confusion.

15   MS. NORRIS: No.

16   MR. WIRSCHING: You don't have 1-9-8?

17   MS. NORRIS: Okay. A copy center thing, okay.

18   MR. WIRSCHING: So if you look at the criteria it is

19 for loop makeup in general, which included LMUSF and LMUWL. So

20 as you drew attention to a sample size of 11, in actual usage

21 we use the combination of the SF and the WL to arrive at our

22 result.

23   MS. NORRIS: If I were to go back to that table, what

24 would that be combined?

25   MR. WIRSCHING: It is 133. And as my team correctly

1 points out, if we flip the page on the tables to Table 1-67,

2 the sample size is much different on both of those.

3   MS. NORRIS: Well, are you now saying that sample

4 size is important?

5   MR. WIRSCHING: No, I was just pointing out -- you

6 were drawing attention to a small sample size. I wanted to

7 draw attention to how we used that sample size.

8   MS. NORRIS: Okay. And we may be getting -- I still

9 don't understand, because you seem to be telling me different

10 things at different times, but I will move on to the -- about

11 is the sample size important or not because you are doing

12 calculations on small sample sizes.

13   DR. SALZBERG: Did you ask a question was sample size

14 important or not at some point that we answered?

15   MS. NORRIS: Well, his counter to my saying that

16 there were small sample sizes, but he said no, over here we're

17 using large ones. But I thought Mike was saying, well, sample

18 sizes wasn't really the issue in a feature functionality test.

19   MR. WEEKS: For evaluating functionality. You do not

20 need large sample sizes to evaluate functionality. You need

21 larger sample sizes to evaluate performance. And what --

22   MS. NORRIS: The table that you used, which was

23 preorder responsiveness, do you consider that a functionality

24 or something where you would need a sample size?

25   MR. WEEKS: I'm not being clear here. We were doing

1 a feature function test and reporting the average response

2 times observed in that feature function test as opposed to

3 designing a test whose purpose it was to test the company's

4 performance.

5   CHAIRMAN JABER: Ms. Norris, I have been patient.

6   MS. NORRIS: I'm done.

7   CHAIRMAN JABER: It's really okay. I don't want to

8 you think that. I have been patient because I thought that

9 there would be some benefit to the dialogue. I don't think

10 KPMG is answering inconsistently, I think you all are talking

11 past each other. But I don't mean that as a criticism.

12   What I want to offer all of you is I don't know what

13 prevents you from talking to KPMG independent of this workshop.

14 So I would encourage you to meet with them after this workshop

15 and flesh it out further. I hear the distinction KPMG is

16 trying to make, and it is that this particular table and that

17 particular test was designed to test the function and not the

18 performance.

19   MS. NORRIS: They just reported the performance even

20 though that was not what they were testing is what I'm hearing.

21 So I would need to go back and look and see if I concur with

22 what I'm hearing here or it may be that some other folks on the

23 panel have some follow-up questions.

24   CHAIRMAN JABER: Okay. But do flesh it out, it just

25 doesn't have to happen right now.

1   MS. AZORSKY: I do have some additional questions

2 about TVV1, but not about sample sizes.

3   CHAIRMAN JABER: Go ahead.

4   MS. AZORSKY: But first I would like to ask when

5 Doctor Bell was asking some questions about a footnote in

6 Appendix 2, you identified an error, and at one point this

7 morning another error in the report was identified. Just so

8 everybody knows what is going on, are there any other errors in

9 the report that have been identified since its publication that

10 presumably will be corrected when the next version comes out?

11   MR. WIRSCHING: There are a number of typographical

12 errors, probably too numerous to spend everybody's time on

13 today, but there are some errors. If there is something where

14 you have a question about and we recognize that that is an

15 error, we will point that out.

16   MS. AZORSKY: But has KPMG identified substantive

17 errors, things that were not reported properly that are in the

18 report?

19   MR. WIRSCHING: No, we have not.

20   MS. AZORSKY: Okay. I would like for you to turn for

21 a moment to TVV1-1-3, which is on POP-62. That evaluation

22 criteria was to identify whether LENS, one of the interfaces

23 provides expected order functionality, is that correct?

24   MR. WIRSCHING: That is the evaluation criteria.

25   MS. AZORSKY: And the determination was that

1 BellSouth had satisfied that criteria, correct?

2   MR. WIRSCHING: That is correct.

3   MS. AZORSKY: In the comments for that evaluation

4 criteria there is a reference to Exception 16, which is still

5 open, and what I'm trying to understand is based on your

6 statements earlier about open exceptions leading to unsatisfied

7 criteria, I'm trying to understand how if Exception 16 is still

8 open this criteria could have been satisfied.

9   MR. WIRSCHING: In our opinion, the workaround that

10 was provided was satisfactory for as -- as we look at the

11 criteria, it is overall LENS interface functionality. It's a

12 large criteria. That specific instance with the applicable

13 workaround in our opinion did not result in a not satisfied

14 criteria.

15   MS. AZORSKY: What was the applicable workaround?

16   MR. WIRSCHING: Can you hold on for a second? So

17 BellSouth has described a workaround where -- this issue just

18 for everyone to bring on the same page is on partial

19 migrations. And BellSouth has provided some instructions for a

20 CLEC to be able to provide service to their customers. In

21 addition, this change request has been prioritized by the CLECs

22 for implementation, I believe, and I think the priority number

23 that was last set on that was Number 10.

24   MS. AZORSKY: Did your decision that this test could

25 be satisfied even though Exception 16 was still open, was it

1 based at all on the fact that there was a pending change

2 request, Change Request 29?

3   MR. WIRSCHING: No.

4   MS. AZORSKY: It had nothing to do with the pendency

5 of that change request?

6   MR. WIRSCHING: No. There are a number of exceptions

7 that are open that have pending change requests.

8   MS. AZORSKY: I'm confused because it says Exception

9 16 remains open in your comments, and then it goes on to say

10 that the ALEC community prioritized Change Request 29 and it

11 won't be implemented during the test.

12   MR. WIRSCHING: That's what it says in the report.

13   MS. AZORSKY: So what significance did that statement

14 have for you, that is what I'm trying to understand?

15   MR. WIRSCHING: That was part of BellSouth's response

16 and we provided it for informational purposes.

17   MS. AZORSKY: So it's only informational purposes,

18 your decision had nothing to do with the pendency of that

19 change request?

20   MR. WIRSCHING: That is correct.

21   MS. AZORSKY: Turning to POP-106, the page number.

22 Does Table 1-19 reflect the last retest for evaluation criteria

23 TVV1-3-4?

24   MR. WIRSCHING: Hang on for one second.

25   MS. AZORSKY: Okay. 1-3-4 was whether BellSouth's

1   EDI interface provides fully mechanized firm order confirmation

2   responses within the agreed-upon interval.

3   MR. WIRSCHING: To answer your question, yes, it does

4   reflect that, but we also have some additional data that we

5   will be adding to it, but it doesn't change the results. In

6   other words, we had some additional completion of transactions.

7   MS. AZORSKY: So Table 1-19 is not complete?

8   MR. WIRSCHING: 1-19 has additional information. We

9   will be updating that.

10   MS. AZORSKY: Okay. I have no idea whether these

11 updates would affect -- let me back up. Is the applicable

12 standard in Florida for return of fully mechanized FOCs 95

13 percent within three hours?

14   MR. WIRSCHING: That is correct.

15   MS. AZORSKY: Now, if I look at this table, for UNE

16 loops it says that the percentage of FOCs received on time is

17 93.9 percent, not 95 percent. With that understanding, how was

18 this evaluation criteria satisfied?

19   MR. WIRSCHING: You're reading of the table is

20 correct, our evaluation criteria are applied at the aggregate

21 level for purposes of this test, which I think reflects back on

22 some of our earlier discussions.

23   MS. AZORSKY: So before when we were talking about

24 preordering and you talked about how you identified different

25 subprocesses, for ordering, when you did the ordering

1 evaluations your evaluation was based on aggregated numbers,

2 not individual product types, is that correct?

3   MR. WIRSCHING: That is correct.

4   MS. AZORSKY: Okay. So, for example, BellSouth could

5 have satisfied the criteria for timely return of firm order

6 confirmations even if through the test they did not timely

7 return firm order confirmations for UNE loops?

8   MR. WIRSCHING: That is correct.

9   MS. AZORSKY: Your summary statement at the

10 conclusion of TTV1 states that significant issues remain

11 unresolved in the TVV1 testing area. It's on POP-139. Are

12 there actions being taken to resolve any of those issues within

13 the confines of the test?

14   MR. WIRSCHING: My first answer would be those issues

15 are related to open exceptions, and each of those open

16 exceptions has some sort of activity occurring around it, I

17 believe. Would you like a listing of the exceptions and the

18 activities?

19   MS. AZORSKY: I just want to know if something is

20 being done to address all of the issues in those open

21 exceptions.

22   MR. WIRSCHING: We are going to have to go through a

23 list, then. Hang on. Of the applicable exceptions, Exception

24 16 has been scheduled for a system update on 8/25. Exception

25 161, we are a waiting a BellSouth response on those activities.

1   Exception 162, BellSouth has provided us with new

2   documentation, we are currently retesting that. And Exception

3   165, we are still waiting for a BellSouth response on that.

4   MS. AZORSKY: Are there any of these open exceptions

5   for which additional retesting will not occur?

6   MR. WIRSCHING: We have no plans for retesting on any

7   of these, save the CENTREX, which we are currently in

8   retesting, so that would be Exception 162.

9   MS. AZORSKY: So do I understand that whatever you

10   get from BellSouth or whenever the system update is completed,

11   you will evaluate that information and make a decision whether

12   you can close the exception or not?

13   MR. WIRSCHING: At this point if there is no

14   retesting scheduled and those are not satisfied, that is how it

15   will appear in the final report.

16   MS. AZORSKY: Okay. Thank you. So the not

17   satisfieds that we see in TVV1 will likely not change?

