IV. Pre-Order/Order Domain Results and Analysis

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A.   Test Results: POP Manual Order Processing Evaluation (PPR7)

1.0   Description

The Pre-order, Order and Provisioning (POP) Manual Order Processing Evaluation (PPR7) was an analysis of BellSouth methods and procedures used to handle manual orders during order processing. Manual orders include orders that are sent by facsimile (fax) or electronic mail and electronically submitted orders that require manual intervention. The objective of the test was to validate the processes and procedures used to support manual submission of orders for service.

Additionally, practices related to the manual processing of orders were compared with retail practices for parity, to the extent that specific retail analogs were identified.

2.0   Business Process

This section provides a summary of manual order processing procedures used by Alternative Local Exchange Carriers (ALEC) to order BellSouth local exchange services.

2.1   Business Process Description

ALECs order BellSouth local exchange services by submitting Local Service Requests (LSR) and Access Service Requests (ASR). LSRs for Complex, Resale, and Unbundled Network Element (UNE) services are processed at the BellSouth Local Carrier Service Center (LCSC). ASRs are used to order local exchange trunks and facilities and are processed at the Local Interconnect Service Center (LISC).

2.1.1   Local Service Request (LSR) Manual Order Processing Procedures

All ALEC orders for Complex, Resale, and UNE services are processed at the LCSC. The BellSouth LCSC locations in Atlanta, Georgia and Birmingham, Alabama are the primary order receipt and order-processing centers for Florida ALECs. ALECs are assigned to one of these locations during the account establishment process. The LCSC receives LSRs by fax from ALECs and from the BellSouth Complex Resale Support Group (CRSG), which receives LSRs from the ALECs via electronic mail. The LCSC also receives and processes partially mechanized orders (electronically submitted orders that require manual intervention for processing).

2.1.1.1   Manually Submitted Orders

The CRSG in Birmingham, Alabama receives ALEC orders for Complex Resale and Complex UNE services that require various pre-order activities before they can be processed at the LCSC. These activities include: verification of switch type, determination of cable pair availability, and completion of service inquiry documents. The CRSG also has an internal help desk, the Pending Facility (PF) Help Desk, which handles expedite requests and troubleshoot orders in PF status. In addition, the CRSG supports the Account Team with sales support functions.

ALECs submit service requests to the CRSG via electronic mail. Clerical employees at the CRSG pre-screen and acknowledge receipt of the orders via electronic mail. The orders are then assigned to Systems Designers who complete pre-order activities by communicating with downstream provisioning organizations. System Designers can reject orders if order information is incomplete or if the requested service cannot be provided.
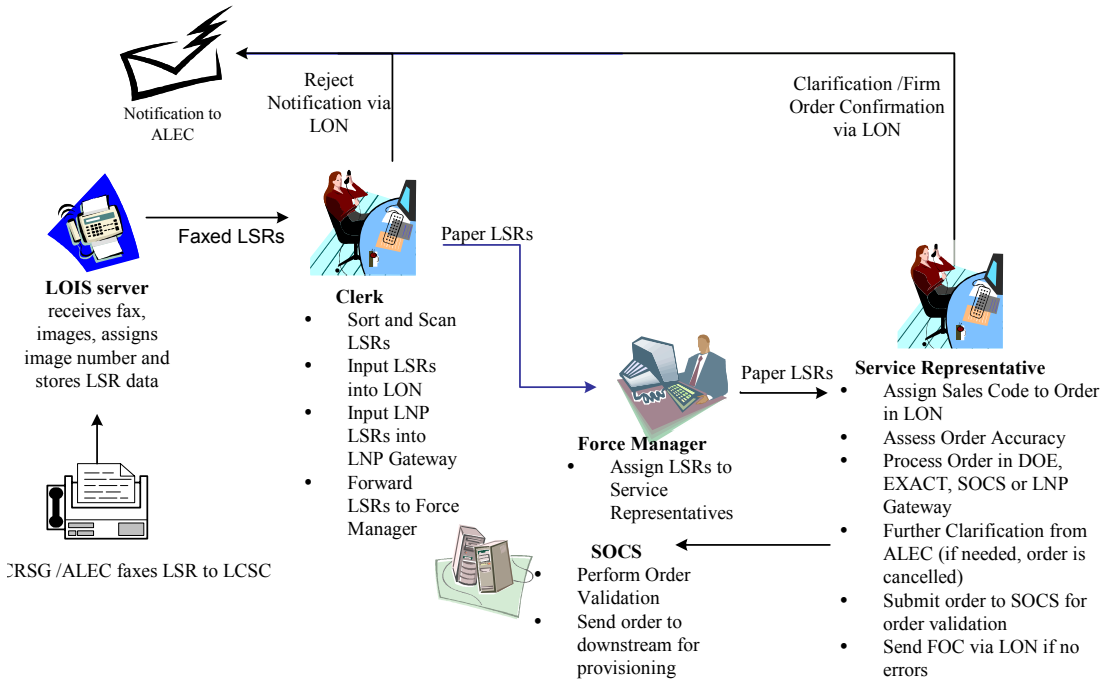
Reject notices are sent to the ALEC by electronic mail. System Designers can also query and clarify orders by placing a telephone call to the ALEC to request additional information. After

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pre-order activities are complete, the orders are faxed by the CRSG to the LCSC for order processing as shown in Figure 7.1.

ALECs submit manual requests for non-Complex Resale, non-Complex UNE and pre-established Complex services to the LCSC by fax. Once manually submitted orders are received at the LCSC, they are completed using the following processes (also shown in Figure 7.1):

♦ Incoming faxes are automatically imaged, assigned an image number, and stored in the Local Ordering Imaging System (LOIS) fax server as they are received at the LCSC.

♦ Clerks pull the LSRs from the fax server and sort and scan them for legibility and completion of required fields.

♦ The LSRs are also logged into the Local Order Number (LON) order tracking system on a first-in-first-out basis. Information such as the LSR Purchase Order Number (PON), fax server image number, and other required fields are entered into the tracking system. Illegible or incomplete LSRs are rejected and sent back to the ALEC by selecting the reject button in LON. LON automatically sends a reject via the LCSC fax server.

♦ Orders for Local Number Portability (LNP) are entered into the LNP Gateway for automatic service order generation. The LNP Gateway allows mechanized porting of telephone numbers (TNs) with the Number Portability Administration Center (NPAC).

♦ The LSR forms are forwarded to work force managers at the LCSC, who in turn assign them to service representatives for processing on a first-in-first-out basis.

♦ Service representatives claim the orders by assigning their sales code to the assigned PON in the LON database. The representatives review the LSRs and ensure that all required fields are completed. Those with missing information are returned to ALECs through LON, as clarifications. Service requests with complete information are entered into the Direct Order Entry (DOE) System, BellSouth Exchange Access and Control Tracking (EXACT) or Service Order Communication System (SOCS). DOE is a front-end order entry system used to generate service orders and subsequent order updates. DOE offers editing capabilities that enable service representatives to correct order entry errors before issuing the orders to the SOCS service order processor. Clearing errors can include sending clarification notices to ALECs for additional information.

♦ SOCS performs additional edits and flags orders with errors. Service representatives must then clear all errors. As a result they may need to send clarification notices to ALECs. Once the errors are cleared in SOCS, the service order is automatically sent to downstream organizations for provisioning. If a clarification is needed from the ALEC, the service order is cancelled. The ALEC must then send a supplemental LSR with correct information. A new service order is issued when an accurate LSR is received.

♦ Service representatives send Firm Order Confirmation (FOC) notices to ALECs to advise them that their orders were received and successfully processed, and that a service due date was assigned.

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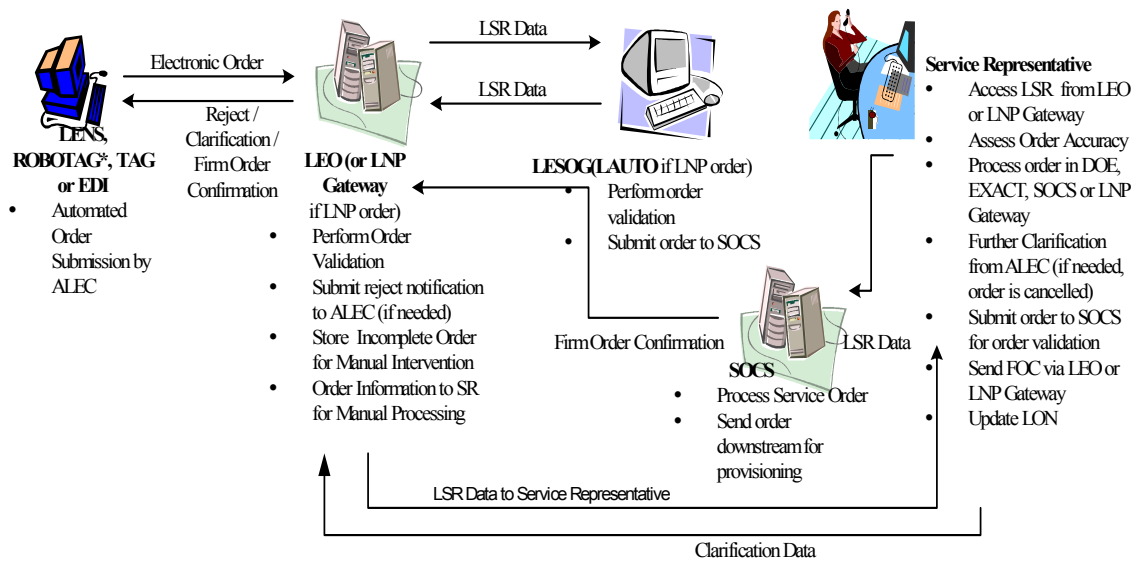
Figure 7-1: LCSC Manual Order Process Flow

2.1.1.2   *Partially mechanized orders*

The following diagram shows the receipt and flow of partially mechanized orders at the LCSC.

Figure 7-2: LCSC Partially Mechanized Order Process Flow

*As of April 3, 2002, the Florida Public Service Commission has removed ROBOTAG from the Florida OSS test (Order # PSC-02-0450-PCO-TP).

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Partially mechanized orders are orders that are submitted through one of the order entry interfaces and fall out of the electronic flow to the LCSC for manual handling. Orders fall out of the electronic flow for a number of reasons as defined in various BellSouth customer guides[30]. For example, orders can fall out due to incorrect character or product types. Orders are submitted using the Local Exchange Navigation System (LENS), Electronic Data Interchange (EDI), Robust Telecommunications Access Gateway (ROBOTAG[31]) or Telecommunications Access Gateway (TAG) interfaces. Orders are routed to the LCSC for manual handling and are completed using the following process:

♦ LSRs for Resale and UNEs transmitted by ALECs via LENS, ROBOTAG, TAG or EDI flow into the Local Exchange Ordering (LEO) system or the LNP Gateway, which are databases and control systems. LEO or the LNP Gateway perform the first level of order validation and automatically send reject notices to ALECs when data is missing, prohibited fields are populated, or when other pre-determined error conditions occur. Error conditions are documented for ALECS in BellSouth customer guides[32].

♦ When the LSRs are validated, LEO sends the data to the Local Exchange Service Order Generator (LESOG), which performs a second level of edits. If LESOG cannot process an order, the data is transmitted back to LEO, which stores it for manual processing by the LCSC. The LNP Gateway sends the data to LNP Automation (LAUTO) to perform second level edits.

♦ Service representatives claim the LSRs from the LEO system or the LNP Gateway and review them for accuracy. The representatives clear errors or clarify the requests with ALECs if necessary. Clarifications are processed through LEO or the LNP Gateway and returned to the ALECs via the same interface through which the order was received. Service representatives then issue the service orders to SOCS. SOCS flags errors, which must be cleared before service orders are successfully generated.

♦ Service orders are automatically generated and sent to downstream systems for provisioning. SOCS returns response notices to LEO or the LNP Gateway, which generate FOC notices and automatically send them to ALECs through the same electronic interface the service request was received (i.e. LENS, EDI, ROBOTAG or TAG).

♦ After an order is provisioned, SOCS is automatically updated with order completion information[33].

♦ Pending order status and completion notifications are automatically sent to the ALEC from LEO or the LNP Gateway.

2.1.2   Error Handling Procedures

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[30]e.g. BellSouth Business Rules for Local Ordering, Flow-Through Ordering Matrix available on the BellSouth interconnection website at http://www.interconnection.bellsouth.com/guides/html/leo.html
[31]As of April 3, 2002, the Florida Public Service Commission has removed ROBOTAG from the Florida OSS test (Order # PSC-02-0450-PCO-TP).
[32]The BellSouth Business Rules for Local Ordering, Error Message Table available on the BellSouth interconnection website at http://www.interconnection.bellsouth.com/guides/leo/html/gleoo032/indexf.htm
[33]SOCS maintains pending orders and their associated history until they are cancelled or the billing system notifies SOCS that a completed order was posted. Completed orders are purged from the SOCS database.

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Service representatives are required to monitor the Quality Assurance (QA) report, which is generated at the close of each business day. The QA report reflects service order errors that are not detected before a service order is issued and a FOC notice is submitted to the ALEC. Service representatives are required to correct service order errors or to send jeopardy notices to ALECs for errors that are the result of inaccurate or incomplete information provided by ALECs. Jeopardy notices are sent through the LON database.

2.1.3   LCSC Process Management Procedures

The LCSC Operations Director is responsible for monitoring the centers' day-to-day operations and for the overall administration of training activities. In addition, the Operations Director is responsible for ensuring that employees adhere to procedures and meet service requirements. This responsibility includes identifying specific training needs and forwarding these requirements to the LCSC Training Manager.

Service representatives are responsible for ensuring that only correct service orders flow into the provisioning systems. Team leaders, who are supervisory level personnel, periodically pull samples of orders worked by each service representative and review them for quality and integrity of content. These reviews are used for performance evaluation, coaching, development, and identification of training needs.

Managers participate in quality review meetings every six months to review and improve the overall effectiveness of the Quality Management System based on information, analysis and reported trends.

Long-term forecasting and capacity management for the LCSC is centrally managed through the Network Services Organization. This group determines resource requirements using force models and submits recommendations for staffing levels to the LCSC Operations Director. Managers and team leaders monitor daily staffing levels and make appropriate scheduling decisions based on recommendations from an in-house force-loading manager.

2.1.4   Access Service Request (ASR) Manual Order Processing Procedures

Requests for local exchange trunking and facilities are received and processed at the LISC in Birmingham, Alabama. ASRs can be submitted manually by fax or electronically via Network Data Mover (NDM) or Common Access Front End (CAFÉ). Both systems provide an interface to the EXACT system. EXACT is an automated system used to process customer ASRs to SOCS.

Service representatives review ASR fax requests to ensure that all required fields are populated and that ASRs are legible. Incomplete or incorrect requests are returned to the ALEC by fax for correction. Service representatives also verify that service requested is available and that the valid codes are entered into the LISC ASR system. After this review, ASRs are typed into the EXACT system and service orders are issued to SOCS. SOCS flags any errors, which must be cleared by service representatives before a service order is successfully provisioned.

When a service order is issued, FOC notices are generated to customers and the service orders are scheduled for provisioning. FOC notices like reject and clarification notices, are sent to customers via the same method as order receipt.

3.0   Methodology

This section summarizes the test methodology.

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3.1   Scenarios

Scenarios were not applicable to this test.

3.2   Test Targets and Measures

The test targets for the POP Manual Order Process Evaluation (PPR7) were the pre-ordering and ordering procedures related to the manual order process. Specific processes and sub-processes in the test target included the following:

♦ Receive and log orders for manual processing;

♦ Process orders manually;

♦ Send order response;

♦ Delivery of error messages and queries;

♦ Delivery of confirmations and completions;

♦ Track and report status;

♦ Escalate problems;

♦ Capacity management process;

♦ Process management;

♦ General management practices; and

♦ Performance measurement process.

3.3   Data Sources

The data collected for this test included training guides, job aids and various LCSC method and procedure documents from the BellSouth Corporate Directory and Information Access (CDIA) database. Examples of documents obtained include the Quick Start Training Guide for CRSG Systems Designers, the LON User Guide, and the Service Order Error Corrections document.

3.4   Data Generation/Volumes

This test did not rely on data generation or volume testing.

3.5   Evaluation and Analysis Methods

The evaluation methodology consisted of interviews, observations of the CRSG, LCSC and LISC operations, and documentation reviews of BellSouth manual pre-order and order processes and procedures. It was designed to determine whether BellSouth's manual processes provide an adequate framework for receipt, review and execution of manual orders.

KPMG Consulting observed CRSG, LCSC, LISC operations and manual order processing procedures. The manual ordering procedural evaluation was conducted by interviewing BellSouth managers and employees at the CRSG in Birmingham, Alabama, the LCSCs in Atlanta, Georgia and Birmingham, Alabama and the LISC in Birmingham, Alabama. The order process observations included site visits with System Designers at the CRSG, service representatives at the LISC and in the Resale, UNE and Complex Groups at the LCSC. KPMG

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Consulting also reviewed CRSG, LCSC and LISC internal method and procedure documentation as well as information available on the BellSouth interconnection website.

KPMG Consulting observed POP Functional Evaluation (TVV1) activities during production testing to determine if processing procedures were consistent with guidelines provided in BellSouth customer guides for manual ordering. This review included observations of order submission processes and associated order responses.

The POP Manual Order Processing Evaluation (PPR7) included a checklist of evaluation criteria developed by KPMG Consulting during the preparation of test activities for the BellSouth OSS Evaluation. These evaluation measures, detailed in the Master Test Plan, provided the framework of norms, standards, and guidelines for the POP Manual Order Processing Evaluation (PPR7).

The data collected were analyzed employing the evaluation measures referenced in Section 4.1.

4.0 Results

This section contains the overall test results.

4.1 Results Summary

The number of exceptions and observations issued during the life of the test is depicted in Table 7-1. For additional exception and observation information, refer to Appendices D and E, respectively. The test criteria and results are presented in Table 7-2.

Table 7-1: Exception and Observation Count

Activity	Exceptions	Observations
Total Issued	1	2
Total Disposed as of Final Report Date	1	2
Total Remaining Open as of Final Report Date	0	0

Table 7-2: Evaluation Criteria and Results

Test Reference	Evaluation Criteria	Result	Comments
		Ordering Process	
PPR7-1	Manual order processes are defined and documented.	Satisfied	CRSG procedures are defined and documented for BellSouth employees in the Quick Start Training Guide for Systems Designers, and for ALECs on the BellSouth interconnection website[34].
			LCSC procedures are defined and documented for BellSouth employees in the BellSouth CDIA system and in the BellSouth ordering

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[34] http://www.interconnection.bellsouth.com/centers/html/crsg.html
[35] http://www.interconnection.bellsouth.com/guides/html/leo.html
[36] BellSouth Business Rules for Local Ordering – OSS99, Issue 9L, March 30, 2001, page 177.

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Test Reference	Evaluation Criteria	Result	Comments
			guides available to ALECs on BellSouth's interconnection website[35]. Information is also available in the BBR-LO – OSS99[36]. LISC procedures are available for BellSouth employees in the BellSouth CDIA system.
PPR7-2	Procedures for receiving and logging manual orders are defined and documented.	Satisfied	Orders received at the CRSG are processed in accordance with procedures defined on BellSouth's interconnection website under the CRSG drop-down menu[37]. Procedures are available to CRSG employees through materials such as the Quick Start Training Guide and the BellSouth Resale Information Tracking Enabler (BRITE) system job aid. Procedures for receiving and logging LSRs at the LCSC are defined in a number of documents available to employees through BellSouth's CDIA system. For example, procedures for receiving and logging faxed orders are available to clerks through a Clerical Work Instructions document. LISC procedures for receiving and logging orders are also documented in the CDIA system, for example, in the LISC Clarification Policy document. During on-site observations, KPMG Consulting observed BellSouth employees receiving and logging order information as described in the methods and procedures documentation. For example, System Designers were observed receiving electronic mail requests and logging order information into BRITE. LCSC clerks were observed receiving LSRs via the fax server and logging information into the LON tracking system. LCSC service representatives were observed receiving partially mechanized orders in the LEO system. LISC service representatives were observed receiving and logging orders into the EXACT system.
PPR7-3	Procedures for service order generation are defined and documented.	Satisfied	Procedures for LCSC and LISC service order generation are defined in method and procedure guides, which are available to service representatives through the CDIA system by product or service type.

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[37]http://www.interconnection.bellsouth.com/centers/index.html

Test Reference	Evaluation Criteria	Result	Comments
			system by product or service type.
			LSRs that are received at the CRSG are submitted to the LCSC for service order generation.
			Service requests received at the LCSC are generated in DOE[38], EXACT or SOCS. KPMG Consulting observed service representatives generating service orders in DOE, EXACT and SOCS and following documented methods and procedures.
			Service requests received at the LISC are processed in EXACT. KPMG Consulting observed LISC service representatives using EXACT to process ASRs.
PPR7-4	Procedures for addressing errors and exceptions are defined and documented.	Satisfied	CRSG procedures for addressing errors and exceptions are documented for employees in the Quick Start Training Guide. An internal CRSG Help Desk, the Pending Facility Help Desk, handles pending-facility orders and expedite requests. Unusual occurrences are escalated to managers.
			LCSC procedures for addressing erroneous information on LSRs are available to employees through method and procedure guides listed by product or service type, and in the Service Order Error Corrections document. Both sources are available in the CDIA system.
			Procedures for dealing with exceptions are in CDIA documentation e.g., Complex Resale Ordering Guide and Service Order Error Corrections document. Unusual occurrences are escalated to management.
			LISC procedures for addressing errors are also documented in CDIA, for example, the LISC Clarification Process document.
			KPMG Consulting observed personnel in BellSouth's centers follow the procedures for addressing errors and determined that they were consistent with documented procedures.
PPR7-5	Procedures for escalation of problems are defined and documented.	Satisfied	CRSG escalation procedures are defined, documented, and readily available to BellSouth employees and ALECs. Information is available to employees through internal

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[38]Used for orders issued in North Carolina, South Carolina, Georgia and Florida.

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Test Reference	Evaluation Criteria	Result	Comments
			available to employees through internal methods and procedures guides such as the Quick Start training tool for System Designers. CRSG escalations are tracked through the BRITE database. Procedures are available to wholesale customers through the BellSouth interconnection website under the CRSG drop-down tab[39]. KPMG Consulting observed System Designers using BRITE to log requests for escalations.
			LCSC escalation procedures are also defined on the BellSouth interconnection website[40]. Escalations are tracked on Call Referral Forms at the Birmingham and Atlanta LCSCs and on Call Analysis Sheets at the Fleming Island, Florida LCSC. The tracking forms are completed by service representatives and forwarded to managers for further handling. Escalation procedures are available for employees on BellSouth's CDIA system. KPMG Consulting observed LCSC service representatives logging escalated issues on Call Referral Forms and Call Analysis sheets and following documented methods and procedures.
			At the LCSC, issues are tracked on paper Call Analysis Sheets. The Call Analysis Sheets have a field for service representatives to indicate when ownership of an issue is transferred to another group or escalated to managers. KPMG Consulting observed employees as they used the Call Analysis Sheets for issue tracking purposes. KPMG Consulting determined that the Call Analysis Sheets did not adequately facilitate status tracking and management reporting. The Call Analysis Sheets were not used consistently across all LCSC locations and employees did not have real time access to information contained therein. As a result, KPMG Consulting issued Exception 110.
			In response to Exception 110 BellSouth implemented an electronic customer contact management system to replace the paper Call

[39]http://www.interconnection.bellsouth.com/centers/index.html
[40]http://www.interconnection.bellsouth.com/centers/html/lcsc.html
[41]http://www.interconnection.bellsouth.com/centers/html/lisc_esc.html

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Test Reference	Evaluation Criteria	Result	Comments
			Analysis Sheet. BellSouth also implemented an internal Escalation Help Desk to track and manage escalated issues to completion. KPMG Consulting evaluated the new call tracking processes and procedures and determined that BellSouth satisfied the issues addressed in Exception 110. KPMG Consulting therefore closed Exception 110.
			LISC escalation procedures are defined for employees in the CDIA system, procedures are defined for ALECs on the BellSouth interconnection website[41].
PPR7-6	Procedures for status tracking and reporting are defined and documented.	Satisfied	At the CRSG, status tracking and reporting is managed through the BRITE system. Criteria used for LSR tracking include: Employee ID, PON ID, Date Received, Pending Facility Condition, Escalation, and Contact number. BRITE is also used to generate reports. Procedures for using the BRITE system are available to employees through the BRITE Job Aid.
			CRSG documentation provides guidelines for transfer of ownership of PONs. The process documentation is available for employees in the Quick Start Training Guide and for ALECs on the BellSouth interconnection website[42].
			At the LCSC, order status is tracked through the Order Tracking system also known as the LON system. Procedures for using LON are available in the LON User Guide, which is available in the CDIA system. Status tracking procedures are provided to wholesale customers through the CLEC Service Order Tracking System (CSOTS) User's Guide under the statusing tab[43]. CSOTS reports are available under the reports tab[44].
			Wholesale customers are instructed to contact the ordering center with questions regarding discrepancies on the online status reports.
			KPMG Consulting also reviewed various BellSouth reports used to track order status and ownership of orders through the process.

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[42]http://www.interconnection.bellsouth.com/centers/html/crsg.html
[43]http://www.interconnection.bellsouth.com/guides/index.html
[44]http://www.interconnection.bellsouth.com/main/clec.html

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Test Reference	Evaluation Criteria	Result	Comments
			Following is a sample of the reports reviewed:
			♦ The Daily Order Status by Group Report;
			♦ The Not Done Center Report;
			♦ The Atlanta Outstanding UNE Work Report; and
			♦ Reports showing orders in Pending Facility, Missed Appointment, Assignable Order, and Fault Assignable Order status.
			KPMG Consulting observed managers using these various status-tracking reports and determined that they were complete and consistent. For example, the reports were used to make decisions about resource adjustments in order to meet ordering timeliness requirements.
			Status tracking at the LISC is achieved through the EXACT system. Procedures for using EXACT are documented in CDIA documentation. ALECs obtain order status by contacting the LISC as documented on the BellSouth interconnection website[45].
PPR7-7	Procedures for addressing and reporting on confirmations and completions are defined and documented.	Satisfied	CRSG Systems Designers issue FOCs as indicated in the CRSG methods and procedure documents such as the Quick Start Training Guide. Procedures are also available to ALECs on the BellSouth interconnection website by selecting CRSG from the drop down menu[46].
			Procedures for issuing confirmations and completions at the LCSC are provided to employees through internal method and procedure guides available on BellSouth's CDIA system. Procedures are delineated by product/service type. KPMG Consulting reviewed CDIA materials and verified that observed procedures were consistent with documented procedures.
			Procedures are available to ALECs via BellSouth ordering guides, which are found on BellSouth's interconnection website[47]. Status

[45]http://www.interconnection.bellsouth.com/centers/html/ipc.html
[46]http://www.interconnection.bellsouth.com/centers/index.html
[47]http://www.interconnection.bellsouth.com/guides/html/leo.html

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Test Reference	Evaluation Criteria	Result	Comments
			information is available to ALECs through the CLEC PON Status Report which can also be accessed on the BellSouth interconnection website.
			CRSG and LCSC Center managers use a number of reports to track confirmations and completions per stated intervals. KPMG Consulting reviewed daily and operational reports such as FOC and Clarification Duration reports and determined that they adequately facilitated reporting on confirmations and completions of orders.
			LISC error handling procedures are also available in CDIA documentation listed by product/service type. KPMG Consulting reviewed CDIA materials and verified that observed procedures were consistent with documented procedures.
Process Management			
PPR7-8	Process management procedures are defined and documented.	Satisfied	Process management procedures for the LCSC, LISC and CRSG are defined and documented. Sources of documentation include the Local Operating Procedures document, the Local Quality Manual, and the CRSG Quick Start training tool for CRSG Systems Designers. The documentation includes procedures for revision control and process audits.
			BellSouth provides ordering center employees an on-line mechanism, the Action Request process, for suggesting process improvements and changes to method and procedure guides. KPMG Consulting observed the functionality of the on-line Action Request process. The suggestions made are reviewed by subject matter experts and implemented accordingly.
			Changes to external process and procedural documents are communicated to ALECs via the official change control process (see Change Management Practices Verification and Validation Review (PPR1)).

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Test Reference	Evaluation Criteria	Result	Comments
PPR7-9	Procedures for maintaining security and integrity of data exist.	Satisfied	BellSouth uses various procedures to maintain security and integrity of data. BellSouth's systems incorporate user identifications, passwords, SecurIDs, and firewalls to secure access. Service representatives have read only access to view orders submitted electronically using the ALEC's company code. All BellSouth buildings use badged-access controls. KPMG Consulting observed employees logging onto their personal computers using SecurIDs, and entering their User ID information whenever a new order was created.
PPR7-10	Performance management procedures are defined and documented.	Satisfied	Performance metrics and objectives for CRSG employees are documented in the Quick Start Training Guide for Systems Designers. Performance metrics and objectives for LCSC service representatives are defined and documented in the service representative Appraisal Plan, which is available on BellSouth's CDIA system. Service representatives are evaluated based on two performance measures: a qualitative measure, which measures Service Order Accuracy (SOA), and a quantitative measure, which measures LSRs per hour. Objectives vary depending on the product group. At the center level, performance measurements are based on FOC and Clarification objectives. The LCSC's internal performance objective is to return 100% of all FOCs to ALECs within established timeframes as listed in CLEC ordering guides available on BellSouth's interconnection website[48]. BellSouth personnel are evaluated on this measure by comparing actual performance to established standards. Employees within the Quality Management Organization measure the process and the results are reported to LCSC directors and managers. LCSC managers monitor daily and operational reports. Reports used include FOC and Clarification Duration reports. KPMG

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[48]http://www.interconnection.bellsouth.com/guides/html/leo.html

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Test Reference	Evaluation Criteria	Result	Comments
			Consulting reviewed copies of these reports and determined that management used the reports to track performance and adjust staffing accordingly.
			LISC performance metrics and objectives are documented in the service representative Appraisal Plan, which is available in the CDIA system.
Capacity Management			
PPR7-11	Procedures for capacity planning are defined and documented.	Satisfied	CSM capacity management procedures, which include backup procedures for managers, are defined in the Customer Support Manager Guidelines for Interaction with CLECs.
			KPMG Consulting conducted interviews with BellSouth LCSC managers and reviewed documentation. The analysis revealed that the manual ordering process included defined procedures for capacity planning, however LCSC processes were not sufficiently documented.
			KPMG Consulting issued Exception 94 because the LCSC documentation provided by BellSouth in response to previous data requests was not complete. Specifically, BellSouth had not provided documentation showing the procedures used for collecting and analyzing historical and forecast data in order to make headcount determinations for ordering center employees. Secondly, BellSouth had not provided documented contingency plans for managing unexpected peaks in order volume. BellSouth provided documentation which satisfied the issues raised in Exception 94. Exception 94 was closed.
			BellSouth's capacity models forecast resource requirements based on current workloads, employee productivity, industry trends, and ALEC-provided forecasts.
			CRSG and LISC capacity management procedures were included in BellSouth internal documentation provided to KPMG Consulting.

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Test Reference	Evaluation Criteria	Result	Comments
PPR7-12	Procedures for scaling capacity in the event of unexpected demand peaks exist.	Satisfied	The CRSG has a documented capacity management plan, which includes procedures for managing unexpected changes in order volume. LCSC procedures list contingency plans for action in the event of unexpected order volumes or emergency situations. The LCSC Operations Assistant Vice President is responsible for managing these situations. LISC capacity management includes procedures for handling unexpected demand peaks using overtime.
PPR7-13	Capacity Planning tools are operational.	Satisfied	KPMG Consulting observed that BellSouth used capacity planning tools to identify and adjust resource requirements. For example, BellSouth established an additional LCSC in Jacksonville, Florida in order to accommodate growth in overall LSR order volumes. KPMG Consulting reviewed documentation showing forecasting and capacity management tools that were used to make the business case for the new LCSC.

5.0   Parity Evaluation

This section contains the parity evaluation for the POP Manual Ordering Processing Evaluation (PPR7).

5.1   Overview

In accordance with the Master Test Plan, KPMG Consulting examined manual ordering processes and procedures used at BellSouth's retail and wholesale ordering centers to determine whether the processes are in parity. KPMG Consulting examined the following manual order sub-process areas: manual ordering centers, order receipt, order entry and service order generation, order tracking, escalation procedures, performance measurement, capacity management, and documentation.

In order to conduct this parity evaluation, KPMG Consulting attempted to identify specific retail analogs to evaluate. KPMG Consulting determined that retail analogs do not exist for some wholesale manual ordering sub-processes. Where analogs are present, KPMG Consulting determined that the wholesale manual ordering sub-process areas are similar to the retail center sub-process areas, with differences attributable to variations in customers served at the respective centers. Based on this analysis, KPMG Consulting determined that BellSouth wholesale and retail manual ordering sub-processes, where analogs are present, are in parity.

5.2   Method of Analysis

KPMG Consulting conducted interviews with BellSouth Florida personnel at the retail and wholesale centers that process manual orders. These interviews focused on the customers,

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manual processes and procedures, systems used, order-processing employees' level of training, and documentation associated with the manual ordering function. KPMG Consulting also reviewed documentation explaining the processes and procedures of both the retail and the wholesale manual ordering centers.

5.3   Parity Results

A summary of the results of KPMG Consulting's parity evaluation is presented in Table 7-3.

Table 7-3: POP Manual Ordering Process Evaluation Parity Review

Process Area	Retail Manual Order Processing	Wholesale Manual Order Processing	Parity Evaluation
Manual Ordering Centers	The centers below serve retail customers based on number of lines and customer revenue. All products for each customer segment are processed within the same center. The Major Account Centers visited by KPMG Consulting are located in Atlanta, Georgia and Jacksonville, Florida and the Mid-Market and Small Business Centers visited are located in Jacksonville, Florida. Major Account Center (MAC) handles orders for customers with more than 20 lines of service. Mid-Market Account Center handles orders for customers with 10-20 lines. Small Business Center handles orders for customers with less than 10 lines.	The following centers support all BellSouth wholesale customers. The centers are organized by product/ service. The centers are located in Birmingham, Alabama and Atlanta, Georgia. The CRSG receives all requests for Complex Resale and UNE orders. The LCSC receives LSRs from Local Exchange carriers and issues service orders for Resale, UNE, and Complex products and services. The centers are divided into groups around the three product categories.	No retail analog. Customers to the retail centers are end-users, while customers to the wholesale centers, i.e. ALECs, are intermediaries to the end-users.
Order Receipt	MAC, and Mid-Market orders are received by fax, electronic mail or over the telephone. MAC orders are received by the Account Team, which enters the requests into the BellSouth Works System and forwards	Orders are received manually by electronic mail to the CRSG, and by fax in the LCSC. Electronic non-flow through/ partially mechanized orders are received at the LCSC via LENS, EDI, TAG or	No retail analog. ALECs submit their service requests through electronic interfaces or manually by fax or electronic email (to the CRSG) using standardized BellSouth ordering forms. Retail customers do not use standardized templates for order submission.

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Process Area	Retail Manual Order Processing	Wholesale Manual Order Processing	Parity Evaluation
	them to the MAC for processing. Orders to the Small Business Center are typically received over the phone.	RoboTAG.	for order submission.
Order Entry and Service Order Generation	Service requests for the MAC, Mid-Market and Small Business centers are entered into the Regional Ordering System (ROS) or DOE and service orders are generated in the SOCS.	Resale, UNE and Complex service requests from Florida ALECs are entered into DOE and EXACT and service orders are generated in SOCS.	The processes and systems used for order entry and service order generation are similar. The front-end order entry systems are comparable in functionality. Both ROS and DOE allow entry of orders and facilitate up-front edit checks. Both systems flow into SOCS for service order generation and provisioning.
Order Tracking	MAC Orders are tracked internally through the BellSouth Works System. Mid-Market and Small Business Centers do not track orders after they are issued. BellSouth Works allows Customer Service Analysts to receive orders from the Account Executives and Service Consultants and to update order status as the orders flow through the ordering process.	Manual orders are tracked internally through LON at the LCSC and through BRITE at the CRSG. LON and BRITE are used to track ownership of orders and to update order status as the orders flow through the ordering process.	The processes and systems used for order tracking within the respective centers are similar. The systems in use at the retail and wholesale centers are comparable in functionality for order tracking.
Escalation Procedures	The retail centers do not have formal escalation procedures. Employees resolve issues on the call or refer customers to managers on an as-needed basis.	LCSC service representatives are the first point of contact for escalations. The second point of escalation requires a call back from a manager. The third level escalation requires Operations Director support and fourth level escalation is at the Assistant Vice President level. CRSG Systems designers	No retail analog. The wholesale centers follow formalized and documented escalation procedures, while the retail centers do not.

Process Area	Retail Manual Order Processing	Wholesale Manual Order Processing	Parity Evaluation
		assigned to the order are the first level of escalation followed by a customer care advocate, then a Sales Support Manager and finally a Sales Support Director. ALECs are provided with escalation lists via the interconnection website.	
Performance Measurement	Order processing employees are rated on qualitative as well as quantitative measures, including: service order accuracy, service order quality, and total number of orders processed.	Order processing employees are rated on qualitative as well as quantitative measures, including: service order accuracy, service order quality, and total number of orders processed.	The procedures and objectives used for performance measurement within the respective centers are similar. Both wholesale and retail centers, employee performance is evaluated based on qualitative as well as quantitative metrics.
Capacity Management	Forecasting headcount and capacity management for the retail centers are done in coordination with the sales team for the MAC. Work volume for ordering employees is primarily driven by incoming phone calls, although faxed and email orders are also received, at the MAC, Small Business and Mid-Market Centers. Force adjustments to meet daily shifts in work volume are managed at the center level. The force managers monitor incoming calls and adjust the number of ordering employees available to answer telephones.	Forecasting headcount and capacity management for the BellSouth Network and Carrier Services-Local Services Centers is centralized. Work volume for ordering employees is driven by incoming electronic and manual orders. Force adjustments to meet daily shifts in work volume are managed at the center level. Force managers within the three product groups monitor incoming manual and electronic orders. Service representatives are directed to process electronic and manual orders on a first-in-first-out basis to ensure equal processing of both order transmission methods.	The retail and wholesale capacity management processes and procedures are similar. Long term capacity planning for both retail and wholesale centers is not performed at the center level. Rather, the centers receive forecasts and resource headcount requirements from other BellSouth organizations and manage short-term capacity, also known as force loading, at the center level. Force loading in both the retail and wholesale centers is based on the volume of incoming orders. There are processes in place to reassign work to other work center locations in order to meet unexpected changes in work volume.

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Process Area	Retail Manual Order Processing	Wholesale Manual Order Processing	Parity Evaluation
Documentation	The BellSouth retail manual ordering centers have internal method and procedure documentation available to employees through a Products and Services knowledge (PSS) database and through ORBIT, a BellSouth intranet site.	The BellSouth wholesale manual ordering centers have internal method and procedure documentation available to employees through an online information repository – the BellSouth Corporate Directory and Information Access (CDIA) system.	The documentation available to wholesale and retail manual ordering center employees, and the medium through which it is disseminated, are similar. The online information sources within the wholesale and retail centers are comparable. Both provide employees with process and procedure documents for the products and services ordered at the centers, various forms, and links to other information resources.

5.4   *Parity Results Summary*

KPMG Consulting determined that BellSouth wholesale and retail manual ordering sub-processes, where analogs are present, are in parity.

6.0   *Final Summary*

This section summarizes the number of test evaluation criteria discussed above and the number that was satisfied or not satisfied at the conclusion of this test.

6.1   *Summary of Findings*

There were 13 evaluation criteria considered for the POP Manual Order Processing Evaluation (PPR7) test. All 13 evaluation criteria received a satisfied result.

As all evaluation criteria are satisfied, KPMG Consulting considers the POP Manual Order Processing Evaluation (PPR7) test area satisfied at the time of final report delivery.

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B. Test Results: POP Work Center Support Evaluation (PPR8)

1.0   Description

The Pre-Order, Order and Provisioning (POP) Work Center Support Evaluation (PPR8) was an operational analysis of the work center and help desk pre-order and order processes developed by BellSouth to support Alternative Local Exchange Carriers (ALECs). These processes provide assistance to ALECs with Operation Support Systems (OSS) questions, problems, escalations, and issues related to pre-ordering and ordering. The test also included a review of the procedures in place to plan for and manage projected growth in ALEC order activity and related work center support.

2.0   Business Process

This section provides an overview of the BellSouth work centers that provide support to ALECs.

2.1   Business Process Description

The POP Work Center Support Evaluation (PPR8) focused on the support provided by four different groups: the Local Carrier Service Center (LCSC), the Complex Resale Support Group (CRSG), the Customer Support Management (CSM) group, and the Local Interconnection Service Center (LISC).

2.1.1 Local Carrier Service Center (LCSC)

The LCSCs are the primary BellSouth work centers responsible for providing ALEC support for pre-order and order processing. BellSouth established three LCSCs to provide ALEC customer support. These centers are located in Jacksonville (Fleming Island), Florida; Atlanta, Georgia; and Birmingham, Alabama. The Birmingham and Atlanta LCSCs are primarily order processing centers with a small group of service representatives assigned to handle ALEC calls on a rotational basis. ALECs are assigned to one of these centers during the account management process. The Fleming Island LCSC serves as a call center for ALECs with order management questions.

The Fleming Island LCSC was established in January 2001 as a call center for ALECs with questions regarding Resale and Unbundled Network Element (UNE) products. The center currently handles calls from all Resale customers and calls from UNE customers assigned to the Atlanta LCSC. The Birmingham LCSC handles calls from UNE customers assigned to the Birmingham ordering center. The Atlanta and Birmingham LCSCs receive calls from Complex service customers. Table 8-1 below summarizes the locations for BellSouth ALEC work center support:

Table 8-1: BellSouth Support for Work Centers

Product/Service Type	Support for Atlanta LCSC Customers	Support for Birmingham LCSC Customers
UNE	Fleming Island LCSC	Birmingham LCSC
Resale	Fleming Island LCSC	Fleming Island LCSC
Complex	Atlanta LCSC	Birmingham LCSC

2.1.1.1   Call Handling Procedures

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Table 8-2 below summarizes the LCSC hours of operation for customer support:

Table 8-2: BellSouth Work Center Hours of Operation

Group	Days	Hours[49]
Residential – Resale & UNE-P[50]	Monday – Friday	7:30 a.m. - 6:30 p.m.
	Saturday	8:00 a.m. - 4:00 p.m.
Coin & Small Business – Resale and UNE-P	Monday – Friday	7:30 a.m. - 6:30 p.m.
	Saturday	8:00 a.m. - 4:00 p.m.
UNE/LNP	Monday – Friday	8:00 a.m. - 6:00 p.m.
Complex Resale and UNE-P	Monday – Friday	8:00 a.m. - 6:00 p.m.

ALECs access BellSouth work centers by dialing 1-800-773-4967 for Atlanta LCSC customers or 1-800-872-3116 for Birmingham LCSC customers. An Automatic Call Distribution (ACD) system prompts the caller to select one of the following menu options:

♦   UNE/Local Number Portability (LNP);

♦   Small Business;

♦   Residential;

♦   Billing;

♦   Reach a specific service representative using their four-digit extension number;

♦   Information about obtaining Purchase Order Number (PON) status; and

♦   Complex orders.

After a caller selects a menu item on the ACD, the call is automatically routed to a service representative at the designated LCSC for the selected function.

The first available service representative within each of these groups responds to incoming calls. If no service representatives are available, calls go into a queue and are routed to the next available service representative, also referred to as an online service representative. The primary objectives for online representatives are to answer and respond to customer calls while ensuring that internal call center service level objectives are met. Resale and UNE call handling service representatives are required to log all calls on Call Analysis Sheets[51]. When an online representative determines that an issue may take more than 15 minutes to resolve, the representative forwards the issue, by way of the Call Analysis Sheet, to an offline representative whose function is to perform any additional work to close out the issue. See Figure 8-1 below.

In addition to maintaining a log of incoming calls, service representatives are required to log call details in the Service Order Communication System (SOCS) when the call is in reference to a

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[49]Eastern Time
[50]Also referred to as UNE-Switched Combinations
[51]BellSouth introduced the electronic Call Analysis Sheets for the Resale Service Representatives in October 2001 and UNE Service Representatives in May 2002 at the Fleming Island LCSC.

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service order for a specific PON. Details pertaining to a particular PON are captured in the SOCS notes screen.

The escalation process is used for calls that cannot be resolved by online or offline representatives, and when the customer requests to speak to a manager. Work leaders, who are supervisory level service representatives, are the first point of contact for assistance. If work leaders cannot resolve the issue or if a customer requests to speak to a manager, the Escalation Manager at the Escalation Desk is contacted to assist with the resolution. Both work leaders and Escalation Managers track and update the issues on Call Analysis Sheets. Additionally, Escalation Managers use an Escalation Log that is maintained at the Escalation Help Desk. After resolution, issues are closed out on the Call Analysis Sheets as well as in the Escalation Log.

Figure 8-1: LCSC Call Handling Process
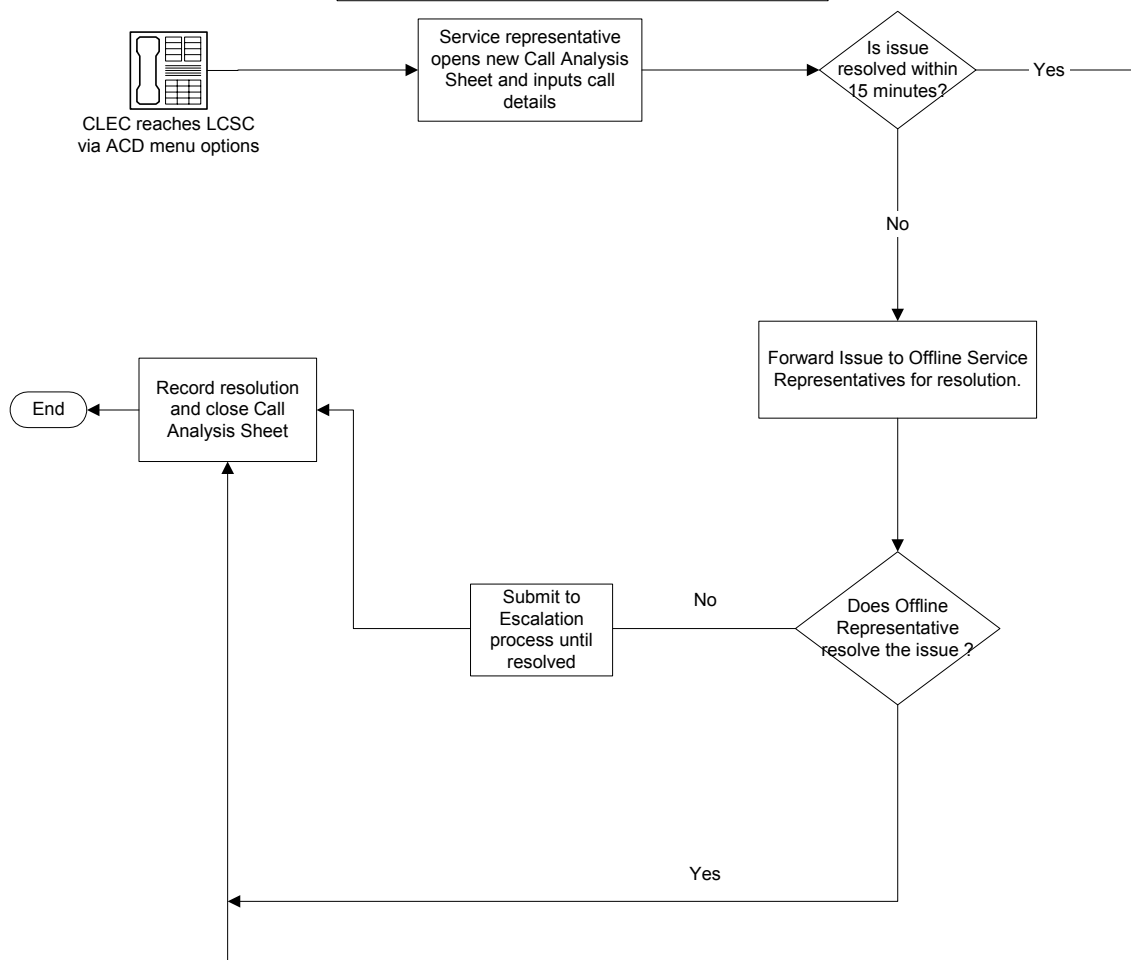
2.1.1.2 Process Management Procedures

Each LCSC has an Operations Assistant Vice President (OAVP) who is supported by Operations Directors, Center Support Managers, and managers for the different product groups. Service representatives at each location are also divided into different product groups for work center support as illustrated in Figure 8-2 below.

