

HOPPING GREEN & SAMS
PROFESSIONAL ASSOCIATION

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(850) 222-7500

FAX (850) 224-8551

www.hgss.com

Writer's Direct Dial No.

(850) 425-2359

July 24, 2002

ANGELA R. MORRISON
ERIC T. OLSEN
GARY V. PERKO
MICHAEL P. PETROVICH
DAVID L. POWELL
CAROLYN S. RAEPPLE
DOUGLAS S. ROBERTS
D. KENT SAFRIET
GARY P. SAMS
TIMOTHY G. SCHOENWALDER
DAN R. STENGLE
CHERYL G. STUART
JENNIFER A. TSCHETTER
VICTORIA L. WEBER
—
OF COUNSEL
ELIZABETH C. BOWMAN
REX D. WARE

JAMES S. ALVES
BRIAN H. BIBEAU
RICHARD S. BRIGHTMAN
DIANE W. CARR
KEVIN B. COVINGTON
T. SPENCER CROWLEY, III
BRIAN A. CRUMBAKER
PETER C. CUNNINGHAM
RALPH A. DEMEO
WILLIAM H. GREEN
MATTHEW L. HICKS
WADE L. HOPPING
GARY K. HUNTER, JR.
JONATHAN T. JOHNSON
ROBERT A. MANNING
FRANK E. MATTHEWS
RICHARD D. MELSON
KYLE V. MITCHELL

BY HAND DELIVERY

Blanca S. Bayó
Director, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 960786B

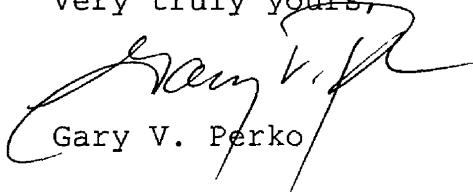
Dear Ms. Bayó:

Enclosed for filing on behalf of WORLDCOM Inc., are the original and fifteen copies of Post - Workshop Comments of WORLDCOM, Inc. on KPMG's Draft Final Report.

By copy of this letter, this document has been provided to the parties on the attached service list.

Please call if you have any questions.

Very truly yours,



Gary V. Perko

GVP/jlm
Enclosures
cc: Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 981834-TP

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

Docket No. 960786-TL

Filed: July 24, 2002.

POST-WORKSHOP COMMENTS OF WORLDCOM, INC.
ON KPMG'S DRAFT FINAL REPORT

WorldCom, Inc. ("WorldCom") hereby files its Post-workshop Comments on KPMG's Draft Final Report.

A. Introduction

ALECs first came to the Commission and requested third-party testing in December 1998. ALECs asserted that BellSouth's operations support systems ("OSS") were woefully inadequate and were incapable of supporting the kind of full-scale entry they wished to provide. Now, 173 exceptions and 206 observations later, there is no question that ALECs were right about the state of BellSouth's OSS; that ALECs desperately needed the Commission's help in addressing the serious flaws in BellSouth's OSS; and that the Commission, in deciding to proceed with a thorough and probing test, clearly made the right call. Under Staff's direction, KPMG has rooted out problem after

problem, unmasking BellSouth's claims that its OSS, change control process and performance metrics provided ALECs with a level playing field.

Although much progress has been made, key deficiencies remain, as evidenced by KPMG's draft report, which details several areas where BellSouth has failed to satisfy the test's criteria. KPMG has not passed judgment on whether these deficiencies merit rejection of BellSouth's request for a recommendation in support of its 271 application, but rather appropriately has left that decision to the Commission. T.59-60. As discussed below, the deficiencies in BellSouth's OSS have a negative impact on Florida consumers and should be addressed before BellSouth is given in-region long distance authority. Moreover, the Draft "Final" Report is final in name only, because the metrics portion of the test is not scheduled for completion until October 31. That portion of the test is critical, because neither KPMG nor the Commission truly can assess BellSouth's commercial performance until BellSouth's metrics have been determined to be trustworthy.