18   MR. WIRSCHING: With the exception of the one around

19   CENTREX where testing is occurring.

20   MS. AZORSKY: Okay. Moving on to TVV2. There are a

21   number of tests in TVV-2, including the tests that are listed

22   on the top of Page 9 of the questions we submitted previously,

23   so I'm not going to read through those numbers. If the

24   Commissioners and the staff would like to look at those

25   questions, it is the second paragraph on the top of Page 9.

1   But for those tests, KPMG created a different standard than the

2   Florida Commission standard of parity plus two seconds, is that

3   correct?

4   MR. WIRSCHING: We applied our own standard. I

5   wouldn't say that we created a standard. We used our

6   professional judgment that a 10 second preorder response in

7   these circumstances would be sufficient.

8   MS. AZORSKY: So you applied a 10 second number

9   instead of parity plus two seconds?

10   MR. WIRSCHING: That is correct.

11   MS. AZORSKY: Are all of these preorder inquiries?

12   MR. WIRSCHING: Let me check with my team.

13   That is correct.

14   MS. AZORSKY: Did KPMG go through some process to

15   determine how many preordering transactions an ALEC performed

16   for one order?

17   MR. WIRSCHING: Yes, we did. We looked at historical

18   data and we also asked for that information in CLEC surveys

19   forecasts.

20   MS. AZORSKY: And did you reach your own conclusions

21   from the historical information and the information you

22   received from ALECs?

23   MR. WIRSCHING: Yes, we did.

24   MS. AZORSKY: What historic ALEC ordering data did

25   you use?

1   MR. WIRSCHING: It was data provided by BellSouth.

2   MS. AZORSKY: Did you independently verify that data?

3   MR. WIRSCHING: No, we did not.

4   MS. AZORSKY: When you set your test bed for the

5   scenarios that you used for the test, did you consider the

6   volumes of orders that go through the separate BellSouth

7   systems, for example, EDI versus LENS?

8   MR. WIRSCHING: Yes, we did.

9   MS. AZORSKY: Where did you get the information to

10 make those determinations?

11   MR. WIRSCHING: We had two sources of information and

12 specifically around the volume test I assume you are asking,

13 which is TVV2?

14   MS. AZORSKY: Yes.

15   MR. WIRSCHING: We had two pieces of data that we

16 used for forecasting volumes through specific interfaces, one

17 was the historical and forecast data provided by BellSouth, and

18 also the other piece of data was forecast data provided by the

19 ALECs.

20   MS. AZORSKY: And how did you review that information

21 to make your determinations?

22   MR. WIRSCHING: The way we developed our volume

23 forecast was to develop historical trends, extrapolate those

24 trends, apply the two forecasts, and do a best fit methodology

25 to determine.

1   MS. AZORSKY: Did you at any time during the test

2   look at current commercial volumes to modify the historical

3   estimates?

4   MR. WIRSCHING: As current commercial volumes became

5   available during the testing, we validated that that projection

6   was within a reasonable amount of the current volumes. And

7   several times we updated our forecast based on history and new

8   forecasts from the ALECs.

9   MS. AZORSKY: When is the last time you did such an

10   update?

11   MR. WIRSCHING: Hang on for one second, we will give

12   you the date. The latest update was February 2002.

13   MS. AZORSKY: When you conducted the volume test in

14   TVV2, you considered, didn't you, you had tests that looked at

15   the timeliness of responses?

16   MR. WIRSCHING: Yes.

17   MS. AZORSKY: And that was part of doing the test to

18   see if you could still get timely responses at a certain

19   volume, correct?

20   MR. WIRSCHING: That is correct.

21   MS. AZORSKY: And if you could turn to TVV2-3-8,

22   which is on Page POP-178. The evaluation criteria is

23   BellSouth's TAG interface provides timely responses to parsed

24   customer service record query preorders, and it is satisfied.

25   But when I look at your comments, it talks about the average

1 interval for receipt of these queries during stress volume

2 retesting on April 25th, 2002 was 20.43 seconds, while the

3 BellSouth equivalent, or the BellSouth parity standard was

4 1.18. In that scenario, how was the evaluation criteria

5 satisfied?

6   MR. WEEKS: There are two parts to the answer to that

7 question. Number one is a stress test isn't designed to be

8 passed or failed, it is diagnostic information. What we are

9 looking for as we do a volume test is we do a normal volume and

10 we look at the company's performance, we do a peak volume, we

11 look at the company's performance. The company can pass or

12 fail the normal test or a peak test. They can't fail a stress

13 test. What we are trying to find in a stress test -- well, I

14 guess you could have such disastrous results that you might

15 suggest that it is a problem, but a stress test isn't pass or

16 fail, it is diagnostic information.

17   The second thing that is true is that in looking at

18 retail data today using today's volumes and comparing that with

19 stress volumes in the wholesale operation during the stress

20 test, which is volumes much into the future, you are comparing

21 apples and oranges. We didn't run a stress test on the retail

22 test in parallel or in retail systems in parallel with the

23 stress test on the wholesale systems, so we can't really say

24 what the retail systems would have performed had they been

25 under their retail stress levels, so you are comparing apples

1   and oranges there.

2   MS. AZORSKY: Well, I'm curious as to why this

3   information even appears, then.

4   MR. WEEKS: It is diagnostic, as I have said. We

5   were trying to describe what we saw at the time. We are

6   finders of fact.

7   MR. WIRSCHING: And maybe to elaborate a little bit,

8   the PCSRQ query wasn't available while we were doing any of our

9   other volume tests. It's a fairly recent decision. Florida

10   staff asked us to add it to the volume testing if possible. By

11   the time we had developed a functionality, the only available

12   date was for stress testing.

13   MS. AZORSKY: So in terms of this test, KPMG did not

14   evaluate the timeliness of the return of parsed customer

15   service record inquiries at normal or peak volume?

16   MR. WIRSCHING: No. We do have some visibility into

17   what that performance would be by looking at the volume of

18   stress. Our stress test methodology is to step up the volume

19   hour-by-hour. And when we looked at the hour-by-hour results

20   and the first hour is roughly equivalent to normal, to the top

21   hour of normal of peak, I'm sorry, to the top hour of peak, the

22   BellSouth performance was -- it was less than six seconds. So

23   it gives us some visibility into performance.

24   MS. NORRIS: Is that information somewhere in the

25   report, too, that you guys are just describing? Is it also in

1   the report or do we just --

2   MR. WIRSCHING: No, it's not in the report.

3   MR. WEEKS: We can add that if it would be helpful.

4   MR. WIRSCHING: We will make sure that happens.

5   MS. AZORSKY: On various pages of the report in the

6   section on both TVV1 and TVV2 there are a number of footnotes,

7   and they appear on POP-92, 97. You can just look at 92 as an

8   example where it states -- Footnote 150 on Page 92 is an

9   example, and this footnote appears more than once. KPMG

10   Consulting used December 2001 through January 2002 RSAG ADDR

11   data to measure AVQ response timeliness due to BellSouth

12   abnormal parity data for RSAG ADDR for February 2002. What is

13   the abnormal parity data?

14   MR. WIRSCHING: As we looked at the parity data it

15   was abnormally high. I believe one of the measures was 1300

16   seconds, the other one was 1400 seconds. As we dug back into

17   that and requested some information from BellSouth, they

18   informed us that there had been some outliers in their data

19   that forced this data high. As any standard would have been a

20   parity plus on the SQM or in our own analysis, we realized that

21   a parity plus two seconds of 1402 seconds was probably not a

22   fair way to judge this, so what we did is we worked back in

23   time until we found a reasonable parity measure.

24   MS. AZORSKY: Do you know whether this abnormal

25   parity data was used for the parity evaluations under

1 BellSouth's SQM in Florida?

2 MR. WIRSCHING: It is available and actually shows up

3 in the commercial data review for both the months of February

4 and March, I believe.

5 MS. AZORSKY: Okay. So that abnormal parity data is

6 included in the information you have reported in Appendix G?

7 MR. WIRSCHING: For commercial, yes, it is.

8 MS. AZORSKY: Okay. Did BellSouth give you any

9 reasons this abnormal parity data existed?

10 MR. WIRSCHING: I don't believe so, besides they

11 mentioned that there were outliers in their data and we are not

12 sure. We didn't go to root cause analysis on that.

13 MS. AZORSKY: Did you remove this data in any way in

14 doing your analysis under Appendix G?

15 MR. WIRSCHING: No, we left Appendix G data just as

16 it was presented.

17 MR. BELL: This is Bob Bell, again. I have a few

18 questions concerning P values. In various places BellSouth

19 fails to meet on the face of it a benchmark standard, and you

20 compute a P value and use that to determine that a criterion is

21 satisfied. For example, one example is Footnote 237, and I'm

22 not sure which page that is on.

23 MR. WEEKS: I believe that is Page POP-193.

24 MR. BELL: 193, yes. Is that correct?

25 MR. WEEKS: It is correct that we did that, yes.

1   MR. BELL: Could you describe the use of P values and

2 how the P value is used in those situations?

3   MR. WEEKS: I think I described a layman's definition

4 of P values and how we used them earlier. I will turn it over

5 to Mr. Salzberg to give us a statistical definition of P value.

6   DR. SALZBERG: I will start by giving a description

7 of the P value and then we can go from there. The P value is a

8 statistical diagnostic that allows you to determine whether

9 you -- let me actually back up. When you are doing statistical

10 testing you usually set up what is called a null hypothesis and

11 what is called an alternative hypothesis. When you do your

12 statistical analysis, one of the diagnostics that you come up

13 with is called a P value. That gives you the strength in one

14 sense, the strength of the evidence that you use to decide

15 whether you are going to reject the null hypothesis. In our

16 case, the way this test was designed, you would reject the null

17 hypothesis that BellSouth is meeting the standard if the P

18 value is less than .05.

19   MR. BELL: Okay. And in the particular situations I

20 was looking at, the P value was greater than .05, the

21 situations where a conclusion was made that the standard was

22 satisfied, is that correct?

23   DR. SALZBERG: That is correct.

24   MR. BELL: And so how would you characterize the

25 evidence that the P value gives you in those situations?