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Figure 8-2: BellSouth LCSC – Local Operations Organizational Chart

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                          ┌──────────────────────────┐
                          │     Vice President        │
                          │ Interconnection Operations│
                          └──────────────────────────┘
                          ┌──────────────────────────┐
                          │     Senior Director       │
                          │ Local Services Operations │
                          └──────────────────────────┘
```

OAVP Local Services Operations Centers Birmingham			OAVP Local Services Operations Centers Atlanta			OAVP Local Services Operations Centers Jacksonville	
Operations Director LCSC-UNE	Operations Director LCSC-Resale	Operations Director LCSC-Complex	Operations Director LCSC-UNE 1, UNE 2 Atlanta	Operations Director LCSC-Resale Atlanta	Operations Director LCSC-Complex Atlanta	Operations Director LCSC-UNE Jacksonville	Operations Director LCSC-Resale Jacksonville
Center Support Manager LCSC-UNE	Center Support Manager LCSC-Resale	Center Support Manager LCSC-Complex Birmingham	Center Support Manager LCSC-UNE 1, UNE 2 Atlanta	Center Support Manager LCSC-Resale Atlanta	Center Support Manager LCSC-Complex Atlanta	Center Support Manager LCSC-UNE Jacksonville	Center Support Manager LCSC-Resale Jacksonville
Manager LCSC-UNE	Manager LCSC-Resale	Manager LCSC-Complex	Manager LCSC-UNE1, UNE 2 Atlanta	Manager LCSC-Resale Atlanta	Manager LCSC-Complex Atlanta	Manager LCSC-UNE Jacksonville	Manager LCSC-Resale Jacksonville
Service Representatives	Service Representative	Service Representative	Service Representative	Service Representatives	Service Representatives	Service Representative	Service Representatives

Operations Directors are responsible for monitoring day-to-day operations and are also responsible for the overall administration of training activities.

Managers have oversight responsibility for the activities of the service representatives and for ensuring that employees adhere to procedures and meet service requirements. This responsibility includes identifying specific training needs related to employees and forwarding these requirements to the Training Manager.

Ordering center managers sample service orders and call center managers sample Call Analysis Sheets from each service representative at the respective centers and review them for integrity of content. Data from this review is compiled into reports that are used to identify areas for process and performance improvement.

Managers participate in quality review meetings every six months to review and improve the overall effectiveness of the Quality Management System based on information, analysis and reported trends such as those reflected in the review of Service Orders and Call Analysis Sheets.

Long-term forecasting and capacity management are centrally managed through the Network Services Organization. This group determines resource requirements using force models and submits recommendations for staffing levels to the LCSC Operations Director. Managers and Team Leaders, who are also service representatives, monitor daily staffing levels and make appropriate scheduling decisions based on recommendations from an in-house force-loading manager.

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2.1.2 Complex Resale Support Group (CRSG)

The CRSG, located in Birmingham, Alabama, is an extended arm of the Account Team/CLEC Care Team. The CRSG provides work center support for ALEC customers with Complex Resale and UNE orders. Complex orders require information other than that contained on the LSRs. ALEC customers therefore submit additional ordering forms such as the End User Information Form and the Service Inquiry Form. The CRSG receives these forms together with the LSRs (collectively known as order packages), reviews them for accuracy and completeness, and obtains additional information from downstream provisioning organizations as needed. Completed order packages are faxed to the LCSC Complex group for service order issuance.

The CRSG hours of operation are Monday through Friday 8:00 a.m. to 5:00 p.m. (Central Time). The CRSG receives service requests from ALECs via facsimile (fax) and electronic mail (email) and communicates with customers by email and telephone. The fax and email systems are available for order receipt 24 hours, seven days a week; however, orders are only processed during CRSG hours of operation. Faxes and emails received after 3:00 p.m. On any given day are time stamped as next business day orders.

2.1.3 Customer Support Manager (CSM) Group

The CSM Group is a group of managers who are assigned to provide specialized support to ALECs based on account volume and/or type of account (e.g., data ALECs, facility-based ALECs, etc.). For example, CSMs address recurring ALEC issues related to address validation, number assignment, and viewing Customer Service Records (CSR). CSMs also assist ALECs with reviewing BellSouth Business Rules and flow through issues. BellSouth established two CSM groups to provide support to the ALEC. The CSMs located in Atlanta, Georgia support ALECs assigned to the Atlanta LCSC and operate Monday through Friday between the hours of 8:00 a.m. and 5:00 p.m. (Eastern Time). The CSMs located in Birmingham, Alabama support ALECs assigned to the Birmingham LCSC and operate Monday through Friday between the hours of 8:00 a.m. and 5:00 p.m. (Central Time).

The CSMs work with ALECs, the BellSouth Account Teams, and the LCSC order processing centers to perform operational assessments to address specific ALEC ordering concerns such as recurring flow-through problems.

2.1.4 Local Interconnection Service Center (LISC)

The LISC, located in Birmingham, Alabama, is the center that receives and processes requests for facility-based, trunk group services. ALECs submit requests for these services by way of Access Service Requests (ASRs). ASRs can be submitted manually by fax or electronically via Network Data Mover (NDM) or Common Access Front End (CAFÉ). Both systems provide an electronic customer interface to the Exchange Access and Control Tracking (EXACT) system. EXACT is used for ASR order receipt, processing and tracking.

The center provides ordering center support for general questions regarding ASRs or for order status prior to Firm Order Confirmation (FOC). Center hours are Monday to Friday, 8:00 a.m. to 4:30 p.m. (Central Time). The center can be reached by dialing 1-800-666-0580 or 205-714-0025.

The Operations Director for Ordering is supported by Center Support Managers who have oversight responsibility for the activities of the service representatives. Center Support Managers ensure that employees adhere to procedures and meet service requirements. Service representatives process ASRs and are the first point of contact for customer support.

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As with the LCSC, long-term forecasting and capacity management for the LISC are centrally managed through the Network Services Organization. This group determines resource requirements using force models and submits recommendations for staffing levels to the LISC Operations Director. LISC Managers monitor daily staffing levels and make appropriate scheduling decisions such as requesting overtime to meet peaks in order volume.

3.0   Methodology

3.1   Scenarios

Scenarios were not applicable to this test.

3.2   Test Targets and Measures

The test target was BellSouth pre-order and order processes to support ALECs and included evaluation of the following processes and sub-processes:

♦ Responding to customer calls;

  ♦ Answering calls;

  ♦ Interfacing with users;

  ♦ Logging calls;

♦ Processing customer calls;

  ♦ Accessing to systems to observe user problems;

  ♦ Resolving user questions, problems, or issues;

♦ Closing and logging customer calls;

♦ Monitoring status;

  ♦ Tracking status;

  ♦ Reporting status;

♦ Requesting escalation;

♦ Managing the work center process; and

♦ Capacity management process.

3.3   Data Sources

The data collected for the test included training guides, job aids and various LCSC method and procedure documents from BellSouth's Corporate Directory and Information Access (CDIA) database. Examples of documentation included the Quick Start training guide for Systems Designers, the Fleming Island Call Center Work Instructions Guide, and the CSM/CLEC 101 Handbook for Customer Support Managers.

3.4   Data Generation/Volumes

This test did not rely on data generation or volume testing.

3.5   Evaluation and Analysis Methods

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The evaluation methodology included interviews, observation of the work center operations, and documentation reviews. The methodology was designed to determine whether the LCSC, CRSG, CSM and LISC groups meet the established evaluation criteria listed in Section 4.1. KPMG Consulting conducted interviews with BellSouth service representatives responsible for customer support functions as well as supervisory and management personnel. Observations of the LCSC, CRSG, CSM and LISC operations in Atlanta, Georgia; Birmingham, Alabama; and Jacksonville, Florida were also conducted. KPMG Consulting also performed detailed analysis of BellSouth documentation.

In addition, KPMG Consulting considered its own experience, via the Pre-Ordering, Ordering and Provisioning (POP) Functional Evaluation (TVV1) transaction test, with the various work centers and help desks to verify that BellSouth's actual procedures were in line with documented procedures.

The data collected were analyzed employing the evaluation measures contained in Section 4.1 below.

4.0   Results

This section contains the overall test results.

4.1   Results Summary

The number of exceptions and observations issued during the life of the test is depicted in Table 8-3. For additional exception and observation information, refer to Appendices D and E, respectively. The test criteria and results are presented in Table 8-4.

Table 8-3: PPR8 Exception and Observation Count

Activity	Exceptions	Observations
Total Issued	5	3
Total Disposed as of Final Report Date	5	3
Total Remaining Open as of Final Report Date	0	0

Table 8-4: PPR8 Evaluation Criteria and Results

Test Reference	Evaluation Criteria	Result	Comments
PPR8-1	Work center scope, objectives, responsibilities, and activities are defined and documented.	Satisfied	Work center scope, objectives, responsibilities, and activities are defined and documented in BellSouth's Quick Start training guide, the CDIA system and the CSM/CLEC 101 Handbook.
			Initial review of work center processes revealed that the scope and objectives of the centers are defined; however, BellSouth was unable to provide formal documentation for the CRSG and CSM group. As a result, KPMG Consulting issued Exceptions 34 and 57. BellSouth provided updated

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Test Reference	Evaluation Criteria	Result	Comments
			documentation for the two work centers. KPMG Consulting determined the documentation was adequate and closed Exceptions 34 and 57.
			Responsibilities and activities of the BellSouth support organizations are defined and documented as detailed below.
			CRSG procedures are available to BellSouth personnel through BellSouth's Quick Start training guide and to ALECs via BellSouth's interconnection website[52].
			LCSC procedures are available to internal BellSouth employees through BellSouth's CDIA system, and to ALECs via the BellSouth interconnection website[53].
			CSM procedures are available in the CSM/ CLEC 101 Handbook, which is available to CSMs and is provided to ALECs upon CSM assignment.
			LISC procedures are available to employees through CDIA documentation. Procedures are available to ALECs via the BellSouth interconnection website[54].
PPR8-2	A description of the work center process is documented for employees and customers.	Satisfied	A description of the work center process is documented for CRSG, CSM, LCSC, and LISC employees and customers.
			During LCSC visits, KPMG Consulting determined that observed procedures were consistent with documented processes, however not all observed processes were documented. As a result, KPMG Consulting issued Exception 103. BellSouth provided updated documentation for the observed processes. KPMG Consulting determined the documentation was adequate and closed Exception 103.
			CRSG and LCSC contact information, hours of operation and escalation procedures are

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[52]http://www.interconnection.bellsouth.com/centers/html/crsg.html
[53]http://www.interconnection.bellsouth.com/centers/html/lcsc.html
[54]http://www.interconnection.bellsouth.com/centers/html/ipc.html and
http://www.interconnection.bellsouth.com/notifications/usergroups/facility_based_docs/LISCOVER.pdf

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Test Reference	Evaluation Criteria	Result	Comments
			accessible on the BellSouth interconnection website[55].
			CRSG processes are available to Systems Designers through BellSouth's Quick Start training guide.
			LCSC processes are described in method and procedure guides, which are available to service representatives on the BellSouth CDIA system.
			CSM processes, contact information, hours of operation and escalation procedures are described in the CSM/CLEC 101 Handbook, which is provided to CSMs, and to ALECs upon CSM assignment.
			LISC procedures are available to employees through CDIA documentation and to ALECs through the BellSouth interconnection website[56]. ASR ordering guidelines are available in the BellSouth Start-Up Guide, April 2002- Issue 1.5 section 6, which can be accessed on the BellSouth interconnection website[57].
			KPMG Consulting conducted observations at BellSouth's work centers and observed the processes and procedures being followed consistent with the documented procedures.
PPR8-3	The work center processes include procedures for addressing errors and exceptions.	Satisfied	The work center processes include procedures for addressing errors and exceptions in the Quick Start training guide, Service Order Error Corrections document, and the CSM/CLEC 101 training guide.
			CRSG procedures for addressing errors and exceptions are documented in the Quick Start training guide. Exceptional situations are escalated to managers. The center has an internal help desk, the Pending Facilities (PF) Help Desk, which addresses issues pertaining to orders in PF status and expedite requests.
			LCSC error handling procedures are documented for employees in the Service Order Error Corrections document, which is

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[55]http://www.interconnection.bellsouth.com/centers/index.html
[56]http://www.interconnection.bellsouth.com/notifications/usergroups/facility_based_docs/LISCOVER.pdf
[57]http://www.interconnection.bellsouth.com/guides/activation/pdf/startup5.pdf

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Test Reference	Evaluation Criteria	Result	Comments
			available on the BellSouth's CDIA system. Service representatives access customer orders in the SOCS to troubleshoot and resolve errors. They also have access to an error screen in SOCS, which lists all errors on the order. Exceptions to standard LCSC operating procedures are escalated to managers for resolution.
			CSM procedures are documented in the CSM/CLEC 101 training guide. CSMs have access to LCSC ordering systems and can view errors or order history.
			LISC procedures for addressing errors are defined in CDIA documentation for example, the LISC Clarification Process document.
			KPMG Consulting observed work center employees addressing errors as defined in method and procedure documents.
PPR8-4	The work center has processes in place to answer calls within established timeframes.	Satisfied	The LCSC work center monitors Speed of Answer in order to answer calls within established timeframes.
			The LCSC has a Speed of Answer Objective upon which center performance is measured. Call answer timeliness is managed by a Force Manager who monitors incoming call volume through the ACD. Resource adjustments are made as needed to meet the Speed of Answer objective.
			KPMG Consulting observed the Fleming Island LCSC Force Manager monitoring the ACD screen and noted instances when service representatives were reassigned between the offline and online positions to meet call answer objectives.
			The CRSG, CSM and LISC are not designated call centers and do not measure performance on the basis of call answer timeliness. Performance measurement for these centers is discussed in PPR8-12.
			KPMG Consulting observed that BellSouth uses internal speed of answer objectives and monitors these objectives through the use of ACD logs. During visits at the Fleming Island LCSC, KPMG Consulting obtained and reviewed copies of the ACD logs and confirmed that BellSouth was meeting the

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Test Reference	Evaluation Criteria	Result	Comments
			stated objectives.
PPR8-5	The work center has defined and documented issue resolution processes.	Satisfied	CRSG, LCSC, CSM and LISC employees receive training specific to their roles and responsibilities and are provided with method and procedure guides to ensure that they have ready access to accurate information for issue resolution. For example, CRSG employees have access to the Quick Start training guide, LCSC and LISC service representatives have access to CDIA method and procedure guides that specify expectations for processing orders, and CSMs have access to the CSM/CLEC 101 training guide.

LCSC call handling representatives are separated into specialized groups: a Residential and a Small Business group for Simple Resale and UNE-Platform (UNE-P) customers, a group for UNE / LNP customers, and a group for customers with Complex Resale and UNE-P. Service representatives in each of these groups receive specialized training to ensure that ALECs are receiving accurate information.

KPMG Consulting observed LCSC service representatives in the different product groups responding to customer issues. KPMG Consulting also reviewed the training curriculum for service representatives in the different product groups and determined that the material was applicable to the employee specialization. |
| PPR8-6 | The work center processes include call intake procedures. | Satisfied | The work center processes include call intake procedures. Procedures for CRSG employees are documented in the Quick Start training guide. Call issues are logged in an internal BellSouth database known as BellSouth internal Response and Information Tracking Enabler (BRITE).

LCSC call handling procedures are documented in the CDIA system. Details on work conducted by a service representative on a particular order are tracked in the Local Order Number (LON) tracking database, or in the notes screens of the Local Exchange Ordering (LEO) system, or the LNP Gateway, depending on the ordering interface used. |

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Test Reference	Evaluation Criteria	Result	Comments
			CSM call logging and tracking guidelines are documented in Customer Support Manager Guidelines for Interaction with ALECs. Issues are logged and tracked on a spreadsheet in an Excel database.
			LISC service representatives note call details in the EXACT system notes page. Procedures for using EXACT are defined in CDIA documentation.
			KPMG Consulting observed work center employees following methods and procedures as they received customer telephone calls and logged call information in the various tracking tools.
PPR8-7	The work center includes procedures for referral both into and out of the work center.	Satisfied	The work center includes procedures for referral both into and out of the work center in the CLEC Call Handling method and procedure guide.
			Employees at the CRSG, LCSC, LISC and CSM groups are provided with contact lists for other work centers and help desks and have the ability to either transfer or conference customers to other groups as needed. LCSC guidelines for referring calls are documented in the CLEC Call Handling method and procedure guide, which is available in the CDIA system.
			KPMG Consulting observed employees as they received customer telephone calls and noted instances when callers were transferred to other work centers.
PPR8-8	The work center processes include documented procedures for closure posting.	Satisfied	The work center processes include documented procedures for ALEC issue closure posting.
			Closure posting at the CRSG is performed through the BellSouth BRITE database. Procedures are documented in the Quick Start training guide and on the BellSouth interconnection website[58].
			The LCSC has standardized processes for closure posting on issues pertaining to a PON. A PON is tracked until closure and

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[58]http://www.interconnection.bellsouth.com/centers/html/crsg.html

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Test Reference	Evaluation Criteria	Result	Comments
			recorded in the SOCS notes. Resolution is indicated by a queried or confirmed message sent to the ALEC for each unique PON. Closure posting of ALEC calls is achieved through Call Analysis Sheets and, for escalated issues, through Manager Escalation Logs.
			CSM closure posting is performed in a central database. Procedures are detailed in the Customer Support Manager Guidelines for Interaction with CLECs.
			As with the LCSC, LISC orders are tracked until closure. Issue resolution is indicated by a queried or confirmed message sent to the ALEC for each unique order number.
			KPMG Consulting observed employees at the various work centers closing out issues as described in method and procedure documentation.
PPR8-9	The work center processes include procedures for status tracking and management reporting of issues.	Satisfied	At the LCSC, ALEC call issues are tracked on paper Call Analysis Sheets. The Call Analysis Sheets have a field for service representatives to indicate when ownership of an issue is transferred to another group or escalated to managers. KPMG Consulting observed employees as they used the Call Analysis Sheets for issue tracking purposes. KPMG Consulting determined that the Call Analysis Sheets did not adequately facilitate status tracking and management reporting. The Call Analysis Sheets were not used consistently across all LCSC locations and employees did not have real time access to information contained therein. As a result, KPMG Consulting issued Exception 110.
			In response to Exception 110 BellSouth implemented an electronic customer contact management system to replace the paper Call Analysis Sheets. BellSouth also implemented an internal Escalation Help Desk to track and manage escalated issues to completion. KPMG Consulting evaluated the new call tracking processes and procedures and determined that they satisfied the issues with Exception 110. KPMG Consulting therefore closed Exception 110.
			The LCSC process also includes procedures for tracking order status. For example, the

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Test Reference	Evaluation Criteria	Result	Comments
			process defines procedures for addressing orders in jeopardy status.
			PON status is monitored via reports that are accessed from the LON system. Examples of reports used are:
			♦ The Daily Order Status by Group Report;
			♦ The Not Done Center Report;
			♦ The Atlanta Outstanding UNE Work Report; and
			♦ Reports showing orders in Pending Facility, Missed Appointment, Assignable Order, and Fault Assignable Order status. Status tracking procedures are provided to wholesale customers through the CLEC Service Order Tracking System (CSOTS) User's Guide under the statusing tab[59]. Status tracking reports such as CSOTS reports are available under the reports tab on the BellSouth interconnection website[60].
			Status tracking at the CRSG is performed through the BRITE database. Procedures for status tracking and management reporting are documented in the Quick Start training guide. Trigger reports, which are compiled using data extracted from the BRITE database, are used for management reporting purposes. KPMG Consulting obtained and reviewed copies of the trigger reports. KPMG Consulting also observed managers using the reports to track the status of requests through the CRSG process flow.
			CSMs track and report issues using an Excel spreadsheet. Procedures are documented in the Customer Support Manager Guidelines for Interaction with CLECs. KPMG Consulting observed CSMs as they made use of the tracking database.
			At the LISC, EXACT is used to track order status and support for ASR processing.

[59]http://www.interconnection.bellsouth.com/guides/index.html
[60]http://www.interconnection.bellsouth.com/main/clec.html

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Test Reference	Evaluation Criteria	Result	Comments
			Procedures for using EXACT are available in CDIA documentation.
PPR8-10	The work center processes include procedures for escalating issues.	Satisfied	CSRG and LCSC escalation procedures are documented for ALECs on the BellSouth interconnection website[61]. LISC escalation procedures are defined for ALECs on the BellSouth interconnection website[62]. CSM procedures are documented in the CSM/CLEC 101 training guide.
			Each center, CSRG, LCSC, CSM, and LISC, has escalation procedures for involving management with customer issues. Escalations at the CSRG are tracked in the BRITE system. Escalations at the LISC are tracked through the EXACT system. Escalations by the CSM group are tracked on an Excel spreadsheet. Escalations at the LCSC are tracked on Call Analysis Sheets; however, KPMG Consulting noted that details captured on the LCSC Call Analysis Sheet, including escalation issues, were not available in real time to all call handling service representatives and their managers. As a result, KPMG Consulting issued Exception 110.
			In response to Exception 110 BellSouth implemented an electronic customer contact management system to replace the paper Call Analysis Sheets. BellSouth also implemented an internal Escalation Help Desk to track and manage escalated issues to completion. KPMG Consulting evaluated the new call tracking processes and procedures and determined that they satisfied the issues with Exception 110. KPMG Consulting therefore closed Exception 110.
			KPMG Consulting observed work center employees using tracking mechanisms at the LCSC, CRSG, LISC and by CSMs.
PPR8-11	The work center processes include procedures for maintaining security and	Satisfied	The work center processes that include procedures for maintaining security and integrity of data access controls are documented in internal method and

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[61]http://www.interconnection.bellsouth.com/centers/index.html
[62]http://www.interconnection.bellsouth.com/centers/html/lisc_esc.html

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Test Reference	Evaluation Criteria	Result	Comments
	integrity of data.		procedure guides.
			ALEC callers to the LCSC are required to identify themselves by name, company name and company code before any information is provided over the telephone. KPMG Consulting confirmed that these procedures are documented in internal method and procedure guides for each of the centers.
			BellSouth's systems incorporate user identification, passwords, and firewalls to secure access. Service representatives must enter their personal sales codes whenever they make changes to a service order. LCSC representatives use the ALEC's company code to view electronic orders with read-only access. KPMG Consulting observed employees as they logged into the various systems using their employee passwords.
PPR8-12	Work center performance management procedures are defined and documented.	Satisfied	Work center performance management procedures are defined and documented in various documents depending upon employee functions.
			Process and performance measurement procedures for CRSG employees are documented in the CRSG Quick Start training guide. Employees are rated on the number of orders processed. This information is accessed from production reports retrieved from the BRITE database. Center performance is based on FOC timeliness objectives.
			LCSC employee performance objectives are documented in the Service Representative Performance Measurement Plan, which is available on BellSouth's CDIA system. Employees in the production centers are rated on service order accuracy and production objectives, while those in the call center are rated on customer service objectives. Production center performance is based on defined FOC timeliness objectives, while call center performance is based on defined service-level objectives.
			CSMs are rated on defined performance objectives as documented in the CSM/CLEC 101 training guide.
			LISC employee performance objectives are

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Test Reference	Evaluation Criteria	Result	Comments
			documented in a Performance Measurement Plan, which is available in BellSouth's CDIA system. LISC service representatives are rated against defined production objectives. Center performance is rated against defined FOC timeliness objectives.
PPR8-13	The work center processes include procedures for capacity planning.	Satisfied	Capacity planning procedures are documented. CRSG capacity management procedures are included in BellSouth internal documentation. CSM capacity management procedures are defined in the Customer Support Manager Guidelines for Interaction with CLECs.

Initial BellSouth LCSC documentation provided in response to data requests was not comprehensive. As a result, KPMG Consulting issued Exception 94. BellSouth provided additional documentation, which KPMG Consulting reviewed and determined to be sufficient. Exception 94 was closed.

The process includes procedures for capacity planning. BellSouth's capacity models forecast resource requirements based on current workloads, employee productivity, industry trends, and ALEC-provided forecasts. LCSC Center Managers and Force Managers use forecast information to make daily staffing decisions.

BellSouth provided KPMG Consulting with internal documentation for the CRSG capacity management procedures. Documentation for LCSC capacity management procedures includes a forecasting process and process flow diagram, defined force sizing components, force models used to convert forecast data into required resources, and resulting force model outputs.

CSM capacity management procedures are defined in the Customer Support Manager Guidelines for Interaction with CLECs.

LISC capacity management procedures are defined and documented. BellSouth's capacity models forecast resource requirements based on current workloads, employee productivity, industry trends, and ALEC-provided forecasts. LISC center managers use the capacity management |

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Test Reference	Evaluation Criteria	Result	Comments
			information to make daily staffing decisions such as the use of overtime to handle peaks in order activity.
			KPMG Consulting determined that the retail and wholesale capacity management processes and procedures are significantly similar. Long term capacity planning for both retail and wholesale centers is not performed at the center level. Rather, the centers receive forecasts and resource headcount requirements from other BellSouth organizations and manage short-term capacity, also known as force loading, at the center level. Force loading in both the retail and wholesale centers is based on the volume of incoming orders. Additionally, there are processes in place to reassign work to other work center locations in order to meet unexpected changes in work volume.
PPR8-14	ALECs can readily interface with the work center.	Satisfied	Procedures for ALEC interaction with the BellSouth work centers are documented on the BellSouth interconnection website[63].
			KPMG Consulting interacted with the CRSG, LCSC and CSM work centers throughout the testing process. The KPMG Consulting internal Help Desk communicated with the centers to obtain pre-ordering and ordering support as well as assistance with resolving errors. Issues that could not be addressed through the BellSouth work centers were deferred to the observation and exception process for resolution as reported in the POP Functional Evaluation (TVV1).

5.0   Parity Evaluation

A parity evaluation was not required for this test.

6.0   Final Summary

This section summarizes the number of test evaluation criteria discussed above and the number that was satisfied or not satisfied at the conclusion of this test.

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[63]http://www.interconnection.bellsouth.com/main/clec.html

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6.1   *Summary of Findings*

There were 14 evaluation criteria considered for the POP Work Center Support Evaluation (PPR8) test. All 14 evaluation criteria received a satisfied result.

As all evaluation criteria are satisfied, KPMG Consulting considers the POP Work Center Support Evaluation (PPR8) test area satisfied at the time of final report delivery.

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C.   Test Results: Pre-Order, Order and Provisioning (POP) Functional Evaluation (TVV1)

1.0   Description

The Pre-Order, Order and Provisioning[64] (POP) Functional Evaluation (TVV1) was an end-to-end review of the functional elements of pre-ordering, ordering, and provisioning; the achievement of the prescribed measures; and an analysis of performance in comparison to BellSouth's Retail systems. The POP Functional Evaluation (TVV1) reviewed the existence, functionality, accuracy, and behavior of the interfaces associated with BellSouth's support for wholesale pre-order and ordering. Performance of these systems was compared to service quality measurement (SQM) standards approved by the Florida Public Service Commission (FPSC) and in some instances BellSouth's retail systems performance. The test evaluated the systems and processes associated with BellSouth's ability to provide Alternative Local Exchange Carriers (ALECs) with non-discriminatory access to its Operational Support System (OSS).

The test included the submission of live transactions over three types of BellSouth supported interfaces: i) interactively via Graphical User Interfaces (GUI), ii) machine-to-machine interfaces, and iii) manual submissions. In addition to manual submission of orders, BellSouth's three electronic interfaces were tested[65]: i) Local Exchange Navigation System (LENS), Telecommunications Access Gateway (TAG), and Electronic Data Interchange (EDI). The two machine-to-machine interfaces were tested using interfaces built by KPMG Consulting according to specifications and processes provided to ALECs by BellSouth. The LENS GUI was tested through transactions entered directly into the GUI interface.

The test included a mix of stand-alone pre-ordering and ordering transactions, along with integrated pre-order transactions, supplements, and cancels. Local Service Request (LSR) orders were submitted, including erred and error free transactions. Resale, Unbundled Network Elements-Loops (UNE-L), Unbundled Network Elements-Platform (UNE-P) and other Unbundled Network Elements (UNE), including xDSL capable Loops, were included in the test. In addition and where appropriate, KPMG Consulting received assistance from CLECs in order to test certain activity types.

2.0   Business Process

This section describes the business processes used by BellSouth to provide pre-order and order services to ALECs.

2.1   Business Process Description

The POP Functional Evaluation (TVV1) tested two BellSouth interfaces which supported electronic pre-orders, three BellSouth interfaces which supported electronic ordering, and the manual pre-order and order process. The three electronic interfaces and the manual pre-order and order processes are described below.

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[64]A description of and results for the provisioning tests can be found under the Provisioning Verification and Validation test (TVV4).

[65]As of April 3, 2002, the FPSC has removed RoboTAG from the Florida OSS test (Order # PSC-02-0450-PCO-TP).

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♦ The TAG interface is a Common Object Request Broker Architecture (CORBA)-based environment that allows for bi-directional flow of information between BellSouth's OSS and ALEC systems. BellSouth provides a standard Application Program Interface (API) from which ALECs can develop their own software applications to obtain information from BellSouth pre-order and ordering systems.

♦ EDI is a batch driven machine-to-machine interface, which uses industry guidelines as its foundation. Business files are exchanged between BellSouth computer applications and ALEC computer applications that are encoded to comply with standard EDI transaction set for data transmission. BellSouth determines when each data element is transferred to a BellSouth service order.

♦ LENS is a GUI that connects directly into BellSouth's OSS and is based on TAG architecture.

♦ Manual submission of pre-orders and orders are sent to BellSouth via facsimile (fax) and electronic mail (email) per BellSouth guidelines. Figure 1-1, provides an overview of the pre-order and order process.

Table 1-1 depicts the functionality and mechanism with which each interface is available.

Table 1-1: Interface Functionality

System	Pre-Order			Order		
	GUI	Machine-to-Machine	Manual	GUI	Machine-to-Machine	Manual
LENS	X			X		
TAG		X			X	
EDI					X	
Manual			X			X

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Figure 1-1: Electronic and Manual Pre-Order and Order Process Flow
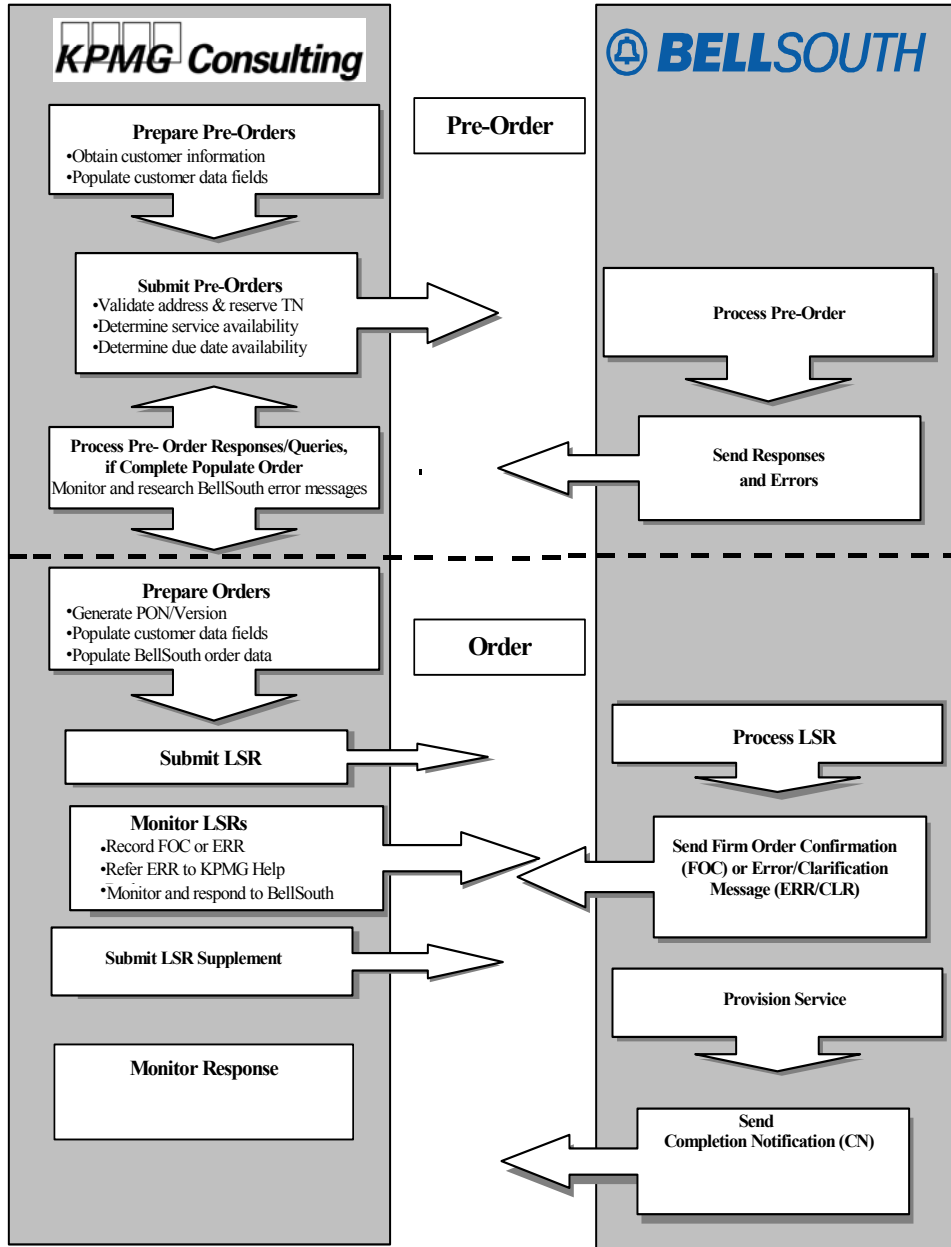
2.2 Pre-Order and Order Process Description

Two transaction processes were central to the POP Functional Evaluation (TVV1): the pre-ordering process and the ordering process. As part of the pre-order process, ALECs submit pre-order queries using published guides[66] for direction on query format and valid input data. Pre-order queries are used by ALECs to validate the customer address and service information, to inquire and/or validate specific switch capabilities, to select and reserve telephone numbers and to obtain service order due dates. In response to a pre-order query BellSouth returns either a valid pre-order response or an error message to the ALEC. Pre-order response information like telephone number, address, available due date confirmation and circuit identification information can be used to complete fields on an LSR form.

The ALEC begins the order process with the origination of an LSR, using the BellSouth technical specifications for the interface[67], as well as the BellSouth Business Rules for Local Ordering (BBR-LO) detailing format and content requirements for the form and fields. Upon receipt of the LSR, BellSouth returns a Functional Acknowledgment (FA), indicating that the file was received. For the LENS interface, the FA is an interim message that is displayed on the screen for the ALEC end user upon successful order submission. The LSR then passes through BellSouth's order-processing environment where systems and/or representatives validate the format and content of the data

If the LSR is unreadable or does not contain accurate and complete information on all required and conditional fields, a Fatal Reject (ERR) error is returned to the ALEC. The validation process begins again with the ALEC's submission of a new LSR containing corrected information. If data on the LSR is not correct, the ALEC may receive an Auto-Clarification (CLR), which is a BellSouth system response requesting corrections or additional information. An order that does not pass may fallout for manual processing by representatives in the Local Carrier Service Center (LCSC). A representative from BellSouth's LCSC reviews the LSR and determines if the ALEC or BellSouth caused the LSR to fallout. For an ALEC error, the representative sends a request for clarification to the ALEC for correction and the ALEC returns a Supplemental (SUP) service request. If a BellSouth system error caused the fallout, the LCSC will re-enter the order into the Service Order Communications System (SOCS).

When the LSR is complete and accurate, the service order is entered in SOCS, which coordinates downstream provisioning activity and monitors the status of the order. SOCS begins the generation process for a Firm Order Confirmation (FOC) response that is delivered to the ALEC. The FOC is confirmation that the LSR was validated by BellSouth, and contains a FOC Due Date (FOC-DD), which is the date BellSouth commits to completing provisioning of the order. The Pre-Order/Order Process descriptions are depicted in Figures 1-2 and 1-3.

Figure 1-2 and 1-3 depicts the BellSouth OSS electronic process flow and BellSouth pre-order and order legacy and wholesale systems. As pre-order requests are generated or orders are transmitted, the following systems may be involved, depending upon the specific request:

Pre-Order Systems:

---

[66]Pre-order guides include the BellSouth Pre-Order Business Rules, the TAG Application Program Interface (API) Guide, and the LENS User Guide and can be found at www.interconnection.BellSouth.com/guides
[67]Interface documents that support ordering include the BellSouth EDI Specifications - TCIF 9, TAG API, and the LENS User Guide.

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♦ Customer Record Information Systems (CRIS)/ Customer Account Billing Systems (CABS);

♦ Regional Street Address Guide (RSAG);

♦ Application for Telephone Number Load Administration and Selection (ATLAS);

♦ Product/Service Inventory Management System (P/SIMS);

♦ Central Office Feature File Interface (COFFI);

♦ Direct Order Entry (DOE) Support Application (DSAP); and

♦ Loop Facility Assignment and Central Systems (LFACS).

Ordering Systems:

♦ Local Service Request Router (LSRR);

♦ Local Exchange Ordering (LEO);

♦ Local Exchange Service Order Generator (LESOG);

♦ Service Order Communications Systems (SOCS);

♦ Service Gate Gateway/Delivery Order Manager (DOM);

♦ Local Number Portability (LNP) Gateway; and

♦ LAUTO.

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Figure 1-2: Process Systems Flow for a Wholesale Mechanized xDSL Order
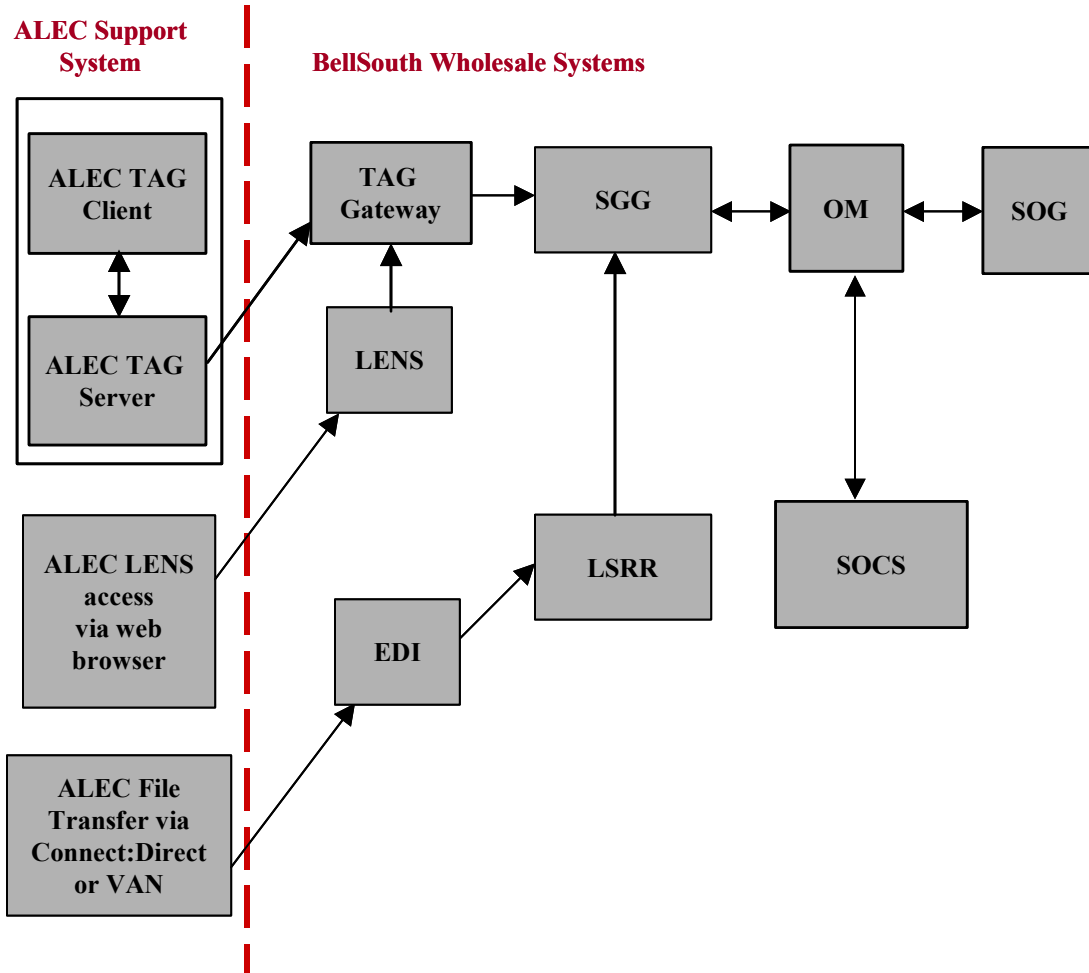
Figure 1-3: Process Systems Flow for a Wholesale Mechanized Order (non-xDSL)
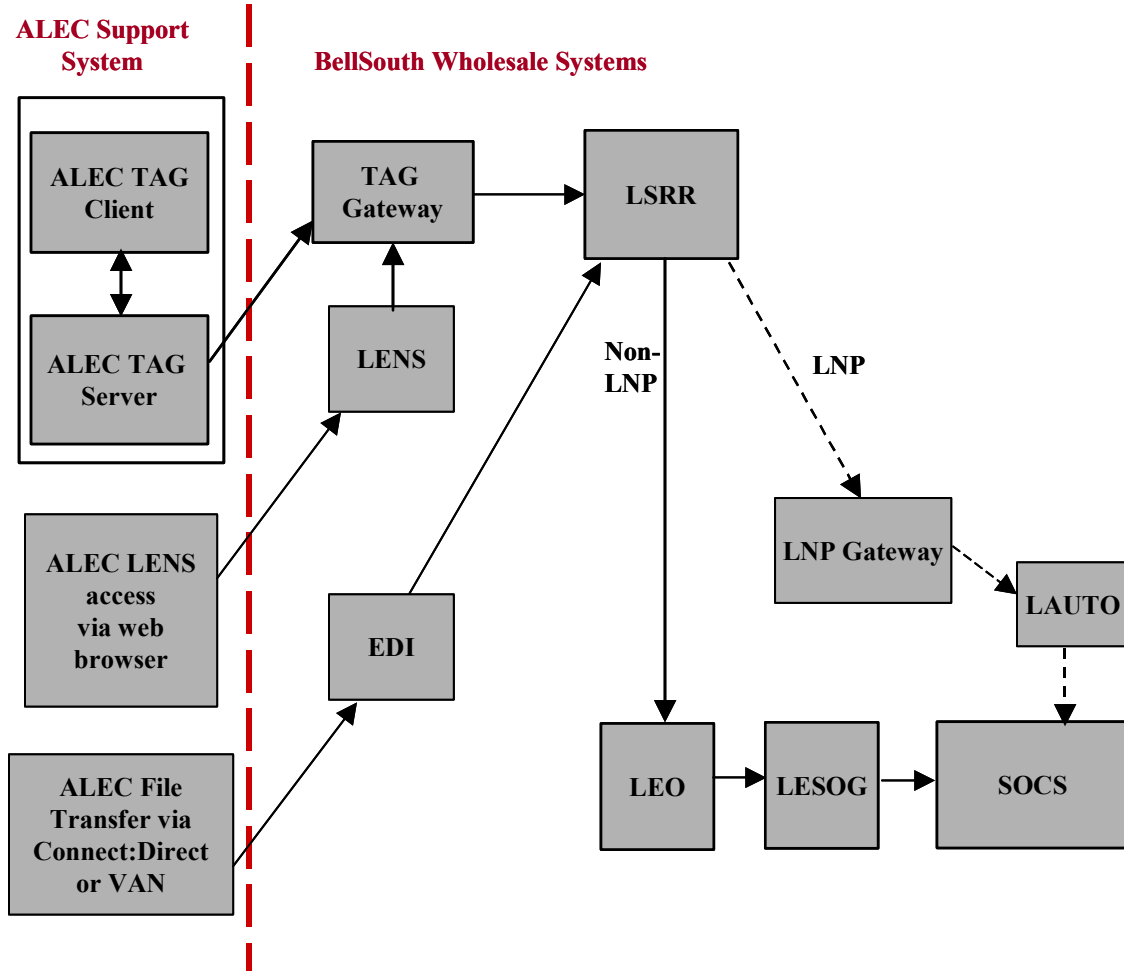
In the event that provisioning activities cannot be completed on the FOC-DD a Missed Appointment (MA) message is delivered to the ALEC. When an order is successfully completed, BellSouth transmits a Completion Notice (CN) to the ALEC indicating successful activation of the order.

3.0 Methodology

This section summarizes the test methodology.

3.1 Scenarios

The following four tables outline the pre-order and order test scenarios that KPMG Consulting used to test the functionality and timeliness of BellSouth systems and representatives.

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Table 1-2: Pre-ordering Scenarios

Activity	Residence	Business
Obtain Customer Service Records (CSRQ).	X	X
Validate Customer Address (AVQ, AVQ-TN).	X	X
Reserve and Release Telephone Numbers (TNAQ, TNSQ, TNCAN, TNAQ-MISC).	X	X
Loop Qualification including xDSL (LMU).	X	X
Determine Due Date/Appointment Availability (AAQ).	X	X
Request Information about Services, Features, Facilities, and PIC/LPIC Choices Available to Customers (SAQ).	X	X
Obtain Parsed Customer Service Records (PCSRQ).	X	X

Table 1-3: Resale Ordering Scenarios

Activity	Res. POTS	Bus. POTS	Res. ISDN	Bus. ISDN	Centrex	Private Line	PBX
Migration from BellSouth "as is"	X	X	X	X	X		X
ALEC to ALEC migration	X	X					
Feature changes to existing customer	X	X			X		
Migration from BellSouth "as specified"	X	X	X	X			
New customer	X	X			X	X	
Telephone number change	X	X					
Directory change	X	X			X		
Add lines/trunks/circuits	X	X	X	X	X	X	X
Suspend/restore service	X	X					
Disconnect (full and partial)	X	X	X	X	X	X	X
Moves (inside and outside)	X	X					
Convert line to ISDN			X	X			
Migrate from ALEC to BellSouth	X	X					

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Table 1-4: UNE Loop Ordering Scenarios

Activity	Res. Analog Loop	Bus. Analog Loop	Res. xDSL Capable Loop	Bus. xDSL Capable Loop	Bus. DS1 Loop	Inter-office Facility	Line Sharing[68]	UDC[69]	EEL[70]
Migration from BellSouth without number porting	X	X	X	X	NA[71]				X
Migration from BellSouth with INP[72]	NA	NA			NA				
Migration from BellSouth with Local Number Portability (LNP)	X	X			NA				
Migration from ALEC to ALEC	X	X					X		
Add new loops to existing customer	X	X	X	X	X				X
Add new interoffice DS1/DS3 facilities						X			
Purchase loops for a new customer	X	X	X	X	X		X	X	X
Disconnect (full and partial)	X	X			X	NA[73]			X
Moves (inside and outside)	X	X			X				
Standalone directory change	X	X							
Standalone INP	NA	NA							
Standalone LNP	X	X							
Convert from UNE-P to UNE-L	X	X							
Convert from Resale to UNE-L	X	X							

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[68]Line Sharing was added to the BBR-LO in Issue 9I on October 12, 2000.

[69]Unbundled Digital Channel (UDC) was added to the BBR-LO in Issue 9E on July 17, 2000.

[70]Enhanced Extended Link (EEL) was added to the BBR-LO in Issue 9E on July 17, 2000.

[71]BellSouth does not support migration of DS1 facilities.

[72]BellSouth no longer offers Interim Number Portability (INP).

[73]KPMG Consulting was unable to obtain facilities from BellSouth to support Interoffice Facility (IOF) disconnects.

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Table 1-5: UNE Platform (UNE-P) Ordering Scenarios

Activity	Res. POTS	Bus. POTS	Res. ISDN	Bus. ISDN	PBX[74]	DID[75]	DID Trunks[76]
Migration from BellSouth "as is"	X	X	X	X	X	X	X
Migrate from ALEC to ALEC	X	X					
Feature changes to existing customer	X	X					
Migration from BellSouth "as specified"	X	X	X	X			
New customer	X	X	NA[77]	NA			
Telephone number change	X	X					
Directory change	X	X					
Add lines/trunks/circuits	X	X	X	X			X
Suspend/restore service	X	X					
Disconnect (full and partial)	X	X	X	X			
Moves (inside and outside)	X	X					
Convert line to ISDN			X	X			
Migrate from ALEC to BellSouth	X	X					
Convert from Resale to UNE-P	X	X	NA[78]	NA			

3.2   Test Targets and Measures

The test targets were the BellSouth pre-order and order systems and processes, including TAG, EDI, LENS and the manual order process.

Included in the test targets for pre-order were the following processes and sub-processes:

♦ Submit and monitor pre-order transactions;

   ♦ Create pre-order query;

   ♦ Send pre-order transaction;

   ♦ Receive match response;

   ♦ Receive near-match response;

   ♦ Receive error response; and

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[74]UNE-P Private Branch Exchange (PBX) was added to the BBR-LO in Issue 9J on December 1, 2000.

[75]UNE-P Direct Inward Dial (DID) was added to the BBR-LO in Issue 9J on December 1, 2000.

[76]UNE-P DID Trunks were added to the BBR-LO in Issue 9J on December 1, 2000.

[77]BellSouth does not offer new Integrated Switch Digital Network (ISDN) accounts using UNE-P.

[78]BellSouth does not support conversion from Resale ISDN (Residential) to UNE-P ISDN (Residential).

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♦ Verify correct processing of pre-order.

The following processes and sub-processes were included in the test target for orders:

♦ Submit order;

  ♦ Create LSR;

  ♦ Transmit LSR;

  ♦ Receive FA;

  ♦ Receive FOC, ERR or CLR;

  ♦ Verify accuracy and completeness of response;

♦ Submit planned error;

  ♦ Send planned error in order transaction;

  ♦ Receive FA;

  ♦ Received planned ERR(s) or response and verify receipt of response;

  ♦ Correct ERR(s);

  ♦ Resend order;

  ♦ Receive FOC, ERR or CLR response;

♦ Supplement (SUP)an order;

  ♦ Send SUP;

  ♦ Receive FA;

  ♦ Receive of supplement FOC, ERR or CLR;

  ♦ Correct errors and re-send SUP;

  ♦ Receive FOC;

♦ Integrate pre-order data on order;

  ♦ Create orders using designated pre-order response information;

  ♦ Submit orders;

  ♦ Receive FA;

  ♦ Receive FOC, ERR or CLR; and

  ♦ Verify correct processing of order.

3.3   Data Sources

The data collected for this test included the BBR-LO General Information, Required/Conditional/Optional (RCO) Tables[79], BBR-LO Data Element Dictionary TCIF9, and

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[79]TCIF 9 versions; 9E, 9F, 9G, 9H, 9I, 9J, 9K, 9L, 9M, 9N, 9O, 9P, 9Q, 9R, 9S, Release 10.4, and Release 10.5.

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the BellSouth Pre-Order Business Rules[80]. Other data collected included the CLEC Universal Service Order Code (USOC) Manuals; BellSouth Products and Services Interval Guide; CLEC UNE Product Guides; Resale Products Guide; and the BellSouth Interim Performance Metrics.

3.4   Data Generation/Volumes

KPMG Consulting determined appropriate transaction levels for functional testing by analyzing the available pre-order types, order delivery methods, and activity types.

3.5   Evaluation and Analysis Methods

The Florida Master Test Plan[81] (MTP) defined a set of pre-order and order scenarios for testing in the POP Functional Evaluation (TVV1). The scenarios outlined, at a high-level, the products and services to order and the activity types to request. KPMG Consulting developed test cases for each scenario that contained a detailed description of the scenario and described order requirements, including customer type (Business or Residential), migration activity (partial or full), flow-through designation, and other information necessary to execute the test case.

BellSouth established a test bed of customer accounts according to KPMG Consulting specifications. Customer test accounts were geographically distributed across multiple Florida central offices, switching/transmission equipment and configurations, and Revenue Accounting Offices (RAOs). Creation of the test bed produced Customer Service Records (CSRs) that identified the end user's initial state, including address, billing requirements, and existing services and equipment information. KPMG Consulting validated the test accounts for accuracy prior to the start of the test. The POP Functional Evaluation (TVV1) required BellSouth to provide additional facilities information such as addresses, telephone numbers and cable pairs necessary to complete LSRs. Scenarios for ordering LNP and for ALEC-to-ALEC migrations were processed by KPMG Consulting using customer data and other order information from participating ALECs currently operating in Florida. Florida ALECs were solicited for voluntary use of facilities and access to the Number Portability Administration Center (NPAC).

Using the BellSouth Business Rules as a guide, KPMG Consulting submitted LSRs, received ERR/CLRs, FOCs and CNs, and logged the results of these transmissions. The data collected were analyzed by employing the evaluation criteria detailed in Section 4.1.

The POP Functional Evaluation (TVV1) results reflect KPMG Consulting's ALEC experience. The Metric Calculations Verification and Validation Review (PMR5) evaluated BellSouth's actual metrics calculations. These calculations were based on the definitions of the BellSouth OSS Testing SQM[82]. Order transmission times were compared to the SQMs, or in the absence of an SQM to a KPMG Consulting defined benchmark. System functionality was compared to BellSouth's published documentation on interface functionality.