The purpose of these comments is to highlight a few of the OSS testing issues that are especially critical to WorldCom: change management, provisioning accuracy and performance metrics validity. Other parties with different business plans may focus on different issues. In the final analysis, however, WorldCom respectfully submits there are three steps the Commission should take in response to the draft "Final" Report: (1) require BellSouth to prepare and implement corrective action plans for the test criteria found not satisfied; (2) ensure that BellSouth corrects any flaws that KPMG finds with BellSouth's performance measurement system; and (3) suspend its consideration of BellSouth's 271 petition until the first two steps have been completed.

B. BellSouth's Change Management Process Delivers Flawed OSS Releases

KPMG opened Exception 157 because "BellSouth did not completely test code changes for Releases 10.2 and 10.3 prior to these releases going into production." KPMG identified thirty-one defect change requests for Release 10.3, finding that "BellSouth's incomplete internal software testing may affect a CLEC's ability to efficiently execute transactions with BellSouth, resulting in CLEC customer dissatisfaction." Release 10.5 also contained a high number of defects. BellSouth delayed Release 10.5 almost two weeks until May 31, 2002 because it found there were too many software errors to implement the release on the intended date. Even after the delay, the release still contained at least seventeen software defects, many of which were not announced to ALECs until well after the release was in place. KPMG found that for Release 10.5, "there were significant defects in the software when releases were placed into the production environment." Exception 157 remains open.

The defects in Release 10.5 affected ALECs' ability to prepare and submit orders and, most importantly, their ability to provide service to their customers. For instance, immediately after implementation of Release 10.5, BellSouth began rejecting all ALEC-to-ALEC migration orders. BellSouth rejected *all* orders through its TAG interface for versions 7.6 or below. BellSouth also rejected orders for new lines at locations where there is QuickService (working service on the premises or warm dial tone). And BellSouth rejected all supplemental orders with a building, pier or wing as part of the address. Such orders are quite common because many addresses (for example in apartment complexes) contain a building number. The fact that such critical defects appeared in a release that was delayed to improve its quality shows that BellSouth is still

unable to properly develop, test, and implement releases. BellSouth also continues to mischaracterize defects as not ALEC-impacting and to postpone their correction.

Although a number of these defects in Release 10.5 were corrected within the first week after the release, these defects still caused significant problems in the interim. A number of other defects in Release 10.5 are not even scheduled to be fixed until August 25 or even later. For example, there is no date yet planned for fixing the invalid rejection of supplemental orders that contain building, pier, or wing information.

Such flawed releases are not the norm in the telecommunications industry. In the Verizon region, for example, a typical release has at most one or two systems defects. WorldCom understands there were no tickets opened with respect to recent Verizon releases. Internally, WorldCom considers its own releases to be unacceptable if there are more than ten errors. BellSouth's recent releases have not met even this low standard, which shows that BellSouth's change management process continues to be fatally flawed. BellSouth should be required to prepare and implement a corrective action plan to deal with this major, consumer-affecting, deficiency. Because this issue is so fundamental to ALECs' ability to offer service, the Commission should not recommend 271 approval until BellSouth takes this action and demonstrates compliance by deploying a major software release that meets standards set by the Commission.¹

C. Provisioning Inaccuracy Still Infects BellSouth's OSS

Consumers reasonably expect that when they request certain features, they will be provisioned correctly. But KPMG has determined in Exception 84 that BellSouth has failed to use the proper codes when provisioning switch translations, falling short of the 95% provisioning accuracy standard. The customer impact is clear. According to

¹ The next software release is Release 10.6, which is scheduled for August 24, 2002.

KPMG, “BellSouth’s inability to accurately provision or remove services and/or features may result in decreased customer satisfaction.” Switch translation errors can result, for example, in consumers not receiving the 900 number blocking they requested; not obtaining call waiting or caller ID; or not receiving long distance service from their carrier of choice. T.60. These errors obviously have a direct affect on consumers’ experience and satisfaction with their new local provider.