1   DR. SALZBERG: In those situations, the P value would

2 tell you whether you were close to failing the hypothesis. It

3 is confounded by other factors, such as the sample size. And

4 what I mean by that is you might get a high P value because you

5 have a really small sample size. That doesn't necessarily tell

6 you that you have strong evidence that the null hypothesis is

7 right, what it tells you is you have weak evidence that the

8 null hypothesis is wrong.

9   MR. BELL: Okay. So would it be correct to

10 characterize that what a P value of greater than .05 is telling

11 you is that you lack the evidence to say that BellSouth is not

12 meeting the standard.

13   DR. SALZBERG: I think that is fair.

14   MR. BELL: Okay. Does the P value tell you anything

15 about whether or not BellSouth might be doing much worse than

16 the standard?

17   DR. SALZBERG: Yes, it tells you something about

18 that. If the P value is high, then it is indicating that you

19 don't have evidence that it is much worse than the standard.

20 But you need to look at -- you would want to look at other

21 factors, too. You want to make sure that your sample size is

22 sufficient and that kind of thing.

23   MR. BELL: But simply looking at a P value, let's say

24 that the benchmark was 99 percent and the observed value was 98

25 percent. Would the P values, per se, tell you whether or not

1 the sort of underlying rate that you would observe if you had

2 unlimited data, would it tell you, per se, whether that rate

3 might be as low as 90 percent?

4   DR. SALZBERG: Well, with the information you gave me

5 you could figure that out because you know what the actual

6 result is, you know what the P value is, you know what the

7 standard is. You could figure out what the confidence interval

8 is from those three things. So you could figure that out. But

9 I don't think most people would go through that. It would be

10 an exercise to figure that out. I don't think you would -- on

11 the face of it you wouldn't see that.

12   MR. BELL: So did the analyses that KPMG performed to

13 determine whether or not the standards were satisfied, did you

14 go through such an analysis like that?

15   DR. SALZBERG: Well, I want to answer that in part

16 and let my colleagues answer that, as well. From my part of

17 it, I tried to look at whether the sample size was sufficient.

18 When we had P values that -- when we had situations where the

19 test result was below some standard and we did statistical

20 testing, I tried to look at the sample size to make sure it was

21 sufficient. And there might have been other factors leading up

22 to that, so --

23   MR. WIRSCHING: If I understand your question, you

24 are asking us if we used confidence intervals, is that the

25 question?

1   MR. BELL: I mean, that would be another way of

2 asking the question. I didn't ask specifically that.

3   MR. WIRSCHING: I was just trying to simplify a

4 little bit.

5   MS. AZORSKY: You could answer that question, though.

6   DR. SALZBERG: We didn't determine confidence

7 intervals, per se.

8   MR. BELL: And why is that?

9   DR. SALZBERG: Because we did the analysis we need to

10 do to determine the result of the test, which is the P value

11 was enough for that. And then you can look at the sample size

12 to see if we have the power that we wanted to get.

13   MR. BELL: But you didn't report anything about

14 what -- you didn't report, say anywhere in the report -- give

15 any indication of how poor the underlying performance might be

16 associated with a particular test, is that correct?

17   MR. WEEKS: I think that is correct. I think what we

18 were trying to do is develop the null hypothesis that the

19 standard was being met. Do a sufficient amount of testing to

20 collect enough data so that the power of the test given the

21 sample size and the P value analysis which would tell us

22 whether or not the evidence suggested, you know, that we had

23 enough evidence to reject the null was there or not.

24   That was sufficient for us to say in our mind, in our

25 professional judgment the system was operating at the level of

1 risk we were willing to accept. Operating at a level that was

2 acceptable for the purposes of the test. What we didn't choose

3 to do and haven't chosen to do in any of the other tests that I

4 am familiar with is engage in additional analysis that would

5 try to quantify what the true performance might have been given

6 what we saw in the sample. The range that it might have been.

7   MR. BELL: Okay. I wanted to ask a couple of

8 questions about something, one specific test procedure that is

9 described in Appendix A on Page A5. In the second paragraph on

10 that page it talks about benchmark tests for intervals. The

11 first sentence talks about benchmark tests for intervals where

12 the sample size was above 200. And then my interest is in the

13 second paragraph, the second sentence of that paragraph that

14 talks about benchmark tests where the sample size is below 200.

15 And what it says here is that a binomial test was used and the

16 null hypothesis will assume the median of the data equals the

17 benchmark, is that correct?

18   DR. SALZBERG: That is correct. We were having kind

19 of a side bar conversation about whether we actually used that,

20 whether there was a situation where we had, where we used this

21 test. But kind of anticipating that question, as well.

22   MR. BELL: Okay. Well, in that case I will try to --

23   MR. WEEKS: I think Appendix A, just for

24 clarification, was sort of the statistical design that was

25 articulated before the beginning of the test, so we were trying

1 to determine how we would deal with this situation should we

2 encounter it.

3   MR. BELL: Okay. That would explain the will in

4 there. It looks prospective.

5   MR. WEEKS: Agreed. The sentence is poorly

6 constructed.

7   MR. BELL: That's no problem. Let me sort of quickly

8 ask for data of this sort, would it be your expectation that in

9 general the median from a sample might well be much less than

10 the mean for that sample?

11   DR. SALZBERG: I think the median is going to be less

12 than the mean in general for this kind of data.

13   MR. BELL: Okay. Thank you.

14   MS. AZORSKY: On that note we are going to leave TVV2

15 and move on to TVV3.

16   MR. BRADBURY: TVV3 is concerned with the order

17 flow-through evaluation. And, David, I would like to ask you

18 just at the beginning to describe briefly what the order

19 flow-through evaluation was, because I think it is important

20 for everybody to understand that it was limited to KPMG's test

21 CLEC experience.

22   MR. WIRSCHING: Yes, it was only KPMG test CLEC

23 experience.

24   MR. BRADBURY: And so that experience would have been

25 unique to the State of Florida?

1   MR. WIRSCHING: Yes.

2   MR. BRADBURY: Okay. On Page POP-268, down under

3   Item 3.4, data generation and volumes, the second bullet down

4   there talks about KPMG Consulting generated test transactions

5   as part of the POP functional evaluation using unique purchase

6   order numbers. And that information for those PONS was

7   gathered for this test. Could you describe the uniqueness of

8   the purchase order numbers?

9   MR. WIRSCHING: Hang on for one second. While they

10   are caucusing, I will ask a clarifying question of your

11   question.

12   MR. BRADBURY: Sure.

13   MR. WIRSCHING: Are you asking us to define in what

14   way they were unique?

15   MR. BRADBURY: In what way they were unique and why

16   unique purchase order numbers were used.

17   MR. WEEKS: I would have the same question.

18   MR. WIRSCHING: That was a poor word choice on our

19   part. They are actually distinct, not unique.

20   MR. WEEKS: No number was reused during the course of

21   the test if that helps.

22   MR. BRADBURY: Is that all that it means?

23   MR. WEEKS: That is all that it means.

24   MR. WIRSCHING: That is all that it means.

25   MR. BRADBURY: Okay. Thank you. The next bullet

1 down on that very same page, you talk about that BellSouth

2 generated a set of reports. And then in the footnote at the

3 bottom you indicate that there was a combination of standard

4 reports that all CLECs and ALECs get, in other words, the LSR

5 detail report, and then some weekly reports that were uniquely

6 provided to KPMG.

7 Several times during the course of the discussion in

8 the weekly calls it was indicated that the situation happened

9 where KPMG would make an evaluation based upon the weekly

10 reports that it received that nonflow-through had occurred.

11 And that subsequently they would receive some additional report

12 that for that very same PON, in fact, flow-through had

13 occurred. Part of the explanation that I heard a number of

14 times was that, well, there is a passage of time and sometimes

15 what I get on that weekly report doesn't tell me the

16 disposition of the item.

17 My question is a disposition of nonflow-through takes

18 longer and has a different thing. Typically its a reject or

19 maybe anywhere from 15 minutes to several hours or days. A

20 determination of flow-through is almost always within 15

21 minutes. How was this weekly report wrong that number of

22 times?

23 MR. WIRSCHING: First of all, I think a lot of the

24 problems were due to the nature this was an ad hoc report that

25 was created especially for KPMG Consulting, especially for the

1 purposes of this test. And so I believe a lot of the

2 classifications that were applied BellSouth was not using its

3 regular classification methodology which they used for the

4 monthly LSR detail report. And, therefore, that caused some

5 issues with the data we received.

6 Now, as an added check for verification, we compared

7 every weekly report with the monthly LSR detail report. The

8 results you see in this report are based on the monthly LSR

9 detail report, not on the weekly reports. The weekly reports

10 were used for us as test administrators in order to provide

11 quicker diagnostic information.

12 MR. BRADBURY: Okay. Thank you very much. Is KPMG

13 aware that BellSouth has produced state specific flow-through

14 information as a result of discovery in the State of Tennessee?

15 MR. WIRSCHING: Yes, we are aware of that.

16 MR. BRADBURY: Did you make any use of that data in

17 your testing here?

18 MR. WIRSCHING: No, we did not.

19 MR. BRADBURY: So as you closed Exception 88 for

20 residential resale found by KPMG in Florida, did you not

21 compare your result of 94 percent to the state-specific result

22 for that same item of 80 percent?

23 MR. WIRSCHING: Just a quick clarification, that was

24 Exception 86.

25 MR. BRADBURY: 86, I'm sorry.

1   MR. WIRSCHING: And to close our exception, again, we

2   based it on our own experience, not on the commercial data.

3   MR. BRADBURY: Okay. And similarly then you wouldn't

4   have compared the business result that you found of 91.37

5   percent to the state-specific reported result of 68 percent?

6   MR. WIRSCHING: No, we would not.

7   MR. BRADBURY: Okay. I notice in the front section

8   of this you do have some good description of the BellSouth

9   wholesale process. Some diagrams of TAG, EDI, LEO, LESOG, et

10   cetera. I notice, however, that back on POP Page 278 where you

11   describe the parity evaluation, there is no similar discussion

12   or diagraming of the BellSouth retail system involving the ROS

13   and RNS systems. Did you have access to information about

14   those systems?