BellSouth ordering Business Rules provided the ordering forms and data fields required for a service request, as well as the data characteristics, usage requirements, and valid entries for each data field. Documentation issues encountered during the creation of order transactions were analyzed and documented. Results in Section 4.0 were calculated based on outbound and inbound transaction timestamps recorded by KPMG Consulting's testing infrastructure. These timestamps

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[80]BellSouth Pre-Order Business Rules Versions 7.0, 8.0, 9.0, 10.0, 11.0, and 12a.
[81]BellSouth Telecommunications, Inc, OSS Evaluation Project Master Test Plan Final Version 3.0 December 2, 1999.
[82]Revised Interim Performance Metrics Version 3.0, approved by the FPSC dated June 2001.

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may differ in varying degrees from the time measurement points reported in BellSouth SQM reports. KPMG Consulting measured the ALEC end-to-end response time while BellSouth measured processing time within its environment. For the pre-order and order evaluation criteria that do not map to performance measurements defined in the SQMs, KPMG Consulting applied a benchmark based on professional judgment.

The POP Functional Evaluation (TVV1) included a checklist of evaluation measures developed by KPMG Consulting during the initial phase of the BellSouth OSS Evaluation. These evaluation criteria provided the framework of norms, standards, and guidelines for the POP Functional Evaluation (TVV1).

The data collected were analyzed employing the evaluation criteria detailed in Section 4.1 below.

4.0   Results

This section contains the overall test results.

4.1   Results Summary

The number of exceptions and observations issued during the life of the test is depicted in Table 1-5. For additional exception and observation information, refer to Appendices D and E, respectively. The test evaluation criteria and results are presented in Table 1-6.

In some instances, KPMG Consulting applied a benchmark to pre-order timeliness evaluation criteria of 10 seconds. Where this benchmark has been applied is identified in the comments section of Table 1-7.

Table 1-6: TVV1 Exception and Observation Count

Activity	Exceptions	Observations
Total Issued	56	51
Total Disposed of as of Final Report Date	52[83]	47
Total Open as of Final Report Date	4	4

Table 1-7: TVV1 Evaluation Criteria and Results

Test Reference	Evaluation Criteria	Result	Comments
Presence of Order Functionality – Functional Evaluation			
TVV1-1-1	The BellSouth EDI interface provides expected order functionality.	Satisfied	The BellSouth EDI interface provides expected order functionality. During transaction testing conducted from March 13, 2001 through May 22, 2002, KPMG Consulting submitted a total number of 3,932 orders with a variety of REQTYP/ACT

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[83]Exceptions 58, 74, 102, 133, and 134 were closed when the FPSC removed RoboTAG from the Florida OSS test (Order # PSC-02-0450-PCO-TP) on April 3, 2002. Information on these Exceptions is not documented in the results below.

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Test Reference	Evaluation Criteria	Result	Comments
			combinations in accordance with the MTP and using the current issue of the BBR-LO. Details of the product and activity types included in this test are shown in Tables 1-3 through 1-5 above. The following order functionality issues were identified: ♦ KPMG Consulting attempted to build orders that called for the partial migration of a Loop (REQTYP A/ACT P) account and determined that the BellSouth BBR-LO (Issue 9K) did not provide Required/Conditional/Optional (RCO) tables with instructions for completing this order type. KPMG Consulting issued Exception 16. BellSouth responded that the addition of this functionality to BellSouth's systems was entered in the Change Control process Change Request (CR) #0029, and was further given a priority ranking by the ALEC community. BellSouth has assigned an implementation date of August 25, 2002 in Release 10.6 for this functionality enhancement. Exception 16 remains open. The ALEC community prioritized CR #0029 such that it will not be implemented during the OSS evaluation. Therefore KPMG Consulting does not feel that this issue is significant enough to warrant a Not Satisfied result for this criterion. ♦ During transaction testing, KPMG Consulting received responses via BellSouth's EDI interfaces that had an inaccurate Transaction Set (TS) for CN responses. KPMG Consulting issued Exception 98. BellSouth identified a downstream system defect and corrected the issue in Encore Release 9.5 on September 1, 2001. KPMG Consulting retested this issue via the EDI interface after September 1 and monitored 855 TSs for accuracy. KPMG Consulting determined that the issue raised had been satisfied and Exception 98 was closed. ♦ KPMG Consulting issued all REQTYP/ACT

[84] 2 Wire Voice Grade UNE Loop/Port Switched Combination (Business, Residential and Line Side PBX Service) CLEC Information package.

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Test Reference	Evaluation Criteria	Result	Comments
			combinations via the EDI interface and failed to receive expected responses. KPMG Consulting issued Exception 105 and BellSouth indicated that the following system defects were identified and fixed: ♦ Direct upload problem. Issue resolved on March 3, 2001; ♦ EDI interchange failure. Issue resolved on April 10, 2001; ♦ EDI LEO communication failure. Issue resolved on March 22, 2001; ♦ Mercator Translator Thread ID defects. Issue resolved on July 19, 2001; ♦ Downstream reject condition defect. Issue resolved on July 27, 2001; and ♦ CONNECT: Direct failure and overwrite condition. Issue resolved on September 28, 2001. After September 28, 2001, KPMG Consulting retested and submitted orders via the EDI interface and monitored the BellSouth responses. All expected responses were received. Exception 105 was closed. ♦ UNE-P (REQTYP M) service requests were submitted in accordance with BellSouth BBR-LO (Issue 9K), relating to the requirement for the Carrier Identification Code (CIC) field. BellSouth EDI error responses were inconsistent with the documented Business Rules. KPMG Consulting issued Exception 32. BellSouth indicated that there was a mismatch between OSS'99 Issue 9K and BellSouth systems. The Business Rules were updated on March 3, 2001 and April 30, 2001 to match existing functionality. KPMG Consulting validated the new CIC requirement and confirmed the update to documentation. Exception 32 was closed. ♦ UNE-P (REQTYP M) LSRs were submitted in accordance with BellSouth documentation, relating to the use of USOCs on the LSR. BellSouth systems and representatives were inconsistent in their response to issuing FOCs on orders and applied the USOC rules differently. KPMG

Test Reference	Evaluation Criteria	Result	Comments
			Consulting issued Exception 41. BellSouth updated the product documentation[84] to specify the USOCs required on the LSR prior to submission and USOCs that were automatically populated by BellSouth systems. KPMG Consulting verified that the documentation was corrected to clarify the use of UNE-P USOCs. Exception 41 was closed.
			♦ BellSouth's EDI interface did not apply accurate business rule BBR-LO (Issue 9L) front-end edits for the Directory Listing (DL) form and data for Resale partial migrations (REQTYP E/ACT P) and UNE-P partial migrations (REQTYP M/ACT P). KPMG Consulting issued Exception 46. BellSouth issued a new version of the Business Rules on May 31, 2001 (Issue 9N) that corrected the rules on use of the DL form on Resale and UNE-P orders. KPMG Consulting submitted orders following the new Business Rule changes to required fields and did not experience further problems. Exception 46 was closed.
			♦ KPMG Consulting attempted to issue Digital Signal 1 (DS1) (REQTYP A/ACT C) orders through the EDI interface using the RCO tables found in OSS'99 Issue 9N. These orders were rejected due to an inaccurate Line Activity (LNA), which indicated that only LNAs of New (N) or Disconnect (D) were appropriate. KPMG Consulting issued Exception 80. BellSouth indicated that an update to the RCO tables for DS1 was necessary to show that change move orders of REQTYP A are not offered by BellSouth. On August 27, 2001 OSS'99 Issue P was released and KPMG Consulting validated the RCO charts for REQTYP A (DS1) had been updated. Exception 80 was closed.
TVV1-1-2	BellSouth TAG interface provides expected order functionality.	Satisfied	BellSouth TAG interface provides expected order functionality. During transaction testing conducted from March 13, 2001 through May 15, 2002, KPMG Consulting submitted 4,043 orders with a variety of REQTYP/ACT combinations in accordance with the MTP and using the current issue of the BBR-LO. Details of the product and activity types included in this test are shown in Tables 1-

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Test Reference	Evaluation Criteria	Result	Comments

			3 through 1-5 above.
			
			The following order functionality issues were observed:
			
			♦ KPMG Consulting attempted to create orders for the partial migration of a Loop (REQTYP A/ACT P) account and determined that the BBR-LO (Issue 9K) did not provide RCO tables to complete this order type. KPMG Consulting issued Exception 16. BellSouth responded that the addition of this functionality to BellSouth systems was entered in the Change Control process CR#0029, and was given a priority ranking by the ALEC community. BellSouth has assigned an implementation date of August 25, 2002 in Release 10.6 for addition of this functionality. Exception 16 remains open. The ALEC community prioritized CR #0029 such that it will not be implemented during the OSS evaluation. Therefore KPMG Consulting does not feel that this issue is significant enough to warrant a Not Satisfied result for this criterion.
			
			♦ A series of Resale (REQTYP E), UNE-P (REQTYP M) and Loop (REQTYP A) orders were submitted through the TAG interface with information populated in the EU fields per the RCO tables in BBR-LO (Issue 9L). The TAG interface rejected the orders due to lack of data in the "State" field. The "State" field was not required per the RCO table. KPMG Consulting issued Exception 42. In response, BellSouth indicated its intent to implement the following fix:
			
			   ♦ Enhancement (CMVC 13022) was implemented on June 2, 2001 that would no longer require address information on Change requests (ACT C) for Loop (REQTYP A) and Resale (REQTYP E).
			
			   ♦ A defect fix was opened to correct the requirements of EU information on Loop (REQTYP A) and UNE-P (REQTYP M) orders for activities of Disconnects (ACT D) and Seasonal Suspension (ACT L). Implementation of the fix occurred on July 27, 2001.
			
			Subsequent to the fix, KPMG Consulting issued

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Test Reference	Evaluation Criteria	Result	Comments
			orders via the TAG interface with the EU fields left unpopulated. The TAG interface processed these orders as expected. Exception 42 was closed.
			♦ The BellSouth TAG interface did not apply accurate BBR-LO (Issue 9L) front-end edits for DL forms and data for Resale partial migrations (REQTYP E/ACT P) and UNE-P partial migrations (REQTYP M/ACT P). KPMG Consulting issued Exception 46. BellSouth updated the Business Rules on May 31, 2001 (Issue 9N). The new rules corrected the information regarding the use of the DL form for Resale and UNE-P orders. KPMG Consulting submitted orders following the new Business Rule requirements. No error message was received for that sample order set. Exception 46 was closed.
			♦ Local Number Portability (LNP) orders issued via the TAG interface received REJ messages associated with the "Coordinated Hot Cut" (CHC) field. KPMG Consulting issued Exception 77. BellSouth indicated that discrepancies existed between TAG edits and LNP Gateway requirements. BellSouth implemented a system enhancement on July 28, 2001. KPMG Consulting issued new LNP orders with and without the CHC field populated and did not experience the defect. Exception 77 was closed.
			♦ KPMG Consulting attempted to issue DS1 (RETYP A/ACT C) orders through the TAG interface using the RCO tables found in BBR-LO (Issue 9N). These orders were rejected due to an inaccurate LNA value, which indicated that only LNAs of New (N) or Disconnect (D) were appropriate. KPMG Consulting issued Exception 80. BellSouth updated the RCO tables for DS1 orders to show that moves of DS1 are not offered by BellSouth. On August 27, 2001 BBR-LO (Issue 9P) was released and KPMG Consulting reviewed the RCO charts and confirmed that they were updated for REQTYP A (DS1). Exception 80 was closed.
			KPMG Consulting submitted various types of

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Test Reference	Evaluation Criteria	Result	Comments
			LSRs and pre-order queries through TAG that were prevented from reaching BellSouth systems due to backend resource limitation exceptions. KPMG Consulting issued Exception 87. BellSouth responded that the backend resource limitations KPMG Consulting received were appropriate. BellSouth indicated if KPMG Consulting received a backend resource limitation three consecutive times, KPMG Consulting should contact EC support. KPMG Consulting issued Amended Exception 87 which showed that during the period of March 13, 2001 through August 8, 2001, there were 2,579 service requests submitted to BellSouth via TAG of which 9% received backend resource limitations. KPMG Consulting's professional opinion is that the percentage of backend resource limitations experienced during the above timeframes was unacceptably high and could cause significant delays in the processing of orders. BellSouth responded that steps would be taken to reduce the occurrence of backend resource limitations. These steps included the creation of more descriptive error messages. KPMG Consulting analyzed TAG communication logs from testing conducted during March 2002 through April 2002 and found 99.21% of all TAG orders were submitted successfully without receiving backend resource limitation errors. Exception 87 was closed.
TVV1-1-3	BellSouth LENS interface provides expected order functionality.	Satisfied	BellSouth LENS interface provides expected order functionality. During transaction testing conducted from March 13, 2001 through May 22, 2002, KPMG Consulting submitted a total number of 880 orders with a variety of REQTYP/ACT combinations in accordance with the MTP and using the current issue of the BBR-LO. Details of the product and activity types included in this test are shown in Tables 1-3 through 1-5 above. The following order functionality issues were observed: ♦ KPMG Consulting attempted to create orders for the partial migration of a Loop (REQTYP A/ACT P) account and determined that the BBR-LO (Issue 9K) did not provide RCO tables. KPMG Consulting issued Exception 16. BellSouth responded that the addition of this functionality to BellSouth's systems was

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Test Reference	Evaluation Criteria	Result	Comments
			entered in the Change Control process CR#0029, and was given a priority ranking by the ALEC community. BellSouth has assigned an implementation date of August 25, 2002 in Release 10.6 for addition of this functionality. Exception 16 remains open. The ALEC community prioritized CR #0029 such that it will not be implemented during the OSS evaluation. Therefore KPMG Consulting does not feel that this issue is significant enough to warrant a Not Satisfied result for this criterion.
			♦ While submitting orders for ISDN Loop service via the BellSouth LENS interface, KPMG Consulting found that a required value H in the Type of Service (TOS) field, per BBR-LO (Issue 9K), was not an option within the LSR field. BellSouth sent clarifications because the LSO information did not include H as the second character. KPMG Consulting issued Exception 40. BellSouth updated the BBR-LO and KPMG Consulting retested by validating BBR-LO (Issue 9O), for the appropriate changes and issued ISDN Loop orders via LENS. KPMG Consulting was able to access the required data elements necessary to complete ISDN BRI orders. Exception 40 was closed.
			♦ KPMG Consulting observed that the BBR-LO stated Loop Conversion orders submitted through the LENS interface did not require the Final Billing Information Indicator (FBI) field. KPMG Consulting submitted a Loop Conversion order and observed that the FBI field was auto populated. KPMG Consulting issued Exception 55. BellSouth responded that LENS automatically navigates users to screens with fields required to process the specific order. LENS does not automatically navigate users to the END USER BILLING page, where the FBI field is located. LENS automatically populates a default value for the FBI field. KPMG Consulting agreed and Exception 55 was closed.
			♦ KPMG Consulting attempted to issue DS1 (RETYP A/ACT C) orders through the LENS interface using the RCO tables found in BBR-LO (Issue 9N). These orders were rejected due to an inaccurate LNA value,

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Test Reference	Evaluation Criteria	Result	Comments
			which indicated that only LNAs of New (N) or Disconnect (D) were appropriate. KPMG Consulting issued Exception 80. BellSouth updated the RCO tables for DS1 orders to show that move change orders of DS1 are not offered by BellSouth. On August 27, 2001 BBR-LO (Issue 9P) was released and the RCO charts were validated for REQTYP A (DS1). Exception 80 was closed.
			KPMG Consulting attempted to issue supplemental orders via LENS without including a comment in the REMARK field per the BBR-LO. KPMG Consulting received an error message. The error message received stated that the REMARK field must be populated. KPMG Consulting noted that this caused orders to fallout for manual handling. KPMG Consulting issued Exception 89. BellSouth responded that adding information in the REMARK field of the LSR does not cause an LSR to fallout for manual handling. KPMG Consulting has successfully tested supplemental orders that do not require the REMARK field to be populated. The REMARK field for these orders was populated and the orders did not fallout for manual handling. Exception 89 was closed.
TVV1-1-4	BellSouth manual order process provides expected system functionality.	Satisfied	BellSouth manual order process provides expected system functionality.
			During transactional testing conducted from March 13, 2001 through May 22, 2002, KPMG Consulting submitted a total number of 1,898 orders with a variety of REQTYP/ACT combinations in accordance with the MTP and using the current issue of the BBR-LO. Details of the product and activity types included in this test are shown in Tables 1-3 through 1-5 above.
			The following manual ordering issues were observed:
			♦ KPMG Consulting attempted to create orders for the partial migration of a Loop (REQTYP A/ACT P) account and determined that the BBR-LO (Issue 9K) did not provide RCO tables. KPMG Consulting issued Exception 16. BellSouth responded that the addition of this functionality to BellSouth's systems was entered in the Change Control process CR#0029, and was given a priority by the ALEC community. BellSouth has assigned

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Test Reference	Evaluation Criteria	Result	Comments
			an implementation date of August 25, 2002 in release 10.6 for addition of this functionality. Exception 16 remains open. The ALEC community prioritized CR #0029 such that it will not be implemented during the OSS evaluation. Therefore KPMG Consulting does not feel that this issue is significant enough to warrant a Not Satisfied result for this criterion.
			♦ KPMG Consulting attempted to issue ALEC-to-ALEC migrations of UNE-L accounts. BellSouth did not provide the appropriate Business Rules to issue these orders. KPMG Consulting issued Exception 49. As part of the BellSouth response to the exception the BBR-LO was updated to address the procedures for migrating Resale and UNE-P accounts from ALEC-to-ALEC. BellSouth also published the CLEC-to-CLEC Conversion for Unbundled Loops guide to address migrations of UNE-L accounts. KPMG Consulting issued ALEC-to-ALEC migrations of Resale, UNE-P accounts and successfully completed the orders. Exception 49 was closed.
			♦ KPMG Consulting was unable to issue orders for the migration of an Extended Enhanced Loop (EEL). KPMG Consulting issued Exception 17. BellSouth responded by updating the BBR-LO (Issue 9L) on March 30, 2001. KPMG Consulting validated the changes to the document and successfully issued orders of this activity type. Exception 17 was closed.
			♦ KPMG Consulting did not receive faxed clarifications for invalid orders sent to the Carrier Resale Services Group (CRSG). KPMG Consulting issued Exception 70. BellSouth modified the CRSG process on July 17, 2001. KPMG Consulting validated that the process document was updated and received expected responses to clarifications. Exception 70 was closed.
			♦ Exception 162 was issued regarding BellSouth's instructions for submitting orders for Centrex® service were inadequate. BellSouth indicated that existing ordering forms would be replaced with new forms. BellSouth intended for the new forms to

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Test Reference	Evaluation Criteria	Result	Comments
			provide clearer instructions for Centex® submission. Exception 162 remains open.
Accuracy of Order Responses[85] – Functional Evaluation			
TVV1-2-1	BellSouth systems or representatives provide accurate and complete Firm Order Confirmations (FOCs).	Satisfied	BellSouth systems or representatives provide accurate and complete FOCs.
			KPMG Consulting did not receive FOCs from BellSouth via fax/email for orders that were assigned a completed (CP) status in CSOTS. KPMG Consulting issued Exception 117. BellSouth agreed that KPMG Consulting did not receive the responses due to BellSouth employee errors. The LCSC and CRSG management trained employees on the need for accuracy and the consequences of making errors. KPMG Consulting submitted additional orders via fax/email and determined that BellSouth returned all expected FOCs. Exception 117 was closed.
			KPMG Consulting applied a benchmark for receipt of accurate FOCs of 95%.
			540 FOCs received from February 28, 2002 through April 2, 2002 were examined for clarity, accuracy and completeness relative to the BBR-LO.
			♦ 96.85% (523 of 540) of FOCs received were accurate and complete[86].
			KPMG Consulting issued Exception 166 which states that BellSouth provided inconsistent information on FOC responses for Resale and UNE-P service requests submitted via TAG and EDI interfaces. BellSouth identified an issue in LESOG and implemented a system fix with Release in 10.5 on June 1, 2002 to address the missing Billing Account Number (BAN) field on FOC responses. KPMG Consulting validated 19 FOC responses after June 1, 2002 and confirmed that the BAN on the FOC was returned. Exception 166 is closed.
TVV1-2-2	BellSouth system or representatives provide	Not Satisfied	BellSouth system or representatives do not provide accurate and complete FRR-CLR

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[85]For this criterion, KPMG Consulting defined an accurate response to be a system response that is consistent with the technical specifications for TAG, EDI and BellSouth representative responses and consistent with the transaction type that initiated the response. In the case of error responses, KPMG Consulting verified that these were only received for incorrectly formatted LSRs.

[86]KPMG Consulting excluded 141 FOC responses from the Accuracy and Completeness evaluation due to a BellSouth LESOG defect, which was fixed in Release 10.5.

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Test Reference	Evaluation Criteria	Result	Comments
	representatives provide accurate and complete Error (ERR)/Clarification (CLR) messages.		provide accurate and complete ERR CLR messages.
			KPMG Consulting applied a benchmark for receipt of accurate ERRs/CLRs of 95%.
			751 clarification responses received from March 15, 2001 through November 7, 2001 were examined to determine compliance with BBR-LO.
			♦ 96.01% (721of 751) of clarification responses were in compliance with the BBR-LO.
			713 clarification responses received from February 28, 2002 through April 2, 2002 were examined to determine compliance with BBR-LO.
			♦ 96.49% (688 of 713) of clarification responses were in compliance with the BBR-LO.
			An additional 308 clarification responses from April 3, 2002 through May 15, 2002 were also examined to determine compliance with the BBR-LO.
			♦ 89.29% (275 of 308) of clarification responses were in compliance with the BBR-LO.
			KPMG Consulting issued Exception 165. BellSouth's response indicated that of the 54 inaccurate responses, they agreed with KPMG Consulting's assessment of 33 of the 54 responses resulting in an 89% accuracy rate. Exception 165 addressed issues including errors in the BBR-LO and BellSouth employee errors. Exception 165 remains open.
			The following BellSouth system and representative issues were observed:
			♦ KPMG Consulting observed that while issuing ISDN-BRI orders to BellSouth, error messages were generated contrary to BellSouth Business Rules. KPMG Consulting issued Exception 73. BellSouth responded by updating the Business Rules[87]

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[87]OSS '99 Issue 9O June 29, 2001.

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Test Reference	Evaluation Criteria	Result	Comments
			for ISDN conversions. KPMG Consulting validated the new documentation and issued orders following the new requirements. No further error messages were received related to this issue. Exception 73 was closed.
			♦ KPMG Consulting issued Line Sharing orders to BellSouth adhering to the BellSouth Business Rules and received error messages that were inconsistent with the expected response. KPMG Consulting issued Exception 75. BellSouth responded with its implementation on July 28, 2001 of ENCORE Release 9.4, which included Change Control process enhancements for Line Sharing. KPMG Consulting issued Line Sharing orders after the implementation date to validate the BellSouth response and no longer observed inappropriate error messages. Exception 75 was closed.
TVV1-2-3	BellSouth systems or representatives provide accurate and complete Completion Notices (CNs).	Satisfied	BellSouth systems or representatives provide accurate and complete CNs. KPMG Consulting applied a benchmark for receipt of accurate CNs of 95%. 146 CN responses received from March 5, 2002 through May 10, 2002 were examined to determine compliance with the BBR-LO. ♦ 97.26% (142 of 146) of CN responses received were found to be accurate and complete per the BellSouth Business Rules.
TVV1-2-4	BellSouth systems or representatives provide, accurate and complete Missed Appointment (MA) Notifications.	Satisfied	BellSouth systems or representatives provide, accurate and complete MAs. KPMG Consulting applied a benchmark for receipt of accurate MAs of 95%. 28 MA responses received from March 13, 2001 through May 22, 2002 were examined to determine compliance with the BBR-LO. ♦ 92.86%[88] (26 of 28) of MA responses received were found to be accurate and complete per the BellSouth Business Rules.

[88]Although the test percentage is below the benchmark of 95%, the statistical evidence is not strong enough to conclude that the performance is below the benchmark with 95% confidence. The inherent variation in the process is large enough to have produced the substandard result, even with a process that is operating above the benchmark standard.

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Test Reference	Evaluation Criteria	Result	Comments
			KPMG Consulting issued Exception 170 detailing the fields and values in the MA responses that did not comply with the BBR-LO. BellSouth's response disagreed with KPMG Consulting's analysis of the missing fields in the MA responses. Additional analysis of the CLEC FCIF files for these PONs show that KPMG Consulting received the appropriate fields and values for MA responses. Exception 170 was closed.
TVV1-2-5	BellSouth Service Order Tracking System (CSOTS) provides accurate LSR status.	Satisfied	BellSouth CSOTS provides accurate LSR status. KPMG Consulting applied a benchmark for accurate LSR status of 95%. 50 purchase orders were examined in CSOTS for accuracy in relation to KPMG Consulting's status of the order. 100% (50 of 50) of the purchase orders examined was found to be accurate.
Timeliness of Order Response[89] - Functional Evaluation (TVV1)		
TVV1-3-1	BellSouth's EDI interface provides Functional Acknowledgements (FAs) within the agreed upon standard interval.	Satisfied	BellSouth's EDI interface provides FAs within the agreed upon standard interval. The O-1 SQM standard for FAs is 95% received within 30 minutes[90]. During initial testing, KPMG Consulting received FAs within the following timeframes: ♦ 96.69% (2,161 of 2,235) of FAs were received in less than 30 minutes[91]. KPMG Consulting issued Exception 61[92]. BellSouth responded that inaccurate date and timestamps were used. KPMG Consulting agreed that incorrect timestamps were used in the

The p-value, which indicates the chance of observing this result when the benchmark is being met, is 0.4117, above the 0.0500 cut-off for a statistical conclusion of failure.

[89]KPMG Consulting excluded 131 EDI and 51 TAG LSR transactions from the initial test due to data exchange issues between KPMG Consulting and BellSouth.

[90]The SQM approved standard for FAs prior to August 1, 2001 was 90% within 30 minutes.

[91]Due to an internal KPMG Consulting mapping issue, KPMG Consulting excluded 23 FA responses from the sample.

[92]KPMG Consulting initially issued Exception 61 with errors in the PON/VER schema. Prior to BellSouth responding to the Exception, KPMG Consulting issued Amended Exception 61 with the appropriate PON/VERs.

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Test Reference	Evaluation Criteria	Result	Comments
			analysis and withdrew the exception.
			Due to changes in the Revised Interim Performance Metrics[93], subsequent testing was conducted from of November 26, 2001 through February 27, 2002. KPMG Consulting received FAs within the following timeframes.
			♦ 99.37% (788 of 793) of FAs were received in less than 30 minutes.
			During additional testing conducted from February 28, 2002 through May 22, 2002, KPMG Consulting received FAs within the following timeframes.
			♦ 99.88 % (862 of 863) of FAs were received in less than 30 minutes.
			See Tables 1-8 through 1-10 for additional transaction details.
TVV1-3-2	BellSouth's EDI interface provides Fully Mechanized (FM) reject (REJ) responses within the agreed upon standard interval.	Satisfied	BellSouth's EDI interface provides FM REJ responses within the agreed upon standard interval.
			The O-8 SQM standard for FM REJs is 97% received within one hour.
			During initial testing conducted from March 13, 2001 through April 9th, 2001, KPMG Consulting received FM REJs within the following timeframes:
			♦ 92.71% (178 of 192) of FM REJs were received in less than one hour[94].
			KPMG Consulting issued 2nd Amended Exception 51[95]. BellSouth stated that a downstream system problem caused production data to be sent to a test dataset. A system fix was implemented. KPMG Consulting initiated subsequent testing on March 24, 2001.
			During subsequent testing conducted from March 24, 2001 through July 16, 2001, KPMG Consulting received FM REJs within the

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[93]SQMs O-8 Reject Interval and O-9 FOC Timeliness changed on August 1, 2001 to reflect a new benchmark for PM responses. KPMG Consulting conducted a full retest of all related evaluation criteria in order to evaluate the new measures.
[94]KPMG Consulting excluded 19 FM REJs received after the initial FOC response.
[95]KPMG Consulting issued Exception 51 and Amended Exception 51. BellSouth indicated that KPMG Consulting was not using the appropriate flow through classifications to determine flow through and non-flow through. KPMG Consulting issued 2nd Amended Exception 51 with the correct flow through/non-flow through classifications.

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Test Reference	Evaluation Criteria	Result	Comments
			following timeframes:
			♦ 95.41% (540 of 566) of FM REJs were received in less than one hour[96].
			KPMG Consulting issued 3rd Amended Exception 51. In the response, BellSouth indicated that the flow through classifications for LNP auto clarifications were incorrect. BellSouth implemented a flow through reporting fix and KPMG Consulting initiated subsequent testing on November 26, 2001.
			During subsequent testing conducted from November 26, 2001 through February 27, 2002, KPMG Consulting received FM REJs within the following timeframes:
			♦ 97.73% (215 of 220 of FM REJs were received in less than one hour[97].
			Due to system performance issues in other evaluation criteria, KPMG Consulting conducted a retest from February 28, 2002 through May 22, 2002♦. KPMG Consulting received FM REJs within the following timeframes:
			♦ 98.16% (160 of 163) of FM REJs were received in less than one hour[98].
			Exception 51 was closed.
			See Tables 1-11 through 1-13 for additional transaction details.
TVV1-3-3	BellSouth's EDI interface provides Partially Mechanized (PM) rejects (REJ) responses within the agreed upon standard interval.	Satisfied	BellSouth's EDI interface provides PM REJ responses within the agreed upon standard interval.
			The O-8 SQM standard for PM REJs is 85% received within 10 hours[99].
			During initial testing conducted from March 13, 2001 through November 25, 2001, KPMG

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[96]KPMG Consulting excluded 44 FM REJs received after the initial FOC response and 17 REJs that did not have FT indicator.

[97]KPMG Consulting excluded 5 FM REJs received after the initial FOC response.

♦When a test result indicates system and/or representative performance issues for a specific evaluation criterion, KPMG Consulting's methodology is to conduct a retest of all related criteria, report the results and issue Observations and/or Exceptions.

[98]KPMG Consulting excluded 8 FM REJs received after the initial FOC response.

[99]For PM LSRs submitted prior to August 1, 2001 the SQM standard for PM REJs is 85% received within 18 hours. For PM LSRs submitted prior to May 1, 2001 the SQM standard for PM REJs is 85% received within 24 hours.

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Test Reference	Evaluation Criteria	Result	Comments
			Consulting received PM REJs within the following timeframes[100]:
			♦ 81.25% (221of 272) of PM REJs were received in less than 10 hours.
			♦ 97.43% (265 of 272) of PM REJs were received in less then 18 hours.
			♦ 98.90% (269 of 272) of PM REJs were received less than 24 hours.
			KPMG Consulting issued Exception 91. BellSouth indicated that KPMG Consulting did not consider applicable exclusions. KPMG Consulting agreed and withdrew the exception.
			Due to changes in the Revised Interim Performance Metrics[101], KPMG Consulting initiated subsequent testing beginning November 26, 2001.
			During subsequent testing conducted from November 26, 2001 through February 27, 2002, KPMG Consulting received PM REJs within the following timeframes:
			♦ 84.38% (108 of 128) of PM REJs were received in less than 10 hours[102].
			Due to system performance issues in other evaluation criteria, subsequent testing was conducted from February 28, 2002 through May, 22, 2002, KPMG Consulting received PM REJs within the following timeframes♦:
			♦ 98.04% (100 of 102) of PM REJs were received in less than 10 hours[103].
			See Tables 1-14 through 1-16 for additional transaction details.
TVV1-3-4	BellSouth's EDI interface provides Fully Mechanized (FM) Firm Order Confirmations (FOC) responses within the agreed	Satisfied	BellSouth's EDI interface provides FM FOC responses within the agreed upon standard interval. The O-9 SQM standard for FM FOCs is 95%

[100]KPMG Consulting excluded 36 PM REJs received after the initial FOC response and 17 REJs that did not have a FT indicator.
[101]SQMs O-8 Reject Interval and O-9 FOC Timeliness changed on August 1, 2001 to reflect a new benchmark for PM responses. KPMG Consulting conducted a retest of all related criteria in order to evaluate the new measures and results of all testing activity are reported.
[102]KPMG Consulting excluded 41 PM REJs received after the initial FOC response.
[103]KPMG Consulting excluded 21 PM REJs received after the initial FOC response.

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Test Reference	Evaluation Criteria	Result	Comments
	responses within the agreed upon standard interval.		received within three hours.
			During initial testing conducted from March 13, 2001 through November 25, 2001, KPMG Consulting received FM FOCs within the following timeframes:
			♦ 92.90% (589 of 634) of FOCs were received within three hours[104].
			KPMG Consulting issued Exception 53. BellSouth indicated that incorrect flow through classifications were used to determine timeliness. KPMG Consulting agreed and Exception 53 was closed.
			Additional analysis for the same test period showed that KPMG Consulting received late FM Resale FOC responses from BellSouth. KPMG Consulting issued Exception 85. KPMG Consulting received FM Resale FOCs in the following timeframes:
			♦ 91.30% (147 of 161) of Resale FOCs were received in less than three hours for FM LSRs.
			BellSouth responded that Mercator and Job Control Language (JCL) errors as well as system unavailability downstream of the service order generator caused the time delay.
			KPMG Consulting also determined that the EDI interface returned late UNE-L FOCs. KPMG Consulting issued Exception 100. KPMG Consulting received FM UNE-L FOCs in the following timeframes:
			♦ 92.02% (150 of 163) of UNE-L FOCs were received in less than three hours for FM LSRs.
			BellSouth responded that an EDI defect and a due date calculation problem caused the delay of responses. A BellSouth system fix was implemented on July 19, 2001 to correct the EDI defect and August 10, 2001 to correct the Due Date calculation problem.
			During subsequent testing conducted from November 26, 2001 through February 27, 2002.

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[104]KPMG Consulting excluded 4 FM FOCs received after the initial REJ response and 47 FOCs that did not have a FT indicator.

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Test Reference	Evaluation Criteria	Result	Comments
			KPMG Consulting received FM Resale and UNE-L FOCs within the following timeframes: ♦ 98.85% (86 of 87) of Resale FOCs were received in less than three hours for FM LSRs. ♦ 97.98% (97 of 99) of UNE-L FOCs were received in less than three hours for FM LSRs. Exceptions 85 and 100 were closed. Due to system performance issues in other evaluation criteria, a subsequent test was conducted from February 28, 2002 through May 22, 2002♦. KPMG Consulting received FM FOCs within the following timeframes: ♦ 98.19% (380 of 387) of FOCs were received in less than three hours. See Tables 1-17 through 1-19 for additional transaction details.
TVV1-3-5	BellSouth's EDI interface provides Partially Mechanized (PM) Firm Order Confirmation (FOC) responses within the agreed upon standard interval.	Satisfied	BellSouth's EDI interface provides PM FOC responses within the agreed upon standard interval. The O-9 SQM standard for PM FOCs is 85% received within 10 hours[105]. During initial testing conducted from March 13, 2001 through November 25, 2001, KPMG Consulting received PM FOCs within the following timeframes[106]: ♦ 92.07% (418 of 454) of FOCs were received in less than 10 hours. KPMG Consulting issued Exception 92. BellSouth responded that an EDI defect on the Sun Solaris server caused a delay in processing responses. BellSouth also responded that KPMG Consulting did not consider applicable exclusions. KPMG Consulting agreed and withdrew the exception. Due to changes in the Revised Interim Performance Metrics, KPMG Consulting

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[105]For PM LSRs submitted prior to August 1, 2001 the SQM standard for PM FOCs is 85% received within 18 hours. For PM LSRs submitted prior to May 1, 2001 the SQM standard for PM REJs is 85% received within 24 hours.
[106]KPMG Consulting excluded 3 PM FOCs received after the initial REJ response and 47 FOCs that did not have a FT indicator.

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Test Reference	Evaluation Criteria	Result	Comments
			initiated subsequent testing on November 26, 2001 for PM FOCs[107].
			During subsequent testing conducted from November 26, 2001 through February 27, 2002, KPMG Consulting received PM FOCs within the following timeframes:
			♦ 75.00% (135 of 180) of FOCs were received in less than 10 hours[108].
			KPMG Consulting issued Exception 131. During subsequent testing, it was determined that the EDI interface returned late PM FOCs. BellSouth's response to Exception 131 indicated that the LCSC experienced delays in processing orders.
			♦ During subsequent testing conducted from February 28, 2002 through May, 22 2002, KPMG Consulting received PM FOCs within the following timeframes:
			♦ 92.65% (189 of 204) of FOCs were received in less than 10 hours for PM LSRs.
			Exception 131 was closed.
			See Tables 1-20 through 1-22 for additional transaction details.
TVV1-3-6	BellSouth's EDI interface provides timely Completion Notifications (CNs).	Satisfied	BellSouth's EDI interface provides timely CNs.
			The expected interval for CNs is 95% received by 12:00 pm of the business day following the receipt of the provisioning completion date.
			During initial testing conducted from March 13, 2001 through November 25, 2001, KPMG Consulting received CNs within the following timeframes:
			♦ 94.47% (871 of 922) of CNs were delivered within 1 day of the DD.
			Due to system performance issues in other evaluation criteria, KPMG Consulting conducted a subsequent test from November 26, 2001 through February 27, 2002♦. KPMG Consulting

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[107]The interval for PM FOCs according to BellSouth OSS testing SQM version 1.06 was 85 percent within 24 hours. On June 1, 2001, BellSouth OSS testing SQM version 3.0 changed the interval to 85 percent within 18 hours on May 1, 2001 and 85% within 10 hours on August 1, 2001.
[108]KPMG Consulting excluded 4 PM FOCs received after the initial REJ response.

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Test Reference	Evaluation Criteria	Result	Comments
			received CNs within the following timeframes:
			♦ 92.88% (326 of 351) of CNs were delivered within one day of the DD.
			Due to system performance issues in other evaluation criteria, KPMG Consulting conducted a subsequent test from February 28, 2002 through May 22, 2002♦. KPMG Consulting received CNs within the following timeframes:
			♦ 95.32% (468 of 491) of CNs were delivered within one day of the DD.
			BellSouth delivers CNs upon the conclusion of provisioning activities.
			See Tables 1-23 through 1-25 for additional transaction details.
TVV1-3-7	BellSouth's TAG interface provides Functional Acknowledgements (FAs) within the agreed upon standard interval.	Satisfied	BellSouth's TAG interface provides FAs within the agreed upon standard interval.
			The O-1 SQM standard for FAs is 95% received within 30 minutes[109].
			During initial testing conducted from March 13, 2001 through November 25, 2001, KPMG Consulting received FAs within the following timeframes:
			♦ 100% (1,697 of 1,697) of FAs were received in less than 30 minutes[110].
			Due to changes in the Revised Interim Performance Metrics[111], a subsequent test was conducted from November 26, 2001 through February 27, 2002. KPMG Consulting received FAs within the following timeframes:
			♦ 100% (361 of 361) of FAs were received in less than 30 minutes[112].
			Due to system performance issues in other evaluation criteria, KPMG Consulting conducted a subsequent test from February 28, 2002 through May 22, 2002♦. KPMG Consulting received FAs

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[109]The SQM-approved standard for FAs prior to August 1, 2001 is 90% within 30 minutes.

[110]KPMG Consulting excluded 6 FA responses from the timeliness calculations due to backend resource limitations.

[111]SQMs O-8 Reject Interval and O-9 FOC Timeliness changed on August 1, 2001 to reflect a new benchmark for PM responses. KPMG Consulting conducted a full retest of all related evaluation criteria in order to evaluate the new measures.

[112]KPMG Consulting excluded 4 FA responses from the timeliness calculations due to backend resource limitations.

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Test Reference	Evaluation Criteria	Result	Comments
			within the following timeframes:
			♦ 100% (831 of 831) of FAs were received in less than 30 minutes[113].
			See Tables 1-29 through 1-31 for additional transaction details.
TVV1-3-8	BellSouth's TAG interface provides Fully Mechanized (FM) reject/error (REJ/ERR) responses within the agreed upon standard interval.	Satisfied	BellSouth's TAG interface provides FM REJ ERR responses within the agreed upon standard interval.
			The O-8 SQM standard for FM REJs is 97% received within one hour.
			During initial testing conducted from March 13, 2001 through November 25, 2001, KPMG Consulting received FM REJs within the following timeframes:
			♦ 79.64% (219 of 275) of FM REJs were received in less than one hour[114].
			KPMG Consulting issued 2nd Amended Exception 54[115]. BellSouth responded that KPMG Consulting did not simultaneously start and re-start the Client Notification Server and Listener, which caused the delay in receipt of response. KPMG Consulting agreed with BellSouth, and Exception 54 was closed.
			Due to changes in the Revised Interim Performance Metrics[116] KPMG Consulting conducted a subsequent test from November 26, 2001 through February 27, 2001, KPMG Consulting received FM REJs within the following timeframes:
			♦ 97.44% (38 of 39) of FM REJs were received in less than one hour[117].
			KPMG Consulting issued Exception 142. BellSouth responded that the Client Side TAG listener failed to acknowledge responses. KPMG

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[113]Due to a internal KPMG Consulting mapping issue, KPMG Consulting excluded 1 FA.

[114]KPMG Consulting excluded 9 FM REJs received after the initial FOC response and 27 REJs that did not have a FT indicator.

[115]KPMG Consulting issued Exception 54 and Amended Exception 54 using inaccurate FT classifications for the KPMG Consulting test CLEC. Upon clarification of the data from BellSouth and further analysis, 2nd Amended Exception 54 was issued with the corrected FT classifications.

[116]SQMs O-8 Reject Interval and O-9 FOC Timeliness changed on August 1, 2001 to reflect a new benchmark for PM responses. KPMG Consulting conducted a full retest of related evaluation criteria to evaluate the new measures.

[117]KPMG Consulting excluded 3 FM REJs received after the initial FOC response.

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Test Reference	Evaluation Criteria	Result	Comments
			Consulting agreed, and Exception 142 was closed.
			Due to system performance issues in other evaluation criteria, KPMG Consulting conducted subsequent testing from February 28, 2002 through May 22, 2002♦. KPMG Consulting received FM REJs within the following timeframes:
			♦ 98.68% (75 of 76) of FM REJs were received in less than one hour[118].
			See Tables 1-32 through 1-34 for additional transaction details.
TVV1-3-9	BellSouth's TAG interface provides Partially Mechanized (PM) rejects (REJ) responses within the agreed upon standard interval.	Satisfied	BellSouth's TAG interface provides PM REJ responses within the agreed upon standard interval.
			The O-8 SQM standard for PM REJs is 85% received within 10 hours[119].
			During initial testing conducted from March 13, 2001 through November 25, 2001, KPMG Consulting received PM REJ within the following timeframes[120]:
			♦ 74.90% (185 of 247) of PM REJs were received within 10 hours.
			KPMG Consulting initiated subsequent testing on November 26, 2001 due to an SQM change for PM REJs[121].
			During subsequent testing conducted from November 26, 2001 through February 27, 2002, KPMG Consulting received PM REJs within the following timeframes:
			♦ 90.80% (79 of 87) of PM REJs were received in less than 10 hours[122].
			KPMG Consulting issued Exception 141. BellSouth indicated that the client side TAG

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[118]KPMG Consulting excluded 10 FM REJs received after the initial FOC response.

[119]For PM LSRs submitted prior to August 1, 2001 the SQM standard is 85% received within 18 hours. For PM LSRs submitted prior to May 1, 2001 the SQM standard is 85% received within 24 hours.

[120]Due to an internal KPMG Consulting mapping issue, KPMG Consulting excluded 2 PM REJs, 20 PM REJs received after the initial FOC response and 27 REJs that did not have FT indicators.

[121]The interval for PM REJs according to BellSouth OSS testing SQM Plan version 10.6 was 85 percent within 24 hours. On June 1, 2001, BellSouth OSS testing SQM version 3.0 changed the interval to 85 percent within 18 hours on May 1, 2001 and 85% within 10 hours on August 1, 2001.

[122]KPMG Consulting excluded 22 PM REJs received after the initial FOC response.

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Test Reference	Evaluation Criteria	Result	Comments
			listener failed to acknowledge responses. KPMG Consulting agreed, and Exception 141 was closed.
			Due to system performance issues in other evaluation criteria, KPMG Consulting conducted subsequent testing from February 28, 2002 through May 22, 2002♦. KPMG Consulting received PM REJs within the following timeframes:
			♦ 97.96% (96 of 98) of PM REJs were received in less than 10 hours[123].
			See Tables 1-35 through 1-37 for additional transaction details.
TVV1-3-10	BellSouth's TAG interface provides Fully Mechanized (FM) Firm Order Confirmation (FOCs) responses within the agreed upon standard interval.	Satisfied	BellSouth's TAG interface provides FM FOCs responses within the agreed upon standard interval.
			The O-9 SQM standard for FM FOCs is 95% received within three hours.
			During initial testing conducted from March 13, 2001 through November 25, 2001, KPMG Consulting received FM FOCs within the following timeframes:
			♦ 88.61% (599 of 676) of FM FOCs were received within three hours[124].
			KPMG Consulting issued Exception 52. BellSouth responded that the Client Side TAG listener failed to acknowledge responses. KPMG Consulting withdrew the exception.
			Due to changes in the Revised Interim Performance Metrics, KPMG Consulting conducted subsequent testing from November 26, 2001 through February 27, 2002[125]. KPMG Consulting received FM FOCs within the following timeframes:
			♦ 98.53% (134 of 136) of FM FOCs were received in less than three hours.
			Due to system performance issues in other evaluation criteria, KPMG Consulting conducted

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[123]KPMG Consulting excluded 34 PM REJs received after the initial FOC response.
[124]KPMG Consulting excluded 50 FOCs due to unavailable FT indicators.
[125]SQMs O-8 Reject Interval and O-9 FOC Timeliness changed on August 1, 2001 to reflect a new benchmark for PM responses. KPMG Consulting conducted a full retest of all related evaluation criteria to evaluate the new measures.

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Test Reference	Evaluation Criteria	Result	Comments
			subsequent testing from February 28, 2002 through May 22, 2002♦. KPMG Consulting received FM FOCs within the following timeframes:
			♦ 99.23% (389 of 392) of FM FOCs were received in less than three hours[126].