Likewise, it is critical to customers’ experience that their directory information be updated. In Exception 171, however, KPMG found that “BellSouth’s systems or representatives have not consistently updated the directory databases as specified in orders submitted by KPMG Consulting.” BellSouth failed the 95% standard by a wide margin, accurately updating its records only 85.5% of the time. Again, the customer impact is significant, as stated by KPMG: “BellSouth’s inability to accurately update the information in directory listing databases may result in the mishandling of customer requests and cause a decrease in CLEC customer satisfaction.” Indeed, in some cases, the failure to update the customer’s number could raise issues of personal safety, as when someone attempts to obtain directory listing information to call an emergency service when stranded on the highway. T.58.

Exceptions 84 and 171 remain open. BellSouth should be directed to prepare and implement action plans to address both of these deficiencies that have such a direct impact on consumers’ experience. Because of that impact, the Commission should not recommend approval of BellSouth’s request for in-region long-distance authority until this problem has been remedied.

D. Because BellSouth's Metrics Have Not Been Validated, the Commission Lacks the Ability to Assess BellSouth's Commercial Performance

KPMG acknowledged at the July 12 workshop that it could not comment on the accuracy of the commercial data presented in Appendix G of its report until it has completed its metrics analysis, currently scheduled for October 31. T.175, 180. Performance metrics testing has revealed numerous problems to date, with BellSouth satisfying only 68% of the evaluation criteria in the PMAP 2.6 environment. Now that BellSouth has moved to PMAP 4.0, “[a]ll 542 evaluation criteria remain testing in progress” Draft Final Report, p. EX – 12. This gaping hole in the test prevents KPMG or the Commission from being able to reach any valid conclusions about BellSouth's commercial performance. Only after BellSouth's performance measurement system has been validated can the Commission review confidently BellSouth's performance data and determine whether it is providing nondiscriminatory access to its OSS and providing ALECs a meaningful opportunity to compete. Accordingly, the Commission should refrain from making a 271 recommendation until metrics testing has been completed successfully.

E. Conclusion

WorldCom respectfully requests that the Commission require BellSouth to prepare and implement corrective action plans for the test criteria found not satisfied; ensure that BellSouth corrects any flaws that KPMG finds with BellSouth's performance measurement system during the ongoing metrics testing; and suspend its consideration of BellSouth's 271 petition until these steps have been taken.

Respectfully submitted, this 24th day of July, 2002.

Donna Canzano McNulty

Donna Canzano McNulty
WorldCom, Inc.
325 John Knox Road
The Atrium, Suite 105
Tallahassee, FL 32303
(850) 422-1254

Dulaney L. O'Roark III
WorldCom, Inc.
Six Concourse Parkway
Suite 3200
Atlanta, Georgia 30328
(770) 284-5498

Attorneys for WorldCom, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U.S. Mail, or hand delivery (*) to the following parties this 24th day of July, 2002.

Beth Keating*
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Nancy White *
c/o Nancy Sims
BellSouth Telecommunications
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301

Lisa Foshee
BellSouth Telecommunications
675 W. Peachtree St., # 4300
Atlanta, GA 30375

John R. Marks, III
Knowles, Marks & Randolph
215 S. Monroe Street
Tallahassee, FL 32301

Floyd R. Self
Messer, Caparello & Self
P.O. Box 1876
Tallahassee, FL 32302-1876

Vicki Kaufman/Joseph McGlothlin
McWhirter, Reeves, McGlothlin
Davidson, Rief & Bakas, P.A.
117 S. Gadsden Street
Tallahassee, FL 32301

Patrick K. Wiggins
Charles Pellegrini
Katz, Kutter Law Firm, 12th Floor
106 E. College Ave.
Tallahassee, FL 32301

Rhonda Merritt
AT&T Communications
101 N. Monroe St., Ste. 700
Tallahassee, FL 32301

Susan Masterton
Sprint
P.O. Box 2214
Tallahassee, FL 32316

Peter M. Dunbar
Karen Camechis
Pennington, Culpepper, Moore
Wilkinson, Dunbar & Dunlap
Post Office Box 10095
Tallahassee, FL 32302

James C. Falvey
American Communications Services
Suite 100
131 National Business Parkway
Annapolis Junction, MD 20701

Marilyn H. Ash
Associate Legal Counsel
MGC Communications, Inc.
3301 N. Buffalo Drive
Las Vegas, NV 89129