15   MR. WIRSCHING: Yes, we did.

16   MR. BRADBURY: Do you think it would be useful to

17   this Commission to know the differences in how those systems

18   operate compared to how the systems used in the wholesale side

19   operate?

20   MR. WIRSCHING: I think our plain language

21   description pretty much covers the differences here. ALECs use

22   the industry standard LSR format to submit wholesale orders via

23   electronic interfaces. It requires a translation process.

24   Since retail orders do not require a translation process,

25   retail orders do not experience fallout that can be compared to

1 the fallout experienced by wholesale orders.

2 　　　　MR. BRADBURY: And how did you determine that retail

3 orders do not have a translation process or fallout?

4 　　　　MR. WIRSCHING: Through observation of people in the

5 retail service centers inputting orders.

6 　　　　MR. BRADBURY: Okay. So specific to the ROS

7 system -- not ROS, the regional negotiation system, the RNS

8 system which is used in BellSouth's residence and small

9 business centers, permanent residence, I think, are you

10 familiar with the system known as FUEL, F-U-E-L, or the system

11 known as SOLAR, S-O-L-A-R?

12 　　　　MR. WIRSCHING: Hang on. No, we are not.

13 　　　　MR. BRADBURY: So you would not know the purpose of

14 those systems in processing RNS's orders?

15 　　　　MR. WIRSCHING: No, we do not.

16 　　　　MR. BRADBURY: So it would be a surprise to you that

17 the purpose of the FUEL system is to edit the service

18 representative's input from RNS before sending to SOCS, or that

19 the purpose of SOLAR is to translate the service

20 representative's RNS input into a service order format prior to

21 transmittal to SOCS? You did not discover that in your

22 investigation of the retail system?

23 　　　　MR. WIRSCHING: No, we weren't aware of those systems

24 and their functions.

25 　　　　MR. BRADBURY: Did you also become aware of the

1 center known as the trouble and error resolution center?

2   MR. WIRSCHING: No.

3   MR. BRADBURY: Specific to ROS, are you familiar with

4 what the system does when service representatives use the apply

5 icon?

6   MR. WIRSCHING: No, we didn't do a detailed analysis

7 of the system, the ROS system.

8   MR. BRADBURY: Or the validate icon?

9   MR. WIRSCHING: No.

10   MR. BRADBURY: Or the service order editor function?

11   MR. WIRSCHING: No.

12   MS. AZORSKY: Just to follow up on some of

13 Mr. Bradbury's questions, KPMG also in a summary for the TVV3

14 testing area expressed the opinion that significant issues

15 remain unresolved in the TVV3 testing area. Is additional

16 testing planned for any of the issues that are not satisfied in

17 the TVV3 testing area?

18   MR. WIRSCHING: There is no additional testing

19 planned.

20   MS. AZORSKY: So things that are not satisfied in the

21 TVV3 testing area will remain not satisfied?

22   MR. WIRSCHING: That is correct.

23   MS. AZORSKY: I have a few questions about the

24 provisioning section of the report. With regard to PPR-6, we

25 talked earlier about how there were some tests that looked at

1 documentation, some tests looked at the adequacy of the

2 documentation, but you didn't look at adherence to the

3 documentation. Do you recall that discussion?

4   MR. WEEKS: I remember that discussion in the context

5 it was held in, yes.

6   MS. AZORSKY: Okay. Well, with regard to PPR-6, was

7 PPR-6 an evaluation of whether the standards existed, or was it

8 an evaluation of whether the standards were adequate, or was it

9 both?

10   MR. WEEKS: In this test we looked for existence. We

11 looked for well-formedness and we examined some historical

12 artifacts of previous collos and NDRs and so on to see if those

13 artifacts, work products of the previous activities suggested

14 that the process had been followed. But we didn't look at any

15 in flight, because of the nature of these projects that go on

16 for a long period of time we didn't follow any of the current

17 ones from like cradle to grave.

18   MS. AZORSKY: So you did not follow any projects from

19 cradle to grave for purposes of doing your evaluations in

20 PPR-6?

21   MR. WEEKS: For any of the applicants. We did look

22 at some that had been completed and we looked at the

23 documentation that had been generated as a by-product of having

24 gone through that process in the past.

25   MS. AZORSKY: For how many of the tests in PPR-6 did

1 you actually look at adherence to the processes that were out

2 there? Was it just collocation or was it anything else?

3 　　　　　MR. WIRSCHING: As Mr. Weeks said, we looked at

4 adherence through historical artifacts wherever possible, and I

5 think for all of these we asked and received historical

6 artifacts.

7 　　　　　MS. AZORSKY: Who did you receive those historical

8 artifacts from?

9 　　　　　MR. WIRSCHING: BellSouth.

10 　　　　　MS. AZORSKY: Did you independently verify the

11 accuracy of the information that you received that you are

12 referring to as historical artifacts?

13 　　　　　MR. WIRSCHING: We did not.

14 　　　　　MS. AZORSKY: Okay. Looking at PPR-9, specifically

15 PPR9-2 in which the report states that both wholesale and

16 retail orders are prioritized according to due date and without

17 regard to whether they are wholesale or retail. How did KPMG

18 conduct -- or strike that. Did KPMG also conduct an analysis

19 to assess the parity of due date assignments, who got the

20 better due date?

21 　　　　　MR. WIRSCHING: We didn't conduct that kind of

22 assignment. I don't think that there is a -- the process works

23 where who gets a better due date. They each have their own

24 interval sets.

25 　　　　　MS. AZORSKY: So you did not analyze whether the

1 wholesale orders have different interval sets than retail

2 orders?

3   MR. WIRSCHING: That is correct.

4   MS. AZORSKY: In determining that evaluation criteria

5 PPR9-11 was satisfied, KPMG found that the order processing

6 centers were staffed with personnel who had comparable skills

7 for wholesale and retail. Did you analyze what was the average

8 length of service of the people who worked in wholesale versus

9 retail?

10   MR. WIRSCHING: No, we did not. We didn't think that

11 was a key component.

12   MS. AZORSKY: Did you analyze how they were trained

13 and compensated?

14   MR. WIRSCHING: We did look at training, but we

15 didn't look at compensation.

16   MS. AZORSKY: What factors did you look at to make

17 the determination that the personnel had comparable skills?

18 You didn't look at compensation, you didn't look at length of

19 service. What things did you look at?

20   CHAIRMAN JABER: Ms. Azorsky, while they are doing

21 that, just to give you a better guide of how much time you

22 have --

23   MS. AZORSKY: Based on the answer to this question, I

24 will fly through the next two pages of issues that are on these

25 lists.

1   CHAIRMAN JABER: Okay. Good. I just wanted to give

2   you a heads-up that we are going to stay on the schedule.

3   MS. AZORSKY: I believe we will. In fact, we should

4   stay ahead of schedule, hopefully.

5   MR. WEEKS: I think in most cases what we discovered

6   is that the same people handled both wholesale and retail, so

7   by definition the skill sets were the same. In talking with

8   the team here, I think what we attempted to do was look at the

9   training programs that were in place and the skills that would

10   be required to master and participate in those training

11   programs and we found parity at that level. We didn't do an

12   assessment of individual reps' skills to assess who had what

13   skills in some sort of test.

14   MS. AZORSKY: Did I understand you to say that the

15   same people for the ordering centers, the same people worked on

16   retail orders that worked on wholesale orders?

17   MR. WEEKS: In the provisioning centers, not in the

18   ordering centers.

19   MS. AZORSKY: In the provisioning centers, okay. I

20   just wanted to be clear. So you looked at the training, but

21   you did not evaluate the individual skill sets of the people in

22   the retail center versus the wholesale center?

23   MR. WEEKS: Correct. We didn't take anybody off line

24   and test their skills.

25   MS. AZORSKY: Okay. And you also did not do that for

1 the problem resolution center that was tested by PPR9-17?

2   MR. WEEKS: Correct.

3   MS. AZORSKY: Or the facilities centers that were

4 tested by PPR9-20?

5   MR. WEEKS: Correct.

6   MS. AZORSKY: Or the engineering centers that were

7 tested by PPR9-23?

8   MR. WEEKS: We didn't do that in any of the center

9 evaluations. We didn't take people away and assess their

10 skills.

11   MS. AZORSKY: So that would also be true for 9-26 and

12 9-29?

13   MR. WEEKS: Correct.

14   MS. AZORSKY: Okay. In determining that PPR9-31 was

15 satisfied, KPMG found that the methods and procedures in the

16 order processing centers for provisioning are comparable for

17 retail and wholesale. Did you take any steps to determine

18 whether the agents in those order processing centers followed

19 the methods and procedures in similar ways?

20   MR. WIRSCHING: During our center visits we did

21 observations of the representatives conducting their daily

22 routines in handling issues and using the M&Ps to conduct those

23 interactions.

24   MS. AZORSKY: Did you do a specific evaluation of the

25 provisioning activities and a comparison of the similar types

1 of activities in one center -- in the wholesale center versus

2 the retail center?

3   MR. WIRSCHING: Could you rephrase that?

4   MS. AZORSKY: Did you watch an activity, a similar

5 activity that would occur in retail and would occur in

6 wholesale, provisioning activity from start to finish and

7 compare the two between the two centers?

8   MR. WIRSCHING: Comparing what basis, step-by-step?

9   MS. AZORSKY: Step-by-step how they were performed,

10 the timeliness, the pleasantness of the people that were

11 handling them, all of those things?

12   MR. WEEKS: Did they dress the same.

13   MS. AZORSKY: Did they dress the same, whatever.

14   MR. WEEKS: I think the best answer to your question

15 is that while we looked at each set of M&Ps and we observed

16 each set of M&Ps in operation through our observations, we

17 didn't explicitly try to compare and contrast each individual

18 step in its execution between wholesale and retail at the level

19 I think you are implying.

20   MS. AZORSKY: And you didn't do that for any of the

21 other centers, either, the facilities center, the engineering

22 center, the dispatch centers, or the inventory centers, is that

23 accurate?

24   MR. WEEKS: That would be correct.

25   MS. AZORSKY: KPMG concluded that BellSouth did not

1 satisfy TVV4-1 and Exception 171 remains open, is that right?