			See Tables 1-38 through 1-40 for additional transaction details.
TVV1-3-11	BellSouth's TAG interface provides Partially Mechanized (PM) Firm Order Confirmation (FOC) responses within the agreed upon standard interval.	Satisfied	BellSouth's TAG interface provides PM FOC responses within the agreed upon standard interval.
			The O-9 SQM standard for PM FOCs is 85% received within 10 hours[127].
			During initial testing conducted from March 13, 2001 through November 25, 2001, KPMG Consulting received PM FOCs within the following timeframes[128]:
			♦ 80.50% (331 of 411) of PM FOCs were received within 10 hours.
			KPMG Consulting conducted subsequent testing beginning November 26, 2001 due to an SQM change for PM FOCs[129].
			During subsequent testing conducted from November 26, 2001 through February 27, 2002, KPMG Consulting received PM FOCs within the following timeframes:
			♦ 79.80% (79 of 99) of PM FOCs were received in less than 10 hours[130].
			KPMG Consulting issued Amended Exception 140[131]. During subsequent testing, it was determined that the TAG interface returned late PM FOCs. BellSouth responded that the LCSC

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[126]KPMG Consulting excluded 2 FM FOCs received after the initial REJ response.

[127]For PM LSRs submitted prior to August 1, 2001 the SQM standard is 85% received within 18 hours. For PM LSRs submitted prior to May 1, 2001 the SQM standard is 85% received within 24 hours.

[128]KPMG Consulting excluded 1 PM FOC that was received after the initial REJ response and 50 FOCs that did not have a FT indicator.

[129]The interval for PM FOC responses according to BellSouth OSS testing SQM version 10.6 was 85% within 24 hours. On June 1, 2001, BellSouth OSS testing SQM version 3.0 changed the interval to 85% within 18 hours on May 1, 2001 and 85% within 10 hours on August 1, 2001.

[130]KPMG Consulting excluded 1 PM FOC received after the initial REJ response.

[131]Due to KPMG Consulting TAG listener and client notification server problems, KPMG Consulting issued Exception 140 with inaccurate timestamps. KPMG Consulting issued Amended Exception 140.

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Test Reference	Evaluation Criteria	Result	Comments
			experienced delays in processing orders between December 1, 2001 and December 14, 2001.
			During subsequent testing conducted from February 28, 2002 through May 22, 2002, KPMG Consulting received PM FOCs within the following timeframes:
			♦ 92.08% (244 of 265) of PM FOCs were received in less than 10 hours[132].
			Exception 140 was closed.
			See Tables 1-41 through 1-43 for additional transaction details.
TVV1-3-12	BellSouth's TAG interface provides Completion Notifications (CNs) within the agreed upon standard interval.	Satisfied	BellSouth's TAG interface provides CNs within the agreed upon standard interval.
			The expected interval for CNs is 95% received by 12:00 pm of the business day following the receipt of the provisioning completion date.
			During initial testing, KPMG Consulting received CNs within the following timeframes:
			♦ 79.32% (702 of 885) of CNs were delivered within 1 day of the DD[133].
			Due to changes in the Revised Interim Performance Metrics[134], KPMG Consulting conducted subsequent testing from November 26, 2001 through February 27, 2002. KPMG Consulting received CNs within the following timeframes:
			♦ 94.69% (196 of 207) of CNs were delivered within 1 day of the DD.
			Due to system performance issues in other evaluation criteria, KPMG Consulting conducted subsequent testing from February 28, 2002 through May 22, 2002♦. KPMG Consulting received CNs within the following timeframes:
			♦ 95.37% (536 of 562) of CNs were delivered within 1 day of the DD.
			See Tables 1-44 through 1-46 for additional transaction details.

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[132]KPMG Consulting excluded 3 PM FOCs received after the initial REJ response.
[133]KPMG Consulting excluded 17 CNs from the timeliness calculations due to unavailable CNDD.
[134]SQMs O-8 Reject Interval and O-9 FOC Timeliness changed on August 1, 2001 to reflect a new benchmark for PM responses. KPMG Consulting conducted a full retest of related evaluation criteria to evaluate the new measures.

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Test Reference	Evaluation Criteria	Result	Comments
TVV1-3-13	BellSouth's LENS interface provides Fully Mechanized (FM) Firm Order Confirmation (FOC) responses within the agreed upon standard interval.	Satisfied	BellSouth's LENS interface provides FM FOC responses within the agreed upon standard interval. The O-9 SQM standard for FM FOCs is 95% received within three hours. During initial testing conducted from March 13, 2001 through November 25, 2001, KPMG Consulting received FM FOCs within the following timeframes: ♦ 98.37% (121 of 123) of FM FOCs were received within three hours[135]. Due to changes in the Revised Interim Performance Metrics, KPMG Consulting conducted a retest from November 26, 2001 through February 27, 2002[136]. KPMG Consulting received FM FOCs within the following timeframes: ♦ 100% (59 of 59) of FM FOCs were received within three hours. During subsequent testing conducted from February 28, 2002 through May 22, 2002, KPMG Consulting received FM FOCs within the following timeframes: ♦ 99.35% (307 of 309) of FM FOCs were received within three hours[137]. See Tables 1-50 through 1-52 for additional transaction details.
TVV1-3-14	BellSouth's LENS interface provides Partially Mechanized (PM) Firm Order Confirmation (FOC) responses within the agreed upon standard interval.	Satisfied	BellSouth's LENS interface provides PM FOC responses within the agreed upon standard interval. The O-9 SQM standard for PM FOCs is 85% received within 10 hours[138]. During initial testing conducted from March 13, 2001 through November 25, 2001, KPMG

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[135]KPMG Consulting excluded 1 FM FOC from timeliness calculations due to LENS timestamp issue and 12 FOCs that did not have a FT indicator.

[136]SQMs O-8 Reject Interval and O-9 FOC Timeliness changed on August 1, 2001 to reflect a new benchmark for PM responses. KPMG Consulting conducted a full retest of all related evaluation criteria in order to evaluate the new measures.

[137]KPMG Consulting excluded 13 FM FOCs from timeliness calculations due to LENS timestamp issues.

[138]For PM LSRs submitted prior to August 1, 2001 the SQM standard for PM FOCs is 85% received within 18 hours. For PM LSRs submitted prior to May 1, 2001 the SQM standard for PM FOCs is 85% received within 24 hours.

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Test Reference	Evaluation Criteria	Result	Comments
			Consulting received PM FOCs within the following timeframes[139]:
			♦ 88.24% (45 of 51) of PM FOCs were received within 10 hours.
			KPMG Consulting issued Exception 93. BellSouth responded that KPMG Consulting did not consider applicable exclusions per the SQM. KPMG Consulting agreed and the exception was withdrawn.
			KPMG Consulting initiated subsequent testing on November 26, 2001 due to an SQM change for PM FOCs[140].
			During subsequent testing conducted from November 26, 2001 through December 14, 2001, KPMG Consulting received PM FOCs within the following timeframes:
			♦ 56.25% (9 of 16) of PM FOCs were received in less than 10 hours.
			KPMG Consulting issued Exception 129 when it was determined that the LENS interface returned late PM FOCs. BellSouth's response to Exception 129 indicated that the LCSC experienced delays in processing orders between December 1, 2001 and December 14, 2001.
			During subsequent testing conducted from February 28, 2002 through May 22, 2002, KPMG Consulting received PM FOCs within the following timeframes:
			♦ 87.80% (36 of 41) of PM FOCs were received in less than 10 hours[141].
			Exception 129 was closed.
			See Tables 1-53 through 1-55 for additional transaction details.
TVV1-3-15	BellSouth's manual order process provides Acknowledgements (ACKs) within the agreed	Satisfied	BellSouth's manual order process provides ACKs within the agreed upon standard interval.
			The KPMG Consulting standard is 95% of ACKs

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[139]KPMG Consulting excluded 2 PM FOCs from the timeliness calculations due to LENS timestamp issues and 12 FOCs that did not have a FT indicator.
[140]The interval for PM FOCs according to BellSouth OSS testing SQM Plan version 10.6 was 85% within 24 hours. On June 1, 2001, BellSouth OSS testing SQM version 3.0 changed the interval to 85% within 18 hours on May 1, 2001 and 85% within 10 hours on August 1, 2001.
[141]KPMG Consulting excluded 4 PM FOCs from the timeliness calculations due to LENS timestamp issues.

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Test Reference	Evaluation Criteria	Result	Comments
	(ACKs) within the agreed upon standard interval.		received within eight hours[142].
			During initial testing conducted from March 13, 2001 through February 27, 2002, KPMG Consulting received ACKs within the following timeframes:
			♦ 95.35% (595 of 624) of ACKs were received within eight hours.
			During subsequent testing conducted from February 28, 2002 through May 22, 2002, KPMG Consulting received ACKs within the following timeframes:
			♦ 99.41% (168 of 169) of ACKs were received within eight hours.
			See Tables 1-56 through 1-57 for additional transaction details.
TVV1-3-16	BellSouth's manual order process provides reject (REJ) responses within the agreed upon standard interval.	Not Satisfied	BellSouth's manual order process does not provide REJ responses within the agreed upon standard interval.
			The O-8 SQM standard for non-mechanized REJs is 85% received within 24 hours[143].
			During initial testing conducted from March 13, 2001 through February 27, 2002, KPMG Consulting received REJs within the following timeframes:
			♦ 86.56% (876 of 1,012) of REJs were received within 24 hours[144].
			KPMG Consulting issued Exception 97. BellSouth responded that KPMG Consulting did not consider applicable exclusions. KPMG Consulting agreed, and withdrew the exception.
			During subsequent testing conducted from February 28, 2002 through May 22, 2002, KPMG Consulting received REJs within the following timeframes.
			♦ 83.33% (155 of 186) of Rejects were received within 24 hours[145].

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[142]KPMG Consulting measured Non-Mechanized FAs received via email.
[143]SQM O-8 included orders sent to the LCSC that receive a REJ, KPMG Consulting applied O-8 to all REJs in lieu of an approved standard.
[144]KPMG Consulting excluded 13 Non-Mechanized REJs due to initial FOC responses and 1 Non-Mechanized FOC due to an inaccurate timestamp.

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Test Reference	Evaluation Criteria	Result	Comments
			KPMG Consulting issued Exception 161 when it was determined that non-mechanized rejects were returned late. BellSouth responded that O-8 SQM Standard does not apply to orders sent directly to the CRSG. The CRSG Guidelines that provide the Rejection and Clarification Standards for complex products and services are located on the interconnection website. Exception 161 remains open. See Tables 1-58 through 1-59 and Figure 1-4 for additional transaction details.
TVV1-3-17	BellSouth's manual order process provides Firm Order Confirmation (FOC) responses within the agreed upon standard interval.	Satisfied	BellSouth's manual order process provides FOC responses within the agreed upon standard interval. The O-9 SQM standard for non-mechanized FOCs is 85% received within 36 hours. During initial testing conducted from March 13, 2001 through February 27, 2002, KPMG Consulting received FOCs within the following timeframes: ♦ 82.75% (235 of 284) of FOCs were received within 36 hours [146]. KPMG Consulting issued Exception 90[147]. This exception states that KPMG Consulting did not receive timely non-mechanized FOCs from BellSouth via fax and electronic mail. BellSouth responded that O-9 SQM does not apply to LSRs submitted to the CRSG. This requires an internal service inquiry. KPMG Consulting should apply O-10 SQM. KPMG Consulting issued 2nd Amended Exception 90 and applied O-9 SQM to LSRs submitted to the CRSG that do not require an internal service inquiry. BellSouth responded that KPMG Consulting should apply the products and services interval guide to LSRs submitted to the CRSG that do not require an internal service inquiry. KPMG Consulting issued 3rd Amended Exception 90 and applied the products and services interval guide to LSRs submitted to the CRSG that do not require an internal service inquiry. BellSouth responded that they would address personnel issues regarding FOC

[145]KPMG Consulting excluded 5 Non-Mechanized REJs received after the initial FOC response.
[146]KPMG Consulting excluded 2 Non-Mechanized FOCs received after the initial REJ response.
[147]KPMG Consulting issued Exception 90 and amended the Exception prior to BellSouth's response.

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Test Reference	Evaluation Criteria	Result	Comments
			timeliness to prevent future recurrence of the issues identified in the items referenced.
			During subsequent testing conducted from February 28, 2002 through May 22, 2002, KPMG Consulting received FOCs within the following timeframes[148]:
			♦ 93.83% (76 of 81) of FOCs were received within 24 hours.
			3rd Amended Exception 90 was closed.
			See Tables 1-60 through 1-61 for additional transaction details.
TVV1-3-18	BellSouth's manual order process provides Completion Notifications (CNs) within the agreed upon standard interval.	Satisfied	BellSouth's manual order process provides CNs within the agreed upon standard interval.
			The expected interval for CNs is 95% received by 12:00 pm of the business day following the receipt of the provisioning completion date[149].
			During initial testing conducted from March 13, 2001 through February 27, 2002, KPMG Consulting received CNs within the following timeframes:
			♦ 91.93% (262 of 285) of CNs were delivered within 1 day of the DD[150].
			During subsequent testing conducted from February 28, 2002 through May 22, 2002, KPMG Consulting received CNs within the following timeframes:
			♦ 97.73% (86 of 88) of CNs were delivered within 1 day of the DD[151].
			See Tables 1-62 through 1-63 for additional transaction details.
Order Documentation Review – Functional Evaluation			
TVV1-4-1	BellSouth order documents are accurate and complete.	Satisfied	BellSouth order documents are accurate and complete.
			During testing from March 13, 2001 through May 15, 2002, KPMG Consulting observed the

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[148]KPMG Consulting applied a standard of 85% of non-mechanized FOCs received within 24 hours due to an interval guide change.
[149]Non-Mechanized orders do not receive a CN. In lieu of a CN, KPMG Consulting measured the FOC-DD.
[150]KPMG Consulting excluded 42 Non-Mechanized CNs from timeliness calculations due to unavailable DDs.
[151]KPMG Consulting excluded 1 Non-Mechanized CN due to an inaccurate CN-DD.

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Test Reference	Evaluation Criteria	Result	Comments
			following issues:
			♦ The BBR-LO (Issue 9K) provided ambiguous information on conditional usage notes for the LOCACT field, a conditional field on the EU form when submitted via the TAG interface. KPMG Consulting issued Exception 28. BellSouth updated the documentation to clarify the usage notes of the LOCACT field. KPMG Consulting verified that the documentation was updated and was satisfied that the issue was addressed. Exception 28 was closed.
			♦ The BBR-LO (Issue 9K) provided inconsistent information with the system responses being generated in reference to the "CIC" field, a conditional field on the LSR form. KPMG Consulting issued Exception 32. BellSouth updated the RCO tables for the use of the CIC field on the LSR. KPMG Consulting verified that the documentation was updated and was satisfied that the issue was addressed. Exception 32 was closed.
			♦ KPMG Consulting determined that the LENS interface fails to provide for the "LSO" field for Port/Loop request types in the BBR-LO. KPMG Consulting issued Exception 39. BellSouth updated the RCO tables for the LSO field no longer making it a required field for Port/Loop requests. KPMG Consulting verified that the documentation was updated and was satisfied that the issue was addressed. Exception 39 was closed.
			♦ KPMG Consulting determined that the BBR-LO (Issue 9L March 28, 2001) contained inconsistent and incomplete instructions necessary for ALECs to access and use BellSouth systems. KPMG Consulting identified six defects with the Business Rules and the Data Element Dictionary and issued Exception 45. BellSouth updated the business rules to address each issue. KPMG Consulting verified that the documentation was updated and was satisfied that the issues were addressed. Exception 45 was closed.
			♦ KPMG Consulting determined that the BBR-LO does not accurately define the method for successfully completing a LSR for a DL

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Test Reference	Evaluation Criteria	Result	Comments
			(REQTYP J) with ACT N or ACT R. KPMG Consulting issued Exception 50. BellSouth updated the Business Rules language to clarify use of the AN field of the DL form. KPMG Consulting verified that the documentation was updated and Exception 50 was closed.
			♦ KPMG Consulting determined that the BBR-LO (Issue 9L March 28, 2001) contained inconsistent documentation for ALECs to access and use BellSouth systems. KPMG Consulting issued Exception 64 to address the four issues. BellSouth updated the Business Rules to address each issue. KPMG Consulting verified that the appropriate updates were made to the documentation and was satisfied that the issue was addressed. Exception 64 was closed.
			♦ KPMG Consulting determined that BellSouth's s Unbundled Dedicated Transports EELs CLEC Information Package and BellSouth's Unbundled Dedicated Transports – Non-Switched Combinations CLEC Information Package did not provide consistent information that identifies applicable Network Code (NC) and Secondary Network Code (SECNCI) for loop service requests. KPMG Consulting issued Exception 66. BellSouth updated the documentation to clarify the use of NCs. KPMG Consulting verified the updated document and determined that the issue was addressed. Exception 66 was closed.
			♦ BellSouth did not provide an accurate method for assigning the USOC to request BellSouth's Operator Services & Directory Assistance (OS/DA) branding feature. KPMG Consulting issued Exception 69. BellSouth updated the BellSouth CLEC Information Package, Selective Call Routing Using Line Class Codes. KPMG Consulting verified the document update and determined that the issue was addressed. Exception 69 was closed.
Pre-Order Order Integration – Functional Evaluation			
TVV1-5-1	Pre-Order/Order field names and formats are	Satisfied	Pre-Order/Order field names and formats are compatible.

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Test Reference	Evaluation Criteria	Result	Comments
	compatible.		compatible. ♦ 100% (89 of 89) of pre-order/order integration transactions issued returned expected pre-order and order responses.
Help Desk Functionality – Functional Evaluation		
TVV1-6-1	Information provided by the BellSouth Help Desk is accurate.	Satisfied	Information provided by the BellSouth Help Desk is accurate. BellSouth representatives provide accurate information in response to LSR queries. For assistance with order and pre-order errors, there are three BellSouth groups that provide help from which KPMG Consulting sought assistance: the Customer Support Manager (CSM), LCSC, and CSRG. During the course of testing, KPMG Consulting raised 132 issues with the CSM, 142 issues with the LCSC, and 16 issues with the CRSG. KPMG Consulting issued Exception 19, which stated that BellSouth's Network Services Customer Services did not provide consistent access to the CSM for CLEC calls. BellSouth responded that the CSM's voice mailbox was full and a single occurrence does not constitute a systematic problem. Each CSM has a backup/counterpart, available when the primary CSM is unavailable. Exception 19 was withdrawn. KPMG Consulting issued Exception 68, which stated that the BellSouth CSM was unable to locate three xDSL orders submitted via EDI for which KPMG Consulting received responses. BellSouth responded that communications between KPMG Consulting and the CSM did not indicate two orders in question were for xDSL service. Once this information was communicated to the CSM, the appropriate xDSL order screens were accessed to view the two orders. KPMG Consulting received an up-front application error for the third order, which cannot be viewed by the CSM. KPMG Consulting subsequently defined service requests by the specific product when calling the LCSC or the CSM regarding active service requests. BellSouth service representatives were able to locate active service requests in the BellSouth systems when identified by product. Exception

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Test Reference	Evaluation Criteria	Result	Comments
			68 was closed.
Presence of Pre-Order Functionality – Functional Evaluation			
TVV1-7-1	BellSouth's TAG interface provides system responses to pre-orders.	Satisfied	BellSouth's TAG interface provides system responses to pre-orders. KPMG Consulting applied a benchmark of 99% of system responses are received. ♦ 99.84% (5,636 of 5,645) of pre-order requests received system responses.
Accuracy of Pre-Order Response[152] – Functional Evaluation			
TVV1-8-1	BellSouth's interfaces provide accurate system responses to pre-orders.	Satisfied	BellSouth's interfaces provide accurate system responses to pre-orders. KPMG Consulting applied a benchmark of 95% of responses are accurately received. ♦ 98.51% (791 of 803) of examined pre-order responses received were accurate.
Timeliness of Pre-Order Response – Functional Evaluation			
TVV1-9-1	BellSouth's TAG interface provides timely responses to pre-order queries that access BellSouth's Regional Street Access Guide – Telephone Number (RSAG-TN) back-end system.	Satisfied	BellSouth's TAG interface provides timely responses to pre-order queries that access BellSouth's RSAG TN back-end system[153]. The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds. KPMG Consulting applied a response timeliness benchmark of 10 seconds based on its professional judgment. 143 AVQ_TNs were submitted during initial testing: ♦ The weighted average interval for BellSouth retail RSAG-TN queries was 2.86 seconds during the functional test. ♦ Average interval for receipt of AVQ_TNs was 5.52 seconds. KPMG Consulting conducted subsequent testing due to a BellSouth system fix on July 28, 2001.

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[152]For this criterion, KPMG Consulting defined an accurate response to be a system response that is consistent with the technical specifications for TAG responses and consistent with the transaction type that initiated the response (e.g., a correctly formatted CSRQ received a Customer Service Record response). In the case of error responses, KPMG Consulting verified that these were only received for incorrectly formatted queries.

[153]LENS pre-order timeliness was not included in these results. Timestamps for pre-order response in LENs were integrated with orders.

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Test Reference	Evaluation Criteria	Result	Comments
			257 AVQ_TNs were submitted during subsequent testing:
			♦ The weighted average interval for BellSouth retail RSAG-TN queries was 2.87 seconds during the functional retest.
			♦ Average interval for receipt of AVQ_TNs was 2.83 seconds.
			282 AVQs were submitted during subsequent testing:
			♦ The weighted average interval for BellSouth retail RSAG-ADDR queries was 3.22 seconds during the functional test.
			♦ Average interval for receipt of AVQs was 5.61 seconds.
			KPMG Consulting conducted subsequent testing due to a BellSouth system fix on July 28, 2001.
			153 AVQs were submitted during subsequent testing:
			♦ The weighted average interval for BellSouth retail RSAG-ADDR queries was 3.21 seconds during the functional retest.
			♦ Average interval for receipt of AVQs was 4.04 seconds.
			KPMG Consulting conducted subsequent testing due to late AVQ responses on December 21, 2001.
			257 AVQs were submitted during subsequent testing:
			♦ The weighted average interval for BellSouth retail RSAG-ADDR queries was 3.25 seconds[154] during the functional retest.
			♦ Average interval for receipt of AVQs was 4.38 seconds.
			KPMG Consulting conducted subsequent testing due to late AVQ responses on April 5, 2002.
			152 AVQs were submitted during subsequent

[154]KPMG Consulting used December 2001 through January 2002 RSAG-ADDR data to measure AVQ response timeliness due to BellSouth abnormal parity data for RSAG-ADDR for February 2002.
[155]KPMG Consulting used January 2002 RSAG-ADDR data to measure AVQ response timeliness due to BellSouth abnormal parity data for RSAG-ADDR for April 2002 through May 2002.

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Test Reference	Evaluation Criteria	Result	Comments
			testing:
			♦ The weighted average interval for BellSouth retail RSAG-ADDR queries was 3.32 seconds[155] during the functional retest.
			♦ Average interval for receipt of AVQs was 3.84 seconds.
			See Tables 1-66 through 1-69 for additional transaction details.
TVV1-9-2	BellSouth's TAG interface provides timely responses to pre-orders that access BellSouth's Direct Order Entry Support Application Program (DSAP) back-end system.	Satisfied	BellSouth's TAG interface provides timely responses to pre-orders that access BellSouth's DSAP back-end system.
			The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds. KPMG Consulting applied a response timeliness benchmark of 10 seconds based on its professional judgment.
			199 AAQs were submitted during initial testing:
			♦ The weighted average interval for BellSouth retail DSAP queries was 2.64 seconds during the functional test.
			♦ Average interval for receipt of AAQs was 1.90 seconds.
			KPMG Consulting conducted subsequent testing due to a BellSouth system fix on July 28, 2001.
			227 AAQs were submitted during subsequent testing:
			♦ The weighted average interval for BellSouth retail DSAP queries was 2.71 seconds during the functional retest.
			♦ Average interval for receipt of AAQ was 2.00 seconds.
			See Tables 1-66 through 1-67 for additional transaction details.
TVV1-9-3	BellSouth's TAG interface provides timely responses to pre-orders that access BellSouth's Application for Telephone Number Load Administration and Selection (ATLAS) back-end system.	Satisfied	BellSouth's TAG interface provides timely responses to pre-orders that access BellSouth's ATLAS back-end system.
			The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds. KPMG Consulting applied a response timeliness benchmark of 10 seconds based on its professional judgment.
			293 TNAQs were submitted during initial testing:

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Test Reference	Evaluation Criteria	Result	Comments
			♦ The weighted average interval for BellSouth retail ATLAS queries was 3.37 seconds during the functional test.
			♦ Average interval for receipt of TNAQs was 5.17 seconds.
			KPMG Consulting conducted subsequent testing due to a BellSouth system fix on July 28, 2001.
			467 TNAQs were submitted during subsequent testing:
			♦ The weighted average interval for BellSouth retail RSAG-TN queries was 3.04 seconds during the functional retest.
			♦ Average interval for receipt of TNAQs was 2.36 seconds.
			162 Telephone Number Availability Query Miscellaneous (TNAQ_MISC) were submitted during subsequent testing:
			♦ The weighted average interval for BellSouth retail ATLAS queries was 3.37 seconds during the functional test.
			♦ Average interval for receipt of TNAQ_MISC was 2.49 seconds.
			KPMG Consulting conducted subsequent testing due to a BellSouth system fix on July 28, 2001.
			151 TNAQ_MISC were submitted during subsequent testing:
			♦ The weighted average interval for BellSouth retail RSAG-TN queries was 2.82 seconds during the functional retest.
			♦ Average interval for receipt of TNAQ_MISC was 1.93 seconds.
			101 Telephone Number Selection Queries (TNSQs) were submitted during subsequent testing:
			♦ The weighted average interval for BellSouth retail ATLAS queries was 3.48 seconds during the functional test.
			♦ Average interval for receipt of TNSQ was 3.06 seconds.
			KPMG Consulting conducted subsequent testing due to a BellSouth system fix on July 28, 2001.
			152 TNSQs were submitted during subsequent

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Test Reference	Evaluation Criteria	Result	Comments
			testing:
			♦ The weighted average interval for BellSouth retail RSAG-TN queries was 2.82 seconds during the functional retest.
			♦ Average interval for receipt of TNSQ was 2.84 seconds.
			59 Telephone Number Cancellations (TNCANs) were submitted during subsequent testing:
			♦ The weighted average interval for BellSouth retail ATLAS queries was 3.99 seconds during the functional test.
			♦ Average interval for receipt of TNCAN was 1.27seconds.
			KPMG Consulting conducted subsequent testing due to a BellSouth system fix on July 28, 2001.
			154 TNCANs were submitted during subsequent testing:
			♦ The weighted average interval for BellSouth retail RSAG-TN queries was 2.82 seconds during the functional retest.
			♦ Average interval for receipt of TNCAN was 3.55 seconds.
			KPMG Consulting conducted subsequent testing due to late TNCAN responses on December 21, 2001.
			161 TNCANs were submitted during subsequent testing:
			♦ The weighted average interval for BellSouth retail RSAG-TN queries was 3.08 seconds during the functional retest.
			♦ Average interval for receipt of TNCAN was 2.71 seconds.
			See Tables 1-66 through 1-68 for additional transaction details.
TVV1-9-4	BellSouth's TAG interface provides timely responses to pre-orders that access BellSouth's Application for Telephone Number Load Administration and Selection Multi Line Hunt (ATLAS_MLH) back-end system.	Satisfied	BellSouth's TAG interface provides timely responses to pre-orders that access BellSouth's ATLAS_MLH back-end system.
			The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds. The OSS-1 SQM reports do not provide retail analog data. KPMG Consulting applied a response timeliness benchmark of 10 seconds based on its

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Test Reference	Evaluation Criteria	Result	Comments
	system.		professional judgment.
			♦ 41 TNCAN-MLH queries submitted during subsequent testing.
			♦ Average interval for receipt of TNCAN-MLH was 3.39 seconds.
			TAG interface provides Telephone Number Availability Query – Multi Line Hunt (TNAQ-MLH) responses within the agreed upon standard interval.
			The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds. The OSS-1 SQM reports do not provide retail analog data. Therefore, KPMG Consulting assigned a benchmark that TNAQ-MLH pre-order queries should be received within an average of 10 seconds.
			♦ 37 TNAQ-MLH were submitted during subsequent testing.
			♦ Average interval for receipt of TNAQ -MLH was 3.51 seconds.
			See Table 1-67 for additional transaction details.
TVV1-9-5	BellSouth's TAG interface provides timely responses to pre-orders that access BellSouth's Application for Telephone Number Load Administration and Selection Direct Inward Dial (ATLAS_DID) back-end system.	Satisfied	BellSouth's TAG interface provides timely responses to pre-orders that access BellSouth's ATLAS_DID back-end system.
			The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds. The OSS-1 SQM reports do not provide retail analog data. KPMG Consulting applied a response timeliness benchmark of 10 seconds based on its professional judgment.
			♦ 28 TNAQ-DID were submitted during initial testing.
			♦ Average interval for receipt of TNAQ-DID was 2.89 seconds.
			TAG interface provides Telephone Number Cancellation Query-Direct Inward Dial (TCAN-DID) responses within the agreed upon standard interval.
			The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds. The OSS-1 SQM reports do not provide retail analog data. Therefore, KPMG Consulting assigned a benchmark that TNCAN-DID pre-order queries should be received within an average of 10

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Test Reference	Evaluation Criteria	Result	Comments
			seconds.
			♦ 22 TCAN-DIDs were submitted during subsequent testing.
			♦ Average interval for receipt of TCAN-DID was 4.55 seconds.
			See Table 1-67 for additional transaction details.
TVV1-9-6	BellSouth's TAG interface provides timely responses to Customer Service Record Query (CSRQ) pre-orders that access BellSouth's Customer Record Information System Accounts CRSACCTS back-end system.	Satisfied	BellSouth's TAG interface provides timely responses to CSRQ pre-orders that access BellSouth's CRSACCTS back-end system.
			The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds. KPMG Consulting applied a response timeliness benchmark of 10 seconds based on its professional judgment.
			284 CSRQs were submitted during initial testing:
			♦ The weighted average interval for BellSouth retail CRSACCTS queries was 1.51 seconds during the functional test.
			♦ Average interval for receipt of CSRQs was 5.12 seconds.
			KPMG Consulting issued Exception 71. BellSouth implemented a system fix on July 28, 2001.
			176 CSRQs were submitted during subsequent testing:
			♦ The weighted average interval for BellSouth retail CRSACCTS queries was 3.55 seconds during the functional retest.
			♦ Average interval for receipt of CSRQs was 2.91 seconds.
			Exception 71 was closed.
			228 PCSRQs were submitted during subsequent testing. The OSS-1 SQM reports do not provide retail analog data. KPMG Consulting applied a response timeliness benchmark of 10 seconds

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Test Reference	Evaluation Criteria	Result	Comments
			based on its professional judgment.
			♦ The weighted average interval for BellSouth retail CRSACCTS queries was 9.65 seconds[156].
			♦ Average interval for receipt of PCSRQs was 3.37 seconds.
			See Tables 1-66 through 1-67 for additional transaction details.
TVV1-9-7	BellSouth's TAG interface provides timely responses to pre-orders that access BellSouth's Obtain Available Services Information Systems (OASIS) back-end system.	Satisfied	BellSouth's TAG interface provides timely responses to pre-orders that access BellSouth's OASIS back-end system.
			The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds. KPMG Consulting applied a response timeliness benchmark of 10 seconds based on its professional judgment.
			327 SAQs were submitted during initial testing:
			♦ The weighted average interval for BellSouth retail OASISBIG queries was 4.11 seconds during the functional test.
			♦ Average interval for receipt of SAQs was 35.41 seconds.
			KPMG Consulting conducted subsequent testing due to a BellSouth system fix on July 28, 2001.
			150 SAQs were submitted during subsequent testing:
			♦ The weighted average interval for BellSouth retail OASISBIG queries was 4.14 seconds during subsequent testing.
			♦ Average interval for receipt of SAQs was 4.43 seconds.
			See Tables 1-66 through 1-67 for additional transaction details.
TVV1-9-8	BellSouth's TAG interface provides timely responses to Loop Makeup (LMU) pre-orders that access BellSouth's Loop Facilities	Satisfied	BellSouth's TAG interface provides timely responses to LMU pre-orders that access BellSouth's LFACS back-end system.
			The PO-1 SQM standard for LMU pre-order

[156]KPMG Consulting used January 2002 CRSACCTS data to measure PCSRQ response timeliness due to: 1) the absence of PCSRQ parity data for the months of March 2002 through May 2002; 2) BellSouth CRSACCTS data for March 2002 through May 2002 contained abnormal parity data.

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Test Reference	Evaluation Criteria	Result	Comments
	BellSouth's Loop Facilities Assessment and Control System (LFACS) back-end system.		queries is 95% received within three business days.
			21 LMU-SI were submitted during subsequent testing[157]:
			♦ 100% of LMU-SI submitted were received within three business days.
			TAG interface provides Look Makeup-Spare Facilities Inquiry (LMU-SF) responses within the agreed upon standard interval.
			The PO-2 SQM standard for LMU pre-order queries is 95% received within one minute[158].
			122 LMU-SF were submitted during subsequent testing:
			♦ 95.90% of LMU-SF submitted were received within one minute.
			♦ Average interval for receipt of LMU-SF was 21.25 seconds.
			KPMG Consulting conducted subsequent testing due to a BellSouth system fix on July 28, 2001.
			195 LMU-SFs were submitted during subsequent testing:
			♦ 98.97% of LMU-SF submitted were received within one minute.
			♦ Average interval for receipt of LMU-SF was 23.32 seconds.
			KPMG Consulting determined that the TAG interface provides Look Makeup-Working Loop (LMU-WL) responses within the agreed upon standard interval.
			11 LMU-WLs were submitted during subsequent testing:
			♦ 100% of LMU-WL submitted were received within one minute.
			♦ Average interval for receipt of LMU-WL was 10.27 seconds.
			KPMG Consulting conducted subsequent testing

[157]KPMG Consulting was unable to obtain internal BellSouth service inquiry timestamps via email or fax. BellSouth personnel provided all LMU-SI timestamps used for calculating PO-1 SQM.
[158]The SQM standard for LMU pre-order queries prior to August 1, 2001 was 90% within 5 minutes.

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Test Reference	Evaluation Criteria	Result	Comments
			due to a BellSouth system fix on July 28, 2001.
			177 LMU-WLs were submitted during subsequent testing:
			♦ 98.31% of LMU-WL submitted were received within one minute.
			♦ Average interval for receipt of LMU-WL was 25.12 seconds.
			KPMG Consulting determined that the TAG interface provides Loop Reservation Cancellation Request Query (LRCRQ) responses within the agreed upon standard interval.
			30 LRCRQs were submitted during subsequent testing:
			♦ 100% of LRCRQ submitted were received within one minute.
			♦ Average interval for receipt of LRCRQ was 12.23 seconds.
			KPMG Consulting conducted subsequent testing due to a BellSouth system fix on July 28, 2001. 156 LRCRQs were submitted during subsequent testing:
			♦ 98.72% of LRCRQ submitted were received within one minute.
			♦ Average interval for receipt of LRCRQ was 19.33 seconds.
			KPMG Consulting determined that the TAG interface provides Loop Reservation Request Query (LRRQ) responses within the agreed upon standard interval.
			66 LRRQs were submitted during subsequent testing:
			♦ 100% of LRRQ submitted were received within one minute.
			♦ Average interval for receipt of LRRQ was 19.42 seconds.
			KPMG Consulting conducted subsequent testing due to a BellSouth system fix on July 28, 2001.
			225 LRRQs were submitted during subsequent testing:
			♦ 98.67% of LRRQ submitted were received within one minute.

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Test Reference	Evaluation Criteria	Result	Comments
			♦ Average interval for receipt of LRRQ was 22.19 seconds. See Tables 1-66 through 1-67 for additional transaction details.

4.2   Additional Data

The Additional Data section consists of a collection of tables that provide a more detailed view of the data summarized in the Evaluation Criteria Comments in Section 4.1.

KPMG Consulting applied the following standards to the data in the tables contained in Section 4.2:

♦ A FM response occurs when an electronically submitted LSR receives a clarification generated by BellSouth systems with no manual intervention. FM responses include ERRs, CLRs and FOCs.

♦ A PM response occurs when an electronically submitted LSR fallout for manual handling and receives either a CLR or FOC generated by a BellSouth representative. PM responses include LCSC issued CLRs and FOCs.

♦ Results are based on the actual performance of LSRs submitted by KPMG Consulting. KPMG Consulting determined that a clarification was FM or Partially/Non-Mechanized by analyzing BellSouth backend system data provided to KPMG Consulting's Flow-Through Evaluation Team. KPMG Consulting validated the BellSouth provided data against the KPMG Consulting obtained data for consistency in FM/PM classification.

♦ Calculations are based on business days (i.e., weekends and BellSouth holidays are not counted).

♦ The disaggregated breakdown of CLR and FOC timeliness reflects the FPSC's desegregation levels outlined in the June 1, 2001 test specific SQMs.

♦ Totals may not equal 100% due to rounding.

Table 1-8: March 13, 2001 – November 25, 2001 EDI Functional Acknowledgements (ACK) Timeliness

Product Type	Number of ACKs Received	Number of On-Time ACK Received	No./Percentage of ACKs Received On Time	SQM Benchmark
Resale Business	323	313	96.90%	95% within 30 minutes
Resale Residence	252	233	92.46%	
UNE-Loop	952	926	97.27%	

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Product Type	Number of ACKs Received	Number of On-Time ACK Received	No./Percentage of ACKs Received On Time	SQM Benchmark
Resale Business	323	313	96.90%	
UNE-P	708	689	97.32%	
Total	2,235	2,161	96.69%	

Table 1-9: November 26, 2001 – February 27, 2002 EDI Functional Acknowledgements (ACK) Timeliness

Product Type	Number of ACKs Received	Number of On-Time ACK Received	No./Percentage of ACKs Received On Time	SQM Benchmark
Resale Business	90	86	95.56%	
Resale Residence	95	95	100%	95% within 30 minutes
UNE-Loop	330	329	99.70%	
UNE-P	278	278	100%	
Total	793	788	99.37%	

Table 1-10: February 28, 2002 – May 22, 2002 EDI Functional Acknowledgements (ACK) Timeliness

Product Type	Number of ACKs Received	Number of On-Time ACK Received	No./Percentage of ACKs Received On Time	SQM Benchmark
Resale Business	124	124	100%	
Resale Residence	119	119	100%	95% within 30 minutes
UNE-Loop	347	346	99.71%	
UNE-P	273	273	100%	
Total	863	862	99.88%	

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Table 1-11: March 13, 2001 – November 25, 2001 EDI Reject Timeliness, Fully Mechanized

Product Type	Number of Rejects Received	Number of On-Time Rejects Received	No./Percentage of Rejects Received On Time	SQM Benchmark
Resale Business	129	122	94.57%	97% within 1 hour
Resale Residence	67	66	98.51%	
UNE-Loop	361	334	92.52%	
UNE-P	202	195	96.53%	
Total	759	717	94.47%	

Table 1-12: November 26, 2001 – February 27, 2002 EDI Reject Timeliness, Fully Mechanized

Product Type	Number of Rejects Received	Number of On-Time Rejects Received	No./Percentage of Rejects Received On Time	SQM Benchmark
Resale Business	25	25	100%	97% within 1 hour
Resale Residence	20	19	95.00%	
UNE-Loop	94	91	96.81%	
UNE-P	81	80	98.77%	
Total	220	215	97.73%	

Table 1-13: February 28, 2002 – May 22, 2002 EDI Reject Timeliness Fully Mechanized

Product Type	Number of Rejects Received	Number of On-Time Rejects Received	No./Percentage of Rejects Received On Time	SQM Benchmark
Resale Business	16	16	100%	97% within 1 hour
Resale Residence	16	16	100%	
UNE-Loop	88	86	97.73%	
UNE-P	43	42	97.67%	
Total	163	160	98.16%	

Table 1-14: March 13, 2001 – November 25, 2001 EDI Reject Timeliness, Partially Mechanized

Product Type	Total	<= 10 hrs	% within 10 hrs	<= 18 hrs	% within 18 hrs	<= 24 hrs	% within 24 hrs	SQM Benchmark
Resale Business	41	39	95.12%	41	100%	41	100%	85% within 24 hours – prior to 5/1/2001
Resale Residence	42	16	38.10%	35	83.33%	39	92.86%	85% within 18 hours – 5/1/2001-7/31/2001
UNE-Loop	110	97	88.18%	110	100%	110	100%	85% within 10 hours – 8/1/2001-present
UNE-P	79	69	87.34%	79	100%	79	100%	
Total	272	221	81.25%	265	97.43%	269	98.90%	

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Table 1-15: November 26, 2001 – February 27, 2002 EDI Reject Timeliness, Partially Mechanized

Product Type	Number of Rejects Received	Number of On-Time Rejects Received	No./Percentage of Rejects Received On Time	SQM Benchmark
Resale Business	5	5	100%	85% within 10 hours
Resale Residence	13	7	53.85%	
UNE-Loop	72	58	80.56%	
UNE-P	38	38	100%	
Total	128	108	84.38%	

Table 1-16: February 28, 2002 – May 22, 2002 EDI Reject Timeliness, Partially Mechanized

Product Type	Number of Rejects Received	Number of On-Time Rejects Received	No./Percentage of Rejects Received On Time	SQM Benchmark
Resale Business	25	24	96.00%	85% within 10 hours
Resale Residence	9	8	88.89%	
UNE-Loop	30	30	100%	
UNE-P	38	38	100%	
Total	102	100	98.04%	

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Table 1-17: March 13, 2001 – November 25, 2001 EDI Firm Order Confirmation (FOC) Timeliness, Fully Mechanized

Product Type	Number of FOCs Received	Number of On-Time FOCs Received	No./Percentage of FOCs Received On Time	SQM Benchmark
Resale Business	83	76	91.57%	95% within 3 hours
Resale Residence	94	86	91.49%	
UNE-Loop	227	205	90.31%	
UNE-P	230	222	96.52%	
Total	634	589	92.90%	

Table 1-18: November 26, 2001 – February 27, 2002 EDI Firm Order Confirmation (FOC) Timeliness, Fully Mechanized

Product Type	Number of FOCs Received	Number of On-Time FOCs Received	No./Percentage of FOCs Received On Time	SQM Benchmark
Resale Business	39	39	100%	95% within 3 hours
Resale Residence	48	47	97.92%	
UNE-Loop	99	97	97.98%	
UNE-P	80	80	100%	
Total	266	263	98.87%	

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Table 1-19: February 28, 2002 – May 22, 2002 EDI Firm Order Confirmation (FOC) Timeliness, Fully Mechanized

Product Type	Number of FOCs Received	Number of On-Time FOCs Received	No./Percentage of FOCs Received On Time	SQM Benchmark
Resale Business	41	40	97.56%	95% within 3 hours
Resale Residence	70	70	100%	
UNE-Loop	145	140	96.55%	
UNE-P	131	130	99.24%	
Total	387	380	98.19%	

Table 1-20: March 13, 2001 – November 25, 2001 EDI Firm Order Confirmation (FOC) Timeliness, Partially Mechanized

Product Type	Total	<= 10 hrs	% within 10 hrs	<= 18 hrs	% within 18 hrs	<= 24 hrs	% within 24 hrs	SQM Benchmark
Resale Business	65	60	92.31%	65	100%	65	100%	85% within 24 hours – prior to 5/1/2001
Resale Residence	48	37	77.08%	46	95.83%	47	97.92%	85% within 18 hours – 5/1/2001-7/31/2001
UNE-Loop	194	182	93.81%	187	96.39%	191	98.45%	85% within 10 hours – 8/1/2001-present
UNE-P	147	139	94.56%	145	98.64%	147	100%	
Total	454	418	92.07%	443	97.58%	450	99.12%	

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Table 1-21: November 26, 2001 – February 27, 2002 EDI Firm Order Confirmation (FOC)
Timeliness, Partially Mechanized

Product Type	Number of FOCs Received	Number of On-Time FOCs Received	No./Percentage of FOCs Received On Time	SQM Benchmark
Resale Business	21	13	61.90%	85% within 10 hours
Resale Residence	13	6	46.15%	
UNE-Loop	67	49	73.13%	
UNE-P	79	67	84.81%	
Total	180	135	75.00%	

Table 1-22: February 28, 2002 – May 22, 2002 EDI Firm Order Confirmation (FOC)
Timeliness, Partially Mechanized

Product Type	Number of FOCs Received	Number of On-Time FOCs Received	No./Percentage of FOCs Received On Time	SQM Benchmark
Resale Business	37	35	94.59%	85% within 10 hours
Resale Residence	24	20	83.33%	
UNE-Loop	84	76	90.48%	
UNE-P	59	58	98.31%	
Total	204	189	92.65%	

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Table 1-23: March 13, 2001 – November 25, 2001 EDI Completion Notice Due Date (CN DD)
vs. Completion Notification Delivery Date

	TOTAL		Product Delivery Analysis								
	CNs Received	% Of Total CNs	No. Of Loops	Loops as a % of CNs Received	% Of Total Loops	No. Of Resale	Resale as a % of CNs Received	% Of Total Resale	No. Of Combos	Combos as a % of CNs Received	% Of Total Combos
CN Date Received = CN DD	834	90.46%	243	26.36%	86.17%	258	27.98%	90.21%	333	36.12%	94.07%
CN Date Received = CN DD + 1 day	37	4.01%	14	1.52%	4.96%	14	1.52%	4.90%	9	0.98%	2.54%
CN Date Received = CN DD + 2 days	22	2.39%	15	1.63%	5.32%	2	0.22%	0.70%	5	0.54%	1.41%
CN Date Received = CN DD + 3-5 days	18	1.95%	8	0.87%	2.84%	8	0.87%	2.80%	2	0.22%	0.56%
CN Date Received = CN DD + >=6 days	11	1.19%	2	0.22%	0.71%	4	0.43%	1.40%	5	0.54%	1.41%
TOTAL	922	100%	282		100%	286		100%	354		100%

Table 1-24: November 26, 2001 – February 27, 2002 EDI Completion Notice Due Date (CN DD) vs. Completion Notification Delivery Date

	TOTAL		Product Delivery Analysis								
	CNs Received	% Of Total CNs	No. Of Loops	Loops as a % of CNs Received	% Of Total Loops	No. Of Resale	Resale as a % of CNs Received	% Of Total Resale	No. Of Combos	Combos as a % of CNs Received	% Of Total Combos
CN Date Received = CN DD	312	88.90%	89	25.36%	74.79%	102	29.06%	95.33%	121	34.47%	96.80%
CN Date Received = CN DD + 1 day	14	3.99%	8	2.28%	6.72%	5	1.42%	4.67%	1	0.28%	0.80%
CN Date Received = CN DD + 2 days	14	3.99%	13	3.70%	10.92%	0	0.00%	0.00%	1	0.28%	0.80%
CN Date Received = CN DD + 3-5 days	3	0.85%	3	0.85%	2.52%	0	0.00%	0.00%	0	0.00%	0.00%
CN Date Received = CN DD + >=6 days	8	2.28%	6	1.71%	5.04%	0	0.00%	0.00%	2	0.57%	1.60%
TOTAL	351	100%	119		100%	107		100%	125		100%

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Table 1-25: February 28, 2002 – May 22, 2002 EDI Completion Notice Due Date (CN DD) vs.
Completion Notification Delivery Date

	TOTAL		Product Delivery Analysis								
	CNs Received	% Of Total CNs	No. Of Loops	Loops as a % of CNs Received	% Of Total Loops	No. Of Resale	Resale as a % of CNs Received	% Of Total Resale	No. Of Combos	Combos as a % of CNs Received	% Of Total Combos
CN Date Received = CN DD	453	92.26%	125	25.46%	79.62%	157	31.98%	98.13%	171	34.83%	98.28%
CN Date Received = CN DD + 1 day	15	3.05%	13	2.65%	8.28%	1	0.20%	0.63%	1	0.20%	0.57%
CN Date Received = CN DD + 2 days	15	3.05%	15	3.05%	9.55%	0	0.00%	0.00%	0	0.00%	0.00%
CN Date Received = CN DD + 3-5 days	7	1.43%	3	0.61%	1.91%	2	0.41%	1.25%	2	0.41%	1.15%
CN Date Received = CN DD + >=6 days	1	0.20%	1	0.20%	0.64%	0	0.00%	0.00%	0	0.00%	0.00%
TOTAL	**491**	**100%**	**157**		**100%**	**160**		**100%**	**174**		**100%**

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Table 1-26: March 13, 2001 – November 25, 2001 EDI Desired Due Date from KPMG Consulting's Local Service Request (LSR DDD) vs. Committed Due Date from BellSouth's Firm Order Confirmation (FOC DD)

		Total		Delivery Method Analysis					
		Number	Percent	Loops	% Loops	Combos	% Combos	Resale	% Resale
LSR DDD = FOC DD		863	75.70%	363	82.88%	335	83.13%	165	55.18%
LSR DDD not =FOC DD	277	24.30%		75	17.12%	68	16.87%	134	44.82%
Total		**1140**	**100%**	**438**	**100%**	**403**	**100%**	**299**	**100%**
Distribution of Earlier Due Dates									
DD = DDD - 1 day		10	50.00%	1	33.33%	8	61.54%	1	25.00%
DD = DDD - 2 days		1	5.00%	0	0.00%	0	0.00%	1	25.00%
DD = DDD - 3-5 days		5	25.00%	2	66.67%	3	23.08%	0	0.00%
DD = DDD - >=6 days		4	20.00%	0	0.00%	2	15.38%	2	50.00%
Total Earlier (DD before DDD)		**20**	**100%**	**3**	**100%**	**13**	**100%**	**4**	**100%**
Distribution of Later Due Dates									
DD = DDD + 1 day		138	53.70%	39	54.17%	33	60.00%	66	50.77%
DD = DDD + 2 days		34	13.23%	12	16.67%	6	10.91%	16	12.31%
DD = DDD + 3-5 days		73	28.40%	15	20.83%	16	29.09%	42	32.31%
DD = DDD + >=6 days		12	4.67%	6	8.33%	0	0.00%	6	4.62%
Total Later (DD after DDD)		**257**	**100%**	**72**	**100%**	**55**	**100%**	**130**	**100%**

Notes:

1. KPMG Consulting's LSR orders with desired due dates that precede the standard interval for the order type, as documented in BellSouth's Product and Services Interval Guide, were excluded from the test.

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Table 1-27: November 26, 2001 – February 27, 2002 EDI Desired Due Date from KPMG Consulting's Local Service Request (LSR DDD) vs. Committed Due Date from BellSouth's Firm Order Confirmation (FOC DD)

	Total		Delivery Method Analysis					
	Number	Percent	Loops	% Loops	Combos	% Combos	Resale	% Resale
LSR DDD = FOC DD	315	70.00%	93	55.69%	131	81.37%	91	74.59%
LSR DDD not =FOC DD	135	30.00%	74	44.31%	30	18.63%	31	25.41%