Rodney L. Joyce
Shook, Hardy & Bacon, L.L.P.
600 14th Street, N.W. Suite 800
Washington, DC 20005-2004

Matthew Feil
Florida Digital Network, Inc.
390 North Orange Ave.
Suite 2000
Orlando, FL 32801

Michael Sloan
Eric Branfman
Swindler Berlin Shereff Friedmann
3000 K Street, NW
Suite 300
Washington, DC 20007

Nanette Edwards
Director of Regulatory Advocacy
ITC^Delta Com
4092 S. Memorial Parkway
Huntsville, AL 35802

Kenneth Ruth
CWA
2180 West State Road 434
Longwood, FL 32779

Michael Gross
Florida Cable Telecommunications Assoc., Inc.
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303

Donna McNulty
MCI WorldCom, Inc.
325 John Knox Road, Suite 105
Tallahassee, FL 32303

Brian Sulmonetti
MCI WorldCom, Inc.
Concourse Corporate Center Six
Six Concourse Parkway
Suite 3200
Atlanta, GA 30328

Carolyn Marek
Time Warner Telecom
233 Bramerton Court
Franklin, TN 37069

Lori Reese
Vice Pres. of Governmental Affairs
NewSouth Communications
Two Main Street
Greenville, SC 29609

Suzanne F. Summerlin, Esq.
1311-B Paul Russell Road
Suite 201
Tallahassee, FL 32301

Henry C. Campen, Jr. Esq,
Parker, Poe, Adams & Bernstein, LLP
P.O. Box 389
First Union Capital Center
150 Fayetteville Street Mall
Suite 1400
Raleigh, NC 27602-0389

Kenneth A. Hoffman, Esq.
John R. Ellis, Esq.
Rutledge, Ecenia, Purnell & Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32302

Genevieve Morelli
Andrew M. Klein
Kelley Drye & Warren LLP
1200 19th Street, NW, Suite 500
Washington, DC 20036

John D. McLaughlin, Jr.
KMC Telecom
1755 North Brown Road
Lawrenceville, GA 30043

IDS Telcom L.L.C.
1525 Northwest 167th Street
Second Floor

Miami, FL 33169

Catherine F. Boone
Covad Communications Company
10 Glenlake Parkway, Suite 650
Atlanta, GA 30328-3495

Virginia C. Tate
AT&T Communications
1200 Peachtree St., Suite 8100
Atlanta, GA 30309

Dana Shaffer
XO Communications, Inc.
105 Molloy Street, Suite 300
Nashville, TN 37201-2315

Mark D. Baxter
Stone & Baxter, LLP
557 Mulberry Street, Suite 1111
Macon, GA 31201-8256

John Kerkorian
Mpower Communications
Two Premier Plaza
5607 Glenridge Drive, N.E.
Suite 310
Atlanta, Ga 30342

Terry Monroe
Vice President, State Affairs
Competitive Telecomm. Assoc.
1900 M Street, N.W., Suite 800
Washington, D.C. 20036

Kimberly Caswell
Verison Select Services
One Tampa City Center
201 North Franklin Street
Tampa, FL 33602

John P. Fons
J. Jeffry Wahlen
Ausley & McMullen

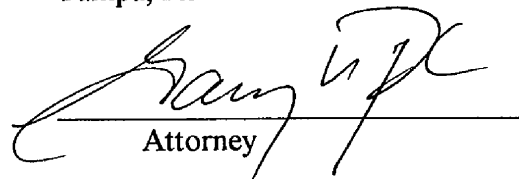
227 South Calhoun Street
Tallahassee, FL 32301

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400

Bettye Willis
Alltell Comm. Services. Inc.
One Allied Drive
Little Rock, AR 72203-2188

Jonathan E. Canis
Michael B. Hazzard
Kelley Drye & Warren, LLP
1200 19th Street, NW
Fifth Floor
Washington, DC 20036

Peggy Rubino
Z-Tel Communications, Inc.
601 South Harbor Island Blvd.
Suite 220
Tampa, FL 33602


Attorney