2 　　　　　　MR. WIRSCHING: That is correct.

3 　　　　　　MS. AZORSKY: Is BellSouth making any modifications

4 in order to correct the items that were identified by Exception

5 171?

6 　　　　　　MR. WIRSCHING: In BellSouth's response to Exception

7 171 they provided us with information that their -- in Issue

8 Number 2, which is on Page 13 of 13, BellSouth will also open a

9 change request to include the community name when appropriate

10 for REQTYP J/ACT N orders to address remaining two items.

11 　　　　　　MS. AZORSKY: And will there be a retest of that

12 issue?

13 　　　　　　MR. WIRSCHING: There is no retest planned.

14 　　　　　　MS. AZORSKY: So will the TVV4-1 remain not

15 satisfied?

16 　　　　　　MR. WIRSCHING: That is correct.

17 　　　　　　MS. AZORSKY: Similarly, TVV4-3, BellSouth

18 provisioning of switch translations was not satisfied and

19 Exception 84 remains open, is that correct?

20 　　　　　　MR. WIRSCHING: That is correct.

21 　　　　　　MS. AZORSKY: Can you explain what impact or did this

22 have an impact on KPMG as a pseudo-ALEC with your pseudo-ALEC

23 hat on?

24 　　　　　　MR. WIRSCHING: Allow me to read from the impact

25 statement on the exception.

1   MS. AZORSKY: Absolutely.

2   MR. WIRSCHING: BellSouth's inability to accurately

3   provision or remove services and/or features may result in

4   decreased CLEC customer satisfaction.

5   MS. AZORSKY: Okay. Has BellSouth made any

6   corrections to correct the deficiencies identified by Exception

7   84?

8   MR. WIRSCHING: Yes, I believe BellSouth's response

9   details several actions that they are planning on taking.

10   MS. AZORSKY: That they are planning to take?

11   MR. WIRSCHING: I believe so.

12   MS. AZORSKY: So KPMG has not evaluated whether those

13 actions will, in fact, correct the issue?

14   MR. WIRSCHING: No, there is no retesting occurring

15 in this area.

16   MS. AZORSKY: For evaluation criteria TVV4-14 on

17 provisioning Page 64, KPMG stated that BellSouth met the hot

18 cut circuit percent installation appointment parity performance

19 requirement, is that correct?

20   MR. WIRSCHING: That is correct.

21   MS. AZORSKY: And I believe in the comments it says

22 that what that means is BellSouth provisioned 98.6 percent of

23 the hot cuts on the scheduled due date, is that correct?

24   MR. WIRSCHING: I think that might be a little bit of

25 a simplification of the SQM, but in essence that is correct.

1   MS. AZORSKY: Okay. Did KPMG analyze BellSouth's

2   performance on time-specific hot cuts, not just ones performed

3   on the day ordered, but ones ordered at specific times?

4   MR. WIRSCHING: Yes, we did.

5   MS. AZORSKY: And does that appear as a different

6   evaluation?

7   MR. WIRSCHING: Actually it is part of this

8   evaluation criteria. As you notice, we didn't disaggregate

9   between time-specific and nontime-specific hot cuts. There are

10   actually 128 time-specific hot cuts. Of those 128, two were

11   failures for a performance rate of 98.4 percent.

12   MS. AZORSKY: Okay. In determining that BellSouth

13   satisfied TVV4-23, which measured whether BellSouth service

14   order completion notices accurately reflect the completion

15   notice due date, did KPMG evaluate the interval between the

16   completion of the order and the time BellSouth sent the

17   completion notice?

18   MR. WIRSCHING: No, we did not.

19   MS. AZORSKY: So all you looked at was to see if they

20   were accurate, not how long it took BellSouth to send them?

21   MR. WIRSCHING: That is correct.

22   MS. AZORSKY: In TVV4-24, which looked at whether

23   BellSouth post order customer service records contain accurate

24   information, KPMG determined that BellSouth satisfied that

25   test, correct?

1   MR. WIRSCHING: That is correct.

2   MS. AZORSKY: And, again, that evaluation was whether

3   they contained the information. Did you measure how long it

4   took BellSouth to complete the update?

5   MR. WIRSCHING: No, we did not.

6   MS. AZORSKY: On TVV4-28, KPMG concluded that

7   BellSouth does not properly provision switch translations and

8   update customer service records, is that correct?

9   MR. WIRSCHING: That is correct.

10   MS. AZORSKY: What impact did this deficiency have on

11 KPMG as a pseudo-ALEC?

12   MR. WIRSCHING: Again, I will read from our impact

13 statement. BellSouth's inability to accurately provision or

14 remove services and/or features may result in decreased CLEC

15 customer satisfaction.

16   MS. AZORSKY: Will a retest of that TVV4-28

17 evaluation criteria be conducted?

18   MR. WIRSCHING: There is no retest planned.

19   MS. AZORSKY: So TVV4-28, which could result in

20 decreased customer satisfaction for CLEC customers, will remain

21 not satisfied, is that correct?

22   MR. WIRSCHING: That is correct. That evaluation

23 criteria will remain not satisfied.

24   MS. AZORSKY: There were tests in the provisioning

25 section, TVV4-5, 6, 7, 8, 9, 10, and 39 which said that testing

1 is in progress. Why is that testing not complete?

2 MR. WIRSCHING: We were waiting for BellSouth to

3 provide us with comparable retail data for our parity

4 evaluation. And since the publication of this report the data

5 has been provided for all the criteria except TVV4-9 and

6 TVV4-10, all of which those criteria save 9 and 10 are

7 satisfied.

8 MS. AZORSKY: At the end of TVV4, the report states

9 that significant issues remain unresolved in the TVV4 testing

10 area, correct?

11 MR. WIRSCHING: That is correct.

12 MS. AZORSKY: And as you will be doing no more

13 testing, that conclusion will not change, will it?

14 MR. WIRSCHING: That is correct.

15 MS. AZORSKY: Maintenance and repair.

16 MR. BRADBURY: Maintenance and repair. In both --

17 MR. WIRSCHING: Would the chair entertain a quick

18 break?

19 CHAIRMAN JABER: Let's take a ten-minute break.

20 (Recess.)

21 CHAIRMAN JABER: Let's go ahead. Maintenance and

22 repair, Mr. Bradbury.

23 MR. BRADBURY: Yes, ma'am.

24 CHAIRMAN JABER: This is the part that is supposed to

25 fly by.

1   MR. BRADBURY: Well, I am going to make that my goal.

2 In both the executive summary and in the PPR maintenance and

3 repair tests you indicate that there are some 52 evaluation

4 criteria that KPMG is unable to assess the current performance

5 of the underlying systems. Is that predominately because of

6 the age of the data?

7   MR. WIRSCHING: That is correct.

8   MR. BRADBURY: As that data has been aging, have

9 there been underlying systems and process modifications?

10   MR. WIRSCHING: Yes, there have.

11   MR. BRADBURY: And can you estimate or describe what

12 impact those modifications might have on current performance?

13   MR. WIRSCHING: No, we couldn't without testing.

14   MR. BRADBURY: And no testing is proposed?

15   MR. WIRSCHING: That is correct.

16   MR. BRADBURY: Okay. For evaluation criteria PPR14-5

17 and 15-6, you all worked with only DS-0 level data for the

18 design services. In the workshops here before this Commission

19 and in other commissions, the CLECs have a number of complaints

20 about services greater than DS-0 having chronic problems. Is

21 there a reason why, for example, T-1s were not measured or

22 evaluated in this test?

23   MR. WIRSCHING: If you could hang on one second while

24 I catch up. As we look at PPR14-5's evaluation criteria, M&R

25 processes for collection and review of center performance data

1 are comparably administered between wholesale and retail work

2 centers. What we were looking at is what BellSouth measured

3 and whether they are comparably administering them. We did not

4 do an analysis, nor was there an intent to do an analysis of

5 the different product types and how BellSouth managed those

6 product types.

7   MR. BRADBURY: Would your answer hold true for

8 PPR15-6 on pages M&R --

9   MR. WIRSCHING: Hang on for a second while I get

10 there. Could you go ahead and elaborate on the question on

11 15-6?

12   MR. BRADBURY: You know at the moment I can't find

13 the reference for the percent repeat trouble reports, so let me

14 just withdraw the question.

15   MR. WIRSCHING: Sure.

16   MS. NORRIS: Let me ask a quick follow-up question to

17 the one you already answered. And you said you didn't look at

18 anything at a product level. Do you guys recall having any

19 documentation about why that level of stratification occurred

20 in the test? You said it was DS-0 only.

21   MR. WIRSCHING: Hang on for a second. When we

22 provided that information it is a list of what is evaluated in

23 that center by BellSouth internally, so it is just our

24 presentation of the list, so we didn't do any further analysis

25 on that.

1   MS. NORRIS: So you are saying BellSouth does not

2 evaluate above DS-0 based on that?

3   MR. WIRSCHING: Based on the information that we

4 have.

5   MS. NORRIS: Thank you.

6   MR. BRADBURY: Finally in this area in the parity

7 evaluation for the PPR14 you stated that in the event a

8 customer requests an earlier appointment, both the wholesale

9 and retail centers contact the WMC, that is the work management

10 center, for approval before providing the customer with an

11 earlier appointment. That is on Page M&R-20. Did you conduct

12 any analysis to ensure that the WMC provided parity treatment

13 in granting earlier appointments?

14   MR. WIRSCHING: Yes, we did. We conducted extensive

15 on-site observations with the WMC.

16   MR. BRADBURY: Thank you. That concludes maintenance

17 and repair.

18   MS. NORRIS: Before the billing folks get up, I am

19 going to defer. There were just a couple of billing questions

20 that I may take Chairman Jaber up on her kind offer that we can

21 ask some follow-up questions. That is testing still in

22 progress, and we can ask them questions in our weekly calls

23 instead.

24   CHAIRMAN JABER: Go ahead.

25   MS. NORRIS: So that would move us on to performance

1 measures where we do have some questions, and I will be asking

2 those. Just to start off, in the metrics tests I know there

3 are a lot of evaluation criteria, 542 or whatever, and it

4 appears from the test report that all of those are tests in

5 progress, is that true?