Total	**450**	**100%**	**167**	**100%**	**161**	**100%**	**122**	**100%**
Distribution of Earlier Due Dates								
DD = DDD - 1 day	7	38.88%	1	25.00%	5	83.33%	1	12.50%
DD = DDD - 2 days	1	5.55%	0	0.00%	1	16.67%	0	0.00%
DD = DDD - 3-5 days	8	44.44%	3	75.00%	0	0.00%	5	62.50%
DD = DDD - >=6 days	2	11.11%	0	0.00%	0	0.00%	2	25.00%
Total Earlier (DD before DDD)	**18**	**100%**	**4**	**100%**	**6**	**100%**	**8**	**100%**
Distribution of Later Due Dates								
DD = DDD + 1 day	46	39.31%	21	30.00%	15	62.50%	10	43.48%
DD = DDD + 2 days	33	28.20%	22	31.43%	7	29.17%	4	17.39%
DD = DDD + 3-5 days	20	17.09%	13	18.57%	2	8.33%	5	21.74%
DD = DDD + >=6 days	18	15.38%	14	20.00%	0	0.00%	4	17.39%
Total Later (DD after DDD)	**117**	**100%**	**70**	**100%**	**24**	**100%**	**23**	**100%**

Notes:

1. KPMG Consulting's LSR orders with desired due dates that precede the standard interval for the order type, as documented in BellSouth's Product and Services Interval Guide, were excluded from the test.

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Table 1-28: February 28, 2002 – May 22, 2002 EDI Desired Due Date from KPMG Consulting's Local Service Request (LSR DDD) vs. Committed Due Date from BellSouth's Firm Order Confirmation (FOC DD)

	Total		Delivery Method Analysis					
	Number	Percent	Loops	% Loops	Combos	% Combos	Resale	% Resale
LSR DDD = FOC DD	432	73.10%	153	66.81%	147	77.37%	132	76.74%
LSR DDD not = FOC DD	159	26.90%	76	33.19%	43	22.63%	40	23.26%
Total	**591**	**100%**	**229**	**100%**	**190**	**100%**	**172**	**100%**
Distribution of Earlier Due Dates								
DD = DDD - 1 day	8	66.67%	2	50.00%	4	66.67%	2	100%
DD = DDD - 2 days	0	0.00%	0	0.00%	0	0.00%	0	0.00%
DD = DDD - 3-5 days	2	16.67%	2	50.00%	0	0.00%	0	0.00%
DD = DDD - >=6 days	2	16.67%	0	0.00%	2	33.33%	0	0.00%
Total Earlier (DD before DDD)	**12**	**100%**	**4**	**100%**	**6**	**100%**	**2**	**100%**
Distribution of Later Due Dates								
DD = DDD + 1 day	84	57.14%	37	51.39%	18	48.65%	29	76.32%
DD = DDD + 2 days	28	19.05%	22	30.56%	1	2.70%	5	13.16%
DD = DDD + 3-5 days	28	19.05%	7	9.72%	18	48.65%	3	7.89%
DD = DDD + >=6 days	7	4.76%	6	8.33%	0	0.00%	1	2.63%
Total Later (DD after DDD)	**147**	**100%**	**72**	**100%**	**37**	**100%**	**38**	**100%**

Notes:

1. KPMG Consulting's LSR orders with desired due dates that precede the standard interval for the order type, as documented in BellSouth's Product and Services Interval Guide, were excluded from the test.

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Table 1-29: March 13, 2001 – November 25, 2001 TAG Functional Acknowledgements (ACK) Timeliness

Product Type	Number of ACKs Received	Number of On-Time ACK Received	No./Percentage of ACKs Received On Time	SQM Benchmark
Resale Business	224	224	100%	95% within 30 minutes
Resale Residence	248	248	100%	
UNE-Loop	609	609	100%	
UNE-P	616	616	100%	
Total	1,697	1,697	100%	

Table 1-30: November 26, 2001 – February 27, 2002 TAG Functional Acknowledgements (ACK) Timeliness

Product Type	Number of ACKs Received	Number of On-Time ACK Received	No./Percentage of ACKs Received On Time	SQM Benchmark
Resale Business	56	56	100%	95% within 30 minutes
Resale Residence	27	27	100%	
UNE-Loop	113	113	100%	
UNE-P	165	165	100%	
Total	361	361	100%	

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Table 1-31: February 28, 2002 – May 22, 2002 TAG Functional Acknowledgements (ACK)
Timeliness

Product Type	Number of ACKs Received	Number of On-Time ACK Received	No./Percentage of ACKs Received On Time	SQM Benchmark
Resale Business	188	188	100%	95% within 30 minutes
Resale Residence	92	92	100%	
UNE-Loop	318	318	100%	
UNE-P	233	233	100%	
Total	831	831	100%	

Table 1-32: March 13, 2001 – November 25, 2001 TAG Reject Timeliness, Fully Mechanized

Product Type	Number of Rejects Received	Number of On-Time Rejects Received	No./Percentage of Rejects Received On Time	SQM Benchmark
Resale Business	32	30	93.75%	97% within 1 hour
Resale Residence	41	31	75.61%	
UNE-Loop	108	88	81.48%	
UNE-P	94	70	74.47%	
Total	275	219	79.64%	

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Table 1-33: November 26, 2001 – February 27, 2002 TAG Reject Timeliness, Fully Mechanized

Product Type	Number of Rejects Received	Number of On-Time Rejects Received	No./Percentage of Rejects Received On Time	SQM Benchmark
Resale Business	8	7	87.50%	
Resale Residence	2	2	100%	97% within 1 hour
UNE-Loop	20	20	100%	
UNE-P	9	9	100%	
Total	39	38	97.44%	

Table 1-34: February 28, 2002 – May 22, 2002 TAG Reject Timeliness Fully Mechanized

Product Type	Number of Rejects Received	Number of On-Time Rejects Received	No./Percentage of Rejects Received On Time	SQM Benchmark
Resale Business	20	20	100%	
Resale Residence	8	8	100%	97% within 1 hour
UNE-Loop	39	38	97.44%	
UNE-P	9	9	100%	
Total	76	75	98.68%	

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Table 1-35: March 13, 2001 – November 25, 2001 TAG Reject Timeliness, Partially Mechanized

Product Type	Total	<= 10 hrs	% within 10 hrs	<= 18 hrs	% within 18 hrs	<= 24 hrs	% within 24 hrs	SQM Benchmark
Resale Business	39	31	79.49%	35	89.74%	39	100%	85% within 24 hours – prior to 5/1/2001
Resale Residence	55	26	47.27%	50	90.91%	52	94.55%	85% within 18 hours – 5/1/2001-7/31/2001
UNE-Loop	56	45	80.36%	55	98.21%	56	100%	85% within 10 hours – 8/1/2001-present
UNE-P	97	83	85.57%	96	98.97%	97	100%	
Total	247	185	74.90%	236	95.55%	244	98.79%	

Table 1-36: November 26, 2001 – February 27, 2002 TAG Reject Timeliness, Partially Mechanized

Product Type	Number of Rejects Received	Number of On-Time Rejects Received	No./Percentage of Rejects Received On Time	SQM Benchmark
Resale Business	15	12	80.00%	85% within 10 hours
Resale Residence	5	5	100%	
UNE-Loop	18	17	94.44%	
UNE-P	49	45	91.84%	
Total	87	79	90.80%	

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Table 1-37: February 28, 2002 – May 22, 2002 TAG Reject Timeliness, Partially Mechanized

Product Type	Number of Rejects Received	Number of On-Time Rejects Received	No.Percentage of Rejects Received On Time	SQM Benchmark
Resale Business	42	41	97.62%	85% within 10 hours
Resale Residence	6	6	100%	
UNE-Loop	26	25	96.15%	
UNE-P	24	24	100%	
Total	98	96	97.96%	

Table 1-38: March 13, 2001 – November 25, 2001 TAG Firm Order Confirmation (FOC) Timeliness, Fully Mechanized

Product Type	Number of FOCs Received	Number of On-Time FOCs Received	No.Percentage of FOCs Received On Time	SQM Benchmark
Resale Business	89	77	86.52%	95% within 3 hours
Resale Residence	89	79	88.76%	
UNE-Loop	240	225	93.75%	
UNE-P	258	218	84.50%	
Total	676	599	88.61%	

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Table 1-39: November 26, 2001 – February 27, 2002 TAG Firm Order Confirmation (FOC)
Timeliness, Fully Mechanized

Product Type	Number of FOCs Received	Number of On-Time FOCs Received	No./Percentage of FOCs Received On Time	SQM Benchmark
Resale Business	11	10	90.91%	95% within 3 hours
Resale Residence	16	16	100%	
UNE-Loop	51	50	98.04%	
UNE-P	58	58	100%	
Total	136	134	98.53%	

Table 1-40: February 28, 2002 – May 22, 2002 TAG Firm Order Confirmation (FOC)
Timeliness, Fully Mechanized

Product Type	Number of FOCs Received	Number of On-Time FOCs Received	No./Percentage of FOCs Received On Time	SQM Benchmark
Resale Business	56	56	100%	95% within 3 hours
Resale Residence	56	56	100%	
UNE-Loop	123	121	98.37%	
UNE-P	157	156	99.36%	
Total	392	389	99.23%	

Table 1-41: March 13, 2001 – November 25, 2001 TAG Firm Order Confirmation (FOC) Timeliness, Partially Mechanized

Product Type	Total	<= 10 hrs	% within 10 hrs	<= 18 hrs	% within 18 hrs	<= 24 hrs	% within 24 hrs	SQM Benchmark
Resale Business	61	48	78.69%	49	80.33%	55	90.16%	85% within 24 hours – prior to 5/1/2001
Resale Residence	60	36	60.00%	57	95.00%	60	100%	85% within 18 hours – 5/1/2001-7/31/2001
UNE-Loop	162	139	85.80%	155	95.68%	157	96.91%	85% within 10 hours –
UNE-P	128	108	84.38%	123	96.09%	125	97.66%	8/1/2001-present
Total	411	331	80.54%	384	93.43%	397	96.59%	

Table 1-42: November 26, 2001 – February 27, 2002 TAG Firm Order Confirmation (FOC) Timeliness, Partially Mechanized

Product Type	Number of FOCs Received	Number of On-Time FOCs Received	No./Percentage of FOCs Received On Time	SQM Benchmark
Resale Business	24	19	79.17%	
Resale Residence	4	2	50.00%	85% within 10 hours
UNE-Loop	22	19	86.36%	
UNE-P	49	39	79.59%	
Total	99	79	79.80%	

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**Table 1-43: February 28, 2002 – May 22, 2002 TAG Firm Order Confirmation (FOC)
Timeliness, Partially Mechanized**

Product Type	Number of FOCs Received	Number of On-Time FOCs Received	No./Percentage of FOCs Received On Time	SQM Benchmark
Resale Business	70	59	84.29%	85% within 10 hours
Resale Residence	22	17	77.27%	
UNE-Loop	131	126	96.18%	
UNE-P	42	42	100%	
Total	265	244	92.08	

**Table 1-44: March 13, 2001 – November 25, 2001 TAG Completion Notice Due Date (CN DD)
vs. Completion Notification Delivery Date**

	TOTAL		Product Delivery Analysis								
	CNs Received	% Of Total CNs	No. Of Loops	Loops as a % of CNs Received	% Of Total Loops	No. Of Resale	Resale as a % of CNs Received	% Of Total Resale	No. Of Combos	Combos as a % of CNs Received	% Of Total Combos
CN Date Received = CN DD	606	68.47%	227	25.65%	83.46%	146	16.50%	56.81%	233	26.33%	65.45%
CN Date Received = CN DD + 1 day	96	10.85%	14	1.58%	5.15%	41	4.63%	15.95%	41	4.63%	11.52%
CN Date Received = CN DD + 2 days	60	6.78%	11	1,24%	4.04%	17	1.92%	6.61%	32	3.62%	8.99%
CN Date Received = CN DD + 3-5 days	115	12.99%	17	1.92%	6.25%	53	5.90%	20.62%	45	5.08%	12.64%
CN Date Received = CN DD + >=6 days	8	0.90%	3	0.34%	1.10%	0	0.00%	0.00%	5	0.56%	1.40%
TOTAL	885	100%	272		100%	257		100%	356		100%

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Table 1-45: November 26, 2001 – February 27, 2002 TAG Completion Notice Due Date (CN DD) vs. Completion Notification Delivery Date

	TOTAL		Product Delivery Analysis								
	CNs Received	% Of Total CNs	No. Of Loops	Loops as a % of CNs Received	% Of Total Loops	No. Of Resale	Resale as a % of CNs Received	% Of Total Resale	No. Of Combos	Combos as a % of CNs Received	% Of Total Combos
CN Date Received = CN DD	165	79.71%	43	20.77%	72.88%	49	23.67%	90.74%	73	35.27%	77.66%
CN Date Received = CN DD + 1 day	31	14.98%	9	4.35%	15.25%	4	1.93%	7.41%	18	8.70%	19.15%
CN Date Received = CN DD + 2 days	4	1.93%	2	0.97%	3.39%	0	0.00%	0.00%	2	0.97%	2.13%
CN Date Received = CN DD + 3-5 days	5	2.42%	3	1.45%	5.08%	1	0.48%	1.85%	1	0.48%	1.06%
CN Date Received = CN DD + >=6 days	2	0.97%	2	0.97%	3.39%	0	0.00%	0.00%	0	0.00%	0.00%
TOTAL	**207**	**100%**	**59**		**100%**	**54**		**100%**	**94**		**100%**

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Table 1-46: February 28, 2002 – May 22, 2002 TAG Completion Notice Due Date (CN DD) vs. Completion Notification Delivery Date

	TOTAL		Product Delivery Analysis								
	CNs Received	% Of Total CNs	No. Of Loops	Loops as a % of CNs Received	% Of Total Loops	No. Of Resale	Resale as a % of CNs Received	% Of Total Resale	No. Of Combos	Combos as a % of CNs Received	% Of Total Combos
CN Date Received = CN DD	521	92.70%	146	25.98%	83.43%	200	35.59%	98.52%	175	31.14%	95.11%
CN Date Received = CN DD + 1 day	15	2.76%	8	1.42%	4.57%	0	0.00%	0.00%	7	1.25%	3.80%
CN Date Received = CN DD + 2 days	18	3.20%	14	2.49%	8.00%	2	0.36%	0.99%	2	0.36%	1.09%
CN Date Received = CN DD + 3-5 days	8	1.42%	7	1.25%	4.00%	1	0.18%	0.49%	0	0.00%	0.00%
CN Date Received = CN DD + >=6 days	0	0.00%	0	0.00%	0.00%	0	0.00%	0.00%	0	0.00%	0.00%
TOTAL	**562**	**100%**	**175**		**100%**	**203**		**100%**	**184**		**100%**

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Table 1-47: March 13, 2001 – November 25, 2001 TAG Desired Due Date from KPMG Consulting Local Service Request (LSR DDD) vs. Committed Due Date from BellSouth's Firm Order Confirmation (FOC DD)

	Total		Delivery Method Analysis					
	Number	Percent	Loops	% Loops	Combos	% Combos	Resale	%Resale
LSR DDD = FOC DD	976	85.84%	380	90.48%	225	74.01%	371	89.83%
LSR DDD not = FOC DD	161	14.16%	40	9.52%	79	25.99%	42	10.17%
Total	1,137	100%	420	100%	304	100%	413	100%
Distribution of Earlier Due Dates								
DD = DDD - 1 day	8	32.00%	3	33.33%	2	50.00%	3	25.00%
DD = DDD - 2 days	0	0.00%	0	0.00%	0	0.00%	0	0
DD = DDD - 3-5 days	8	32.00%	1	11.11%	2	50.00%	5	41.67%
DD = DDD - >=6 days	9	36.00%	5	55.56%	0	0.00%	4	33.33%
Total Earlier (DD before DDD)	25	100%	9	100%	4	100%	12	100%
Distribution of Later Due Dates								
DD = DDD + 1 day	67	49.26%	14	45.16%	43	57.33%	10	33.33%
DD = DDD + 2 days	8	5.88%	1	3.23%	6	8.00%	1	3.33%
DD = DDD + 3-5 days	54	39.71%	11	35.48%	25	33.33%	18	60.00%
DD = DDD + >=6 days	7	5.15%	5	16.13%	1	1.33%	1	3.33%
Total Later (DD after DDD)	136	100%	31	100%	75	100%	30	100%

Notes:
1. KPMG Consulting's LSR orders with desired due dates that precede the standard interval for the order type, as documented in BellSouth's Product and Services Interval Guide, were excluded from the test.

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Table 1-48: November 26, 2001 – February 27, 2002 TAG Desired Due Date from KPMG Consulting Local Service Request (LSR DDD) vs. Committed Due Date from BellSouth's Firm Order Confirmation (FOC DD)

	Total		Delivery Method Analysis					
	Number	Percent	Loops	% Loops	Combos	% Combos	Resale	%Resale
LSR DDD = FOC DD	174	73.73%	46	63.01%	82	75.93%	46	83.64%
LSR DDD not = FOC DD	62	26.27%	27	36.99%	26	24.07%	9	16.36%
Total	236	100%	73	100%	108	100%	55	100%
Distribution of Earlier Due Dates								
DD = DDD - 1 day	3	50.00%	0	0.00%	2	66.67%	1	33.33%
DD = DDD - 2 days	0	0.00%	0	0.00%	0	0.00%	0	0.00%
DD = DDD - 3-5 days	3	50.00%	0	0.00%	1	33.33%	2	66.67%
DD = DDD - >=6 days	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total Earlier (DD before DDD)	6	100%	0	0.00%	3	100%	3	100%
Distribution of Later Due Dates								
DD = DDD + 1 day	14	25.00%	9	33.33%	4	17.39%	1	16.66%
DD = DDD + 2 days	22	39.28%	14	51.85%	5	21.74%	3	50.00%
DD = DDD + 3-5 days	11	19.64%	3	11.11%	7	30.43%	1	16.66%
DD = DDD + >=6 days	9	16.07%	1	3.70%	7	30.43%	1	16.66%
Total Later (DD after DDD)	56	100%	27	100%	23	100%	6	100%

Notes:
1. KPMG Consulting's LSR orders with desired due dates that precede the standard interval for the order type, as documented in BellSouth's *Product and Services Interval Guide*, were excluded from the test.

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Table 1-49: February 28, 2002 – May 22, 2002 TAG Desired Due Date from KPMG Consulting Local Service Request (LSR DDD) vs. Committed Due Date from BellSouth's Firm Order Confirmation (FOC DD)

	Total		Delivery Method Analysis					
	Number	Percent	Loops	% Loops	Combos	% Combos	Resale	%Resale
LSR DDD = FOC DD	524	79.15%	169	65.76%	172	86.43%	183	88.83%
LSR DDD not =FOC DD	138	20.85%	88	34.24%	27	13.57%	23	11.17%
Total	662	100%	257	100%	199	100%	206	100%
Distribution of Earlier Due Dates								
DD = DDD - 1 day	7	70.00%	1	33.33%	5	100%	1	50.00%
DD = DDD - 2 days	2	20.00%	1	33.33%	0	0.00%	1	50.00%
DD = DDD - 3-5 days	0	0.00%	0	0.00%	0	0.00%	0	0.00%
DD = DDD - >=6 days	1	10.00%	1	33.33%	0	0.00%	0	0.00%
Total Earlier (DD before DDD)	10	100%	3	100%	5	100%	2	100%
Distribution of Later Due Dates								
DD = DDD + 1 day	76	59.38%	35	41.18%	20	90.91%	21	100%
DD = DDD + 2 days	30	23.44%	30	35.29%	0	0.00%	0	0.00%
DD = DDD + 3-5 days	13	10.16%	11	12.94%	2	9.09%	0	0.00%
DD = DDD + >=6 days	9	7.03%	9	10.59%	0	0.00%	0	0.00%
Total Later (DD after DDD)	128	100%	85	100%	22	100%	21	100%

Notes:

1. KPMG Consulting's LSR orders with desired due dates that precede the standard interval for the order type, as documented in BellSouth's Product and Services Interval Guide, were excluded from the test.

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Table 1-50: March 13, 2001 – November 25, 2001 LENS Firm Order Confirmation (FOC)
Timeliness, Fully Mechanized

Product Type	Number of FOCs Received	Number of On-Time FOCs Received	No./Percentage of FOCs Received On Time	SQM Benchmark
Resale Business	22	21	95.45%	95% within 3 hours
Resale Residence	16	16	100%	
UNE-Loop	15	15	100%	
UNE-P	70	69	98.57%	
Total	123	121	98.37%	

Table 1-51: November 26, 2001 – February 27, 2002 LENS Firm Order Confirmation (FOC)
Timeliness, Fully Mechanized

Product Type	Number of FOCs Received	Number of On-Time FOCs Received	No./Percentage of FOCs Received On Time	SQM Benchmark
Resale Business	2	2	100%	95% within 3 hours
Resale Residence	17	17	100%	
UNE-Loop	4	4	100%	
UNE-P	36	36	100%	
Total	59	59	100%	

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Table 1-52: February 28, 2002 – May 22, 2002 LENS Firm Order Confirmation (FOC)
Timeliness, Fully Mechanized

Product Type	Number of FOCs Received	Number of On-Time FOCs Received	No./Percentage of FOCs Received On Time	SQM Benchmark
Resale Business	74	74	100%	
Resale Residence	76	76	100%	95% within 3 hours
UNE-Loop	22	22	100%	
UNE-P	137	135	98.54%	
Total	309	307	99.35%	

Table 1-53: March 13, 2001 – November 25, 2001 LENS Firm Order Confirmation (FOC)
Timeliness, Partially Mechanized

Product Type	Total	<= 10 hrs	% within 10 hrs	<= 18 hrs	% within 18 hrs	<= 24 hrs	% within 24 hrs	SQM Benchmark
Resale Business	3	3	100%	3	100%	3	100%	85% within 24 hours – prior to 5/1/2001
Resale Residence	10	8	80.00%	9	90.00%	9	90.00%	85% within 18 hours – 5/1/2001-7/31/2001
UNE-Loop	22	21	95.45%	22	100%	22	100%	85% within 10 hours – 8/1/2001-present
UNE-P	16	13	81.25%	14	87.50%	15	93.75%	
Total	51	45	88.24%	48	94.12%	49	96.08%	

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Table 1-54: November 26, 2001 – February 27, 2002 LENS Firm Order Confirmation (FOC) Timeliness, Partially Mechanized

Product Type	Number of FOCs Received	Number of On-Time FOCs Received	No./Percentage of FOCs Received On Time	SQM Benchmark
Resale Business	12	5	41.67%	85% within 10 hours
Resale Residence	3	3	100%	
UNE-Loop	0	0	0.00%	
UNE-P	1	1	100%	
Total	16	9	56.25%	

Table 1-55: February 28, 2002 – May 22, 2002 LENS Firm Order Confirmation (FOC) Timeliness, Partially Mechanized

Product Type	Number of FOCs Received	Number of On-Time FOCs Received	No./Percentage of FOCs Received On Time	SQM Benchmark
Resale Business	13	12	92.31%	85% within 10 hours
Resale Residence	3	3	100%	
UNE-Loop	15	11	73.33%	
UNE-P	10	10	100%	
Total	41	36	87.80%	

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Table 1-56: March 13, 2001 – February 27, 2002 Non-Mechanized Functional Acknowledgements (ACK) Timeliness

Product Type	Number of ACKs Received	Number of On-Time ACK Received	No./Percentage of ACKs Received On Time	SQM Benchmark
Resale Business	367	348	94.82%	95% within 8 hours
Resale Residence	125	121	96.80%	
UNE-Loop	44	43	97.73%	
UNE-P	88	83	94.32%	
Total	624	595	95.35%	

Table 1-57: February 28, 2002 – May 22, 2002 Non-Mechanized Functional Acknowledgements (ACK) Timeliness

Product Type	Number of ACKs Received	Number of On-Time ACK Received	No./Percentage of ACKs Received On Time	SQM Benchmark
Resale Business	101	101	100%	95% within 8 hours
Resale Residence	0	0	0.00%	
UNE-Loop	0	0	0.00%	
UNE-P	68	67	98.53%	
Total	169	168	99.41%	

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Table 1-58: March 13, 2001 – February 27, 2002 Non-Mechanized Test Reject Timeliness

Product Type	Number of Rejects Received	Number of On-Time Rejects Received	No./Percentage of Rejects Received On Time	SQM Benchmark
Resale Business	410	327	79.76%	85% within 24 hours
Resale Residence	114	81	71.05%	
UNE-Loop	361	357	98.89%	
UNE-P	127	111	87.40%	
Total	1,012	876	86.56%	

Table 1-59: February 28, 2002 – May 22, 2002 Non-Mechanized Reject Timeliness

Product Type	Number of Rejects Received	Number of On-Time Rejects Received	No./Percentage of Rejects Received On Time	SQM Benchmark
Resale Business	110	89	80.91%	85% within 24 hours
Resale Residence	0	0	0.00%	
UNE-Loop	6	6	100%	
UNE-P	70	60	85.71%	
Total	186	155	83.33%	

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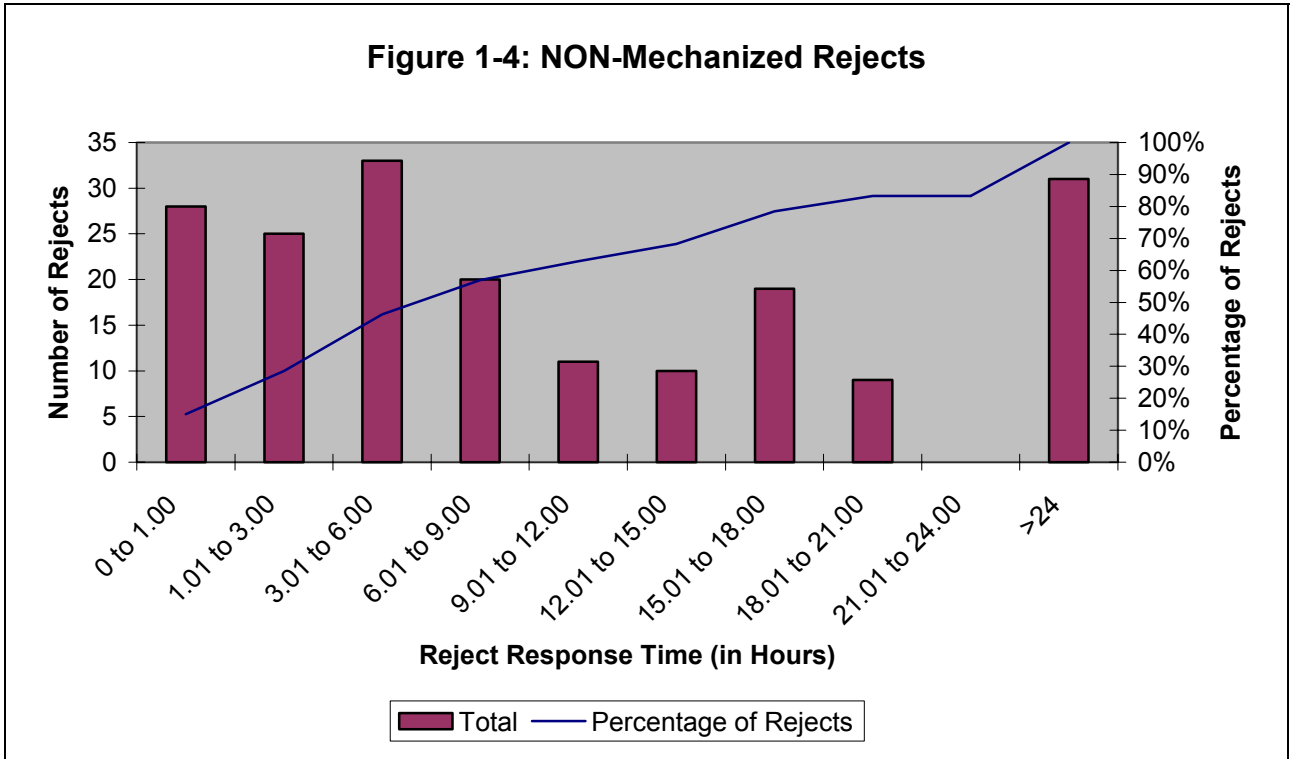
Figure 1-4: NON-Mechanized Rejects

Table 1-60: March 13, 2001 – February 27, 2002 Non-Mechanized Firm Order Confirmation (FOC) Timeliness

Product Type	Number of FOCs Received	Number of On-Time FOCs Received	No./Percentage of FOCs Received On Time	SQM Benchmark
Resale Business	119	83	69.75%	85% within 36 hours
Resale Residence	6	6	100%	
UNE-Loop	111	110	99.10%	
UNE-P	48	36	75.00%	
Total	284	235	82.75%	

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Table 1-61: February 28, 2002 – May 22, 2002 Non-Mechanized Firm Order Confirmation (FOC) Timeliness

Product Type	Number of FOCs Received	Number of On-Time FOCs Received	No./Percentage of FOCs Received On Time	SQM Benchmark
Resale Business	57	53	92.98%	85% within 24 hours
Resale Residence	0	0	0.00%	
UNE-Loop	9	9	100%	
UNE-P	15	14	93.33%	
Total	81	76	93.83%	

Table 1-62: March 13, 2001 – February 27, 2002 Non-Mechanized Completion Notice Due Date (CN DD) vs. Completion Notification Delivery Date

	TOTAL		Product Delivery Analysis							
	CNs Received	% Of Total CNs	No. Of Loops	Loops as a % of CNs Received	% Of Total Loops	No. Of Resale	Resale as a % of CNs Received	% Of Total Resale	No. Of Combos	Combos as a % of CNs Received	% of Total Combos
CN Date Received = CN DD	256	89.82%	67	23.51%	91.78%	152	53.33%	91.02%	37	12.98%	82.22%
CN Date Received = CN DD + 1 day	6	2.11%	2	0.70%	2.74%	1	0.35%	0.60%	3	1.05%	6.67%
CN Date Received = CN DD + 2 days	2	0.70%	0	0.00%	0.00%	1	0.35%	0.60%	1	0.35%	2.22%
CN Date Received = CN DD + 3-5 days	6	2.11%	1	0.35%	1.37%	3	1.05%	1.80%	2	0.70%	4.44%
CN Date Received = CN DD + >=6 days	15	5.26%	3	1.05%	4.11%	10	3.51%	5.99%	2	0.70%	4.44%
TOTAL	**285**	**100%**	**73**		**100%**	**167**		**100%**	**45**		**100%**

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Table 1-63: February 28, 2002 – May 22, 2002 Non-Mechanized Completion Notice Due Date (CN DD) vs. Completion Notification Delivery Date

	TOTAL		Product Delivery Analysis								
	CNs Received	% of Total CNs	No. of Loops	Loops as a % of CNs Received	% of Total Loops	No. of Resale	Resale as a % of CNs Received	% of Total Resale	No. Of Combos	Combos as a % of CNs Received	% of Total Combos
CN Date Received = CN DD	85	96.59%	7	7.95%	100%	63	71.59%	95.45%	15	17.05%	100%
CN Date Received = CN DD + 1 day	1	1.14%	0	0.00%	0.00%	1	1.14%	1.52%	0	0.00%	0.00%
CN Date Received = CN DD + 2 days	1	1.14%	0	0.00%	0.00%	1	1.14%	1.52%	0	0.00%	0.00%
CN Date Received = CN DD + 3-5 days	1	1.14%	0	0.00%	0.00%	1	1.14%	1.52%	0	0.00%	0.00%
CN Date Received = CN DD + >=6 days	0	0.00%	0	0.00%	0.00%	0	0.00%	0.00%	0	0.00%	0.00%
TOTAL	**88**	**100%**	**7**		**100%**	**66**		**100%**	**15**		**100%**

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Table 1-64: March 13, 2001 – February 27, 2002 Non-Mechanized Desired Due Date from
KPMG Consulting Local Service Request (LSR DDD) vs. Committed Due Date from
BellSouth's Firm Order Confirmation (FOC DD)

	Total		Delivery Method Analysis					
	Number	Percent	Loops	% Loops	Combos	% Combos	Resale	%Resale
LSR DDD = FOC DD	196	60.49%	53	49.53%	28	59.59%	115	67.65%
LSR DDD not =FOC DD	128	39.51%	54	50.47%	19	40.43%	55	32.35%
Total	**324**	**100%**	**107**	**100%**	**47**	**100%**	**170**	**100%**
Distribution of Earlier Due Dates								
DD = DDD - 1 day	0	0.00%	0	0.00%	0	0.00%	0	0.00%
DD = DDD - 2 days	2	12.50%	0	0.00%	1	33.33%	1	7.69%
DD = DDD - 3-5 days	2	12.50%	0	0.00%	1	33.33%	1	7.69%
DD = DDD - >=6 days	12	75.00%	0	0.00%	1	33.33%	11	84.62%
Total Earlier (DD before DDD)	**16**	**100%**	**0**	**0.00%**	**3**	**100%**	**13**	**100%**
Distribution of Later Due Dates								
DD = DDD + 1 day	34	31.19%	14	25.93%	3	18.75%	17	40.48%
DD = DDD + 2 days	9	8.26%	7	12.96%	2	12.50%	0	0.00%
DD = DDD + 3-5 days	7	6.42%	2	3.70%	0	0.00%	5	11.90%
DD = DDD + >=6 days	62	56.88%	31	57.41%	11	68.75%	20	46.62%
Total Later (DD after DDD)	**109**	**100%**	**54**	**100%**	**16**	**100%**	**42**	**100%**

Notes:
1. KPMG Consulting's LSR orders with desired due dates that precede the standard interval for the order type, as documented in BellSouth's Product and Services Interval Guide, were excluded from the test.

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***Table 1-65: February 28, 2002 – May 22, 2002 Non-Mechanized Desired Due Date from
KPMG Consulting Local Service Request (LSR DDD) vs. Committed Due Date from
BellSouth's Firm Order Confirmation (FOC DD)***

	Total		Delivery Method Analysis					
	Number	Percent	Loops	% Loops	Combos	% Combos	Resale	%Resale
LSR DDD = FOC DD	54	58.70%	7	77.78%	15	100%	32	47.06%
LSR DDD not =FOC DD	38	41.30%	2	22.22%	0	0.00%	36	52.94%
Total	**92**	**100%**	**9**	**100%**	**15**	**100%**	**68**	**100%**
Distribution of Earlier Due Dates								
DD = DDD - 1 day	0	0.00%	0	0.00%	0	0.00%	0	0.00%
DD = DDD - 2 days	0	0.00%	0	0.00%	0	0.00%	0	0.00%
DD = DDD - 3-5 days	0	0.00%	0	0.00%	0	0.00%	0	0.00%
DD = DDD - >=6 days	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total Earlier (DD before DDD)	**0**	**0.00%**	**0**	**0.00%**	**0**	**0.00%**	**0**	**0.00%**
Distribution of Later Due Dates								
DD = DDD + 1 day	11	28.95%	1	50.00%	0	0.00%	10	27.78%
DD = DDD + 2 days	4	10.53%	0	0.00%	0	0.00%	4	11.11%
DD = DDD + 3-5 days	10	26.32%	0	0.00%	0	0.00%	10	27.78%
DD = DDD + >=6 days	13	34.21%	1	50.00%	0	0.00%	12	33.33%
Total Later (DD after DDD)	**38**	**100%**	**2**	**100%**	**0**	**0.00%**	**36**	**100%**

Notes:
1. KPMG Consulting's LSR orders with desired due dates that precede the standard interval for the order type, as documented in BellSouth's Product and Services Interval Guide, were excluded from the test.

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Table 1-66: March 13, 2001 – July 31, 2001 Average Pre-Order Response Timeliness by Pre-Order Type

Pre-order Type	Total Transactions Sent	Average Response Time (seconds)	Benchmark (seconds)[159]
AAQ	199	1.90	2.64
AVQ	282	5.61	3.22
AVQ_TN	143	5.52	2.86
CSRQ	284	5.12	3.51
LMU_SF	122	21.25	60
LMU_WL	11	10.27	60
LRCRQ	30	12.23	60
LRRQ	66	19.42	60
SAQ	327	35.41	4.11
TNAQ	293	5.17	3.37
TNAQ_MISC	162	2.49	3.37
TNCAN_TN	59	1.27	3.99
TNSQ	101	3.06	3.48

Notes:
1. The PO-2 SQM benchmark for electronic LMU queries is 95% received within 60 seconds. 95.90% of LMU-SF received responses within 60 seconds for the period of March 13, 2001 through July 31, 2001. 100% of LMU-WL received responses within 60 seconds for the period of March 13, 2001 through July 31, 2001.

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[159]BellSouth retail pre-order response times were obtained from the March 2001 through July 2001 Pre-Ordering and Ordering OSS Report performance measurement reports.

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Table 1-67: August 1, 2001 – January 14, 2002 Average Pre-Order Response Timeliness by Pre-Order Type

Pre-order Type	Total Transactions Sent	Average Response Time (seconds)	Parity with Retail / Benchmark[160]
AAQ	227	2.00	2.71
AVQ	153	4.04	3.21
AVQ_TN	257	2.83	2.87
CSRQ	176	2.91	3.55
LMU_SF	195	23.32	60
LMU_WL	177	25.12	60
LRCRQ	156	19.33	60
LRRQ	225	22.19	60
PCSRQ	228	3.37	9.65[161]
SAQ	150	4.43	4.14
TNCAN_DID	22	4.55	N/A
TNCAN_MLH	41	3.39	N/A
TNAQ	467	2.36	3.04
TNAQ_MISC	151	1.93	2.82
TNCAN_TN	154	3.55	2.82
TNSQ	152	2.84	2.82

Notes:
1. The PO-2 SQM benchmark for electronic LMU queries is 95% received within 60 seconds. 98.97% of LMU-SF received responses within 60 seconds for the period of March 13, 2001 through July 31, 2001. 98.31% of LMU-WL received responses within 60 seconds for the period of March 13, 2001 through July 31, 2001.

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[160]BellSouth retail pre-order response times were obtained from the August 2001through April 2002 Pre-Ordering and Ordering OSS Report performance measurement reports.

[161]KPMG Consulting used January 2002 CRSACCTS data to measure PCSRQ response timeliness due to: 1) the absence of PCSRQ parity data for the months of March 2002 through May 2002; 2) BellSouth CRSACCTS data for the months of March 2002 through May 2002 contained abnormal parity data.

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Table 1-68: December 21, 2001 – February 12, 2002 Average Pre-Order Response Timeliness by Pre-Order Type

Pre-order Type	Total Transactions Sent	Average Response Time (seconds)	Parity with Retail / Benchmark[162]
AVQ	257	4.38	3.25
TNCAN_TN	161	2.71	3.08

Table 1-69: April 5, 2002 – May 2, 2002 Average Pre-Order Response Timeliness by Pre-Order Type

Pre-order Type	Total Transactions Sent	Average Response Time (seconds)	Parity with Retail / Benchmark[163]
AVQ	152	3.84	3.32

5.0   Parity Evaluation

A parity evaluation was not required for this test.

6.0   Final Summary

This section summarizes the number of test evaluation criteria discussed above and the number of evaluation criteria satisfied or not satisfied at the conclusion of this test.

6.1   Summary of Findings

There were 40 evaluation criteria considered for the POP Functional Evaluation (TVV1). Thirty-eight evaluation criteria received a satisfied result. Two evaluation criteria received a not satisfied result.

Due to the not satisfied evaluation criteria (TVV1-2-2 and TVV1-3-16), it is KPMG Consulting's opinion that significant issues remain unresolved in the TVV1 testing area.

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[162]BellSouth retail pre-order response times were obtained from the December 2001 through January 2002 Pre-Ordering and Ordering OSS Report performance measurement reports. KPMG Consulting did not use the February 2002 report for calculating AVQ response time due to abnormal parity data.

[163]BellSouth retail pre-order response times were obtained from the January 2002 Pre-Ordering and Ordering OSS Report performance measurement reports. KPMG Consulting used the January 2002 report due to abnormal parity data for the month of April 2002 and May 2002.

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D.   Test Results: Pre-Order, Order and Provisioning (POP) Volume Performance Test (TVV2)

1.0   Description

The Pre-Order, Order and Provisioning (POP) Volume Performance Test (TVV2) was designed to evaluate the relevant systems and processes associated with the BellSouth pre-order and order processes. The objective of this test was to validate the performance of the BellSouth Graphical User Interface (GUI), manual, and machine-to-machine interfaces at projected volumes.

The POP Volume Performance Test (TVV2) examined BellSouth system responses and timeliness for pre-order and order transactions submitted using the BellSouth Business Rules for Local Ordering (BBR-LO). The test was conducted in three parts: (i) two normal volume tests using anticipated transaction volumes for the March 2003 time frame, (ii) a peak test using volumes at 150% (1.5 times) of the normal volume test, and (iii) a stress test using volumes at 250% (2.5 times) of the normal volume test. The projected transaction volume was determined by analyzing historical Alternative Local Exchange Carrier (ALEC) ordering behavior, ALEC forecasts and BellSouth regional forecasts.

All volume tests were conducted in BellSouth's production environment. The majority of orders transmitted during the test were limited to those that flow through BellSouth's order processing systems without human intervention. Transactions submitted during the POP Volume Performance Test (TVV2) did not go through the physical provisioning process.

The test used test bed accounts provided by BellSouth for the POP Functional Evaluation (TVV1). The volume performance pre-order and order transactions were standalone transactions; data returned in pre-order transactions was not used to populate Local Service Request (LSR) fields. Customer test accounts were geographically distributed across multiple Florida central offices, switching/transmission equipment and configurations, and Revenue Accounting Offices (RAOs).

KPMG Consulting executed normal electronic volume tests on August 16, 2001; October 30, 2001; December 5, 2001; December 20, 2001; January 10, 2002; and January 28, 2002. KPMG Consulting executed peak electronic volume tests on February 25, 2002 and March 19, 2002. KPMG Consulting executed stress electronic volume tests on April 9, 2002 and April 25, 2002.

KPMG Consulting executed normal manual volume testing on May 23, 2001; May 31, 2001; August 28, 2001; October 16, 2001; December 10, 2001; January 29, 2002; February 20, 2002; March 13, 2002; and April 17, 2002. KPMG Consulting executed peak manual volume tests on May 8, 2002 and June 3, 2002. KPMG Consulting executed a stress manual volume test on June 13, 2002.

2.0   Business Process

This section describes BellSouth's pre-ordering and ordering business processes associated with the electronic and manual interfaces that ALECs use when requesting service from BellSouth.

2.1   Business Process Description

The POP Volume Performance Test (TVV2) tested three BellSouth electronic order interfaces, two BellSouth electronic pre-order interfaces, and the manual order process. Interfaces tested included Electronic Data Interchange (EDI) for ordering, Telecommunications Access Gateway (TAG) for pre-ordering and ordering, and Local Exchange Navigation System (LENS) for pre-

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ordering and ordering. The BellSouth manual ordering process[164] was also examined. The POP Volume Performance Test (TVV2) employed the same connectivity used during the POP Functional Evaluation (TVV1). The electronic interfaces[165] and processes and the manual order processes are described below.
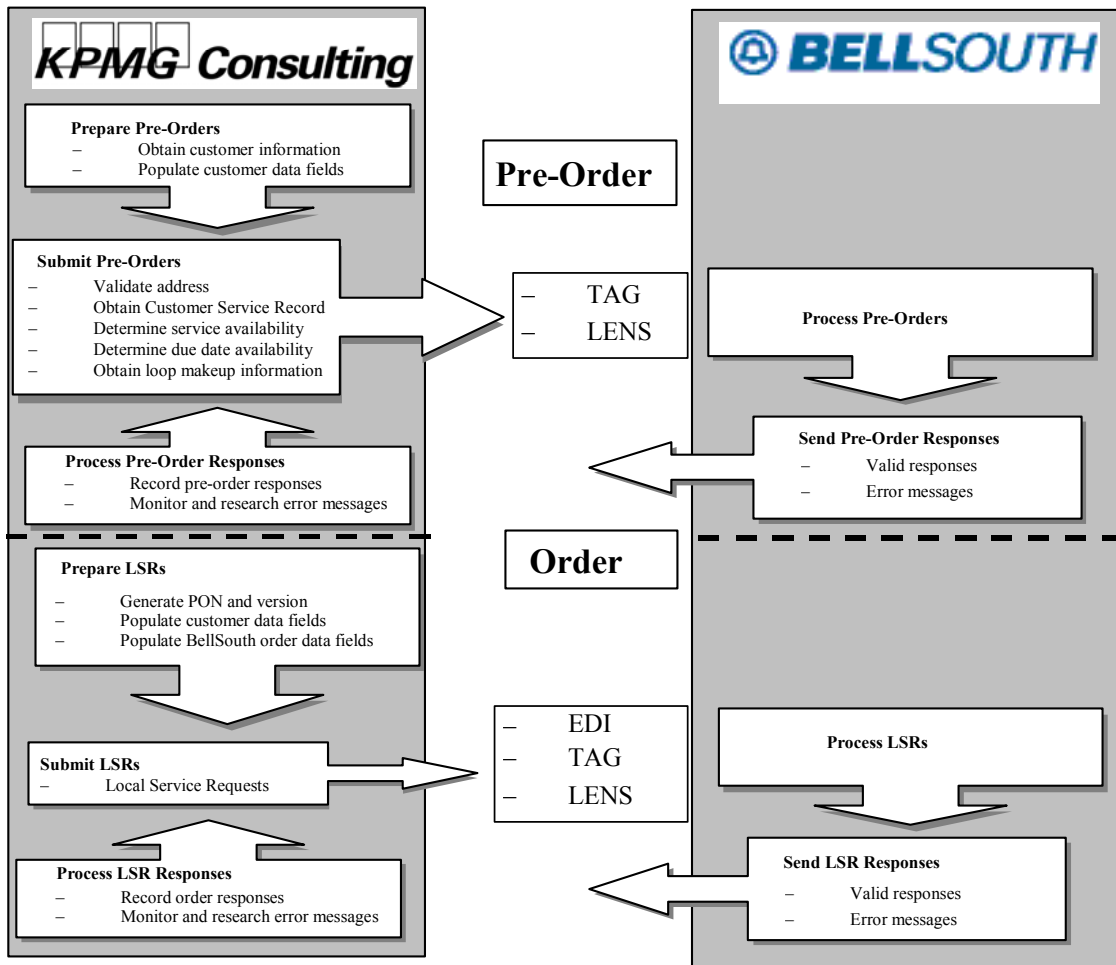
♦ The Telecommunications Access Gateway (TAG) interface is a CORBA-based environment that allows for bi-directional flow of information between BellSouth's OSS and ALEC systems. ALECs develop their own software applications to obtain information from BellSouth's OSS and can incorporate various internal functions, such as downloading information directly to their own inventory/billing systems, creating their own customer databases and generating internal reports. BellSouth provides a standard Application Program Interface (API) from which ALECs can develop their own software applications to obtain information from BellSouth's pre-order and order systems.

♦ The Electronic Data Interchange (EDI) is a batch-driven machine-to-machine interface, which uses industry standards as its foundation. Business files are exchanged between BellSouth computer applications and ALEC computer applications that are encoded to comply with standard EDI transaction sets for data transmission. BellSouth determines how and when each data element is transferred into a BellSouth Service Order.

♦ The Local Exchange Navigation System (LENS) is a GUI that connects directly via the Internet into BellSouth's OSS and is based on the TAG architecture. This interface was developed to provide ALECs with an alternative method of connection to BellSouth through the Internet.

♦ Manual orders were sent to BellSouth via facsimile (fax) according to the guidelines in the BBR-LO.

Figure 2-1 provides an overview of the BellSouth pre-ordering and ordering processes used during the POP Volume Performance Test (TVV2).

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[164]The manual ordering process was tested using facsimile transmissions to the Atlanta Local Carrier Service Center (LCSC).
[165]As of April 3, 2002, the FPSC has removed RoboTAG from the Florida OSS test (Order # PSC-02-0450-PCO-TP).

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Figure 2-1: Electronic Pre-Ordering and Ordering Processes

2.2 Pre-Order and Order Process Description

Two transaction processes were central to the POP Volume Performance Test (TVV2): the pre-ordering process and the ordering process. As part of the pre-order process, ALECs submit pre-order queries using published guides[166] for direction on query format and valid input data. Pre-order queries are used by ALECs to validate existing customer address and service information, to inquire and/or validate specific switch capabilities, to select and reserve telephone numbers and to obtain service order due dates. In response to a pre-order query BellSouth returns either a valid pre-order response or an error message to the ALEC. Pre-order response information can be used to complete information on an LSR form.

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[166]Pre-order guides include the BellSouth Pre-Order Business Rules, the TAG Application Program Interface (API) Guide, and the LENS User Guide.

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The ALEC begins the order process with the origination of an LSR, using the BellSouth technical specifications for the interface[167], as well as the BBR-LO detailing format and content requirements for the form and fields. Upon receipt of an LSR, BellSouth returns a Functional Acknowledgment (FA), indicating that the file was received. For the LENS interface, the FA is an interim message that is displayed upon successful order submission. The LSR then passes through BellSouth's order-processing environment where systems and representatives validate the format and content of the data.

If the LSR is unreadable or does not contain accurate and complete information on all required and conditional fields, a Fatal Reject (ERR) error is returned to the ALEC. The validation process begins again with a new LSR containing corrected information. If an LSR passes through initial validation but falls out for manual handling, a representative from BellSouth's Local Carrier Service Center (LCSC) reviews the LSR to determine if the fallout was caused by an ALEC error or an error caused by BellSouth. For an ALEC error, the representative sends a request for clarification (CLR) to the ALEC for correction and the ALEC returns a supplemental (SUP) service request.

When the LSR is complete and accurate, the service order is entered in the BellSouth Service Order Communications System (SOCS), which coordinates downstream provisioning activity and monitors the status of the order. SOCS begins the generation process for a Firm Order Confirmation (FOC) response that is delivered to the ALEC. The FOC is confirmation that the LSR was validated by BellSouth and contains a Due Date (DD) on which BellSouth commits to completing provisioning of the order.

3.0   Methodology

This section summarizes the test methodology.

3.1   Scenarios

The following four tables outline the pre-order and order test scenarios that KPMG Consulting used to test the functionality and timeliness of BellSouth systems and representatives. Scenarios were chosen from the following tables for volume pre-order and order submission [168].

---

[167]Interface documents that support ordering include the BellSouth EDI Specifications - TCIF 9, the TAG API, and the LENS User Guide.

[168]The majority of orders transmitted during the POP Volume Performance Test (TVV2) were limited to those that flow through BellSouth's order processing systems without human intervention.

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Table 2-1: Stand-Alone Pre-Ordering Scenarios

Activity	Residence	Business
Obtain Customer Service Record (CSRQ)	X	X
Validate Customer Address (AVQ and AVQ_TN)	X	X
Telephone Number Availability Query (TNAQ)	X	X
Loop Qualification including xDSL (LMU)	X	X
Inquire About Product/Service Availability (SAQ)	X	X
Determine Availability of Desired Due Date (EDD)	X	X
Obtain Parsed CSR[169] (PCSRQ)	X	X

Table 2-2: Resale Ordering Scenarios

Activity	Res. POTS	Bus. POTS	Res. ISDN	Bus. ISDN	Centrex	Private Line	PBX
Migration from BellSouth "as is"	X	X	X	X	X		X
ALEC to ALEC migration	X	X					
Feature changes to existing customer	X	X			X		
Migration from BellSouth "as specified"	X	X	X	X			
New customer	X	X			X	X	
Telephone number change	X	X					
Directory change	X	X			X		
Add lines/trunks/circuits	X	X	X	X	X	X	X
Suspend/restore service	X	X					
Disconnect (full and partial)	X	X	X	X	X	X	X
Moves (inside and outside)	X	X					
Convert line to ISDN			X	X			
Migrate from ALEC to BellSouth	X	X					

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[169]Parsed CSR was introduced in Release 10.3 on January 5, 2002. The pre-order was added to the scope of the test in March 2002 and tested during stress volume tests only.

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Table 2-3: UNE Loop Ordering Scenarios

Activity	Res. Analog Loop	Bus. Analog Loop	Res. xDSL Capable Loop	Bus. xDSL Capable Loop	Bus. DS1 Loop	Line Sharing [170]	UDC [171]	EEL [172]	Inter-office Facility
Migration from BellSouth without number porting	X	X	X	X	NA[173]			X	
Migration from BellSouth with INP[174]	NA	NA			NA				
Migration from BellSouth with Local Number Portability (LNP)	X	X			NA				
Migration from ALEC to ALEC	X	X				X			
Add new loops to existing customer	X	X	X	X	X			X	
Add new interoffice DS1/ DS3 facilities									X
Purchase loops for a new customer	X	X	X	X	X	X	X	X	
Disconnect (full and partial)	X	X			X			X	NA[175]
Moves (inside and outside)	X	X			X				
Standalone directory change	X	X							
Standalone INP[176]	NA	NA							
Standalone LNP	X	X							
Convert from UNE P to UNE loop	X	X							
Convert from Resale to UNE loop	X	X							

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[170]Line Sharing was added to the BBR-LO in Issue 9I on October 12, 2000.

[171]Unbundled Digital Channel (UDC) was added to the BBR-LO in Issue 9E on July 17, 2000.

[172]Enhanced Extended Link (EEL) was added to the BBR-LO in Issue 9E on July 17, 2000.

[173]BellSouth does not support migration of DS1 facilities.

[174]BellSouth no longer offers Interim Number Portability (INP).

[175]KPMG Consulting was unable to obtain facilities from BellSouth to support Interoffice Facility (IOF) disconnects.

[176]BellSouth no longer offers Interim Number Portability (INP).

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Table 2-4: UNE Platform (UNE-P) Ordering Scenarios

Activity	Res. POTS	Bus. POTS	Res. ISDN	Bus. ISDN	PBX[177]	DID[178]	DID Trunks[179]
Migration from BellSouth "as is"	X	X	X	X	X	X	X
Migrate from ALEC to ALEC	X	X					
Feature changes to existing customer	X	X					
Migration from BellSouth "as specified"	X	X	X	X			
New customer	X	X	NA[180]	NA			
Telephone number change	X	X					
Directory change	X	X					
Add lines/trunks/circuits	X	X	X	X			X
Suspend/restore service	X	X					
Disconnect (full and partial)	X	X	X	X			
Moves (inside and outside)	X	X					
Convert line to ISDN			X	X			
Migrate from ALEC to BellSouth	X	X					
Convert from Resale to UNE-P	X	X	NA[181]	NA			

3.2   Test Targets and Measures

The test targets were BellSouth's pre-ordering (TAG, LENS) and ordering (EDI, TAG, LENS) systems, and the manual ordering process. Included in the test targets were the following processes and sub-processes:

♦ Submit and monitor pre-order transactions through TAG and LENS;

 ♦ Send pre-order transaction;

 ♦ Receive pre-order response;

 ♦ Verify correct processing of pre-order;

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[177]UNE-P PBX was added to the BBR-LO in Issue 9J on December 1, 2000.

[178]UNE-P DID was added to the BBR-LO in Issue 9J on December 1, 2000.

[179]UNE-P DID Trunks were added to the BBR-LO in Issue 9J on December 1, 2000.

[180]BellSouth does not offer new Integrated Switch Digital Network (ISDN) accounts using UNE-P.

[181]BellSouth does not support conversion from Resale ISDN to UNE-P ISDN.

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- ♦ Submit and monitor planned error pre-order transactions through TAG and LENS;

  - ♦ Send pre-order transaction;

  - ♦ Receive pre-order error response;

  - ♦ Verify correct processing of pre-order;

- ♦ Submit and monitor order transactions through EDI, TAG, LENS, and manual;

  - ♦ Transmit LSR;

  - ♦ Receive FA of request;

  - ♦ Receive confirmation of request;

  - ♦ Verify correct processing of order;

- ♦ Submit and monitor planned error order transactions through EDI, TAG, LENS, and manual;

  - ♦ Transmit LSR;

  - ♦ Receive FA of request;

  - ♦ Receive clarification or error response; and

  - ♦ Verify correct processing of order.

3.3   Data Sources

The data collected for the test included documents defining business rules governing transactions between BellSouth and its ALEC trading partners, which include the BBR-LO[182] and the BellSouth Pre-Order Business Rules[183]. KPMG Consulting used interface instructions found in the TAG API Guide, the BellSouth EDI Specifications - TCIF 9, and the LENS User Guide. Other data collected included historical ALEC ordering data, BellSouth's volume forecast, and ALEC volume forecasts.

3.4   Data Generation/Volumes

Transaction testing used March 2003 projected volumes. The forecasted date of March 2003 reflects anticipated volumes after BellSouth is granted approval to provide interLATA service pursuant to Section 271 of the Telecommunications Act of 1996. The forecast date of the "anticipated volumes" is the estimated test completion date plus nine months. The nine months was derived based on an assumption of three months for 271 approval and a six-month "ramp-up" period in ALEC volumes after FCC 271 approval is granted.

Data for this test were generated through pre-order and order transaction submission via EDI, TAG, LENS, and manual interfaces. KPMG Consulting's March 2003 volume projections, which were determined by analyzing historical ALEC ordering data, ALEC forecasts and BellSouth regional forecasts, determined the volume submission level for normal volume testing. Peak volume transactions were submitted at 150% of the normal volume transaction level throughout the entire test.

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[182]BBR-LO Versions 9E, 9F, 9G, 9H, 9I, 9J, 9K, 9L, 9M, 9N, 9O, 9P, 9Q, 9R, 9S, Release 10.4 and Release 10.5.
[183]BellSouth Pre-Order Business Rules Versions 11B, 11C, 11D, 11E, and 12A.

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The stress test covered a four-hour period. Stress test hourly volumes were derived from the normal day schedule. The hourly submissions from the normal day schedule with the highest volumes covering four consecutive hours were used as the baseline. KPMG Consulting then transmitted 150% of the first hour's normal day transaction count, 200% of the second hour's transaction count, 225% of the third hour's transaction count and 250% of the fourth hour's transaction count, respectively. The different load conditions are summarized in Table 2-5 below.

Table 2-5: Load Conditions

Load Conditions	Definition
Normal Hour Load	Load based on projected future volume transactions.
Peak Hour Load	Load based on 1.5 times projected normal hour load transactions.
Stress Hour Load	Load based on 2.5 times projected normal hour transactions.

Prior to the start of the normal volume test, KPMG Consulting undertook a series of Volume System Readiness Tests (SRTs), which were designed to ensure the functionality of KPMG Consulting's transactional systems. Volume SRTs also confirmed that orders flowed through BellSouth's system, but did not enter into the physical provisioning process. KPMG Consulting also used Volume SRTs to troubleshoot system problems during volume testing.

3.5   Evaluation and Analysis Methods

Pre-order and order scenarios tested in POP Volume Performance Test (TVV2) were drawn from the scenarios defined in Appendix A of the Florida Master Test Plan (MTP). The scenarios outline the products and services to be ordered and activity types to be requested. Using these test scenario descriptions, KPMG Consulting developed test cases for each scenario. The test cases contain a detailed description of the order to be executed, defining, for example, customer types (business or residential), migration activity (partial or full migration[184]), and expected flow-through designations.

Each test case was used to generate distinct instances of pre-order and order transactions. Based on KPMG Consulting requirements, BellSouth provided test bed accounts against which pre-order and order transactions were placed. The pre-order and order transaction scenarios and test cases represented a range of services (e.g., POTS, analog loop, digital loop) executed against a variety of service delivery methods (e.g., Resale, UNE-P, UNE-Loop) and activity types (e.g., Migration as-is, Migration as specified).

The electronic test cases for the POP Volume Performance Test (TVV2) were submitted in an automated fashion, based on a scheduled submission date and time determined by KPMG Consulting prior to the start of the test.

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[184]A full migration converts all of a customer's lines to a new service provider. A partial migration retains at least one-line with BellSouth and converts some lines to an ALEC.

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As pre-order and order volume transactions were submitted, error messages or confirmation responses were returned. A flow-through eligible order transaction was deemed complete if a FA and a FOC were received, or if an expected error was received. An order that was not flow-through eligible was deemed complete if an FA was received, and no FOC or error was received[185]. A pre-order transaction was deemed complete if the expected response was received.

The transaction responses were logged and evaluated for accuracy[186] and for consistency with the pre-order and order business process flow, as described in Section 2.1. KPMG Consulting evaluated the presence and timeliness of responses for interfaces. Intentional errors were included in a number of orders to test BellSouth's ability to process errors and to test how BellSouth systems handled such transactions under increased volume conditions.

3.5.1   Volume Performance Tests

Transactions were analyzed for trends relative to time of day, service delivery method, and product family. KPMG Consulting collected and evaluated the timestamps associated with outgoing EDI, TAG, LENS, and manual pre-order and order submissions, as well as timestamps associated with incoming EDI, TAG, LENS, and manual pre-order and order responses.

When a volume test resulted in deficient performance for a specific criterion, KPMG Consulting conducted a full retest of all criteria. A full retest was required to accurately test BellSouth's systems on expected future volumes of transactions.

The POP Volume Performance Test (TVV2) electronic volume testing was conducted in the following three phases:

♦   Two normal electronic volume tests and four normal electronic volume retests were conducted using projected normal daily volumes. EDI and TAG transactions were submitted over a 24-hour period. LENS transactions were submitted between the hours of 8:00 a.m. and 7:00 p.m. to simulate an ALEC's normal hours of operation.

♦   One peak electronic volume test and one peak electronic volume retest were conducted using volumes at 150% of projected normal daily volumes. Test hours were the same as the two normal volume tests for electronic testing.

♦   One stress electronic volume test and one stress electronic volume retest were conducted over a four-hour period, using volumes increasing from 150% to 250% of the normal volume test's four consecutive highest volume hours. The electronic stress tests were conducted between 5:00 p.m. and 9:00 p.m.

The POP Volume Performance Test (TVV2) manual volume testing was conducted in the following three phases:

♦   Two normal manual volume tests and six normal manual volume retests were conducted using projected normal daily volumes. Manual transactions were submitted via facsimile during the hours of operation of the Atlanta LCSC, between 8:00 a.m. and 6:00 p.m.

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[185]BellSouth LCSC representatives did not view or process KPMG Consulting's partially mechanized volume test orders; as a result, no FOC or error was received on these orders. Representatives did not process electronic volume test orders to ensure that volume testing did not have a detrimental impact on ALEC order processing.
[186]The contents of response files were evaluated for accuracy on a sample basis only.

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♦ One peak manual volume test and one peak manual volume retest were conducted using volumes at 150% of projected normal daily volumes. Test hours were the same as the two normal volume tests for manual testing.