6   MR. WIRSCHING: That is correct.

7   MS. NORRIS: And there is some reference, I believe,

8 and I don't want to mix up what is in the report, so I will let

9 you answer the question with what I just hear generally that in

10 part that is due to a systems upgrade called PMAP 4.0?

11   MR. WIRSCHING: That is correct.

12   MS. NORRIS: Okay. I have a couple of questions

13 about that. And first starting with just generally for the

14 benefit of all of us, why did you decide to test 4.0 as an

15 upgrade?

16   MR. WIRSCHING: We had not finished testing on the

17 previous system 2.6 when PMAP 4.0 became available, so the

18 decision was made with staff concurrence to start testing 4.0.

19   MS. NORRIS: Okay. I'm going to try to put my 4.0

20 questions together, so hang on just a second. I think you

21 categorized that in your report as a significant upgrade. Is

22 that a term of art, or how do you -- what made you reach that

23 conclusion?

24   MR. WIRSCHING: Based on our knowledge of the

25 elements that had changed, we determined that was a significant

1 change to the system.

2   MS. NORRIS: Okay. Based on the fact that you think

3 that is a significant system upgrade, what reliance or what is

4 your recommendations, if any, about what the Commission should

5 do in terms of looking at your 2.6 results to date?

6   MR. WIRSCHING: We do have a number of results that

7 were available in 2.6 that we did present in the report which

8 we feel are reliable.

9   MS. NORRIS: But they were not reliable enough to

10 satisfy the criteria, though, right?

11   MR. WIRSCHING: Because we had restated testing, we

12 characterized everything as testing in progress. But if you

13 read through the individual reports, we outlined where we were

14 satisfied in 2.6. But because the system has changed, we

15 have -- with the concurrence of staff we have decided to test

16 additional months.

17   MS. NORRIS: Okay. And I will maybe come back to

18 that a little later. I guess that gives us a good context for

19 4.0. Throughout the comments in PMR-1, you state that the

20 points of data collection change for 4.0, could you describe

21 just very briefly what you mean by that?

22   MR. WIRSCHING: I will try to do a simple one, and if

23 that is not good enough then we will go into specific data

24 point collections. Because most of the elements of PMAP 2.6

25 have been replaced with new elements in PMAP 4.0, the majority

1 of the collection points have changed because they are brand

2 new systems, or at least new points of collection.

3   MS. NORRIS: I mean, they still go back to the same

4 legacy system in BellSouth.

5   MR. WIRSCHING: Yes. The legacy systems haven't

6 changed, but after leaving the legacy system the majority of

7 the collection points have changed.

8   MS. NORRIS: Okay. In your comments you also talk

9 about -- and just for the benefit of, I guess, the Commission

10 and others, there are some metrics that come straight out of

11 PMAP straight through the legacy system mechanically and there

12 are others that are more what they call manual calculations.

13 However, you are still going to review the manually calculated

14 metrics again, and I just wanted to get a very brief

15 understanding of what is the impact of the move to 4.0 on

16 manual metrics?

17   MR. WIRSCHING: Our opinion is that it will be

18 minimal, but we are testing to ensure.

19   MS. NORRIS: You have some language in your report

20 about relying or using the Georgia OSS test data. Could you

21 explain a little bit more about that? It's in PMR-1.

22   MR. WIRSCHING: Correct. There was a visit to a data

23 center in North Carolina that was done during Georgia that we

24 used the results for that, and that is the only element of

25 Georgia data that we are still using.

1   MS. NORRIS: Okay. Before we go on a little bit

2   deeper, let me do one follow-up while I'm thinking about it,

3   Mr. Wirsching. You talked to MPower earlier and I just wanted

4   to make sure I understood your answer. You guys were talking

5   about an inaccurate FOC situation where the circuit ID was not

6   coming back on the FOC, and you had some discussion about

7   whether that was measurable or not. And I know that in your

8   test you measure FOC accuracy, but you didn't capture that

9   problem because of time frame issues, is that correct? Because

10   by the time you had finished testing FOC accuracy --

11   MR. WIRSCHING: That is correct.

12   MS. NORRIS: It is my understanding that while you

13   had an evaluation criteria and you did test that in your test,

14   currently in the SQM at the Florida Commission there is no

15   metric for FOC accuracy.

16   MR. WIRSCHING: That is correct.

17   MS. NORRIS: So on a going-forward basis there would

18   no way to capture that unless that metric was instituted?

19   MR. WIRSCHING: It is correct there is no SQM.

20   MS. NORRIS: Okay. Thank you. Under the PMR-2 test

21   is where you look at the documentation for its consistency. I

22   had a couple of questions I was going to follow up on. This is

23   to look at the PMAP documentation to make sure it is consistent

24   and reliable in terms of the SQM and documents that are

25   produced. You say in your language that documented metrics are

1 consistent with documented metrics definitions. Are you

2 referring to the metrics definition in the SQM document only or

3 do you include other documents in your review? SQM only?

4 　　　　MR. WIRSCHING: Just SQM.

5 　　　　MS. NORRIS: Okay. And then going into a couple of

6 examples where I had some questions, for evaluation criteria

7 PMR2.4, you state that the documented metrics exclusion are

8 appropriate within the context of the metrics definition and

9 you found that the FOC timeliness measure met this criteria.

10 So, you are saying that whatever is excluded is appropriate for

11 what you are trying to measure in this measure is the way I

12 take that. And the definition for this measurement is that it

13 is the interval for the return of a FOC from the receipt of the

14 valid LSR to distribute distribution of the FOC. In other

15 words, it is trying to measure FOC timeliness.

16 　　　　However, one of the exclusions in the FOC timeliness

17 measure are project orders, and these orders do receive FOC.

18 So I wanted to get your understanding of why that is consistent

19 with the definition when it excludes something that the

20 definition says should be measured.

21 　　　　MR. WIRSCHING: As the SQM excludes that, and that

22 was a measure that was developed and agreed in a collaborative

23 method, we don't see anything improper about excluding a

24 certain transaction type in the SQM.

25 　　　　MS. NORRIS: Okay. So, you are not -- I just want to

1 make sure I understood. You were making an independent

2 judgment or you were just finding consistency among --

3   MR. WIRSCHING: We were looking for consistency.

4   MS. NORRIS: Okay. So you were not saying I find

5 this consistent, you were saying this document found it to be

6 consistent?

7   MR. WIRSCHING: That is correct.

8   MS. NORRIS: I mean --

9   MR. WEEKS: Yes. I think the way that you

10 characterized it originally was probably the right way to think

11 about it. That what we were attempting to do is understand

12 whether the systems and the definitions and the SQMs and all of

13 those things that BellSouth uses to create the metric supports

14 are all internally consistent per the collaborative agreement.

15 Not standing back as independent judge and jury saying what

16 should be measured in FOC timeliness and is the SQM properly

17 and well formed.

18   MS. NORRIS: Okay. You are doing that as a separate

19 analysis?

20   MR. WEEKS: There is an analysis for that, but it is

21 not in this evaluation criteria.

22   MS. NORRIS: Okay. Thank you. Moving on. It's on

23 Page 17 if you are following along in the questions. The

24 report states that BellSouth uses the term raw data to describe

25 the performance measurement data at the stage it enters the SQM

1   calculations, and that is on 41 at Footnote 5. And I have a

2   couple of questions about that.

3   Did you conduct any analysis to ensure that

4   BellSouth's definition was consistent with Commission orders?

5   MR. WIRSCHING: We weren't aware of any Commission

6   order that defines raw data.

7   MS. NORRIS: So if we were to produce one as an ALEC,

8   I mean, that is just not something that you found in your

9   analysis.

10   MR. WIRSCHING: Exactly.

11   MS. NORRIS: Okay. Did you do any analysis to

12   determine if BellSouth applied this definition consistently to

13   all metrics, that it excluded data from that stage all the time

14   the same way?

15   MR. WIRSCHING: We were not able to complete our PMAP

16   2.6 data integrity test, so therefore we were not able to

17   conclude that for PMAP 2.6. We do intend to do it in PMAP 4.0.

18   MS. NORRIS: It will be done. Okay, great. Thank

19   you. Those are my questions in that. And the third bullet

20   point really is not applicable since you are not at that stage

21   of testing yet. Okay.

22   Moving down a little ways. On 60, you had 160

23   evaluation criteria in data integrity, in that section of the

24   five sections of the metrics test. 62 of them say that you

25   couldn't test because you didn't have -- in essence, without

1 going through the jargon, you didn't have enough documentation

2 to be able to conduct your test, is that correct?

3   MR. WIRSCHING: That is correct.

4   MS. NORRIS: Were you able to do any testing at all

5 on those for data integrity, or what level of work remains to

6 be done?

7   MR. WIRSCHING: For PMAP 2.6, first of all, we

8 basically stopped testing PMAP 2.6 and moved on to PMAP 4.0.

9 At the time of the report and at the time we ceased testing

10 2.6, we had been able to do certain elements of the data

11 integrity test, but not fully every step of the data as it

12 moved through the system. So there are pieces and parts that

13 we were able to do.

14   MS. NORRIS: Okay. But at this point you are just

15 going to do a complete data integrity analysis of 4.0 for all

16 of those metrics?

17   MR. WIRSCHING: That is correct.

18   MS. NORRIS: And so they have not been analyzed, the

19 accuracy of those metrics have not yet been validated by your

20 organization?

21   MR. WIRSCHING: Which metrics?

22   MS. NORRIS: The 62 that you said you could not use

23 the business rules.

24   MR. WIRSCHING: That is correct.

25   MS. NORRIS: We have talked a lot about the test and

1 the fact that it is not yet complete. Do you believe that all

2 the tests will be completed on the same date? I haven't seen

3 your most recent project plans.

4 　　　　MR. WIRSCHING: At this point I believe they are

5 scheduled to end at the same date, but there is a potential

6 that they will end at different dates.

7 　　　　MS. NORRIS: And what date is that going to occur?

8 　　　　MR. WIRSCHING: Our current project plan is October

9 31st.

10 　　　　MS. NORRIS: October 31st. I think those are all the

11 questions I have. Tammy I think has the last section.

12 　　　　MS. AZORSKY: Let me follow on from what Ms. Norris

13 was just asking you, and segue into Appendix G. Until you

14 finished your analysis of PMAP 4.0, am I correct in what I see

15 in Appendix G that you are not commenting on the accuracy of

16 any of the commercial data that is presented?

17 　　　　MR. WIRSCHING: That is correct.

18 　　　　MS. AZORSKY: And you won't be able to do that until

19 you finish your analysis of PMAP 4.0, is that correct?

20 　　　　MR. WIRSCHING: That is correct.

21 　　　　MS. AZORSKY: Setting aside that issue just for a

22 minute, and looking at Table ES-1 in Appendix G, is it possible

23 to look at that commercial data, take OSS, for example, and

24 make a comparison between how BellSouth is performing for the

25 ALEC community at large to how BellSouth performed for KPMG as

1   a pseudo-ALEC?

2   MR. WIRSCHING: Actually, KPMG Consulting attempted

3   to do that analysis. Given our knowledge of the issues, we

4   were unable draw any conclusions between the commercial data

5   and KPMG test CLEC.

6   MS. AZORSKY: So you did try to analyze whether

7   BellSouth was doing better or worse for ALECs at large compared

8   to how it did for KPMG as a pseudo-ALEC, and you were unable to

9   reach any determination?

10   MR. WIRSCHING: Yes. Some of that was due to the

11 fact that a large number of the data that is produced for the

12 test CLEC is a test artifact. A good example of that is M&R

13 troubles. We initiate troubles in order to create troubles and

14 track them through the system. If troubles are initiated, that

15 obviously isn't a good metric to compare to commercial

16 performance. So once we eliminate those and any other metrics

17 that we knew had problems with them in 2.6, we had nothing left

18 to evaluate.

19   MS. AZORSKY: And is that one of the reasons you

20 can't evaluate the accuracy of any of the data that BellSouth

21 is producing, or am I missing the point there?

22   MR. WIRSCHING: You are probably a little too general

23 on that. Given that there were issues in 2.6 and we did not

24 finish our analysis of 2.6, we cannot form an opinion on the

25 commercial data.

1   MS. AZORSKY: All right. But the fact that you

2   haven't completed your performance measures analysis and so you

3   can't comment on the accuracy of the data isn't really related

4   to the fact that you can't compare accepting the data. You

5   can't compare BellSouth's performance for ALECs at large with

6   BellSouth's performance for KPMG as a pseudo-ALEC.

7   MR. WEEKS: Well, I think the point we were trying to

8   make is for a number of the measures that are in the commercial

9   data, there isn't any pseudo-CLEC experience or any data to

10 match up. That is one case.

11   There is another case where the data is apples and

12 oranges even though they are the same subject matter. The

13 example of troubles where we manufacture troubles and so

14 looking at trouble rates is irrelevant. It's a meaningless

15 comparison we wouldn't make, so we would set that aside.

16   And then there is the third case which in theory we

17 should be able to make, which is, for example, preorder

18 timeliness or something like that, where one could compare the

19 numbers expecting them to not be the same, but to be

20 consistent. Because we are measuring on one side of the wall,

21 the company is measuring for SQM purposes on the other side of

22 the wall. So they shouldn't be the same numbers, but there

23 shouldn't be a radical difference. There shouldn't be two

24 seconds on the BellSouth side and two hours on the KPMG side.

25   So, it is possible in theory to make some of the

1 comparisons in some of the areas as long as you are very

2 careful about the assumptions you make for the basis of that

3 comparison.

4   MR. WIRSCHING: And to follow up on that, in those

5 cases, that third case that Mr. Weeks described, there were

6 pending issues in PMAP 2.6, so therefore we could not conclude

7 our analysis.

8   MS. AZORSKY: Concerns you had about the data in PMAP

9 2.6?

10   MR. WIRSCHING: As referenced back in those final

11 reports sections and data integrity or replication there was a

12 known issue of some sort, so therefore we couldn't make -- draw

13 any conclusions.

14   MR. WEEKS: An issue raised in the test that said it

15 may be inappropriate to compare our number that we observed to

16 a number the validity of which we have in question as part of

17 our metrics test.

18   MS. AZORSKY: Okay. So questioning the validity of

19 the data is a part --

20   MR. WEEKS: The BellSouth data.

21   MS. AZORSKY: -- of the BellSouth data is part of the

22 problem?

23   MR. WEEKS: Is one of the three or four legs of the

24 stool there.

25   MS. AZORSKY: All right. As another leg of that

1 stool, were you able to look at the commercial data and verify

2 by looking at it some of the issues that you uncovered in doing

3 your analysis?

4 　　　　MR. WIRSCHING: I believe you are asking did the

5 commercial data reflect issues, problems that we may have

6 discovered.

7 　　　　MS. AZORSKY: That's another way to say it. I'm

8 happy to have you answer that question.

9 　　　　MR. WIRSCHING: I just wanted to make sure I was

10 clear. In some cases yes and in some cases no. It becomes a

11 depends. It depends on the nature of the problem that we

12 uncovered and whether or not that was something that was being

13 done commercially. As we have stated earlier in the test, a

14 large number of our transactions are not done at high

15 commercial volumes so that may not have appeared in the

16 commercial volume.

17 　　　　Other issues, I think one of the examples we used

18 earlier was the extremely large response time that we saw for

19 certain preorder transactions. So most definitely we did see

20 that in the MSS report. So there are cases. Now, did we do an

21 exhaustive analysis, no.

22 　　　　MS. AZORSKY: When you raised that issue of that,

23 that is what we discussed earlier that was referred to as the

24 abnormal parity data, is that correct?

25 　　　　MR. WIRSCHING: That is correct.

1   MS. AZORSKY: And I asked you if that abnormal parity

2 data was in the information in the commercial data, Appendix G.

3   MR. WIRSCHING: That is correct.

4   MS. AZORSKY: Does that mean that when BellSouth

5 produced its SQM reports for that month its parity comparisons

6 were not accurate?

7   MR. WIRSCHING: We didn't do that analysis, but that

8 is possible.

9   MS. AZORSKY: So am I understanding you to say that

10 the bottom line on Appendix G is that until you complete the

11 metrics analysis, you will express no opinion on the accuracy

12 of the commercial data?

13   MR. WIRSCHING: That is correct.

14   MS. AZORSKY: I just want to go back very briefly.

15 You spent a lot of time today talking with Mr. Bradbury about

16 some change management issues. In the RMI domain of the test

17 that was conducted, KPMG has concluded that significant issues

18 remain unresolved in the PPR-1 test area that addressed change

19 management, is that correct?

20   MR. WIRSCHING: That is correct.

21   MS. AZORSKY: And similarly you addressed with Mr.

22 Bradbury interface development?

23   MR. WIRSCHING: That is correct.

24   MS. AZORSKY: And there, too, KPMG has concluded that

25 significant issues remain unresolved in the PPR-5 section of

1   the RMI test domain?

2   　　　　MR. WIRSCHING: That is correct.

3   　　　　MS. AZORSKY: And then in the preorder and order

4   domain of the test, am I correct that KPMG also found that

5   significant issues remain unresolved in the TVV1, which was the

6   preorder/order provisioning and functional evaluation of the

7   preorder and order test domain?

8   　　　　MR. WIRSCHING: This one I don't remember off the top

9   of my head, hang on. Yes, we did.

10   　　　　MS. AZORSKY: And then order flow-through evaluation,

11   TVV3 was another part of the preorder and order test domain, is

12   that correct?

13   　　　　MR. WIRSCHING: That is correct.

14   　　　　MS. AZORSKY: And am I correct that KPMG also

15   concluded that significant issues remain unresolved in that

16   test area?

17   　　　　MR. WIRSCHING: That is correct.

18   　　　　MS. AZORSKY: And then in the provisioning test

19   domain, TVV4 was a provisioning verification and validation,

20   correct?

21   　　　　MR. WIRSCHING: That is correct.

22   　　　　MS. AZORSKY: And am I correct that KPMG also

23   concluded that significant issues remain unresolved in that

24   testing area?

25   　　　　MR. WIRSCHING: That is correct.

1   MS. AZORSKY: And on that basis, I don't think we

2   have any more questions.

3   CHAIRMAN JABER: Let's see. This was going to be the

4   part where we asked if there was any other ALEC in the audience

5   that wanted to ask questions. And I think, Ms. Harvey, you

6   identified that there was one, is that correct?

7   Come on up to the table.

8   MS. HARVEY: That is correct, Commissioner. Network

9   Telephone.

10   CHAIRMAN JABER: Go ahead and identify yourself for

11   the record.

12   MR. McMAHAN: I am Brent McMahan, Vice President of

13   Regulatory Governmental Affairs with Network Telephone. We are

14   a facility-based CLEC certified in Florida and headquartered in

15   Pensacola.

16   I have with me Kyle Kopytchak, who is our OSS subject

17   matter expert, and he has been active in the third-party test.

18   Most of you, I think, know him.

19   Thank you for the opportunity to speak hastily. We

20   are sorry we didn't have our questions in earlier than today,

21   but we were able to share two questions that we had with the

22   KPMG staff just before lunch, and I trust you have been able to

23   look at those and perhaps formulate your answers. But we would

24   like to address these several items.

25   We have questions about the loop makeup process that

1 was examined, and I would like to discuss those. I think you

2 will find them on POP-98. This is test reference TVV1-9-8, and

3 our questions are these: Did you do a loop makeup test

4 procedure using the LENS interface?

5 MR. WIRSCHING: Yes, we did.

6 MR. McMAHAN: And were your results different or the

7 same as what you found in the TAG interface? And if they were

8 the same, are they outlined somewhere separately?

9 MR. WIRSCHING: Maybe to clarify a little bit in the

10 evaluation criteria, our evaluation criteria is based on the

11 back end system LFACS, so our results are a combination. Hang

12 on. I wanted to be clear with my team.

13 Our results here include both TAG and LENS. What we

14 have is probably a little communication issue. BellSouth as it

15 reports, data reports LENS transactions as TAG transactions on

16 some of their internal reports and we have just picked up that

17 terminology. What we will do is clear that up for the final

18 report. And 1-9-8 does include LENS.