♦ One stress manual volume test, using volumes increasing from 150% to 250% of the normal volume test's four consecutive highest volume hours, was conducted over a four-hour period during the hours of operation of the Atlanta LCSC, between 10:00 a.m. and 2:00 p.m.

The following tables provide information regarding the volume test schedule:

Table 2-6: Electronic Volume Tests

Test	Date	Retest Target(s)
Normal Day 1	8/16/2001	Initial Test
Normal Day 1 Retest 1	10/30/2001	Exception 99 and Exception 107
Normal Day 1 Retest 2	12/5/2001	Exception 118
Normal Day 1 Retest 3	12/20/2001	Exception 126 and Exception 127
Normal Day 2	1/10/2002	Initial Test
Normal Day 2 Retest 1	1/28/2002	Exception 137
Peak Day	2/25/2002	Initial Test
Peak Day Retest 1	3/19/2002	LENS retest required due to multiple logins
Stress Day	4/9/2002	Initial Test
Stress Day Retest 1	4/25/2002	Exception 160

Table 2-7: Manual Volume Tests

Test	Date	Retest Target(s)
Normal Day 1	5/23/2001	Initial Test
Normal Day 2	5/31/2001	Initial Test
Normal Day 1 Retest 1	8/29/2001	Exception 72
Normal Day 1 Retest 2	10/16/2001	Exception 72
Normal Day 1 Retest 3	12/10/2001	Exception 72 and Exception 116
Normal Day 1 Retest 4	1/29/2002	Exception 116
Normal Day 1 Retest 5	2/20/2002	Exception 116
Normal Day 2 Retest 1	3/13/2002	Exception 116
Normal Day 2 Retest 2	4/17/2002	Exception 116
Peak Day	5/8/2002	Initial Test
Peak Day Retest 1	6/3/2002	Exception 116
Stress Day	6/13/2002	Initial Test

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All test days used the same set of test cases. A limited number of pre-order and order transactions were submitted with error conditions to test how BellSouth systems handled such transactions under increased volume conditions.

For each volume day, the planned pre-order and order transactions were distributed throughout the testing window based on BellSouth's reported hourly order distribution. Each transaction was then assigned an interface (EDI, TAG, LENS, or manual) through which it was to be submitted. The distribution of orders and pre-orders among interfaces was determined according to volume forecasts. Product delivery types (e.g. UNE-P) as well as pre-order request types were distributed in accordance with volume forecasts.

The POP Volume Performance Test (TVV2) included a checklist of evaluation measures developed by KPMG Consulting during the preparation of test activities for the BellSouth Florida OSS Evaluation. These evaluation measures, detailed in the Florida MTP[187], provided the framework of norms, standards, and guidelines for the POP Volume Performance Test (TVV2). The data collected were analyzed employing the evaluation measures shown in Section 4.1 below.

The POP Volume Performance Test (TVV2) evaluation results are intended to reflect the KPMG Consulting ALEC experience. The Metrics Calculations Verification and Validation Review (PMR5) evaluated BellSouth's actual metrics calculations based on the definitions in the BellSouth OSS Testing Service Quality Measurements (SQM)[188].

Results in Section 4.0 were calculated based on outbound and inbound transaction timestamps recorded by KPMG Consulting's testing infrastructure. These timestamps may differ in varying degrees from the time measurement points reported in BellSouth's SQM reports. KPMG Consulting measures the ALEC end-to-end response time while BellSouth measures processing time within their environment. For those POP Volume Performance Test (TVV2) evaluation criteria that do not map to the performance measure benchmarks defined in the SQMs, KPMG Consulting assessed results based on an evaluation of potential ALEC impact.

4.0   Results

This section contains the overall test results.

4.1   Results Summary

The number of exceptions and observations issued during the life of the test is depicted in Table 2-8. For additional exception and observation information, refer to Appendices D and E, respectively. The test criteria and results are presented in Table 2-9.

In some instances KPMG Consulting applied a benchmark to pre-order timeliness evaluation criteria of 10 seconds. Where this benchmark has been applied is identified in the comments section of Table 2-9.

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[187]Florida Master Test Plan, approved by the Florida Public Service Commission on January 11, 2000.
[188]Revised Interim Performance Metrics Version 3.0, approved by the Florida Public Service Commission on June 1, 2001.

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Table 2-8: TVV2 Exception and Observation Count

Activity	Exceptions	Observations
Total Issued	11	7
Total Disposed as of Final Report Date	11[189]	6[190]
Total Open as of Final Report Date	0	1

Table 2-9: TVV2 Evaluation Criteria and Results

Test Reference	Evaluation Criteria	Result	Comments
	Presence of Pre-Order Functionality – Volume Performance Test		
TVV2-1-1	BellSouth systems provide responses to pre-order queries.	Satisfied	BellSouth's systems provide responses to pre-order queries.
			KPMG Consulting applied a benchmark of 99% for receipt of pre-order responses. BellSouth's LENS and TAG systems provided the following results during electronic volume testing:
			◆ 99.97% (32,563 of 32,573) of pre-order requests sent during day one normal volume testing on August 16, 2001 received system responses.
			◆ KPMG Consulting conducted a full day one normal volume retest on October 30, 2001, to retest Exceptions 99 and 107, which were written due to failures on other criteria. 99.98% (28,894 of 28,900) of pre-order requests sent during day one normal volume retesting on October 30, 2001 received system responses.
			◆ KPMG Consulting conducted a full day one normal volume retest on December 5, 2001, to retest Exception 118, which was written due to a failure on another criterion. 99.98% (28,209 of 28,214) of pre-order requests sent during day one normal volume retesting on

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[189]Exception 104 was closed when the FPSC removed RoboTAG from the Florida OSS test (Order # PSC-02-0450-PCO-TP) on April 3, 2002.
[190]Observation 136 was closed when the FPSC removed RoboTAG from the Florida OSS test (Order # PSC-02-0450-PCO-TP) on April 3, 2002.

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Test Reference	Evaluation Criteria	Result	Comments
			December 5, 2001 received system responses.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest Exceptions 126 and 127, which were written due to failures on other criteria. 100% (29,525 of 29,525) of pre-order requests sent during day one normal volume retesting on December 20, 2001 received system responses.
			♦ 99.82% (28,846 of 28,899) of pre-order requests sent during day two normal volume testing on January 10, 2002 received system responses.
			♦ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. 99.95% (29,483 of 29,497) of pre-order requests sent during day two normal volume retesting on January 28, 2002 received system responses.
			♦ 99.61% (60,212 of 60,447) of pre-order requests sent during peak volume testing on February 25, 2002 received system responses.
			♦ KPMG Consulting conducted a full peak volume retest on March 19, 2002, due to an error with KPMG Consulting's LENS scripts, which artificially strained BellSouth's LENS login servers during February 25, 2002 peak testing. 100% (79,145 of 79,145) of pre-order requests sent during peak volume retesting on March 19, 2002 received system responses.
			♦ 99.70% (71,425 of 71,639) of pre-order requests sent during stress volume testing on April 9, 2002 received system responses.
			♦ KPMG Consulting conducted a full stress volume retest on April 25,

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Test Reference	Evaluation Criteria	Result	Comments
			2002, to retest Exception 160, which was written due to a failure on another criterion. 99.96% (62,624 of 62,647) of pre-order requests sent during stress volume retesting on April 25, 2002 received system responses.
			See Tables 2-10 through 2-29 for additional details on pre-order responses.
TVV2-1-2	BellSouth systems provide required pre-order functionality.	Satisfied	BellSouth systems provide required pre-order functionality.
			KPMG Consulting submitted a total of 451,488 pre-orders into BellSouth's TAG and LENS systems over 10 days of volume testing. During test dates, BellSouth's systems were available to receive queries and submit responses. The interfaces also generated appropriate error messages when a system problem occurred.
			During testing, KPMG Consulting opened Exception 127, which identified problems submitting pre-orders via LENS during normal volume testing on December 5, 2001. Following BellSouth's addition of capacity to a mainframe communication link, KPMG Consulting retested on December 20, 2001 and did not experience problems submitting pre-orders via LENS during normal volume testing. During day two normal volume testing on January 10, 2002, KPMG Consulting experienced problems submitting pre-orders via LENS. BellSouth indicated that network element saturation in a BellSouth data center affected wholesale and retail operations on January 10, 2002. KPMG Consulting retested on January 28, 2002 and did not experience problems submitting pre-orders via LENS during normal volume

Test Reference	Evaluation Criteria	Result	Comments
			testing. Exception 127 was closed.
Accuracy of Pre-Order Response – Volume Performance Test[191]			
TVV2-2-1	BellSouth's interfaces provide accurate system responses to pre-orders.	Satisfied	BellSouth's interfaces provide accurate system responses to pre-orders.
			KPMG Consulting applied a benchmark of 99% for accuracy of pre-order responses. BellSouth's systems provided the following results during volume testing:
			♦ 100% (35 of 35) of examined LENS pre-order responses received during day one normal volume testing on August 16, 2001 were accurate. 100% (35 of 35) of examined TAG pre-order responses received during day one normal volume testing on August 16, 2001 were accurate.
			♦ KPMG Consulting conducted a full day one normal volume retest on October 30, 2001, to retest Exceptions 99 and 107, which were written due to failures on other criteria. 100% (35 of 35) of examined LENS pre-order responses received during day one normal volume retesting on October 30, 2001 were accurate. 80.00% (28 of 35) of examined TAG pre-order responses received during day one normal volume retesting on October 30, 2001 were accurate.
			KPMG Consulting issued Exception 118 to describe invalid responses for pre-order queries submitted via the TAG interface during day one normal volume retesting on October 30, 2001. BellSouth maintained that the failure was due to the memory management used by KPMG Consulting on the client TAG

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[191]For this criterion, KPMG Consulting defined an accurate response to be a system response that is consistent with the technical specifications for TAG or LENS responses and with the transaction type that initiated the response (e.g. a correctly formatted Customer Service Record Query received a Customer Service Record response). In the case of error responses, KPMG Consulting verified that these were only received for incorrectly formatted queries. The contents of the response files were evaluated for accuracy on a sample basis only. However, identification of any problem led to a more complete examination.

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Test Reference	Evaluation Criteria	Result	Comments
			infrastructure.
			KPMG Consulting implemented memory management changes and initiated retesting of Exception 118 on December 5, 2001.
			♦ 100% (35 of 35) of examined LENS pre-order responses received during day one normal volume retesting on December 5, 2001 were accurate.
			♦ 100% (35 of 35) of examined TAG pre-order responses received during day one normal volume retesting on December 5, 2001 were accurate.
			Following memory management changes, KPMG Consulting received valid responses to pre-order queries during December 5, 2001 retesting. Exception 118 was closed.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest Exceptions 126 and 127, which were written due to failures on other criteria. 100% (35 of 35) of examined LENS pre-order responses received during day one normal volume retesting on December 20, 2001 were accurate. 100% (35 of 35) of examined TAG pre-order responses received during day one normal volume retesting on December 20, 2001 were accurate. 100% (35 of 35) of examined LENS pre-order responses received during day two normal volume testing on January 10, 2002 were accurate. 100% (35 of 35) of examined TAG pre-order responses received during day two normal volume testing on January 10, 2002 were accurate.

[192]Upon identification of eight invalid responses received during April 25, 2002 stress volume testing, KPMG Consulting investigated and concluded that a component of KPMG Consulting's TAG architecture experienced memory management problems identical to the problem identified after October 5, 2001 testing. Therefore, BellSouth's system error responses were appropriate.

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Test Reference	Evaluation Criteria	Result	Comments
			♦ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. 100% (35 of 35) of examined LENS pre-order responses received during day two normal volume retesting on January 28, 2002 were accurate. 100% (35 of 35) of examined TAG pre-order responses received during day two normal volume retesting on January 28, 2002 were accurate.
			♦ 100% (35 of 35) of examined LENS pre-order responses received during peak volume testing on February 25, 2002 were accurate. 100% (35 of 35) of examined TAG pre-order responses received during peak volume testing on February 25, 2002 were accurate.
			♦ KPMG Consulting conducted a full peak volume retest on March 19, 2002, due to an error with KPMG Consulting's LENS scripts, which artificially strained BellSouth's LENS login servers during February 25, 2002 peak testing. 100% (35 of 35) of examined LENS pre-order responses received during peak volume retesting on March 19, 2002 were accurate. 100% (35 of 35) of examined TAG pre-order responses received during peak volume retesting on March 19, 2002 were accurate.
			♦ 100% (35 of 35) of examined LENS pre-order responses received during stress volume testing on April 9, 2002 were accurate. 100% (35 of 35) of examined TAG pre-order responses received during stress volume testing on April 9, 2002 were accurate.
			♦ KPMG Consulting conducted a full stress volume retest on April 25, 2002, to retest Exception 160, which was written due to a failure on

Test Reference	Evaluation Criteria	Result	Comments
			another criterion. 100% (35 of 35) of examined LENS pre-order responses received during stress volume retesting on April 25, 2002 were accurate. 100% (35 of 35) of examined TAG pre-order responses received during stress volume retesting on April 25, 2002 were accurate[192].
Timeliness of Pre-Order Response – Volume Performance Test[193]		
TVV2-3-1	BellSouth's TAG interface provides timely responses to Address Validation Query by Telephone Number (AVQ_TN) pre-orders.	Satisfied	BellSouth's TAG interface provides timely responses to AVQ_TN pre-orders. The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds. KPMG Consulting applied a response timeliness benchmark of 10 seconds based on its professional judgment. AVQ_TNs sent during volume testing received responses within the following timeframes: ♦ The average interval for receipt of AVQ_TNs during day one normal volume testing on August 16, 2001 was 1.52 seconds. The August 2001 average interval for BellSouth retail Regional Street Address Guide – Telephone Number (RSAG-TN) queries was 0.95 seconds. ♦ KPMG Consulting conducted a full day one normal volume retest on October 30, 2001, to retest Exceptions 99 and 107, which were written due to failures on other criteria. The average interval for receipt of AVQ_TNs during day one normal volume retesting on October 30, 2001 was 1.00 second. The October 2001 average interval for BellSouth retail RSAG-TN queries was 1.07 seconds. ♦ KPMG Consulting conducted a full day one normal volume retest on

[193]The SQM Standard for pre-order queries is defined by OSS-1 of the Revised Interim Performance Metrics Version 3.0, approved by the Florida Public Service Commission on June 1, 2001, unless otherwise noted.

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Test Reference	Evaluation Criteria	Result	Comments
			December 5, 2001, to retest Exception 118, which was written due to a failure on another criterion. The average interval for receipt of AVQ_TNs during day one normal volume retesting on December 5, 2001 was 1.72 seconds. The December 2001 average interval for BellSouth retail RSAG-TN queries was 0.94 seconds.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest Exceptions 126 and 127, which were written due to failures on other criteria. The average interval for receipt of AVQ_TNs during day one normal volume retesting on December 20, 2001 was 1.10 seconds. The December 2001 average interval for BellSouth retail RSAG-TN queries was 0.94 seconds.
			♦ The average interval for receipt of AVQ_TNs during day two normal volume testing on January 10, 2002 was 2.43 seconds. The January 2002 average interval for BellSouth retail RSAG-TN queries was 0.95 seconds.
			♦ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. The average interval for receipt of AVQ_TNs during day two normal volume retesting on January 28, 2002 was 1.16 seconds. The January 2002 average interval for BellSouth retail RSAG-TN queries was 0.95 seconds.
			♦ The average interval for receipt of AVQ_TNs during peak volume testing on February 25, 2002 was 1.29 seconds. The February 2002

[194]KPMG Consulting used February 2002 RSAG-TN data to measure AVQ_TN response timeliness due to BellSouth abnormal parity data for RSAG-TN for March 2002-April 2002.

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Test Reference	Evaluation Criteria	Result	Comments
			average interval for BellSouth retail RSAG-TN queries was 0.88 seconds.
			♦ KPMG Consulting conducted a full peak volume retest on March 19, 2002, due to an error with KPMG Consulting's LENS scripts, which artificially strained BellSouth's LENS login servers during February 25, 2002 peak testing. The average interval for receipt of AVQ_TNs during peak volume retesting on March 19, 2002 was 1.15 seconds. The February 2002 average interval for BellSouth retail RSAG-TN queries was 0.88 seconds[194].
			♦ The average interval for receipt of AVQ_TNs during stress volume testing on April 9, 2002 was 1.09 seconds. The February 2002 average interval for BellSouth retail RSAG-TN queries was 0.88 seconds.
			♦ KPMG Consulting conducted a full stress volume retest on April 25, 2002, to retest Exception 160, which was written due to a failure on another criterion. The average interval for receipt of AVQ_TNs during stress volume retesting on April 25, 2002 was 1.20 seconds. The February 2002 average interval for BellSouth retail RSAG-TN queries was 0.88 seconds.
			See Tables 2-10 through 2-29 for additional details on pre-order response timeliness.
TVV2-3-2	BellSouth's TAG interface provides timely responses to Address Validation Query (AVQ) pre-orders.	Satisfied	BellSouth's TAG interface provides timely responses to AVQ pre-orders.
			The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds. KPMG Consulting applied a response timeliness benchmark of 10 seconds based on its professional judgment. AVQs sent during volume testing received responses within the following timeframes:
			♦ The average interval for receipt of AVQs during day one normal

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Test Reference	Evaluation Criteria	Result	Comments
			volume testing on August 16, 2001 was 1.47 seconds. The August 2001 average interval for BellSouth retail Regional Street Address Guide – Address (RSAG-ADDR) queries was 1.27 seconds.
			KPMG Consulting issued Exception 108 for untimely responses for the pre-order queries Appointment Availability Query (AAQ), AVQ, Service Availability Query (SAQ) and Telephone Number Availability Query (TNAQ) submitted via TAG. Exception 108 was withdrawn due to KPMG Consulting timestamp errors.
			♦ KPMG Consulting conducted a full day one normal volume retest on October 30, 2001, to retest Exceptions 99 and 107, which were written due to failures on other criteria. The average interval for receipt of AVQs during day one normal volume retesting on October 30, 2001 was 1.17 seconds. The October 2001 average interval for BellSouth retail RSAG-ADDR queries was 1.30 seconds.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 5, 2001, to retest Exception 118, which was written due to a failure on another criterion. The average interval for receipt of AVQs during day one normal volume retesting on December 5, 2001 was 1.80 seconds. The December 2001 average interval for BellSouth retail RSAG-ADDR queries was 1.17 seconds.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest Exceptions 126 and 127, which were written due to failures on other criteria. The average interval for receipt of AVQs during day one normal volume retesting on December 20, 2001 was 1.14 seconds. The December 2001

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Test Reference	Evaluation Criteria	Result	Comments
			average interval for BellSouth retail RSAG-ADDR queries was 1.17 seconds.
			◆ The average interval for receipt of AVQs during day two normal volume testing on January 10, 2002 was 1.56 seconds. The January 2002 average interval for BellSouth retail RSAG-ADDR queries was 1.32 seconds.
			◆ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. The average interval for receipt of AVQs during day two normal volume retesting on January 28, 2002 was 1.18 seconds. The January 2002 average interval for BellSouth retail RSAG-ADDR queries was 1.32 seconds.
			◆ KPMG Consulting could not measure the average interval for receipt of AVQs during peak volume testing on February 25, 2002, due to a coding error in KPMG Consulting's TAG mapping structure[195].
			◆ The average interval for receipt of AVQs during peak volume retesting on March 19, 2002 was 1.18 seconds. The January 2002 average interval for BellSouth retail RSAG-ADDR queries was 1.32 seconds[196].
			◆ The average interval for receipt of AVQs during stress volume testing on April 9, 2002 was 1.19 seconds. The January 2002 average interval for BellSouth retail RSAG-ADDR queries was 1.32 seconds.

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[195]The coding error occurred when KPMG Consulting created an AVQ output that inserted a single space for non-populated values in the INQNUM field.
[196]KPMG Consulting used January 2002 RSAG-ADDR data to measure AVQ response timeliness due to BellSouth abnormal parity data for RSAG-ADDR for February 2002-April 2002.

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Test Reference	Evaluation Criteria	Result	Comments
			♦ KPMG Consulting conducted a full stress volume retest on April 25, 2002, to retest Exception 160, which was written due to a failure on another criterion. The average interval for receipt of AVQs during stress volume retesting on April 25, 2002 was 1.38 seconds. The January 2002 average interval for BellSouth retail RSAG-ADDR queries was 1.32 seconds. See Tables 2-10 through 2-29 for additional details on pre-order response timeliness.
TVV2-3-3	BellSouth's TAG interface provides timely responses to Appointment Availability Query (AAQ) pre-orders.	Satisfied	BellSouth's TAG interface provides timely responses to AAQ pre-orders. The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds. KPMG Consulting applied a response timeliness benchmark of 10 seconds based on its professional judgment. AAQs sent during volume testing received responses within the following timeframes: ♦ The average interval for receipt of AAQs during day one normal volume testing on August 16, 2001 was 1.45 seconds. The August 2001 average interval for BellSouth retail Direct Order Entry (DOE) Support Application (DSAP) queries was 0.67 seconds. KPMG Consulting issued Exception 108 on untimely responses for the pre-order queries AAQ, AVQ, SAQ and TNAQ submitted via TAG. Exception 108 was withdrawn due to KPMG Consulting timestamp errors. ♦ KPMG Consulting conducted a full day one normal volume retest on October 30, 2001, to retest Exceptions 99 and 107, which were written due to failures on other criteria. The average interval for receipt of AAQs during day one normal volume retesting on October 30, 2001 was 1.00 second. The

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Test Reference	Evaluation Criteria	Result	Comments
			October 2001 average interval for BellSouth retail DSAP queries was 0.89 seconds.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 5, 2001, to retest Exception 118, which was written due to a failure on another criterion. The average interval for receipt of AAQs during day one normal volume retesting on December 5, 2001 was 2.09 seconds. The December 2001 average interval for BellSouth retail DSAP queries was 0.80 seconds.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest Exceptions 126 and 127, which were written due to failures on other criteria. The average interval for receipt of AAQs during day one normal volume retesting on December 20, 2001 was 1.19 seconds. The December 2001 average interval for BellSouth retail DSAP queries was 0.80 seconds.
			♦ The average interval for receipt of AAQs during day two normal volume testing on January 10, 2002 was 1.58 seconds. The January 2002 average interval for BellSouth retail DSAP queries was 0.82 seconds.
			♦ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. The average interval for receipt of AAQs during day two normal volume retesting on January 28, 2002 was 1.23 seconds. The January 2002 average interval for BellSouth retail DSAP queries was 0.82 seconds.
			♦ The average interval for receipt of AAQs during peak volume testing on February 25, 2002 was 1.38 seconds. The February 2002 average interval

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Test Reference	Evaluation Criteria	Result	Comments
			for BellSouth retail DSAP queries was 0.64 seconds.
			♦ KPMG Consulting conducted a full peak volume retest on March 19, 2002, due to an error with KPMG Consulting's LENS scripts, which artificially strained BellSouth's LENS login servers during February 25, 2002 peak testing. The average interval for receipt of AAQs during peak volume retesting on March 19, 2002 was 1.17 seconds. The March 2002 average interval for BellSouth retail DSAP queries was 0.66 seconds.
			♦ The average interval for receipt of AAQs during stress volume testing on April 9, 2002 was 1.08 seconds. The April 2002 average interval for BellSouth retail DSAP queries was 0.91 seconds.
			♦ KPMG Consulting conducted a full stress volume retest on April 25, 2002, to retest Exception 160, which was written due to a failure on another criterion. The average interval for receipt of AAQs during stress volume retesting on April 25, 2002 was 1.54 seconds. The April 2002 average interval for BellSouth retail DSAP queries was 0.91 seconds.
			See Tables 2-10 through 2-29 for additional details on pre-order response timeliness.
TVV2-3-4	BellSouth's TAG interface provides timely responses to Telephone Number Availability Query (TNAQ) pre-orders.	Satisfied	BellSouth's TAG interface provides timely responses to TNAQ pre-orders.
			The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds. KPMG Consulting applied a response timeliness benchmark of 10 seconds based on its professional judgment. TNAQs sent during volume testing received responses within the following timeframes:
			♦ The average interval for receipt of TNAQs during day one normal

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Test Reference	Evaluation Criteria	Result	Comments
			volume testing on August 16, 2001 was 1.82 seconds. The August 2001 average interval for BellSouth retail Application for Telephone Number Load Administration and Selection (ATLAS) queries was 0.68 seconds.
			KPMG Consulting issued Exception 108 for untimely responses for the pre-order queries AAQ, AVQ, SAQ and TNAQ submitted via TAG. Exception 108 was withdrawn due to KPMG Consulting timestamp errors.
			♦ KPMG Consulting conducted a full day one normal volume retest on October 30, 2001, to retest Exceptions 99 and 107, which were written due to failures on other criteria. The average interval for receipt of TNAQs during day one normal volume retesting on October 30, 2001 was 1.00 second. The October 2001 average interval for BellSouth retail ATLAS queries was 1.20 seconds.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 5, 2001, to retest Exception 118, which was written due to a failure on another criterion. The average interval for receipt of TNAQs during day one normal volume retesting on December 5, 2001 was 3.14 seconds. The December 2001 average interval for BellSouth retail ATLAS queries was 1.06 seconds.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest Exceptions 126 and 127, which were written due to failures on other criteria. The average interval for receipt of TNAQs during day one normal volume retesting on December 20, 2001 was 1.41 seconds. The December 2001 average interval for BellSouth retail ATLAS queries was 1.06 seconds.

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Test Reference	Evaluation Criteria	Result	Comments
			♦ The average interval for receipt of TNAQs during day two normal volume testing on January 10, 2002 was 1.79 seconds. The January 2002 average interval for BellSouth retail ATLAS queries was 1.09 seconds.
			♦ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. The average interval for receipt of TNAQs during day two normal volume retesting on January 28, 2002 was 1.42 seconds. The January 2002 average interval for BellSouth retail ATLAS queries was 1.09 seconds.
			♦ The average interval for receipt of TNAQs during peak volume testing on February 25, 2002 was 2.00 seconds. The February 2002 average interval for BellSouth retail ATLAS queries was 0.88 seconds.
			♦ KPMG Consulting conducted a full peak volume retest on March 19, 2002, due to an error with KPMG Consulting's LENS scripts, which artificially strained BellSouth's LENS login servers during February 25, 2002 peak testing. The average interval for receipt of TNAQs during peak volume retesting on March 19, 2002 was 1.32 seconds. The March 2002 average interval for February retail ATLAS queries was 0.88 seconds[197].
			♦ The average interval for receipt of TNAQs during stress volume testing on April 9, 2002 was 1.16 seconds. The April 2002 average interval for BellSouth retail ATLAS queries was 0.86 seconds.

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[197]KPMG Consulting used February 2002 ATLAS data to measure TNAQ response timeliness due to BellSouth abnormal parity data for ATLAS for March 2002.

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Test Reference	Evaluation Criteria	Result	Comments
			♦ KPMG Consulting conducted a full stress volume retest on April 25, 2002, to retest Exception 160, which was written due to a failure on another criterion. The average interval for receipt of TNAQs during stress volume retesting on April 25, 2002 was 1.98 seconds. The April 2002 average interval for BellSouth retail ATLAS queries was 0.86 seconds. See Tables 2-10 through 2-29 for additional details on pre-order response timeliness.
TVV2-3-5	BellSouth's TAG interface provides timely responses to Customer Service Record Query (CSRQ) pre-orders.	Satisfied	BellSouth's TAG interface provides timely responses to CSRQ pre-orders. The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds. KPMG Consulting applied a response timeliness benchmark of 10 seconds based on its professional judgment. CSRQs sent during volume testing received responses within the following timeframes: ♦ The average interval for receipt of CSRQs during day one normal volume testing on August 16, 2001 was 2.59 seconds. The August 2001 average interval for BellSouth retail Hands-off Assignment Logic/Customer Records Information System (HAL/CRIS) queries was 1.52 seconds. ♦ KPMG Consulting conducted a full day one normal volume retest on October 30, 2001, to retest Exceptions 99 and 107, which were written due to failures on other criteria. The average interval for receipt of CSRQs during day one normal volume retesting on October 30, 2001 was 1.02 seconds. The October 2001 average interval for BellSouth retail HAL/CRIS queries was 1.65 seconds. ♦ KPMG Consulting conducted a full day one normal volume retest on

Test Reference	Evaluation Criteria	Result	Comments
			December 5, 2001, to retest Exception 118, which was written due to a failure on another criterion. The average interval for receipt of CSRQs during day one normal volume retesting on December 5, 2001 was 3.16 seconds. The December 2001 average interval for BellSouth retail HAL/CRIS queries was 7.79 seconds.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest Exceptions 126 and 127, which were written due to failures on other criteria. The average interval for receipt of CSRQs during day one normal volume retesting on December 20, 2001 was 1.39 seconds. The December 2001 average interval for BellSouth retail HAL/CRIS queries was 7.79 seconds.
			♦ The average interval for receipt of CSRQs during day two normal volume testing on January 10, 2002 was 2.09 seconds. The January 2002 average interval for BellSouth retail HAL/CRIS queries was 7.65 seconds.
			♦ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. The average interval for receipt of CSRQs during day two normal volume retesting on January 28, 2002 was 2.20 seconds. The January 2002 average interval for BellSouth retail HAL/CRIS queries was 7.65 seconds.
			♦ The average interval for receipt of CSRQs during peak volume testing on February 25, 2002 was 1.96 seconds. The January 2002 average interval for BellSouth retail HAL/CRIS queries was 7.65

Test Reference	Evaluation Criteria	Result	Comments
			seconds[198].
			♦ KPMG Consulting conducted a full peak volume retest on March 19, 2002, due to an error with KPMG Consulting's LENS scripts, which artificially strained BellSouth's LENS login servers during February 25, 2002 peak testing. The average interval for receipt of CSRQs during peak volume retesting on March 19, 2002 was 1.50 seconds. The March 2002 average interval for BellSouth retail HAL/CRIS queries was 1.18 seconds.
			♦ The average interval for receipt of CSRQs during stress volume testing on April 9, 2002 was 1.39 seconds. The March 2002 average interval for BellSouth retail HAL/CRIS queries was 1.18 seconds[199].
			♦ KPMG Consulting conducted a full stress volume retest on April 25, 2002, to retest Exception 160, which was written due to a failure on another criterion. The average interval for receipt of CSRQs during stress volume retesting on April 25, 2002 was 1.50 seconds. The March 2002 average interval for BellSouth retail HAL/CRIS queries was 1.18 seconds[200].
			See Tables 2-10 through 2-29 for additional details on pre-order response timeliness.
TVV2-3-6	BellSouth's TAG interface provides timely responses to Service Availability Query (SAQ) pre-orders.	Satisfied	BellSouth's TAG interface provides timely responses to SAQ pre-orders. The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds. KPMG Consulting applied a

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[198]KPMG Consulting used January 2002 HAL/CRIS data to measure CSRQ response timeliness due to BellSouth abnormal parity data for HAL/CRIS for February 2002.

[199]KPMG Consulting used March 2002 HAL/CRIS data to measure CSRQ response timeliness due to BellSouth abnormal parity data for HAL/CRIS for April 2002.

[200]KPMG Consulting used March 2002 HAL/CRIS data to measure CSRQ response timeliness due to BellSouth abnormal parity data for HAL/CRIS for April 2002.

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Test Reference	Evaluation Criteria	Result	Comments
			response timeliness benchmark of 10 seconds based on its professional judgment. SAQs sent during volume testing received responses within the following timeframes:
			♦ The average interval for receipt of SAQs during day one normal volume testing on August 16, 2001 was 15.78 seconds[201]. The August 2001 average interval for BellSouth retail Obtain Available Service Information Systems (OASIS) queries was 2.14 seconds.
			KPMG Consulting issued Exception 108 for untimely responses for the pre-order queries AAQ, AVQ, SAQ and TNAQ submitted via TAG. Exception 108 was withdrawn due to KPMG Consulting time stamp errors.
			♦ The average interval for receipt of SAQs during day one normal volume retesting on October 30, 2001 was 1.00 second. The October 2001 average interval for BellSouth retail OASIS queries was 2.87 seconds.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 5, 2001, to retest Exception 118, which was written due to a failure on another criterion. The average interval for receipt of SAQs during day one normal volume retesting on December 5, 2001 was 2.84 seconds. The December 2001 average interval for BellSouth retail OASIS queries was 2.77 seconds.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest

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[201]Following the August 16, 2001 test, KPMG Consulting noted that the SAQs used during the volume test queried all possible features, rather than querying for a specific feature class. Queries by specific feature class are more common in TAG commercial usage. The SAQ problem was corrected for subsequent tests. The results for SAQ queries for the August 16, 2001 volume test are presented for illustrative purposes only.
[202]KPMG Consulting used January 2002 OASIS data to measure SAQ response timeliness due to BellSouth abnormal parity data for OASIS for February 2002.

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Test Reference	Evaluation Criteria	Result	Comments
			Exceptions 126 and 127, which were written due to failures on other criteria. The average interval for receipt of SAQs during day one normal volume retesting on December 20, 2001 was 1.49 seconds. The December 2001 average interval for BellSouth retail OASIS queries was 2.77 seconds.
			♦ The average interval for receipt of SAQs during day two normal volume testing on January 10, 2002 was 2.40 seconds. The January 2002 average interval for BellSouth retail OASIS queries was 2.68 seconds.
			♦ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. The average interval for receipt of SAQs during day two normal volume retesting on January 28, 2002 was 1.23 seconds. The January 2002 average interval for BellSouth retail OASIS queries was 2.68 seconds.
			♦ The average interval for receipt of SAQs during peak volume testing on February 25, 2002 was 1.79 seconds. The January 2002 average interval for BellSouth retail OASIS queries was 2.68 seconds[202].
			♦ KPMG Consulting conducted a full peak volume retest on March 19, 2002, due to an error with KPMG Consulting's LENS scripts, which artificially strained BellSouth's LENS login servers during February 25, 2002 peak testing. The average interval for receipt of SAQs during peak volume retesting on March 19, 2002 was 1.20 seconds. The March 2002 average interval for BellSouth retail OASIS queries was 2.46 seconds.
			♦ The average interval for receipt of SAQs during stress volume testing on April 9, 2002 was 1.49 seconds.

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Test Reference	Evaluation Criteria	Result	Comments
			The April 2002 average interval for BellSouth retail OASIS queries was 2.37 seconds.
			♦ KPMG Consulting conducted a full stress volume retest on April 25, 2002, to retest Exception 160, which was written due to a failure on another criterion. The average interval for receipt of SAQs during stress volume retesting on April 25, 2002 was 2.76 seconds. The April 2002 average interval for BellSouth retail OASIS queries was 2.37 seconds.
			See Tables 2-10 through 2-29 for additional details on pre-order response timeliness.
TVV2-3-7	BellSouth's TAG interface provides timely responses to Loop Make-up (LMU) pre-orders.	Satisfied	BellSouth's TAG interface provides timely responses to LMU pre-orders.
			The PO-2 SQM standard for LMU pre-order queries is 95% received within one minute[203]. LMUs sent during volume testing received responses within the following timeframes:
			♦ LMUs were not sent during day one normal volume testing on August 16, 2001[204].
			♦ 99.59% (731 of 734) of LMUs sent during day one normal volume retesting on October 30, 2001 received responses within one minute.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 5, 2001, to retest Exception 118, which was written due to a failure on another criterion. 98.63% (646 of 655) of LMUs sent during day one normal volume retesting on December 5, 2001

[203]The SQM Standard for LMU pre-order queries is defined by PO-2 of the Revised Interim Performance Metrics Version 3, approved by the Florida Public Service Commission on June 1, 2001. The LMU results are presented in a format consistent with PO-2.
[204]Electronic LMU was introduced in Release 10.0 on September 29, 2001.

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Test Reference	Evaluation Criteria	Result	Comments
			received responses within one minute.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest Exceptions 126 and 127, which were written due to failures on other criteria. 99.32% (732 of 737) of LMUs sent during day one normal volume retesting on December 20, 2001 received responses within one minute.
			♦ 98.35% (598 of 608) of LMUs sent during day two normal volume testing on January 10, 2002 received responses within one minute.
			♦ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. 99.86% (745 of 746) of LMUs sent during day two normal volume retesting on January 28, 2002 received responses within one minute.
			♦ 77.13% (850 of 1,102) of LMUs sent during peak volume testing on February 25, 2002 received responses within one minute.
			♦ 95.97% (1,334 of 1,390) of LMUs sent during peak volume retesting on March 19, 2002 received responses within one minute.
			♦ 98.13% (893 of 910) of LMUs sent during stress volume testing on April 9, 2002 received responses within one minute.
			♦ KPMG Consulting conducted a full stress volume retest on April 25, 2002, to retest Exception 160, which was written due to a failure on another criterion. 76.39% (673 of 881) of LMUs sent during stress volume retesting on April 25, 2002 received responses within one minute.

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Test Reference	Evaluation Criteria	Result	Comments
			See Tables 2-10 through 2-29 for additional details on pre-order response timeliness.
TVV2-3-8	BellSouth's TAG interface provides timely responses to Parsed Customer Service Record Query (PCSRQ) pre-orders.	Satisfied	BellSouth's TAG interface provides timely responses to PCSRQ pre-orders.
			KPMG Consulting applied a benchmark of 10 seconds for response to PCSRQ. BellSouth's systems provided the following results during volume testing:
			PCSRQs sent during volume testing[205] received responses within the following timeframes:
			♦ The average interval for receipt of PCSRQs during stress volume testing on April 9, 2002 was 10.47 seconds. As PSCRQ was not available during normal and peak testing, KPMG Consulting evaluated this criterion based on the first hour of stress volume testing, which submits volumes comparable to those submitted during the top hour of peak testing. The average interval for receipt of PCSRQs during the first hour of stress volume testing on April 9, 2002 was 5.68 seconds. The March 2002 average interval for BellSouth retail HAL/CRIS queries was 1.18 seconds[206].
			♦ KPMG Consulting conducted a full stress volume retest on April 25, 2002, to retest Exception 160, which was written due to a failure on another criterion. The average interval for receipt of PCSRQs during stress volume retesting on April 25, 2002 was 20.43 seconds. As PCSRQ was not available during normal and peak testing, KPMG Consulting evaluated this criterion based on the first hour of stress

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[205]PCSRQ was introduced in Release 10.3 on January 5, 2002. The pre-order was added to the scope of the test in March 2002 and tested during stress volume tests only.
[206]KPMG Consulting used March 2002 HAL/CRIS data to measure CSRQ response timeliness due to BellSouth abnormal parity data for HAL/CRIS for April 2002.

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Test Reference	Evaluation Criteria	Result	Comments
			volume testing, which submits volumes comparable to those submitted during the top hour of peak testing. The average interval for receipt of PCSRQs during the first hour of stress volume testing on April 25, 2002 was 3.7 seconds. The March 2002 average interval for BellSouth retail HAL/CRIS queries was 1.18 seconds. See Tables 2-10 through 2-29 for additional details on pre-order response timeliness.
TVV2-3-9	BellSouth's LENS interface provides timely responses to Address Validation Query by Telephone Number (AVQ_TN) pre-orders.	Satisfied	BellSouth's LENS interface provides timely responses to AVQ_TN pre-orders. The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds. KPMG Consulting applied a response timeliness benchmark of 10 seconds based on its professional judgment. AVQ_TNs sent during volume testing received responses within the following timeframes: ♦ The average interval for receipt of AVQ_TNs during day one normal volume testing on August 16, 2001 was 6.01 seconds. The August 2001 average interval for BellSouth retail RSAG-TN queries was 0.95 seconds. ♦ The average interval for receipt of AVQ_TNs during day one normal volume retesting on October 30, 2001 was 9.44 seconds. The October 2001 average interval for BellSouth retail RSAG-TN queries was 1.07 seconds. ♦ The average interval for receipt of AVQ_TNs during day one normal volume retesting on December 5, 2001 was 4.98 seconds. The December 2001 average interval for BellSouth retail RSAG-TN queries was 0.94 seconds. ♦ The average interval for receipt of AVQ_TNs during day one normal volume retesting on December 20, 2001 was 2.91 seconds. The

Test Reference	Evaluation Criteria	Result	Comments
			December 2001 average interval for BellSouth retail RSAG-TN queries was 0.94 seconds.
			♦ The average interval for receipt of AVQ_TNs during day two normal volume testing on January 10, 2002 was 2.92 seconds. The January 2002 average interval for BellSouth retail RSAG-TN queries was 0.95 seconds.
			♦ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. The average interval for receipt of AVQ_TNs during day two normal volume retesting on January 28, 2002 was 2.59 seconds. The January 2002 average interval for BellSouth retail RSAG-TN queries was 0.95 seconds.
			♦ The average interval for receipt of AVQ_TNs during peak volume testing on February 25, 2002 was 6.68 seconds. The February 2002 average interval for BellSouth retail RSAG-TN queries was 0.88 seconds.
			♦ The average interval for receipt of AVQ_TNs during peak volume retesting on March 19, 2002 was 2.54 seconds. The February 2002 average interval for BellSouth retail RSAG-TN queries was 0.88 seconds[207].
			♦ The average interval for receipt of AVQ_TNs during stress volume testing on April 9, 2002 was 3.69 seconds. The February 2002 average interval for BellSouth retail RSAG-TN queries was 0.88 seconds.
			♦ The average interval for receipt of AVQ_TNs during stress volume retesting on April 25, 2002 was 4.99 seconds. The February 2002 average

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[207]KPMG Consulting used February 2002 RSAG-TN data to measure AVQ_TN response timeliness due to BellSouth abnormal parity data for RSAG-TN for March 2002-April 2002.

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Test Reference	Evaluation Criteria	Result	Comments
			interval for BellSouth retail RSAG-TN queries was 0.88 seconds. See Tables 2-10 through 2-29 for additional details on pre-order response timeliness.
TVV2-3-10	BellSouth's LENS interface provides timely responses to Address Validation Query (AVQ) pre-orders.	Satisfied	BellSouth's LENS interface provides timely responses to AVQ pre-orders. The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds. KPMG Consulting applied a response timeliness benchmark of 10 seconds based on its professional judgment. AVQs sent during volume testing received responses within the following timeframes: ♦ The average interval for receipt of AVQs during day one normal volume testing on August 16, 2001 was 4.18 seconds. The August 2001 average interval for BellSouth retail RSAG-ADDR queries was 1.27 seconds. ♦ The average interval for receipt of AVQs during day one normal volume retesting on October 30, 2001 was 8.69 seconds. The October 2001 average interval for BellSouth retail RSAG-ADDR queries was 1.30 seconds. ♦ The average interval for receipt of AVQs during day one normal volume retesting on December 5, 2001 was 4.28 seconds. The December 2001 average interval for BellSouth retail RSAG-ADDR queries was 1.17 seconds. ♦ The average interval for receipt of AVQs during day one normal volume retesting on December 20, 2001 was 2.00 seconds. The December 2001 average interval for BellSouth retail RSAG-ADDR queries was 1.17 seconds. ♦ The average interval for receipt of AVQs during day two normal volume testing on January 10, 2002

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Test Reference	Evaluation Criteria	Result	Comments
			was 2.11 seconds. The January 2002 average interval for BellSouth retail RSAG-ADDR queries was 1.32 seconds.
			♦ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. The average interval for receipt of AVQs during day two normal volume retesting on January 28, 2002 was 2.06 seconds. The January 2002 average interval for BellSouth retail RSAG-ADDR queries was 1.32 seconds.
			♦ The average interval for receipt of AVQs during peak volume testing on February 25, 2002 was 2.54 seconds. The January 2002 average interval for BellSouth retail RSAG-ADDR queries was 1.32 seconds[208].
			♦ The average interval for receipt of AVQs during peak volume retesting on March 19, 2002 was 1.70 seconds. The January 2002 average interval for BellSouth retail RSAG-ADDR queries was 1.32 seconds.
			♦ The average interval for receipt of AVQs during stress volume testing on April 9, 2002 was 3.18 seconds. The January 2002 average interval for BellSouth retail RSAG-ADDR queries was 1.32 seconds.
			♦ The average interval for receipt of AVQs during stress volume retesting on April 25, 2002 was 4.93 seconds. The January 2002 average interval for BellSouth retail RSAG-ADDR queries was 1.32 seconds.
			See Tables 2-10 through 2-29 for additional details on pre-order response

[208]KPMG Consulting used January 2002 RSAG-ADDR data to measure AVQ response timeliness due to BellSouth abnormal parity data for RSAG-ADDR for February 2002-April 2002.

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Test Reference	Evaluation Criteria	Result	Comments
			timeliness.
TVV2-3-11	BellSouth's LENS interface provides timely responses to Estimate Due Date (EDD) pre-orders.	Satisfied	BellSouth's LENS interface provides timely responses to EDD pre-orders. The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds. KPMG Consulting applied a response timeliness benchmark of 10 seconds based on its professional judgment. EDDs sent during volume testing received responses within the following timeframes: ♦ The average interval for receipt of EDDs during day one normal volume testing on August 16, 2001 was 5.38 seconds. The August 2001 average interval for BellSouth retail DSAP queries was 0.67 seconds. ♦ The average interval for receipt of EDDs during day one normal volume retesting on October 30, 2001 was 7.74 seconds. The October 2001 average interval for BellSouth retail DSAP queries was 0.89 seconds. ♦ The average interval for receipt of EDDs during day one normal volume retesting on December 5, 2001 was 6.33 seconds. The December 2001 average interval for BellSouth retail DSAP queries was 0.80 seconds. ♦ The average interval for receipt of EDDs during day one normal volume retesting on December 20, 2001 was 3.93 seconds. The December 2001 average interval for BellSouth retail DSAP queries was 0.80 seconds. ♦ The average interval for receipt of EDDs during day two normal volume testing on January 10, 2002 was 7.00 seconds. The January 2002 average interval for BellSouth retail DSAP queries was 0.82 seconds. ♦ The average interval for receipt of EDDs during day two normal volume retesting on January 28, 2002 was 4.13 seconds. The January 2002 average interval for BellSouth retail

Test Reference	Evaluation Criteria	Result	Comments
			DSAP queries was 0.82 seconds.
			♦ The average interval for receipt of EDDs during peak volume testing on February 25, 2002 was 6.02 seconds. The February 2002 average interval for BellSouth retail DSAP queries was 0.64 seconds.
			♦ The average interval for receipt of EDDs during peak volume retesting on March 19, 2002 was 3.56 seconds. The March 2002 average interval for BellSouth retail DSAP queries was 0.66 seconds.
			♦ The average interval for receipt of EDDs during stress volume testing on April 9, 2002 was 5.32 seconds. The April 2002 average interval for BellSouth retail DSAP queries was 0.91 seconds.
			♦ The average interval for receipt of EDDs during stress volume retesting on April 25, 2001 was 4.81 seconds. The April average interval for BellSouth retail DSAP queries was 0.91 seconds.
			See Tables 2-10 through 2-29 for additional details on pre-order response timeliness.
TVV2-3-12	BellSouth's LENS interface provides timely responses to Telephone Number Availability Query (TNAQ) pre-orders.	Satisfied	BellSouth's LENS interface provides timely responses to TNAQ pre-orders.
			The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds KPMG Consulting applied a response timeliness benchmark of 10 seconds based on its professional judgment. TNAQs sent during volume testing received responses within the following timeframes:
			♦ The average interval for receipt of TNAQs during day one normal volume testing on August 16, 2001 was 1.74 seconds. The August 2001 average interval for BellSouth retail ATLAS queries was 0.68 seconds.
			♦ KPMG Consulting conducted a full

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Test Reference	Evaluation Criteria	Result	Comments
			day one normal volume retest on October 30, 2001, to retest Exceptions 99 and 107, which were written due to failures on other criteria. The average interval for receipt of TNAQs during day one normal volume retesting on October 30, 2001 was 5.29 seconds. The October 2001 average interval for BellSouth retail ATLAS queries was 1.20 seconds. ♦ The average interval for receipt of TNAQs during day one normal volume retesting on December 5, 2001 was 3.96 seconds. The December 2001 average interval for BellSouth retail ATLAS queries was 1.06 seconds. ♦ The average interval for receipt of TNAQs during day one normal volume retesting on December 20, 2001 was 2.13 seconds. The December 2001 average interval for BellSouth retail ATLAS queries was 1.06 seconds. ♦ The average interval for receipt of TNAQs during day two normal volume testing on January 10, 2002 was 1.91 seconds. The January 2002 average interval for BellSouth retail ATLAS queries was 1.09 seconds. ♦ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. The average interval for receipt of TNAQs during day two normal volume retesting on January 28, 2002 was 1.33 seconds. The January 2002 average interval for BellSouth retail ATLAS queries was 1.09 seconds. ♦ The average interval for receipt of TNAQs during peak volume testing on February 25, 2002 was 2.46 seconds. The February 2002 average interval for BellSouth retail ATLAS

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Test Reference	Evaluation Criteria	Result	Comments
			queries was 0.88 seconds.
			♦ The average interval for receipt of TNAQs during peak volume retesting on March 19, 2002 was 1.62 seconds. The February 2002 average interval for BellSouth retail ATLAS queries was 0.88 seconds[209].
			♦ The average interval for receipt of TNAQs during stress volume testing on April 9, 2002 was 3.36 seconds. The April 2002 average interval for BellSouth retail ATLAS queries was 0.86 seconds.
			♦ The average interval for receipt of TNAQs during stress volume retesting on April 25, 2002 was 4.20 seconds. The April 2002 average interval for BellSouth retail ATLAS queries was 0.86 seconds.
			See Tables 2-10 through 2-29 for additional details on pre-order response timeliness.
TVV2-3-13	BellSouth's LENS interface provides timely responses to Customer Service Record Query (CSRQ) pre-orders.	Satisfied	BellSouth's LENS interface provides timely responses to CSRQ pre-orders.
			The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds. KPMG Consulting applied a response timeliness benchmark of 10 seconds based on its professional judgment. CSRQs sent during volume testing received responses within the following timeframes:
			♦ The average interval for receipt of CSRQs during day one normal volume testing on August 16, 2001 was 2.43 seconds. The August 2001 average interval for BellSouth retail HAL/CRIS queries was 1.52 seconds.
			♦ KPMG Consulting conducted a full day one normal volume retest on

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[209]KPMG Consulting used February 2002 ATLAS data to measure TNAQ response timeliness due to BellSouth abnormal parity data for ATLAS for March 2002.

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Test Reference	Evaluation Criteria	Result	Comments
			October 30, 2001, to retest Exceptions 99 and 107, which were written due to failures on other criteria. The average interval for receipt of CSRQs during day one normal volume retesting on October 30, 2001 was 4.93 seconds. The October 2001 average interval for BellSouth retail HAL/CRIS queries was 1.65 seconds.
			♦ The average interval for receipt of CSRQs during day one normal volume retesting on December 5, 2001 was 5.18 seconds. The December 2001 average interval for BellSouth retail HAL/CRIS queries was 7.79 seconds.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest Exceptions 126 and 127, which were written due to failures on other criteria. The average interval for receipt of CSRQs during day one normal volume retesting on December 20, 2001 was 2.23 seconds. The December 2001 average interval for BellSouth retail HAL/CRIS queries was 7.79 seconds.
			♦ The average interval for receipt of CSRQs during day two normal volume testing on January 10, 2002 was 2.52 seconds. The January 2002 average interval for BellSouth retail HAL/CRIS queries was 7.65 seconds.
			♦ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a

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[210]KPMG Consulting used January 2002 HAL/CRIS data to measure CSRQ response timeliness due to BellSouth abnormal parity data for HAL/CRIS for February 2002.

[211]KPMG Consulting used March 2002 HAL/CRIS data to measure CSRQ response timeliness due to BellSouth abnormal parity data for HAL/CRIS for April 2002.

Test Reference	Evaluation Criteria	Result	Comments
			failure on another criterion. The average interval for receipt of CSRQs during day two normal volume retesting on January 28, 2002 was 2.69 seconds. The January 2002 average interval for BellSouth retail HAL/CRIS queries was 7.65 seconds.
			♦ The average interval for receipt of CSRQs during peak volume testing on February 25, 2002 was 3.11 seconds. The January 2002 average interval for BellSouth retail HAL/CRIS queries was 1.32 seconds[210].
			♦ The average interval for receipt of CSRQs during peak volume retesting on March 19, 2002 was 1.72 seconds. The March 2002 average interval for BellSouth retail HAL/CRIS queries was 1.18 seconds.
			♦ The average interval for receipt of CSRQs during stress volume testing on April 9, 2002 was 2.38 seconds. The March 2002 average interval for BellSouth retail HAL/CRIS queries was 1.18 seconds[211].
			♦ The average interval for receipt of CSRQs during stress volume retesting on April 25, 2002 was 2.87 seconds. The March 2002 average interval for BellSouth retail HAL/CRIS queries was 1.18 seconds.
			See Tables 2-10 through 2-29 for additional details on pre-order response timeliness.
TVV2-3-14	BellSouth's LENS interface provides timely responses to Service Availability Query (SAQ) and View Primary Interexchage Carrier (PIC)/ Local Primary Interexchange Carrier (LPIC) pre-orders.	Satisfied	BellSouth's LENS interface provides timely responses to SAQ and View PIC/LPIC pre-orders. The OSS-1 SQM standard for pre-order queries is parity with retail plus two seconds. KPMG Consulting applied a response timeliness benchmark of 10 seconds based on its professional judgment. SAQs sent during volume testing received responses within the

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Test Reference	Evaluation Criteria	Result	Comments
			following timeframes:
			♦ The average interval for receipt of SAQs during day one normal volume testing on August 16, 2001 was 6.05 seconds. The August 2001 average interval for BellSouth retail OASIS queries was 2.14 seconds.
			♦ The average interval for receipt of SAQs during day one normal volume retesting on October 30, 2001 was 9.82 seconds. The October 2001 average interval for BellSouth retail OASIS queries was 2.87 seconds.
			♦ The average interval for receipt of SAQs during day one normal volume retesting on December 5, 2001 was 9.72 seconds. The December 2001 average interval for BellSouth retail OASIS queries was 2.77 seconds.
			♦ The average interval for receipt of SAQs during day one normal volume retesting on December 20, 2001 was 6.40 seconds. The December 2001 average interval for BellSouth retail OASIS queries was 2.77 seconds.
			♦ The average interval for receipt of SAQs during day two normal volume testing on January 10, 2002 was 5.80 seconds. The January 2002 average interval for BellSouth retail OASIS queries was 2.68 seconds.
			♦ The average interval for receipt of SAQs during day two normal volume retesting on January 28, 2002 was 3.53 seconds. The January 2002 average interval for BellSouth retail OASIS queries was 2.68 seconds.
			♦ The average interval for receipt of SAQs during peak volume testing on February 25, 2002 was 7.06 seconds. The January 2002 average interval

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Test Reference	Evaluation Criteria	Result	Comments
			for retail OASIS queries was 2.68 seconds[212].
			♦ The average interval for receipt of SAQs during peak volume retesting on March 19, 2002 was 2.94 seconds. The March 2002 average interval for BellSouth retail OASIS queries was 2.46 seconds.
			♦ The average interval for receipt of SAQs during stress volume testing on April 9, 2002 was 7.22 seconds. The April 2002 average interval for BellSouth retail OASIS queries was 2.37 seconds.
			♦ The average interval for receipt of SAQs during stress volume retesting on April 25, 2002 was 6.53 seconds. The April 2002 average interval for BellSouth retail OASIS queries was 2.37 seconds.
			See Tables 2-10 through 2-29 for additional details on pre-order response timeliness.
	Presence of Order Functionality – Volume Performance Test		
TVV2-4-1	BellSouth's EDI interface provides Functional Acknowledgements (FA).	Satisfied	BellSouth's EDI interface provides FAs. KPMG Consulting applied a benchmark of 99% for receipt of FAs over the EDI interface. BellSouth's system provided the following results during volume testing:
			♦ 99.23% (9,250 of 9,322) of order requests sent during day one normal volume testing on August 16, 2001 received FAs.
			♦ KPMG Consulting conducted a full day one normal volume retest on October 30, 2001, to retest Exceptions 99 and 107, which were written due to failures on other criteria. 99.23% (10,346 of 10,426)

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[212]KPMG Consulting used January 2002 OASIS data to measure SAQ response timeliness due to BellSouth abnormal parity data for OASIS for February 2002.

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Test Reference	Evaluation Criteria	Result	Comments
			of order requests sent during day one normal volume retesting on October 30, 2001 received FAs.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 5, 2001, to retest Exception 118, which was written due to a failure on another criterion. 100% (10,875 of 10,875) of order requests sent during day one normal volume retesting on December 5, 2001 received FAs.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest Exceptions 126 and 127, which were written due to failures on other criteria. 100% (11,597 of 11,597) of order requests sent during day one normal volume retesting on December 20, 2001 received FAs.
			♦ 100% (11,589 of 11,589) of order requests sent during day two normal volume testing on January 10, 2002 received FAs.
			♦ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. 100% (11,593 of 11,593) of order requests sent during day two normal volume retesting on January 28, 2002 received FAs.
			♦ 99.76% (19,571 of 19,618) of order requests sent during peak volume testing on February 25, 2002 received FAs.
			♦ KPMG Consulting conducted a full peak volume retest on March 19, 2002, due to an error with KPMG Consulting's LENS scripts, which artificially strained BellSouth's LENS login servers during February 25, 2002 peak testing. 100% (20,408 of 20,408) of order requests sent during peak volume retesting on

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Test Reference	Evaluation Criteria	Result	Comments
			March 19, 2002 received FAs.
			♦ 100% (9,918 of 9,918) of order requests sent during stress volume testing on April 9, 2002 received FAs.
			♦ KPMG Consulting conducted a full stress volume retest on April 25, 2002, to retest Exception 160, which was written due to a failure on another criterion. 100% (11,929 of 11,929) of order requests sent during stress volume retesting on April 25, 2002 received FAs.
			See Table 2-30 for additional details on EDI FAs.
TVV2-4-2	BellSouth's TAG interface provides Functional Acknowledgements (FAs) or synchronous fatal rejects (ERRs) as expected.	Satisfied	BellSouth's TAG interface provides FAs or synchronous ERRs as expected.
			KPMG Consulting applied a benchmark of 99% for receipt of FAs over the TAG interface. BellSouth's system provided the following results during volume testing:
			♦ 100% (100 of 100) of order requests sent during day one normal volume testing on August 16, 2001 received FAs or synchronous ERRs.
			♦ KPMG Consulting conducted a full day one normal volume retest on October 30, 2001, to retest Exceptions 99 and 107, which were written due to failures on other criteria. 97.89% (93 of 95)[213] of order requests sent during day one normal volume retesting on October 30, 2001 received FAs or synchronous ERRs.
			♦ KPMG Consulting conducted a full day one normal volume retest on

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[213]Although the test percentage is below the benchmark of 99%, the statistical evidence is not strong enough to conclude that the performance is below the benchmark with 95% confidence. The inherent variation in the process is large enough to have produced the substandard result, even with a process that is operating above the benchmark standard. The p-value, which indicates the chance of observing this result when the benchmark is being met, is 0.2456, above the 0.0500 cut-off for a statistical conclusion of failure.

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Test Reference	Evaluation Criteria	Result	Comments
			December 5, 2001, to retest Exception 118, which was written due to a failure on another criterion. 96.25% (77 of 80) of order requests sent during day one normal volume retesting on December 5, 2001 received FAs or synchronous ERRs[214].
			♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest Exceptions 126 and 127, which were written due to failures on other criteria. 98.00% (98 of 100)[215] of order requests sent during day one normal volume retesting on December 20, 2001 received FAs or synchronous ERRs.
			♦ 99.00% (99 of 100) of order requests sent during day two normal volume testing on January 10, 2002 received FAs or synchronous ERRs.
			♦ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. 98.99% (98 of 99)[216] of order requests sent during day two normal volume retesting on January 28, 2002 received FAs or synchronous ERRs.
			♦ 99.40% (334 of 336) of order

[214]KPMG Consulting experienced multiple outages of its TAG client software during December 5, 2001 testing. A synchronous TAG response is not received if an outage occurs during a transaction "handshake". Since the missing synchronous responses correspond with outages, KPMG Consulting concluded that client-side outages are the cause of the missing responses.

[215]Although the test percentage is below the benchmark of 99%, the statistical evidence is not strong enough to conclude that the performance is below the benchmark with 95% confidence. The inherent variation in the process is large enough to have produced the substandard result, even with a process that is operating above the benchmark standard. The p-value, which indicates the chance of observing this result when the benchmark is being met, is 0.2642, above the 0.0500 cut-off for a statistical conclusion of failure.

[216]Although the test percentage is below the benchmark of 99%, the statistical evidence is not strong enough to conclude that the performance is below the benchmark with 95% confidence. The inherent variation in the process is large enough to have produced the substandard result, even with a process that is operating above the benchmark standard. The p-value, which indicates the chance of observing this result when the benchmark is being met, is 0.6303, above the 0.0500 cut-off for a statistical conclusion of failure.

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Test Reference	Evaluation Criteria	Result	Comments
			requests sent during peak volume testing on February 25, 2002 received FAs or synchronous ERRs.
			♦ KPMG Consulting conducted a full peak volume retest on March 19, 2002, due to an error with KPMG Consulting's LENS scripts, which artificially strained BellSouth's LENS login servers during February 25, 2002 peak testing. 100% (151 of 151) of order requests sent during peak volume retesting on March 19, 2002 received FAs or synchronous ERRs.
			♦ 100% (286 of 286) of order requests sent during stress volume testing on April 9, 2002 received FAs or synchronous ERRs.
			♦ KPMG Consulting conducted a full stress volume retest on April 25, 2002, to retest Exception 160, which was written due to a failure on another criterion. 100% (277 of 277) of order requests sent during stress volume retesting on April 25, 2002 received FAs or synchronous ERRs.
			See Table 2-33 for additional details on TAG FAs.
TVV2-4-3	BellSouth's EDI interface provides Fully Mechanized (FM) Firm Order Confirmations (FOC), Errors, and Clarifications (ERRs/CLRs).	Satisfied	BellSouth's EDI interface provides FM FOCs and ERRs/CLRs.
			KPMG Consulting applied a benchmark of 99% for receipt of FM FOCs and ERRs/CLRs over the EDI interface. BellSouth's system provided the following results during volume testing:
			♦ 91.80% (7,989 of 8,703) of order requests sent during day one normal volume testing on August 16, 2001 received FM FOCs and ERRs/CLRs.
			Based on the results of August 16, 2001 testing, KPMG Consulting issued Exception 99. The exception noted that BellSouth's EDI interface did not provide responses to all submitted orders. BellSouth's response indicated that Purchase Order Numbers (PONs) fell out

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Test Reference	Evaluation Criteria	Result	Comments
			for manual handling due to two defects, including a Product/Services Inventory Management System (PSIMS) defect and a calculate due date defect. PONs also fell out due to transient system problems and backend system unavailability.
			♦ Following BellSouth's implementation of defect corrections, KPMG Consulting retested on October 30, 2001. 99.55% (10,113 of 10,159) of order requests sent during day one normal volume retesting on October 30, 2001 received FM FOCs and ERRs/CLRs. KPMG Consulting closed Exception 99.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 5, 2001, to retest Exception 118, which was written due to a failure on another criterion. 99.07% (10,708 of 10,809) of order requests sent during day one normal volume retesting on December 5, 2001 received FM FOCs and ERRs/CLRs.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest Exceptions 126 and 127, which were written due to failures on other criteria. 99.50% (11,502 of 11,560) of order requests sent during day one normal volume retesting on December 20, 2001 received FM FOCs and ERRs/CLRs.
			♦ 98.32% (11,325 of 11,518) of order requests sent during day two normal volume testing on January 10, 2002 received FM FOCs and ERRs/CLRs.
			Based on the results of January 10, 2002 testing, KPMG Consulting issued Exception 137. The exception noted that BellSouth's EDI interface did not provide responses to all submitted orders. BellSouth's response indicated that 187 PONs did not receive flow-through responses due to network element

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Test Reference	Evaluation Criteria	Result	Comments
			saturation in one of BellSouth's data centers. Six of the PONs were affected by transient backend system processing errors. BellSouth's response indicated that the problem was corrected by adding additional capacity to the network element.
			♦ Based on BellSouth's network repair, KPMG Consulting retested on January 28, 2002. 99.95% (11,517 of 11,523) of order requests sent during day two normal volume retesting on January 28, 2002 received FM FOCs and ERRs/CLRs. KPMG Consulting closed Exception 137.
			♦ 99.03% (18,537 of 18,719) of order requests sent during peak volume testing on February 25, 2002 received FM FOCs and ERRs/CLRs.
			♦ KPMG Consulting conducted a full peak volume retest on March 19, 2002, due to an error with KPMG Consulting's LENS scripts, which artificially strained BellSouth's LENS login servers during February 25, 2002 peak testing. 99.77% (20,282 of 20,329) of order requests sent during peak volume retesting on March 19, 2002 received FM FOCs and ERRs/CLRs.
			♦ 95.50% (9,248 of 9,684) of order requests sent during stress volume testing on April 9, 2002 received FM FOCs and ERRs/CLRs.
			♦ KPMG Consulting conducted a full stress volume retest on April 25, 2002, to retest Exception 160, which was written due to a failure on another criterion. 99.89% (11,665 of 11,678) of order requests sent during stress volume retesting on April 25, 2002 received FM FOCs and ERRs/CLRs.
			See Tables 2-31 and 2-32 for additional details on EDI FOCs and ERR/CLRs.
TVV2-4-4	BellSouth's TAG interface provides Fully	Satisfied	BellSouth's TAG interface provides FM FOCs and ERRs/CLRs.

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Test Reference	Evaluation Criteria	Result	Comments
	Mechanized (FM) Firm Order Confirmations (FOC), Errors, and Clarifications (ERRs/CLRs).		FOCs and ERRs/CLRs. KPMG Consulting applied a benchmark of 99% for receipt of FM FOCs and ERRs/CLRs over the TAG interface. BellSouth's system provided the following results during volume testing: ♦ 97.78% (88 of 90) of order requests sent during day one normal volume testing on August 16, 2001 received FM FOCs and ERRs/CLRs. Based on the results of August 16, 2001 testing, KPMG Consulting issued Exception 107. The exception noted that BellSouth's TAG interface did not provide responses to all orders. BellSouth's response indicated that PONs fell out for manual handling due to a PSIMS defect. ♦ Following BellSouth's implementation of defect corrections, KPMG Consulting retested on October 30, 2001. 98.92% (92 of 93)[217] of order requests sent during day one normal volume retesting on October 30, 2001 received FM FOCs and ERRs/CLRs. KPMG Consulting closed Exception 107. ♦ KPMG Consulting conducted a full day one normal volume retest on December 5, 2001, to retest Exception 118, which was written due to a failure on another criterion. 100% (77 of 77) of order requests sent during day one normal volume retesting on December 5, 2001 received FM FOCs and ERRs/CLRs. ♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest

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[217]Although the test percentage is below the benchmark of 99%, the statistical evidence is not strong enough to conclude that the performance is below the benchmark with 95% confidence. The inherent variation in the process is large enough to have produced the substandard result, even with a process that is operating above the benchmark standard. The p-value, which indicates the chance of observing this result when the benchmark is being met, is 0.6073, above the 0.0500 cut-off for a statistical conclusion of failure.

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Test Reference	Evaluation Criteria	Result	Comments
			Exceptions 126 and 127, which were written due to failures on other criteria. 100% (97 of 97) of order requests sent during day one normal volume retesting on December 20, 2001 received FM FOCs and ERRs/CLRs.
			♦ 98.97% (96 of 97)[218] of order requests sent during day two normal volume testing on January 10, 2002 received FM FOCs and ERRs/CLRs.
			♦ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. 98.97% (96 of 97)[219] of order requests sent during day two normal volume retesting on January 28, 2002 received FM FOCs and ERRs/CLRs.
			♦ 99.38% (320 of 322) of order requests sent during peak volume testing on February 25, 2002 received FM FOCs and ERRs/CLRs.
			♦ KPMG Consulting conducted a full peak volume retest on March 19, 2002, due to an error with KPMG Consulting's LENS scripts, which artificially strained BellSouth's LENS login servers during February 25, 2002 peak testing. 100% (146 of 146) of order requests sent during peak volume retesting on March 19, 2002 received FM FOCs and ERRs/CLRs.

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[218]Although the test percentage is below the benchmark of 99%, the statistical evidence is not strong enough to conclude that the performance is below the benchmark with 95% confidence. The inherent variation in the process is large enough to have produced the substandard result, even with a process that is operating above the benchmark standard. The p-value, which indicates the chance of observing this result when the benchmark is being met, is 0.6228, above the 0.0500 cut-off for a statistical conclusion of failure.

[219]Although the test percentage is below the benchmark of 99%, the statistical evidence is not strong enough to conclude that the performance is below the benchmark with 95% confidence. The inherent variation in the process is large enough to have produced the substandard result, even with a process that is operating above the benchmark standard. The p-value, which indicates the chance of observing this result when the benchmark is being met, is 0.6228, above the 0.0500 cut-off for a statistical conclusion of failure.

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Test Reference	Evaluation Criteria	Result	Comments
			♦ 96.03% (266 of 277) of order requests sent during stress volume testing on April 9, 2002 received FM FOCs and ERRs/CLRs.
			♦ 100% (260 of 260) of order requests sent during stress volume retesting on April 25, 2002 received FM FOCs and ERRs/CLRs.
			See Tables 2-34 and 2-35 for additional details on TAG FOCs and ERR/CLRs.
TVV2-4-5	BellSouth's LENS interface provides Fully Mechanized (FM) Firm Order Confirmations (FOC), Errors, and Clarifications (ERRs/CLRs).	Satisfied	BellSouth's LENS interface provides FM FOCs and ERRs/CLRs.
			KPMG Consulting applied a benchmark of 99% for receipt of FM FOCs and ERRs/CLRs over the LENS interface. BellSouth's system provided the following results during volume testing:
			♦ 100% (100 of 100) of order requests sent during day one normal volume testing on August 16, 2001 received FM FOCs and ERRs/CLRs.
			♦ KPMG Consulting conducted a full day one normal volume retest on October 30, 2001, to retest Exceptions 99 and 107, which were written due to failures on other criteria. 100% (100 of 100) of order requests sent during day one normal volume retesting on October 30, 2001 received FM FOCs and ERRs/CLRs.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 5, 2001, to retest Exception 118, which was written due to a failure on another criterion. 97.98% (97 of 99)[220] of order requests sent during day one normal volume retesting on December 5,

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[220]Although the test percentage is below the benchmark of 99%, the statistical evidence is not strong enough to conclude that the performance is below the benchmark with 95% confidence. The inherent variation in the process is large enough to have produced the substandard result, even with a process that is operating above the benchmark standard. The p-value, which indicates the chance of observing this result when the benchmark is being met, is 0.2605, above the 0.0500 cut-off for a statistical conclusion of failure.

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Test Reference	Evaluation Criteria	Result	Comments
			2001 received FM FOCs and ERRs/CLRs.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest Exceptions 126 and 127, which were written due to failures on other criteria. 100% (95 of 95) of order requests sent during day one normal volume retesting on December 20, 2001 received FM FOCs and ERRs/CLRs.
			♦ 100% (96 of 96) of order requests sent during day two normal volume testing on January 10, 2002 received FM FOCs and ERRs/CLRs.
			♦ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. 98.97% (97 of 98) [221] of order requests sent during day two normal volume retesting on January 28, 2002 FM FOCs and ERRs/CLRs.
			♦ 100% (1,876 of 1,876) of order requests sent during peak volume testing on February 25, 2002 FM FOCs and ERRs/CLRs.
			♦ KPMG Consulting conducted a full peak volume retest on March 19, 2002, due to an error with KPMG Consulting's LENS scripts, which artificially strained BellSouth's LENS login servers during February 25, 2002 peak testing. 100% (2,445 of 2,445) of order requests sent during peak volume retesting on March 19, 2002 FM FOCs and

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[221]Although the test percentage is below the benchmark of 99%, the statistical evidence is not strong enough to conclude that the performance is below the benchmark with 95% confidence. The inherent variation in the process is large enough to have produced the substandard result, even with a process that is operating above the benchmark standard. The p-value, which indicates the chance of observing this result when the benchmark is being met, is 0.6265, above the 0.0500 cut-off for a statistical conclusion of failure.

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Test Reference	Evaluation Criteria	Result	Comments
			ERRs/CLRs.
			♦ 99.30% (3,853 of 3,880) of order requests sent during stress volume testing on April 9, 2002 FM FOCs and ERRs/CLRs.
			♦ 99.84% (4,978 of 4,986) of order requests sent during stress volume retesting on April 25, 2002 FM FOCs and ERRs/CLRs.
			See Tables 2-36 and 2-37 for additional details on LENS FOCs and ERR/CLRs.
TVV2-4-6	BellSouth's Manual Order process provides Firm Order Confirmations (FOCs), Errors, and Clarifications.	Satisfied	BellSouth's Manual Order process provides FOCs, Errors, and Clarifications.
			KPMG Consulting applied a benchmark of 99% for receipt of FOCs and ERRs/CLRs using the manual ordering process. BellSouth's manual ordering process provided the following results during volume testing:
			♦ 85.19% (46 of 54) of order requests sent during day one normal volume testing on May 23, 2001 received FOCs and ERRs/CLRs.
			♦ 83.33% (45 of 54) of order requests sent during day two normal volume testing on May 31, 2001 received FOCs and ERRs/CLRs.
			Based on the results of testing on May 23, 2001 and May 31, 2001, KPMG Consulting issued Exception 72. The exception noted that BellSouth's manual ordering process did not provide responses to all orders. BellSouth's response to Exception 72 indicated that employee errors were the cause of the missing responses. The errors included faxes returned to an incorrect phone number and incoming faxes not being logged and processed in the LCSC. BellSouth indicated that LCSC managers provided training to employees to prevent recurrence of the errors.
			♦ Based on BellSouth's response, KPMG Consulting initiated a retest. During retesting, 79.63% (43 of 54)

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Test Reference	Evaluation Criteria	Result	Comments
			of order requests sent during day one normal volume retesting on August 28, 2001 received FOCs and ERRs/CLRs.
			KPMG Consulting issued Amended Exception 72. BellSouth responded that KPMG Consulting did not receive several responses due to LCSC employee error. BellSouth indicated that LCSC managers provided training to employees to prevent recurrence of the errors.
			♦ Based on BellSouth's response, KPMG Consulting initiated a second retest. During retesting, 79.63% (43 of 54) of order requests sent during day one normal volume retesting on October 16, 2001 received FOCs and ERRs/CLRs.
			KPMG Consulting issued Second Amended Exception 72. BellSouth responded that KPMG Consulting did not receive several responses due to LCSC employee error. BellSouth indicated that LCSC managers provided training to employees to prevent recurrence of the errors.
			♦ Based on BellSouth's response, KPMG Consulting initiated a third retest. During retesting, 92.59% (50 of 54) of order requests sent during day one normal volume retesting on December 10, 2001 received FOCs and ERRs/CLRs.
			KPMG Consulting issued Third Amended Exception 72. BellSouth responded that KPMG Consulting did not receive several responses due to LCSC employee error. BellSouth indicated that a software change was implemented on January 28, 2002, to remove an option on the LCSC application that led to the incorrect employee handling of manual orders.
			♦ Based on BellSouth's response, KPMG Consulting initiated a fourth retest. 100% (54 of 54) of order requests sent during day one normal volume retesting on January 29, 2002

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Test Reference	Evaluation Criteria	Result	Comments
			received FOCs and ERRs/CLRs. Exception 72 was closed.
			♦ KPMG Consulting conducted a manual day one normal volume retest on February 20, 2002, to retest Exception 116, which was written due to a failure on another criterion. 100% (54 of 54) of order requests sent during day one normal volume retesting on February 20, 2002 received FOCs and ERRs/CLRs.
			♦ 100% (54 of 54) of order requests sent during day two normal volume retesting on March 13, 2002 received FOCs and ERRs/CLRs.
			♦ KPMG Consulting conducted a manual day two normal volume retest on April 17, 2002, to retest Exception 116, which was written due to a failure on another criterion. 98.15% (53 of 54) of order requests sent during day two normal volume retesting on April 17, 2002 received FOCs and ERRs/CLRs.
			♦ 100% (80 of 80) of order requests sent during peak volume testing on May 8, 2002 received FOCs and ERRs/CLRs.
			♦ KPMG Consulting conducted a manual peak volume retest on June 3, 2002, to retest Exception 116, which was written due to a failure on another criterion. 98.75% (79 of 80)[222] of order requests sent during peak volume retesting on June 3, 2002 received FOCs and ERRs/CLRs.
			♦ 100% (60 of 60) of order requests sent during manual stress volume

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[222]Although the test percentage is below the benchmark of 99%, the statistical evidence is not strong enough to conclude that the performance is below the benchmark with 95% confidence. The inherent variation in the process is large enough to have produced the substandard result, even with a process that is operating above the benchmark standard. The p-value, which indicates the chance of observing this result when the benchmark is being met, is 0.5525, above the 0.0500 cut-off for a statistical conclusion of failure.

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Test Reference	Evaluation Criteria	Result	Comments
			testing on June 13, 2002 received FOCs and ERRs/CLRs.
TVV2-4-7	BellSouth systems or representatives provide required order functionality.	Satisfied	BellSouth systems or representatives provide required order functionality. KPMG Consulting submitted the following number of orders into BellSouth's systems during volume testing: ♦ 127,275 EDI orders were submitted during 10 electronic volume tests. ♦ 1,624 TAG orders were submitted during 10 electronic volume tests. ♦ 13,848 LENS orders were submitted during 10 electronic volume tests. ♦ 707 orders were submitted to the Atlanta LCSC during 12 manual volume tests. During electronic test dates, BellSouth's systems were available to receive orders, acknowledge order receipt, and provide FOCs and error messages. The interfaces also generated appropriate error messages when a system problem occurred. During manual test dates, BellSouth's Atlanta LCSC accepted fax orders sent to the appropriate number and provided FOCs and error messages. During testing, KPMG Consulting opened Exception 160 to present data on problems submitting orders via LENS during stress volume testing on April 9, 2002. BellSouth's response indicated that a primary LENS application server was re-booted during April 9, 2002 testing. KPMG Consulting retested on April 25, 2002 and successfully submitted orders via LENS throughout stress volume testing. Exception 160 was closed.
Accuracy of Order Response – Volume Performance Test[223]		

[223]For these criteria, KPMG Consulting defined an accurate response to be a system response that is consistent with the technical specifications for responses and to be with the transaction that initiated the response (e.g., a correctly formatted LSR received a FOC). In the case of error/clarification responses, KPMG Consulting verified that these

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Test Reference	Evaluation Criteria	Result	Comments
TVV2-5-1	BellSouth's EDI interface provides accurate Fully Mechanized (FM) Firm Order Confirmations (FOC), Errors, and Clarifications (ERRs/CLRs).	Satisfied	BellSouth's EDI interface provides accurate FM FOCs and ERRs/CLRs. KPMG Consulting applied a benchmark of 95% for receipt of accurate FM FOCs and ERRs/CLRs over the EDI interface. BellSouth's system provided the following results during volume testing: ♦ Of 140 FOCs examined, 100% (140 of 140) were correct relative to the LSR submitted[224]. ♦ Of 140 ERRs/CLRs examined, 99.75% (139 of 140) were correct relative to the LSR submitted[225].
TVV2-5-2	BellSouth's TAG interface provides accurate Fully Mechanized (FM) Firm Order Confirmations (FOC), Errors, and Clarifications (ERRs/CLRs).	Satisfied	BellSouth's TAG interface provides accurate FM FOCs and ERRs/CLRs. KPMG Consulting applied a benchmark of 95% for receipt of accurate FM FOCs and ERRs/CLRs over the TAG interface. BellSouth's system provided the following results during volume testing: ♦ Of 140 FOCs examined, 100% (140 of 140) were correct relative to the LSR submitted. ♦ Of 140 ERRs/CLRs examined, 100% (140 of 140) were correct relative to the LSR submitted.
TVV2-5-3	BellSouth's LENS interface provides accurate Fully Mechanized (FM) Firm Order Confirmations (FOC), Errors, and Clarifications (ERRs/CLRs).	Satisfied	BellSouth's LENS interface provides accurate FM FOCs and ERRs/CLRs. KPMG Consulting applied a benchmark of 95% for receipt of accurate FM FOCs and ERRs/CLRs over the LENS interface. BellSouth's system provided the following results during volume testing: ♦ Of 140 FOCs examined, 100% (140 of 140) were correct relative to the LSR submitted. ♦ Of 140 ERRs/CLRs examined, 100%

were only received for incorrectly formatted LSRs. The contents of the response files (FOCs/ERRs/CLRs) were evaluated for accuracy on a sample basis only. However, identification of any problem led to a more complete examination.

[224] A FOC was received in response to a correctly formatted LSR

[225] An ERR/CLR was received in response to an incorrectly formatted LSR.

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Test Reference	Evaluation Criteria	Result	Comments
			(140 of 140) were correct relative to the LSR submitted.
TVV2-5-4	BellSouth's manual ordering process provides accurate Firm Order Confirmations (FOC), Errors, and Clarifications (ERRs/CLRs).	Satisfied	BellSouth's manual ordering process provides accurate FOCs, ERRs/CLRs. KPMG Consulting applied a benchmark of 95% for receipt of accurate FOCs and ERRs/CLRs using the manual ordering process. BellSouth's manual ordering process provided the following results during volume testing: ♦ Of the responses analyzed for the manual normal volume tests conducted on May 23, 2001[226], May 31, 2001[227] and August 28, 2001[228], 100% were correct relative to the LSR submitted. ♦ After response inconsistencies on FOCs and ERRs/CLRs were noted on sampled responses from the October 16, 2001 manual day one normal volume retest, KPMG Consulting analyzed each of the 43 responses received during the test. Thirty-one of the 43 responses (72.09%) were accurate. Based on the results of testing on October 16, 2001, KPMG Consulting issued Exception 116. The exception noted that BellSouth's manual ordering process provided unexpected responses on several orders. BellSouth's response indicated that the inaccurate responses were sent due to BellSouth employee errors. BellSouth indicated that employees would be re-trained on errors in November 2001, and that an update was made to the service representative work instructions on November 23, 2001. ♦ Based on BellSouth's response, KPMG Consulting initiated a retest. After response inconsistencies on

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[226] Forty-six responses were received from May 23, 2001 day one normal testing.
[227] Forty-five responses were received from May 31, 2001 day two normal testing.
[228] Forty-three responses were received from August 28, 2001 day one normal retesting.

Test Reference	Evaluation Criteria	Result	Comments
			FOCs and ERRs/CLRs were noted on sampled responses from the December 10, 2001 manual day one normal volume retest, KPMG Consulting analyzed each of the 50 responses received during the test. Forty-two of the 50 responses (84.00%) were accurate.
			KPMG Consulting issued Amended Exception 116. BellSouth's response indicated that one incorrect response was returned due to employee error and seven unexpected responses were returned as a result of retail test bed account inaccuracies. BellSouth initiated retail service orders to fix the retail account inaccuracies.
			♦ Based on BellSouth's response, KPMG Consulting initiated a second retest. After response inconsistencies on FOCs and ERRs/CLRs were noted on sampled responses from the January 29, 2002 manual day one normal volume retest, KPMG Consulting analyzed each of the 54 responses received during the test. Forty-two of the 54 responses (77.78%) were accurate.
			KPMG Consulting issued Second Amended Exception 116. BellSouth's response indicated that the incorrect responses were due to employee error, and BellSouth conducted additional training on the errors.
			♦ Based on BellSouth's response, KPMG Consulting initiated a third retest. Of the responses analyzed for the manual day one normal volume retest conducted on February 20, 2002, 97.15% (34 of 35) were correct

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[229]Although the test percentage is below the benchmark of 95%, the statistical evidence is not strong enough to conclude that the performance is below the benchmark with 95% confidence. The inherent variation in the process is large enough to have produced the substandard result, even with a process that is operating above the benchmark standard. The p-value, which indicates the chance of observing this result when the benchmark is being met, is 0.5615, above the 0.0500 cut-off for a statistical conclusion of failure.

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Test Reference	Evaluation Criteria	Result	Comments
			relative to the LSR submitted.
			♦ After response inconsistencies on FOCs and ERRs/CLRs were noted on sampled responses from the March 13, 2002 manual day two normal volume retest, KPMG Consulting analyzed each of the 54 responses received during the test. Thirty-seven of the 54 responses (68.52%) were accurate.
			KPMG Consulting issued Third Amended Exception 116. BellSouth's response indicated that the incorrect responses were due to employee error. BellSouth conducted additional representative training on order accuracy.
			♦ Based on BellSouth's response, KPMG Consulting initiated additional testing. Of the responses analyzed for the manual day two normal volume retest conducted on April 17, 2002, 97.15% (34 of 35) were correct relative to the LSR submitted.
			♦ After response inconsistencies on FOCs and ERRs/CLRs were noted on sampled responses from the May 8, 2002 manual peak volume test, KPMG Consulting analyzed each of the 80 responses received during the test. Seventy-three of the 80 responses (91.25%) were accurate.
			KPMG Consulting issued Fourth Amended Exception 116. BellSouth's response indicated that four of the incorrect responses were due to employee error and three of the responses were subsequently corrected with FOCs.
			♦ Based on BellSouth's response, KPMG Consulting initiated manual peak retesting. Of the responses analyzed for the manual peak volume retest conducted on June 3, 2002, 94.94% (75 of 79)[229] were correct relative to the LSR submitted.
			♦ Of the responses analyzed for the manual stress volume test conducted

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Test Reference	Evaluation Criteria	Result	Comments
			on June 13, 2002, 96.67% (58 of 60) were correct relative to the LSR submitted. Exception 116 was closed.
	Timeliness of Order Response – Volume Performance Test		
TVV2-6-1	BellSouth's EDI interface provides Functional Acknowledgements (FAs) within the agreed upon standard interval.	Satisfied	BellSouth's EDI interface provides FAs within the agreed upon standard interval. The O-1 SQM standard for FAs is 95% received within 30 minutes. LSRs submitted for volume testing received FAs within the following timeframes: ♦ 99.99% (9,249 of 9,250) of order requests sent during day one normal volume testing on August 16, 2001 received FAs in less than 30 minutes. ♦ KPMG Consulting conducted a full day one normal volume retest on October 30, 2001, to retest Exceptions 99 and 107, which were written due to failures on other criteria. 100% (10,346 of 10,346) of order requests sent during day one normal volume retesting on October 30, 2001 received FAs in less than 30 minutes. ♦ KPMG Consulting conducted a full day one normal volume retest on December 5, 2001, to retest Exception 118, which was written due to a failure on another criterion. 100% (10,875 of 10,875) of order requests sent during day one normal volume retesting on December 5, 2001 received FAs in less than 30 minutes. ♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest Exceptions 126 and 127, which were written due to failures on other criteria. 100% (11,597 of 11,597) of order requests sent during day one normal volume retesting on December 20, 2001 received FAs in less than 30 minutes.

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Test Reference	Evaluation Criteria	Result	Comments
			♦ 100% (11,589 of 11,589) of order requests sent during day two normal volume testing on January 10, 2002 received FAs in less than 30 minutes.
			♦ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. 100% (11,593 of 11,593) of order requests sent during day two normal volume retesting on January 28, 2002 received FAs in less than 30 minutes.
			♦ 100% (19,571 of 19,571) of order requests sent during peak volume testing on February 25, 2002 received FAs in less than 30 minutes.
			♦ KPMG Consulting conducted a full peak volume retest on March 19, 2002, due to an error with KPMG Consulting's LENS scripts, which artificially strained BellSouth's LENS login servers during February 25, 2002 peak testing. 100% (20,408 of 20,408) of order requests sent during peak volume retesting on March 19, 2002 received FAs in less than 30 minutes.
			♦ 98.00% (9,720 of 9,918) of order requests sent during stress volume testing on April 9, 2002 received FAs in less than 30 minutes.
			♦ KPMG Consulting conducted a full stress volume retest on April 25, 2002, to retest Exception 160, which was written due to a failure on another criterion. 100% (11,929 of 11,929) of order requests sent during stress volume retesting on April 25, 2002 received FAs in less than 30 minutes.
			See Table 2-30 for additional details on EDI FAs.
TVV2-6-2	BellSouth's EDI interface provides Fully Mechanized (FM) error/clarification	Satisfied	BellSouth's EDI interface provides FM ERR/CLR responses within the agreed upon standard interval.

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Test Reference	Evaluation Criteria	Result	Comments
	error/clarification (ERR/CLR) responses within the agreed upon standard interval.		The O-8 SQM standard for FM ERRs/CLRs is 97% received within one hour. LSRs submitted for volume testing received FM ERRs/CLRs within the following timeframes: ♦ 99.77% (427 of 428) of order requests sent during day one normal volume testing on August 16, 2001 received FM ERRs/CLRs in less than one hour. ♦ KPMG Consulting conducted a full day one normal volume retest on October 30, 2001, to retest Exceptions 99 and 107, which were written due to failures on other criteria. 99.40% (329 of 331) of order requests sent during day one normal volume retesting on October 30, 2001 received FM ERRs/CLRs in less than one hour. ♦ KPMG Consulting conducted a full day one normal volume retest on December 5, 2001, to retest Exception 118, which was written due to a failure on another criterion. 96.03% (363 of 378) of order requests sent during day one normal volume retesting on December 5, 2001 received FM ERRs/CLRs in less than one hour. Based on the results of the December 5, 2001 testing, KPMG Consulting issued Exception 126. The exception noted that KPMG Consulting did not receive timely FM ERR/CLR responses in EDI. ♦ Following BellSouth's addition of capacity to a mainframe communication link, KPMG Consulting retested on December 20, 2001. 98.91% (363 of 367) of order requests sent during day one normal volume retesting on December 20, 2001 received FM ERRs/CLRs in less than one hour. Exception 126 was closed. ♦ 97.15% (546 of 562) of order requests sent during day two normal

Test Reference	Evaluation Criteria	Result	Comments
			volume testing on January 10, 2002 received FM ERRs/CLRs in less than one hour.
			♦ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. 99.06% (529 of 534) of order requests sent during day two normal volume retesting on January 28, 2002 received FM ERRs/CLRs in less than one hour.
			♦ 98.62% (932 of 945) of order requests sent during peak volume testing on February 25, 2002 received FM ERRs/CLRs in less than one hour.
			♦ KPMG Consulting conducted a full peak volume retest on March 19, 2002, due to an error with KPMG Consulting's LENS scripts, which artificially strained BellSouth's LENS login servers during February 25, 2002 peak testing. 98.72% (928 of 940) of order requests sent during peak volume retesting on March 19, 2002 received FM ERRs/CLRs in less than one hour.