19 MR. McMAHAN: It does include LENS?

20 MR. WIRSCHING: Yes, it does.

21 MR. McMAHAN: Thank you. Because loop makeup is so

22 crucial to us in terms of extraordinary effort and expense

23 involved in qualifying the loops that we use for our broad band

24 links, and, of course, we are a voice over broad band or voice

25 over DSL player, consequently it affects all of our services.

1 We are concerned that the testing results looked at the

2 timeliness perhaps of the loop makeup procedure, but not

3 necessarily the accuracy. And our question is did you examine

4 the accuracy in any form of the data that you compiled from

5 these tests?

6   MR. WIRSCHING: I will draw your attention to

7 evaluation criteria TVV1-8-1, which is on Page POP-91, the

8 evaluation criteria is BellSouth's interfaces provide accurate

9 system responses to preorders.

10   MR. McMAHAN: Could you explain to me how you tested

11 the accuracy of the data?

12   MR. WIRSCHING: And to clarify, where we tested

13 accuracy of the data we determined that the fields were

14 returned appropriately. In other words, the correct

15 information was in the correct field. Specifically for LMU, we

16 did not verify that the loop was in the condition that it would

17 be returned because our accounts are test accounts, they are

18 not live accounts. So, therefore, the information in the test

19 account that is contained in LFACS would not provide real life

20 situations data.

21   MR. McMAHAN: So essentially you were testing the

22 functionality of the return of the form from BellSouth to the

23 CLEC, but not the performance of the actual loop as it was

24 identified in the database?

25   MR. WEEKS: I think it's fair to characterize it that

1   what we were doing was testing the system and its ability to

2   accept and respond to and reflect in the response the

3   information stored in engineering databases that are accessed

4   to retrieve information. What we didn't do is independently

5   verify that the information that was in the engineering

6   databases that sit behind the query conform with what is

7   physically installed in the real world.

8   So if the engineering says there is a bridged tap and

9   bridged tap information was returned, we took that at face

10 value. We didn't go do any engineering work to determine

11 whether there really was a bridged tap on that particular loop.

12   MR. McMAHAN: Were you aware of the fact that upwards

13 of 50 percent of the loops are not in the LFACS database?

14   MR. WEEKS: I think we were aware that not all of the

15 engineering database was there. I couldn't have attested to

16 whether the number was 50 or 20 or 70. But, yes, we were aware

17 that not all of the engineering database is intact.

18   MR. McMAHAN: So the sample size you used here, was

19 that a function of the universe of loops or what basis was

20 used?

21   MR. WEEKS: This was a feature function test of a

22 piece of software.

23   MR. McMAHAN: So it was not any sort of performance

24 testing, then, in terms of --

25   MR. WEEKS: We were not attempting to test the

1   accuracy of the loop makeup data in the engineering database as

2   a percentage of total loops installed. We were testing

3   software and its ability to return what was stored in the

4   systems.

5   MR. McMAHAN: Okay. You will agree, then, that

6   because your test stopped where it did and attempted to

7   accomplish only what you have just outlined, that it is

8   possible for a CLEC to have enormous problems with the accuracy

9   of the data that we retrieve from LFACS through the LMU process

10 and be affected adversely thereby in terms of higher costs,

11 longer installation times, et cetera, and you would not have

12 any knowledge of that whatsoever?

13   MR. WEEKS: The test was not designed to detect that.

14   MR. McMAHAN: Okay.

15   MR. KOPYTCHAK: Mr. Weeks, was the quantity of data

16 in LFACS tested within this process?

17   MR. WEEKS: No.

18   MR. KOPYTCHAK: Thank you.

19   MR. McMAHAN: Let's move on then to our second

20 question. Was there any work done -- and I'm going to

21 reference here the following page, it is under provisioning,

22 Page 59. And the test item number is TVV4-5. Here we are

23 talking about BellSouth testing or testing of BellSouth's

24 provision of DSL-1 or synonomous T-1 circuits in terms of

25 installation appointments. And then on the next page there is

1 the testing of the percentage of DS-1 or T-1 circuits placed in

2 jeopardy due to PF conditions. I have several questions

3 regarding this measurement. Again, what you were testing was

4 the functionality of the process of these, or was it actually a

5 performance test in the sense of both the actual circuits that

6 were identified or installed?

7   MR. WEEKS: This test was -- because the pseudo-CLEC

8 was not facilities-based -- relied on commercial orders with

9 real CLECs. And in those cases we were actually measuring the

10 extent to which in the case of, I believe you called out

11 TVV4-4, is that correct? I mean, excuse me, 4-5. What we

12 looked at there is the missed installation appointments on the

13 real commercial orders that were the subject of the test.

14   MR. McMAHAN: Can you tell me how you did that, what

15 the process was?

16   MR. WEEKS: We looked at real orders and determined

17 whether the appointments were kept or not.

18   MR. McMAHAN: And you based that on the completion

19 date of the loop versus the original due date?

20   MR. WEEKS: Fundamentally, the technique here was to

21 obtain from BellSouth a list of all of the orders and their due

22 dates, and then we went into the field on the due date and

23 observed the actual operation of the provisioning activities

24 and were there to determine for ourselves whether the

25 appointment was missed or not.

1   MR. McMAHAN: So from what you are saying, I imagine

2 you have one of your consultants ride with an installer

3 repairman or a T-1 installer to see if they actually met the

4 due date?

5   MR. WEEKS: It's not actually a ride along, it's a

6 meet at the customer location.

7   MR. McMAHAN: Okay. So in that sense the blindness

8 of the test was totally sacrificed, right? You were there at

9 the knowledge of the installer.

10   MR. WEEKS: The installer had no knowledge before

11 they arrived that we were going to be there.

12   MR. McMAHAN: But he knew you were there when he

13 started his work.

14   MR. WEEKS: Once we were there. But this was did he

15 miss the appointment or not, which he can't fake that. He is

16 either there or he is not.

17   MR. McMAHAN: Okay. We are finding a disparity in

18 the treatment of the demarcs in some cases on T-1s that suggest

19 to us that the installer will deal with the demarc point

20 superficially, if you will, in installation of CLECs loops of

21 this kind where we are finding on the retail side that there is

22 a willingness to work with the customer and to put the demarc

23 at the appropriate spot. There seems to be disparate

24 treatment there.

25   MR. WEEKS: I'm sure the Commission would like to

1 hear about that.

2   MR. McMAHAN: But in your case you were able to

3 verify that 98.1 percent of the commercial orders were worked

4 on the due date and as far as you know were placed according to

5 the criteria of the customer as far as the demarc point?

6   MR. WIRSCHING: In our sample we found no demarc

7 problems.

8   MR. McMAHAN: We have experienced those demarc

9 problems that I referred to; and, of course, that adversely

10 affects our orders, having to resend either our technician or

11 in some cases have BellSouth go back out as well to correct

12 problems with demarcs.

13   I think that is probably all we have, right? Do you

14 have anything else? That's it. Thank you very much.

15   CHAIRMAN JABER: Thank you. Well, is there another

16 ALECs in the audience that has questions? Okay.

17   Commissioners, this was the point I was going to

18 close out the workshop by allowing staff to brief us on the

19 schedule from here on out, but I thought I would give you all

20 an opportunity if you had questions. Feel free to ask them.

21 Okay.

22   Ms. Harvey, Ms. Keating, what happens next?

23   MS. KEATING: The next date that is scheduled is the

24 post-workshop comment due date, which is currently July 22nd.

25 The final publication date is July 30th. Thereafter, staff

1 will prepare a recommendation, schedule to be filed by August

2 23rd for a special agenda on September 9th.

3 CHAIRMAN JABER: Okay. Let me take an opportunity to

4 thank Mr. Wirsching, Mr. Weeks, your entire team. I mean,

5 obviously I know this was a long day for all of you, but the

6 report at the end of the day will be very useful to Florida, I

7 hope. And I thank you for your hard work. I thank you for

8 your patience today.

9 Let me also acknowledge the cooperative effort of

10 BellSouth, and you are to be commended for your hard work in

11 this process.

12 And not to forget all of the stakeholders, and

13 certainly the ALECs that participated today. Your questions

14 were very good. I hope that it will result in a thorough

15 report and a thorough understanding of these issues.

16 Job well done.

17 Staff, thank you.

18 (The workshop concluded at 3:35 p.m.)

19

20

21

22

23

24

25

STATE OF FLORIDA   )

                      :   CERTIFICATE OF REPORTER

COUNTY OF LEON   )

        WE, JANE FAUROT, RPR, Chief, Office of Hearing Reporter
Services, and LINDA BOLES, RPR, Official FPSC Reporter, FPSC
Division of Commission Clerk and Administrative Services,
do hereby certify that the foregoing proceeding was heard at
the time and place herein stated.

        IT IS FURTHER CERTIFIED that we stenographically
reported the said proceedings; that the same has been
transcribed under our direct supervision; and that this
transcript constitutes a true transcription of our notes of
said proceedings.

        WE FURTHER CERTIFY that we are not relatives,
employees, attorneys or counsel of any of the parties, nor are
we relatives or employees of any of the parties' attorneys or
counsel connected with the action, nor are we financially
interested in the action.

        DATED THIS 18TH DAY OF JULY, 2002.

_____
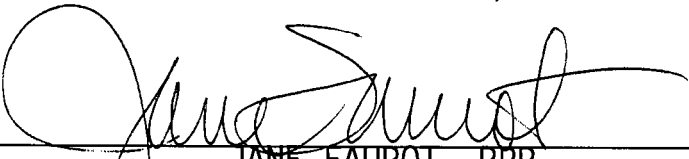   JANE FAUROT, RPR
    Chief, Office of Hearing Reporter Services
      FPSC Division of Commission Clerk and
               Administrative Services
                 (850) 413-6732

_____
            LINDA BOLES, RPR
         Official Commission Reporter
      FPSC Division of Commission Clerk and
               Administrative Services
                 (850) 413-6734

                FLORIDA PUBLIC SERVICE COMMISSION