			♦ 100% (687 of 687) of order requests sent during stress volume testing on April 9, 2002 received FM ERRs/CLRs in less than one hour.
			♦ KPMG Consulting conducted a full stress volume retest on April 25, 2002, to retest Exception 160, which was written due to a failure on another criterion. 100% (347 of 347) of order requests sent during stress volume retesting on April 25, 2002 received FM ERRs/CLRs in less than one hour.
			See Table 2-32 for additional details on EDI ERR/CLR timeliness.
TVV2-6-3	BellSouth's EDI interface provides Fully Mechanized (FM) Firm	Satisfied	BellSouth's EDI interface provides FM FOCs within the agreed upon standard interval.

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Test Reference	Evaluation Criteria	Result	Comments
			day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. 99.28% (10,904 of 10.983) of order requests sent during day two normal volume retesting on January 28, 2002 received FM FOCs within three hours.
			♦ 99.18% (17,447 of 17,592) of order requests sent during peak volume testing on February 25, 2002 received FM FOCs within three hours.
			♦ KPMG Consulting conducted a full peak volume retest on March 19, 2002, due to an error with KPMG Consulting's LENS scripts, which artificially strained BellSouth's LENS login servers during February 25, 2002 peak testing. 99.31% (19,208 of 19,342) of order requests sent during peak volume retesting on March 19, 2002 received FM FOCs within three hours.
			♦ 100% (8,561 of 8,561) of order requests sent during stress volume testing on April 9, 2002 received FM FOCs within three hours.
			♦ KPMG Consulting conducted a full stress volume retest on April 25, 2002, to retest Exception 160, which was written due to a failure on another criterion. 100% (11,318 of 11,318) of order requests sent during stress volume retesting on April 25, 2002 received FM FOCs within three hours.
			See Table 2-31 for additional details on EDI FOC timeliness.
TVV2-6-4	BellSouth's TAG interface provides Functional Acknowledgements (FAs) within the agreed upon standard interval.	Satisfied	BellSouth's TAG interface provides FAs within the agreed upon standard interval. The O-1 SQM standard for FAs is 95% received within 30 minutes. LSRs submitted for volume testing received FAs within the following timeframes:

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Test Reference	Evaluation Criteria	Result	Comments
			♦ 100% (100 of 100) of order requests sent during day one normal volume testing on August 16, 2001 received FAs in less than 30 minutes.
			♦ KPMG Consulting conducted a full day one normal volume retest on October 30, 2001, to retest Exceptions 99 and 107, which were written due to failures on other criteria. 96.77% (90 of 93) of order requests sent during day one normal volume retesting on October 30, 2001 received FAs in less than 30 minutes.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 5, 2001, to retest Exception 118, which was written due to a failure on another criterion. 100% (77 of 77) of order requests sent during day one normal volume retesting on December 5, 2001 received FAs in less than 30 minutes.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest Exceptions 126 and 127, which were written due to failures on other criteria. 100% (98 of 98) of order requests sent during day one normal volume retesting on December 20, 2001 received FAs in less than 30 minutes.
			♦ 100% (99 of 99) of order requests sent during day two normal volume testing on January 10, 2002 received FAs in less than 30 minutes.
			♦ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. 100% (98 of 98) of order requests sent during day two normal volume retesting on January 28, 2002 received FAs in less than 30 minutes.
			♦ 99.70% (333 of 334) of order

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Test Reference	Evaluation Criteria	Result	Comments
			requests sent during peak volume testing on February 25, 2002 received FAs in less than 30 minutes.
			♦ KPMG Consulting conducted a full peak volume retest on March 19, 2002, due to an error with KPMG Consulting's LENS scripts, which artificially strained BellSouth's LENS login servers during February 25, 2002 peak testing. 100% (151 of 151) of order requests sent during peak volume retesting on March 19, 2002 received FAs in less than 30 minutes.
			♦ 100% (286 of 286) of order requests sent during stress volume testing on April 9, 2002 received FAs in less than 30 minutes.
			♦ KPMG Consulting conducted a full stress volume retest on April 25, 2002, to retest Exception 160, which was written due to a failure on another criterion. 100% (277 of 277) of order requests sent during stress volume retesting on April 25, 2002 received FAs in less than 30 minutes.
			See Table 2-33 for additional details on TAG FA timeliness.
TVV2-6-5	BellSouth's TAG interface provides Fully Mechanized (FM) error/clarification (ERR/CLR) responses within the agreed upon standard interval.	Satisfied	BellSouth's TAG interface provides FM ERR/CLR responses within the agreed upon standard interval.
			The O-8 SQM standard for FM ERRs/CLRs is 97% received within one hour. LSRs submitted for volume testing received FM ERRs/CLRs within the following timeframes:
			♦ 100% (2 of 2) of order requests sent during day one normal volume testing on August 16, 2001 received FM ERRs/CLRs in less than one hour.
			♦ KPMG Consulting conducted a full day one normal volume retest on October 30, 2001, to retest Exceptions 99 and 107, which were written due to failures on other

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Test Reference	Evaluation Criteria	Result	Comments
			criteria. 100% (2 of 2) of order requests sent during day one normal volume retesting on October 30, 2001 received FM ERRs/CLRs in less than one hour.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 5, 2001, to retest Exception 118, which was written due to a failure on another criterion. No order requests sent during day one normal volume retesting on December 5, 2001 received FM ERRs/CLRs.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest Exceptions 126 and 127, which were written due to failures on other criteria. 100% (4 of 4) of order requests sent during day one normal volume retesting on December 20, 2001 received FM ERRs/CLRs in less than one hour.
			♦ 100% (2 of 2) of order requests sent during day two normal volume testing on January 10, 2002 received FM ERRs/CLRs in less than one hour.
			♦ 100% (2 of 2) of order requests sent during day two normal volume retesting on January 28, 2002 received FM ERRs/CLRs in less than one hour.
			♦ No order requests sent during peak volume testing on February 25, 2002 received FM ERRs/CLRs.
			♦ 100% (5 of 5) of order requests sent during peak volume retesting on March 19, 2002 received FM ERRs/CLRs in less than one hour.
			♦ 100% (14 of 14) of order requests sent during stress volume testing on April 9, 2002 received FM ERRs/CLRs in less than one hour.
			♦ KPMG Consulting conducted a full

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Test Reference	Evaluation Criteria	Result	Comments
			stress volume retest on April 25, 2002, to retest Exception 160, which was written due to a failure on another criterion. 100% (10 of 10) of order requests sent during stress volume retesting on April 25, 2002 received FM ERRs/CLRs in less than one hour. See Table 2-35 for additional details on TAG ERR/CLR timeliness.
TVV2-6-6	BellSouth's TAG interface provides Fully Mechanized (FM) Firm Order Confirmation (FOC) responses within the agreed upon standard interval.	Satisfied	BellSouth's TAG interface provides FM FOCs within the agreed upon standard interval. The O-9 SQM standard for FM FOCs is 95% received within three hours. LSRs submitted for volume testing received FM FOCs within the following timeframes: ♦ 98.84% (85 of 86) of order requests sent during day one normal volume testing on August 16, 2001 received FM FOCs within three hours. ♦ KPMG Consulting conducted a full day one normal volume retest on October 30, 2001, to retest Exceptions 99 and 107, which were written due to failures on other criteria. 98.89% (89 of 90) of order requests sent during day one normal volume retesting on October 30, 2001 received FM FOCs within three hours. ♦ KPMG Consulting conducted a full day one normal volume retest on December 5, 2001, to retest Exception 118, which was written due to a failure on another criterion. 100% (77 of 77) of order requests sent during day one normal volume retesting on December 5, 2001 received FM FOCs within three hours. ♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest Exceptions 126 and 127, which were written due to failures on other criteria. 98.92% (92 of 93) of order

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Test Reference	Evaluation Criteria	Result	Comments
			requests sent during day one normal volume retesting on December 20, 2001 received FM FOCs within three hours.
			◆ 95.74% (90 of 94) of order requests sent during day two normal volume testing on January 10, 2002 received FM FOCs within three hours.
			◆ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception 137, which was written due to a failure on another criterion. 98.94% (93 of 94) of order requests sent during day two normal volume retesting on January 28, 2002 received FM FOCs within three hours.
			◆ 95.63% (306 of 320) of order requests sent during peak volume testing on February 25, 2002 received FM FOCs within three hours.
			◆ KPMG Consulting conducted a full peak volume retest on March 19, 2002, due to an error with KPMG Consulting's LENS scripts, which artificially strained BellSouth's LENS login servers during February 25, 2002 peak testing. 99.29% (140 of 141) of order requests sent during peak volume retesting on March 19, 2002 received FM FOCs within three hours.
			◆ 100% (252 of 252) of order requests sent during stress volume testing on April 9, 2002 received FM FOCs within three hours.
			◆ KPMG Consulting conducted a full stress volume retest on April 25, 2002, to retest Exception 160, which was written due to a failure on another criterion. 100% (250 of 250) of order requests sent during stress volume retesting on April 25, 2002 received FM FOCs within three

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Test Reference	Evaluation Criteria	Result	Comments
			hours.
			See Table 2-34 for additional details on TAG FOC timeliness.
TVV2-6-7	BellSouth's LENS interface provides Fully Mechanized (FM) error/clarification (ERR/CLR) responses within the agreed upon standard interval.	Satisfied	BellSouth's LENS interface provides FM ERR/CLR responses within the agreed upon standard interval.
			The O-8 SQM standard for FM ERRs/CLRs is 97% received within one hour. LSRs submitted for volume testing received FM ERRs/CLRs within the following timeframes:
			♦ 100% (2 of 2) of order requests sent during day one normal volume testing on August 16, 2001 received FM ERRs/CLRs in less than one hour.
			♦ KPMG Consulting conducted a full day one normal volume retest on October 30, 2001, to retest Exceptions 99 and 107, which were written due to failures on other criteria. 100% (3 of 3) of order requests sent during day one normal volume retesting on October 30, 2001 received FM ERRs/CLRs in less than one hour.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 5, 2001, to retest Exception 118, which was written due to a failure on another criterion. 40.00% (2 of 5) of order requests sent during day one normal volume retesting on December 5, 2001 received FM ERRs/CLRs in less than one hour.
			♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest Exceptions 126 and 127, which were written due to failures on other criteria. 100% (1 of 1) of order requests sent during day one normal volume retesting on December 20, 2001 received FM ERRs/CLRs in less than one hour.

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Test Reference	Evaluation Criteria	Result	Comments
			♦ 83.33% (5 of 6) of order requests sent during day two normal volume testing on January 10, 2002 received FM ERRs/CLRs in less than one hour.
			♦ 100% (4 of 4) of order requests sent during day two normal volume retesting on January 28, 2002 received FM ERRs/CLRs in less than one hour.
			♦ 94.21% (179 of 190) of order requests sent during peak volume testing on February 25, 2002 received FM ERRs/CLRs in less than one hour.
			♦ KPMG Consulting conducted a full peak volume retest on March 19, 2002, due to an error with KPMG Consulting's LENS scripts, which artificially strained BellSouth's LENS login servers during February 25, 2002 peak testing. 100% (140 of 140) of order requests sent during peak volume retesting on March 19, 2002 received FM ERRs/CLRs in less than one hour.
			♦ KPMG Consulting was unable to report on the timeliness of FM ERRs/CLRs received during stress volume testing on April 9, 2002, because KPMG Consulting's LENS response processor could not transact with LENS for a period of greater than one hour. See Exception 160 for additional details on the April 9, 2002 LENS outage.
			♦ KPMG Consulting conducted a full stress volume retest on April 25, 2002. 100% (205 of 205) of order requests sent during stress volume retesting received FM ERRs/CLRs in less than one hour.
			See Table 2-37 for additional details on LENS ERR/CLR timeliness.
TVV2-6-8	BellSouth's LENS interface provides Fully	Satisfied	BellSouth's LENS interface provides FM FOCs within the agreed upon standard

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Test Reference	Evaluation Criteria	Result	Comments
	Mechanized (FM) Firm Order Confirmation (FOC) responses within the agreed upon standard interval.		interval. The O-9 SQM standard for FM FOCs is 95% received within three hours. LSRs submitted for volume testing received FM FOCs within the following timeframes: ♦ 100% (98 of 98) of order requests sent during day one normal volume testing on August 16, 2001 received FM FOCs within three hours. ♦ KPMG Consulting conducted a full day one normal volume retest on October 30, 2001, to retest Exceptions 99 and 107, which were written due to failures on other criteria. 98.97% (96 of 97) of order requests sent during day one normal volume retesting on October 30, 2001 received FM FOCs within three hours. ♦ KPMG Consulting conducted a full day one normal volume retest on December 5, 2001, to retest Exceptions 126 and 127, which were written due to failures on other criteria. 97.83% (90 of 92) of order requests sent during day one normal volume retesting on December 5, 2001 received FM FOCs within three hours. ♦ KPMG Consulting conducted a full day one normal volume retest on December 20, 2001, to retest Exceptions 126 and 127, which were written due to failures on other criteria. 100% (94 of 94) of order requests sent during day one normal volume retesting on December 20, 2001 received FM FOCs within three hours. ♦ 97.78% (88 of 90) of order requests sent during day two normal volume testing on January 10, 2002 received FM FOCs within three hours. ♦ KPMG Consulting conducted a full day two normal volume retest on January 28, 2002, to retest Exception

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Test Reference	Evaluation Criteria	Result	Comments
			137, which was written due to a failure on another criterion. 100% (93 of 93) of order requests sent during day two normal volume retesting on January 28, 2002 received FM FOCs within three hours.
			♦ 100% (1,686 of 1,686) of order requests sent during peak volume testing on February 25, 2002 received FM FOCs within three hours.
			♦ KPMG Consulting conducted a full peak volume retest on March 19, 2002, due to an error with KPMG Consulting's LENS scripts, which artificially strained BellSouth's LENS login servers during February 25, 2002 peak testing. 100% (2,305 of 2,305) of order requests sent during peak volume retesting on March 19, 2002 received FM FOCs within three hours.
			♦ 99.99% (3,339 of 3,340) of order requests sent during stress volume testing on April 9, 2002 received FM FOCs within three hours.
			♦ 100% (4,773 of 4,773) of order requests sent during stress volume retesting on April 25, 2002 received FM FOCs within three hours.
			See Table 2-36 for additional details on LENS FOC timeliness.
TVV2-6-9	BellSouth's manual ordering process provides error/clarification (ERR/CLR) responses within the agreed upon standard interval.	Satisfied	BellSouth's manual ordering process provides error/clarification (ERR/CLR) responses within the agreed upon standard interval.
			The O-8 SQM standard for non-mechanized ERRs/CLRs is 85% received within 24 hours. LSRs submitted for volume testing received non-mechanized ERRs/CLRs within the following timeframes:
			♦ 100% (28 of 28) of order requests sent during manual day one normal volume testing on May 23, 2001

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Test Reference	Evaluation Criteria	Result	Comments
			received non-mechanized ERRs/CLRs within 24 hours.
			♦ 100% (12 of 12) of order requests sent during manual day two normal volume testing on May 31, 2001 received non-mechanized ERRs/CLRs within 24 hours.
			♦ KPMG Consulting conducted manual day one normal volume retest on August 28, 2001 to retest Exception 72, which was written due to a failure on another criterion. 100% (12 of 12) of order requests sent during day one normal volume retesting on August 28, 2001 received non-mechanized ERRs/CLRs within 24 hours.
			♦ KPMG Consulting conducted a manual day one normal volume retest on October 16, 2001 to retest Exception 72, which was written due to a failure on another criterion. 100% (21 of 21) of order requests sent during day one normal volume retesting on October 16, 2001 received non-mechanized ERRs/CLRs within 24 hours.
			♦ KPMG Consulting conducted a manual day one normal volume retest on December 10, 2001 to retest Exceptions 72 and 116, which were written due to failures on other criteria. 100% (19 of 19) of order requests sent during day one normal volume retesting on December 10, 2001 received non-mechanized ERRs/CLRs within 24 hours.
			♦ KPMG Consulting conducted a manual day one normal volume retest on January 29, 2002, to retest Exception 116, which was written due to a failure on another criterion. 100% (13 of 13) of order requests sent during day one normal volume retesting on January 29, 2002 received non-mechanized ERRs/CLRs within 24 hours.

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Test Reference	Evaluation Criteria	Result	Comments
			♦ KPMG Consulting conducted a manual day one normal volume retest on February 20, 2002, to retest Exception 116, which was written due to a failure on another criterion. 100% (2 of 2) of order requests sent during day one normal volume retesting on February 20, 2002 received non-mechanized ERRs/CLRs within 24 hours.
			♦ 100% (17 of 17) of order requests sent during manual day two normal volume retesting on March 13, 2002 received non-mechanized ERRs/CLRs within 24 hours.
			♦ KPMG Consulting conducted a manual day two normal volume retest on April 17, 2002, to retest Exception 116, which was written due to a failure on another criterion. 100% (5 of 5) of order requests sent during day two normal volume retesting on April 17, 2002 received non-mechanized ERRs/CLRs within 24 hours.
			♦ 100% (12 of 12) of order requests sent during manual peak volume testing on May 8, 2002 received non-mechanized ERRs/CLRs within 24 hours.
			♦ KPMG Consulting conducted a manual peak volume retest on June 3, 2002, to retest Exception 116, which was written due to a failure on another criterion. 100% (16 of 16) of order requests sent during manual peak volume retesting on June 3, 2002 received non-mechanized ERRs/CLRs within 24 hours.
			♦ 100% (4 of 4) of order requests sent during manual stress volume testing on June 13, 2002 received non-mechanized ERRs/CLRs within 24 hours.
TVV2-6-10	BellSouth's manual ordering process provides Firm Order Confirmation	Satisfied	BellSouth's manual ordering process provides FOC responses within the agreed upon standard interval.

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Test Reference	Evaluation Criteria	Result	Comments
	(FOC) responses within the agreed upon standard interval.		agreed upon standard interval. The O-9 SQM standard for non-mechanized FOCs is 85% received within 36 hours. LSRs submitted for volume testing received non-mechanized FOCs within the following timeframes: ♦ 100% (13 of 13) of order requests sent during manual day one normal volume testing on May 23, 2001 received non-mechanized FOCs within 36 hours. ♦ 100% (33 of 33) of order requests sent during manual day two normal volume testing on May 31, 2001 received non-mechanized FOCs within 36 hours. ♦ KPMG Consulting conducted a manual day one normal volume retest on August 28, 2001 to retest Exception 72, which was written due to a failure on another criterion. 100% (31 of 31) of order requests sent during day one normal volume retesting on August 28, 2001 received non-mechanized FOCs within 36 hours. ♦ KPMG Consulting conducted a manual day one normal volume retest on October 16, 2001 to retest Exception 72, which was written due to a failure on another criterion. 100% (22 of 22) of order requests sent during manual day one normal volume retesting on October 16, 2001 received non-mechanized FOCs within 36 hours. ♦ KPMG Consulting conducted a manual day one normal volume retest on December 10, 2001 to retest Exceptions 72 and 116, which were written due to failures on other criteria. 100% (31 of 31) of order requests sent during manual day one normal volume retesting on December 10, 2001 received non-mechanized FOCs within 36 hours.

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Test Reference	Evaluation Criteria	Result	Comments
			♦ KPMG Consulting conducted a manual day one normal volume retest on January 29, 2002, to retest Exception 116, which was written due to a failure on another criterion. 100% (41 of 41) of order requests sent during manual day one normal volume retesting on January 29, 2002 received non-mechanized FOCs within 36 hours.
			♦ KPMG Consulting conducted a manual day one normal volume retest on February 20, 2002, to retest Exception 116, which was written due to a failure on another criterion. 100% (52 of 52) of order requests sent during manual day one normal volume retesting on February 20, 2002 received non-mechanized FOCs within 24 hours[230].
			♦ 100% (37 of 37) of order requests sent during manual day two normal volume retesting on March 13, 2002 received non-mechanized FOCs within 24 hours.
			♦ KPMG Consulting conducted a manual day two normal volume retest on April 17, 2002, to retest Exception 116, which was written due to a failure on another criterion. 100% (48 of 48) of order requests sent during manual day two normal volume retesting on April 17, 2002 received non-mechanized FOCs within 24 hours.
			♦ 100% (68 of 68) of order requests sent during manual peak volume testing on May 8, 2002 received non-mechanized FOCs within 24 hours.
			♦ KPMG Consulting conducted a manual peak volume retest on June 3, 2002, to retest Exception 116, which

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[230]KPMG Consulting applied a standard of 85% of non-mechanized FOCs received within 24 hours due to an interval guide change.

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Test Reference	Evaluation Criteria	Result	Comments
			was written due to a failure on another criterion. 98.41% (62 of 63) of order requests sent during manual peak volume retesting on June 3, 2002 received non-mechanized FOCs within 24 hours.
			♦ 100% (56 of 56) of order requests sent during manual stress volume testing on June 13, 2002 received non-mechanized FOCs within 24 hours.

4.2 Additional Data

The Additional Data section consists of a collection of tables that provide a more detailed view of the data summarized in the Evaluation Criteria comments in Section 4.1.

Table 2-10: 8/16/01 - Normal Day-1 TAG Pre-Order Response Timeliness

Query Type	Number of Responses	Range of Response Time (seconds)		Average Response Time (seconds)	
		Min	Max	BellSouth Retail	KPMG Consulting
CSRQ	3,522	1	114	1.52	2.59
AAQ	5,577	1	102	0.67	1.45
AVQ	8,363	1	111	1.27	1.47
AVQ_TN	5,572	1	113	0.95	1.52
SAQ	1,362	1	91	2.14	15.78
TNAQ	3,344	1	117	0.68	1.82
Total Count	27,740				
Time-Outs	0				
Total Pre-Orders Submitted	27,740				

Notes:

1. The OSS-1 SQM benchmark for pre-order queries is parity with retail plus two seconds. This standard applies to CSRQ, AAQ, AVQ, AVQ_TN, SAQ, and TNAQ.

2. The BellSouth retail average response time was determined by taking the weighted average of BellSouth's Regional Navigation System (RNS) and Regional Ordering System (ROS) pre-order response times for the month in which the test was conducted.

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Table 2-11: 10/30/01 - Normal Day-1 TAG Pre-Order Response Timeliness

Query Type	Number of Responses	Range of Response Time (seconds)		Average Response Time (seconds)	
		Min	Max	BellSouth Retail	KPMG Consulting
CSRQ	7,488	1	126	1.65	1.02
AAQ	2,499	1	36	0.89	1.00
AVQ	3,488	1	76	1.30	1.17
AVQ_TN	8,737	1	113	1.07	1.00
SAQ	750	1	40	2.87	1.00
TNAQ	1,249	1	55	1.20	1.00
LMU	734	1	77	60.00	23.60
Total Count	24,945				
Time-Outs	0				
Total Pre-Orders Submitted	24,945				

Notes:

1. The OSS-1 SQM benchmark for pre-order queries is parity with retail plus two seconds. This standard applies to CSRQ, AAQ, AVQ, AVQ_TN, SAQ, and TNAQ.

2. The PO-2 SQM benchmark for electronic LMU queries is 95% received within 60 seconds. 99.59% (731 of 734) of LMUs sent on October 30, 2001 received responses within 60 seconds.

3. The BellSouth retail average response time was determined by taking the weighted average of RNS and ROS pre-order response times for the month in which the test was conducted.

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Table 2-12: 12/5/01 - Normal Day-1 TAG Pre-Order Response Timeliness

Query Type	Number of Responses	Range of Response Time (seconds)		Average Response Time (seconds)	
		Min	Max	BellSouth Retail	KPMG Consulting
CSRQ	7,175	1	67	7.79	3.16
AAQ	2,340	1	53	0.80	2.09
AVQ	3,307	1	33	1.17	1.80
AVQ_TN	8,363	1	61	0.94	1.72
SAQ	693	1	32	2.77	2.84
TNAQ	1,164	1	59	1.06	3.14
LMU	655	1	118	60.00	23.24
Total Count	23,697				
Time-Outs	0				
Total Pre-Orders Submitted	23,697				

Notes:

1. The OSS-1 SQM benchmark for pre-order queries is parity with retail plus two seconds. This standard applies to CSRQ, AAQ, AVQ, AVQ_TN, SAQ, and TNAQ.

2. The PO-2 SQM benchmark for electronic LMU queries is 95% received within 60 seconds. 98.63% (646 of 655) of LMUs sent on December 5, 2001 received responses within 60 seconds.

3. The BellSouth retail average response time was determined by taking the weighted average of RNS and ROS pre-order response times for the month in which the test was conducted.

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Table 2-13: 12/20/01 - Normal Day-1 TAG Pre-Order Response Timeliness

Query Type	Number of Responses	Range of Response Time (seconds)		Average Response Time (seconds)	
		Min	Max	BellSouth Retail	KPMG Consulting
CSRQ	7,485	1	41	7.79	1.39
AAQ	2,493	1	28	0.80	1.19
AVQ	3,488	1	28	1.17	1.14
AVQ_TN	8,734	1	28	0.94	1.10
SAQ	745	1	33	2.77	1.49
TNAQ	1,244	1	25	1.06	1.41
LMU	737	16	109	60.00	25.44
Total Count	24,926				
Time-Outs	0				
Total Pre-Orders Submitted	24,926				

Notes:

1. The OSS-1 SQM benchmark for pre-order queries is parity with retail plus two seconds. This standard applies to CSRQ, AAQ, AVQ, AVQ_TN, SAQ, and TNAQ.

2. The PO-2 SQM benchmark for electronic LMU queries is 95% received within 60 seconds. 99.32% (732 of 737) of LMUs sent on December 20, 2001 received responses within 60 seconds.

3. The BellSouth retail average response time was determined by taking the weighted average of RNS and ROS pre-order response times for the month in which the test was conducted.

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Table 2-14: 1/10/02 - Normal Day-2 TAG Pre-Order Response Timeliness

Query Type	Number of Responses	Range of Response Time (seconds)		Average Response Time (seconds)	
		Min	Max	BellSouth Retail	KPMG Consulting
CSRQ	7,438	1	60	7.65	2.09
AAQ	2,475	1	28	0.82	1.58
AVQ	3,476	1	60	1.32	1.56
AVQ_TN	8,719	1	71	0.95	2.43
SAQ	744	1	41	2.68	2.40
TNAQ	1,239	1	24	1.09	1.79
LMU	608	14	112	60.00	23.50
Total Count	24,699				
Time-Outs	0				
Total Pre-Orders Submitted	24,699				

Notes:

1. The OSS-1 SQM benchmark for pre-order queries is parity with retail plus two seconds. This standard applies to CSRQ, AAQ, AVQ, AVQ_TN, SAQ, and TNAQ.

2. The PO-2 SQM benchmark for electronic LMU queries is 95% received within 60 seconds. 98.35% (598 of 608) of LMUs sent on January 10, 2002 received responses within 60 seconds.

3. The BellSouth retail average response time was determined by taking the weighted average of RNS and ROS pre-order response times for the month in which the test was conducted.

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Table 2-15: 1/28/02 - Normal Day-2 TAG Pre-Order Response Timeliness

Query Type	Number of Responses	Range of Response Time (seconds)		Average Response Time (seconds)	
		Min	Max	BellSouth Retail	KPMG Consulting
CSRQ	7,438	1	60	7.65	2.20
AAQ	2,485	1	43	0.82	1.23
AVQ	3,477	1	13	1.32	1.18
AVQ_TN	8,683	1	38	0.95	1.16
SAQ	750	1	23	2.68	1.23
TNAQ	1,247	1	19	1.09	1.42
LMU	746	11	65	60.00	18.94
Total Count	24,826				
Time-Outs	0				
Total Pre-Orders Submitted	24,826				

Notes:

1. The OSS-1 SQM benchmark for pre-order queries is parity with retail plus two seconds. This standard applies to CSRQ, AAQ, AVQ, AVQ_TN, SAQ, and TNAQ.

2. The PO-2 SQM benchmark for electronic LMU queries is 95% received within 60 seconds. 99.86% (745 of 746) of LMUs sent on January 28, 2002 received responses within 60 seconds.

3. The BellSouth retail average response time was determined by taking the weighted average of RNS and ROS pre-order response times for the month in which the test was conducted.

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Table 2-16: 2/25/02 - Peak Day TAG Pre-Order Response Timeliness

Query Type	Number of Responses	Range of Response Time (seconds)		Average Response Time (seconds)	
		Min	**Max**	**BellSouth Retail**	**KPMG Consulting**
CSRQ	12,977	1	69	7.65	1.96
AAQ	4,338	1	44	0.64	1.38
AVQ	See Note 3	N/A	N/A	N/A	N/A
AVQ_TN	15,267	1	51	0.88	1.29
SAQ	1,288	1	32	2.68	1.79
TNAQ	2,156	1	58	0.88	2.00
LMU	1,102	9	118	60.00	36.68
Total Count	37,128				
Time-Outs	0				
Total Pre-Orders Submitted	37,128				

Notes:

1. The OSS-1 SQM benchmark for pre-order queries is parity with retail plus two seconds. This standard applies to CSRQ, AAQ, AVQ, AVQ_TN, SAQ, and TNAQ.

2. The PO-2 SQM benchmark for electronic LMU queries is 95% received within 60 seconds. 77.13% (850 of 1,102) of LMUs sent on February 25, 2002 received responses within 60 seconds.

3. KPMG Consulting could not measure the average interval for receipt of AVQs during peak volume testing on February 25, 2002, due to a coding error in KPMG Consulting's TAG mapping structure. AVQ results recorded during peak retesting on March 19, 2002 are presented in Table 2-15.

4. The BellSouth retail average response time was determined by taking the weighted average of RNS and ROS pre-order response times for the month in which the test was conducted.

5. KPMG Consulting used January 2002 HAL/CRIS data to measure CSRQ response timeliness due to BellSouth abnormal parity data for HAL/CRIS for February 2002.

6. KPMG Consulting used January 2002 OASIS data to measure SAQ response timeliness due to BellSouth abnormal parity data for OASIS for February 2002.

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Table 2-17: 3/19/02 - Peak Day TAG Pre-Order Response Timeliness

Query Type	Number of Responses	Range of Response Time (seconds)		Average Response Time (seconds)	
		Min	Max	BellSouth Retail	KPMG Consulting
CSRQ	13,682	1	65	1.18	1.50
AAQ	6,491	1	50	0.66	1.17
AVQ	4,628	1	46	1.32	1.18
AVQ_TN	16,216	1	46	0.88	1.15
SAQ	1,393	1	49	2.46	1.20
TNAQ	2,314	1	38	0.88	1.32
LMU	1,390	11	118	60.00	23.47
Total Count	46,114				
Time-Outs	0				
Total Pre-Orders Submitted	46,114				

Notes:

1. The OSS-1 SQM benchmark for pre-order queries is parity with retail plus two seconds. This standard applies to CSRQ, AAQ, AVQ, AVQ_TN, SAQ, and TNAQ.

2. The PO-2 SQM benchmark for electronic LMU queries is 95% received within 60 seconds. 95.97% (1,334 of 1,390) of LMUs sent on March 19, 2002 received responses within 60 seconds.

3. The BellSouth retail average response time was determined by taking the weighted average of RNS and ROS pre-order response times for the month in which the test was conducted.

4. KPMG Consulting used January 2002 RSAG-ADDR data to measure AVQ response timeliness due to BellSouth abnormal parity data for RSAG-ADDR for February 2002-April 2002.

5. KPMG Consulting used February 2002 RSAG-TN data to measure AVQ_TN response timeliness due to BellSouth abnormal parity data for RSAG-TN for March 2002-April 2002.

6. KPMG Consulting used February 2002 ATLAS data to measure TNAQ response timeliness due to BellSouth abnormal parity data for ATLAS for March 2002.

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Table 2-18: 4/9/02 - Stress Day TAG Pre-Order Response Timeliness

Query Type	Number of Responses	Range of Response Time (seconds)		Average Response Time (seconds)	
		Min	Max	BellSouth Retail	KPMG Consulting
CSRQ	7,888	1	72	1.18	1.39
AAQ	3,034	1	9	0.91	1.08
AVQ	4,248	1	59	0.88	1.19
AVQ_TN	10,618	1	59	1.32	1.09
SAQ	909	1	16	2.37	1.49
TNAQ	1,516	1	22	0.86	1.16
LMU	910	10	119	60.00	21.61
PCSRQ	1,212	1	119	1.18	10.47
Total Count	30,335				
Time-Outs	0				
Total Pre-Orders Submitted	30,335				

Notes:

1. The OSS-1 SQM benchmark for pre-order queries is parity with retail plus two seconds. This standard applies to CSRQ, AAQ, AVQ, AVQ_TN, SAQ, and TNAQ.

2. The PO-2 SQM benchmark for electronic LMU queries is 95% received within 60 seconds. 98.13% (893 of 910) of LMUs sent on April 9, 2002 received responses within 60 seconds.

3. KPMG Consulting applied a benchmark of 10 seconds for response to PCSRQ.

4. The BellSouth retail average response time was determined by taking the weighted average of RNS and ROS pre-order response times for the month in which the test was conducted.

5. KPMG Consulting used January 2002 RSAG-ADDR data to measure AVQ response timeliness due to BellSouth abnormal parity data for RSAG-ADDR for February 2002-April 2002.

6. KPMG Consulting used February 2002 RSAG-TN data to measure AVQ_TN response timeliness due to BellSouth abnormal parity data for RSAG-TN for March 2002-April 2002.

7. KPMG Consulting used March 2002 HAL/CRIS data to measure CSRQ response timeliness due to BellSouth abnormal parity data for HAL/CRIS for April 2002.

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Table 2-19: 4/25/02 - Stress Day TAG Pre-Order Response Timeliness

Query Type	Number of Responses	Range of Response Time (seconds)		Average Response Time (seconds)	
		Min	Max	BellSouth Retail	KPMG Consulting
CSRQ	5,461	1	119	1.18	1.50
AAQ	2,592	1	140	0.91	1.54
AVQ	3,378	1	121	0.88	1.38
AVQ_TN	7,081	1	121	1.32	1.20
SAQ	860	1	126	2.37	2.76
TNAQ	1,261	1	128	0.86	1.98
LMU	881	10	159	60.00	32.45
PCSRQ	1,171	1	179	1.18	20.43
Total Count	22,685				
Time-Outs	0				
Total Pre-Orders Submitted	22,685				

Notes:

1. The OSS-1 SQM benchmark for pre-order queries is parity with retail plus two seconds. This standard applies to CSRQ, AAQ, AVQ, AVQ_TN, SAQ, and TNAQ.

2. The PO-2 SQM benchmark for electronic LMU queries is 95% received within 60 seconds. 76.39% (673 of 881) of LMUs sent on April 25, 2002 received responses within 60 seconds.

3. KPMG Consulting applied a benchmark of 10 seconds for response to PCSRQ.

4. The BellSouth retail average response time was determined by taking the weighted average of RNS and ROS pre-order response times for the month in which the test was conducted.

5. KPMG Consulting used January 2002 RSAG-ADDR data to measure AVQ response timeliness due to BellSouth abnormal parity data for RSAG-ADDR for February 2002-April 2002.

6. KPMG Consulting used February 2002 RSAG-TN data to measure AVQ_TN response timeliness due to BellSouth abnormal parity data for RSAG-TN for March 2002-April 2002.

7. KPMG Consulting used March 2002 HAL/CRIS data to measure CSRQ response timeliness due to BellSouth abnormal parity data for HAL/CRIS for April 2002.

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Table 2-20: 8/16/01 - Normal Day-1 LENS Pre-Order Response Timeliness

Query Type	Number of Responses	Range of Response Time (seconds)		Average Response Time (seconds)	
		Min	Max	BellSouth Retail	KPMG Consulting
CSRQ	2,146	1	64	1.52	2.43
AVQ	639	1	19	1.27	4.18
AVQ_TN	1,592	1	21	0.95	6.01
EDD	73	1	13	0.67	5.38
SAQ	267	1	35	2.14	6.05
TNAQ	108	1	5	0.68	1.74
Total Count	4,825				
Time-Outs	10				
Total Pre-Orders Submitted	4,835				

Notes:

1. The OSS-1 SQM benchmark for pre-order queries is parity with retail plus two seconds. This standard applies to CSRQ, AVQ, AVQ_TN, EDD, SAQ, and TNAQ.

2. KPMG Consulting's LENS pre-order script was designed to time out and move on to the next pre-order after four minutes. Time-outs are considered missing responses.

3. The BellSouth retail average response time was determined by taking the weighted average of RNS and ROS pre-order response times for the month in which the test was conducted.

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Table 2-21: 10/30/01 - Normal Day-1 LENS Pre-Order Response Timeliness

Query Type	Number of Responses	Range of Response Time (seconds)		Average Response Time (seconds)	
		Min	Max	BellSouth Retail	KPMG Consulting
CSRQ	2,131	1	99	1.65	4.93
AVQ	422	1	59	1.30	8.69
AVQ_TN	905	1	82	1.07	9.44
EDD	82	2	25	0.89	7.74
SAQ	281	1	82	2.87	9.82
TNAQ	128	1	43	1.20	5.29
Total Count	3,949				
Time-Outs	6				
Total Pre-Orders Submitted	3,955				

Notes:

1. The OSS-1 SQM benchmark for pre-order queries is parity with retail plus two seconds. This standard applies to CSRQ, AVQ, AVQ_TN, EDD, SAQ, and TNAQ.

2. KPMG Consulting's LENS pre-order script was designed to time out and move on to the next pre-order after four minutes. Time-outs are considered missing responses.

3. The BellSouth retail average response time was determined by taking the weighted average of RNS and ROS pre-order response times for the month in which the test was conducted.

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Table 2-22: 12/5/01 - Normal Day-1 LENS Pre-Order Response Timeliness

Query Type	Number of Responses	Range of Response Time (seconds)		Average Response Time (seconds)	
		Min	Max	BellSouth Retail	KPMG Consulting
CSRQ	2,634	1	94	7.79	5.18
AVQ	424	1	105	1.17	4.28
AVQ_TN	938	1	74	0.94	4.98
EDD	92	2	51	0.80	6.33
SAQ	283	1	49	2.77	9.72
TNAQ	141	1	60	1.06	3.96
Total Count	4,512				
Time-Outs	5				
Total Pre-Orders Submitted	4,517				

Notes:

1. The OSS-1 SQM benchmark for pre-order queries is parity with retail plus two seconds. This standard applies to CSRQ, AVQ, AVQ_TN, EDD, SAQ, and TNAQ.

2. KPMG Consulting's LENS pre-order script was designed to time out and move on to the next pre-order after four minutes. Time-outs are considered missing responses.

3. The BellSouth retail average response time was determined by taking the weighted average of RNS and ROS pre-order response times for the month in which the test was conducted.

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Table 2-23: 12/20/01 - Normal Day-1 LENS Pre-Order Response Timeliness

Query Type	Number of Responses	Range of Response Time (seconds)		Average Response Time (seconds)	
		Min	Max	BellSouth Retail	KPMG Consulting
CSRQ	2,751	1	22	7.79	2.23
AVQ	415	1	16	1.17	2.00
AVQ_TN	918	1	27	0.94	2.91
EDD	94	2	9	0.80	3.93
SAQ	280	1	40	2.77	6.40
TNAQ	141	1	13	1.06	2.13
Total Count	4,599				
Time-Outs	0				
Total Pre-Orders Submitted	4,599				

Notes:

1. The OSS-1 SQM benchmark for pre-order queries is parity with retail plus two seconds. This standard applies to CSRQ, AVQ, AVQ_TN, EDD, SAQ, and TNAQ.

2. The BellSouth retail average response time was determined by taking the weighted average of RNS and ROS pre-order response times for the month in which the test was conducted.

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Table 2-24: 1/10/02 - Normal Day-2 LENS Pre-Order Response Timeliness

Query Type	Number of Responses	Range of Response Time (seconds)		Average Response Time (seconds)	
		Min	Max	BellSouth Retail	KPMG Consulting
CSRQ	2,449	1	99	7.65	2.52
AVQ	388	1	11	1.32	2.11
AVQ_TN	851	1	22	0.95	2.92
EDD	87	1	64	0.82	7.00
SAQ	243	1	71	2.68	5.80
TNAQ	129	1	6	1.09	1.91
Total Count	4,147				
Time-Outs	53				
Total Pre-Orders Submitted	4,200				

Notes:

1. The OSS-1 SQM benchmark for pre-order queries is parity with retail plus two seconds. This standard applies to CSRQ, AVQ, AVQ_TN, EDD, SAQ, and TNAQ.

2. KPMG Consulting's LENS pre-order script was designed to time out and move on to the next pre-order after four minutes. Time-outs are considered missing responses.

3. The BellSouth retail average response time was determined by taking the weighted average of RNS and ROS pre-order response times for the month in which the test was conducted.

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Table 2-25: 1/28/02 - Normal Day-2 LENS Pre-Order Response Timeliness

Query Type	Number of Responses	Range of Response Time (seconds)		Average Response Time (seconds)	
		Min	Max	BellSouth Retail	KPMG Consulting
CSRQ	2,804	1	77	7.65	2.69
AVQ	423	1	104	1.32	2.06
AVQ_TN	912	1	35	0.95	2.59
EDD	94	1	13	0.82	4.13
SAQ	283	1	20	2.68	3.53
TNAQ	141	1	5	1.09	1.33
Total Count	4,657				
Time-Outs	14				
Total Pre-Orders Submitted	4,671				

Notes:

1. The OSS-1 SQM benchmark for pre-order queries is parity with retail plus two seconds. This standard applies to CSRQ, AVQ, AVQ_TN, EDD, SAQ, and TNAQ.

2. KPMG Consulting's LENS pre-order script was designed to time out and move on to the next pre-order after four minutes. Time-outs are considered missing responses.

3. The BellSouth retail average response time was determined by taking the weighted average of RNS and ROS pre-order response times for the month in which the test was conducted.

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Table 2-26: 2/25/02 - Peak Day LENS Pre-Order Response Timeliness

Query Type	Number of Responses	Range of Response Time (seconds)		Average Response Time (seconds)	
		Min	Max	BellSouth Retail	KPMG Consulting
CSRQ	13,933	1	110	7.65	3.11
AVQ	2,072	1	111	1.32	2.54
AVQ_TN	4,595	1	119	0.88	6.68
EDD	444	1	106	0.64	6.02
SAQ	1,363	1	119	2.68	7.06
TNAQ	677	1	107	0.88	2.46
Total Count	23,084				
Time-Outs	235				
Total Pre-Orders Submitted	23,319				

Notes:

1. The OSS-1 SQM benchmark for pre-order queries is parity with retail plus two seconds. This standard applies to CSRQ, AVQ, AVQ_TN, EDD, SAQ, and TNAQ.

2. KPMG Consulting's LENS pre-order script was designed to time out and move on to the next pre-order after four minutes. Time-outs are considered missing responses.

3. The BellSouth retail average response time was determined by taking the weighted average of RNS and ROS pre-order response times for the month in which the test was conducted.

4. KPMG Consulting used January 2002 RSAG-ADDR data to measure AVQ response timeliness due to BellSouth abnormal parity data for RSAG-ADDR for February 2002-April 2002.

5. KPMG Consulting used January 2002 HAL/CRIS data to measure CSRQ response timeliness due to BellSouth abnormal parity data for HAL/CRIS for February 2002.

6. KPMG Consulting used January 2002 OASIS data to measure SAQ response timeliness due to BellSouth abnormal parity data for OASIS for February 2002.

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Table 2-27: 3/19/02 - Peak Day LENS Pre-Order Response Timeliness

Query Type	Number of Responses	Range of Response Time (seconds)		Average Response Time (seconds)	
		Min	Max	BellSouth Retail	KPMG Consulting
CSRQ	19,821	1	54	1.18	1.72
AVQ	2,973	1	51	1.32	1.70
AVQ_TN	6,605	1	51	0.88	2.54
EDD	660	1	12	0.66	3.56
SAQ	1,981	1	22	2.46	2.94
TNAQ	991	1	13	0.88	1.62
Total Count	33,031				
Time-Outs	0				
Total Pre-Orders Submitted	33,031				

Notes:

1. The OSS-1 SQM benchmark for pre-order queries is parity with retail plus two seconds. This standard applies to CSRQ, AVQ, AVQ_TN, EDD, SAQ, and TNAQ.

2. The BellSouth retail average response time was determined by taking the weighted average of RNS and ROS pre-order response times for the month in which the test was conducted.

3. KPMG Consulting used January 2002 RSAG-ADDR data to measure AVQ response timeliness due to BellSouth abnormal parity data for RSAG-ADDR for February 2002-April 2002.

4. KPMG Consulting used February 2002 RSAG-TN data to measure AVQ_TN response timeliness due to BellSouth abnormal parity data for RSAG-TN for March 2002-April 2002.

5. KPMG Consulting used February 2002 ATLAS data to measure TNAQ response timeliness due to BellSouth abnormal parity data for ATLAS for March 2002.

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Table 2-28: 4/9/02 - Stress Day LENS Pre-Order Response Timeliness

Query Type	Number of Responses	Range of Response Time (seconds)		Average Response Time (seconds)	
		Min	Max	BellSouth Retail	KPMG Consulting
CSRQ	24,458	1	115	1.18	2.38
AVQ	3,741	1	99	1.32	3.18
AVQ_TN	8,543	1	112	0.88	3.69
EDD	756	1	34	0.91	5.32
SAQ	2,396	1	117	2.37	7.22
TNAQ	1,196	1	61	0.86	3.36
Total Count	41,090				
Time-Outs	214				
Total Pre-Orders Submitted	41,304				

Notes:

1. The OSS-1 SQM benchmark for pre-order queries is parity with retail plus two seconds. This standard applies to CSRQ, AVQ, AVQ_TN, EDD, SAQ, and TNAQ.

2. KPMG Consulting's LENS pre-order script was designed to time out and move on to the next pre-order after four minutes. Time-outs are considered missing responses.

3. The BellSouth retail average response time was determined by taking the weighted average of RNS and ROS pre-order response times for the month in which the test was conducted.

4. KPMG Consulting used January 2002 RSAG-ADDR data to measure AVQ response timeliness due to BellSouth abnormal parity data for RSAG-ADDR for February 2002-April 2002.

5. KPMG Consulting used February 2002 RSAG-TN data to measure AVQ_TN response timeliness due to BellSouth abnormal parity data for RSAG-TN for March 2002-April 2002.

6. KPMG Consulting used March 2002 HAL/CRIS data to measure CSRQ response timeliness due to BellSouth abnormal parity data for HAL/CRIS for April 2002.

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Table 2-29: 4/25/02 - Stress Day LENS Pre-Order Response Timeliness

Query Type	Number of Responses	Range of Response Time (seconds)		Average Response Time (seconds)	
		Min	Max	BellSouth Retail	KPMG Consulting
CSRQ	23,790	1	118	1.18	2.87
AVQ	3,670	1	119	1.32	4.93
AVQ_TN	7,978	1	97	0.88	4.99
EDD	821	1	35	0.91	4.81
SAQ	2,454	1	100	2.37	6.53
TNAQ	1,226	1	51	0.86	4.20
Total Count	39,939				
Time-Outs	23				
Total Pre-Orders Submitted	39,962				

Notes:

1. The OSS-1 SQM benchmark for pre-order queries is parity with retail plus two seconds. This standard applies to CSRQ, AVQ, AVQ_TN, EDD, SAQ, and TNAQ.

2. KPMG Consulting's LENS pre-order script was designed to time out and move on to the next pre-order after four minutes. Time-outs are considered missing responses.

3. The BellSouth retail average response time was determined by taking the weighted average of RNS and ROS pre-order response times for the month in which the test was conducted.

4. KPMG Consulting used January 2002 RSAG-ADDR data to measure AVQ response timeliness due to BellSouth abnormal parity data for RSAG-ADDR for February 2002-April 2002.

5. KPMG Consulting used February 2002 RSAG-TN data to measure AVQ_TN response timeliness due to BellSouth abnormal parity data for RSAG-TN for March 2002-April 2002.

6. KPMG Consulting used March 2002 HAL/CRIS data to measure CSRQ response timeliness due to BellSouth abnormal parity data for HAL/CRIS for April 2002.

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Table 2-30: EDI FA Response Timeliness for BellSouth Florida LSRs

Test Day	Date	Total LSRs Submitted	LSRs Expected to Receive FAs	FA		
				Number Received	Number On-Time	Percent On-Time
Normal Day-1	8/16/01	9,322	9,322	9,250	9,249	99.99%
Normal Day-1	10/30/01	10,426	10,426	10,346	10,346	100%
Normal Day-1	12/5/01	10,875	10,875	10,875	10,875	100%
Normal Day-1	12/20/01	11,597	11,597	11,597	11,597	100%
Normal Day-2	1/10/02	11,589	11,589	11,589	11,589	100%
Normal Day-2	1/28/02	11,593	11,593	11,593	11,593	100%
Peak Day	2/25/02	19,618	19,618	19,571	19,571	100%
Peak Day	3/19/02	20,408	20,408	20,408	20,408	100%
Sub-Total		**105,428**	**105,428**	**105,229**	**105,228**	**100%**
Stress Day	4/9/02	9,918	9,918	9,918	9,720	98.00%
Stress Day	4/25/02	11,929	11,929	11,929	11,929	100%
Total		**127,275**	**127,275**	**127,076**	**126,877**	**99.84%**

Notes:

1. KPMG Consulting applied a benchmark for receipt of FAs of 99%.

2. The O-1 SQM standard for FA timeliness is 95% received within 30 minutes.

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Table 2-31: EDI FOC Response Timeliness for BellSouth Florida LSRs

Test Day	Date	Total LSRs Submitted	LSRs Expected to Receive FOC	FOC		
				Number Received	Number On-Time	Percent On-Time
Normal Day-1	8/16/01	9,322	8,275	7,561	7,468	98.77%
Normal Day-1	10/30/01	10,426	9,828	9,782	9,689	99.05%
Normal Day-1	12/5/01	10,875	10,431	10,330	10,167	98.42%
Normal Day-1	12/20/01	11,597	11,193	11,135	10,987	98.67%
Normal Day-2	1/10/02	11,589	10,985	10,763	10,674	99.17%
Normal Day-2	1/28/02	11,593	10,989	10,983	10,904	99.28%
Peak Day	2/25/02	19,618	17,765	17,592	17,447	99.18%
Peak Day	3/19/02	20,408	19,389	19,342	19,208	99.31%
Sub-Total		**105,428**	**98,855**	**97,488**	**96,544**	**99.03%**
Stress Day	4/9/02	9,918	9,001	8,561	8,561	100%
Stress Day	4/25/02	11,929	11,331	11,318	11,318	100%
Total		**127,275**	**119,187**	**117,367**	**116,423**	**99.20%**

Notes:

1. The number of LSRs submitted expected to receive FOCs does not include intentional errors submitted.

2. The number of LSRs submitted expected to receive FOCs does not include submitted orders that were not flow-through eligible.

3. KPMG Consulting applied a benchmark for receipt of responses (FOC, CLR, or ERR) of 99%.

4. The O-9 SQM standard for FOC timeliness is 95% received within 3 hours.

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Table 2-32: EDI ERR/CLR Response Timeliness for BellSouth Florida LSRs

Test Day	Date	Total LSRs Submitted	LSRs Expected to Receive ERR/CLR	ERR/CLR		
				Number Received	Number On-Time	Percent On-Time
Normal Day-1	8/16/01	9,322	428	428	427	99.77%
Normal Day-1	10/30/01	10,426	331	331	329	99.40%
Normal Day-1	12/5/01	10,875	378	378	363	96.03%
Normal Day-1	12/20/01	11,597	367	367	363	98.91%
Normal Day-2	1/10/02	11,589	533[3]	562	546	97.15%
Normal Day-2	1/28/02	11,593	534	534	529	99.06%
Peak Day	2/25/02	19,618	954	945	932	98.62%
Peak Day	3/19/02	20,408	940	940	928	98.72%
Sub-Total		**105,428**	**4,465**	**4,485**	**4,417**	**98.48%**
Stress Day	4/9/02	9,918	683[4]	687	687	100%
Stress Day	4/25/02	11,929	347	347	347	100%
Total		**127,275**	**5,495**	**5,519**	**5,451**	**98.77%**

Notes:

1. KPMG Consulting applied a benchmark for receipt of responses (FOC, CLR, or ERR) of 99%.

2. The O-8 SQM standard for ERR/CLR timeliness is 97% received within 1 hour.

3. During peak volume testing on January 10, 2002, 29 orders that were expected to receive FOCs received a CLR or ERR.

4. During stress volume testing on April 9, 2002, four orders that were expected to receive FOCs received an ERR.

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Table 2-33: TAG FA Response Timeliness for BellSouth Florida LSRs

Test Day	Date	Total LSRs Submitted	LSRs Expected to Receive FAs	FA		
				Number Received	Number On-Time	Percent On-Time
Normal Day-1	8/16/01	100	100	100	100	100%
Normal Day-1	10/30/01	95	95	93	90	96.77%
Normal Day-1	12/5/01	80	80	77	77	100%
Normal Day-1	12/20/01	100	100	98	98	100%
Normal Day-2	1/10/02	100	100	99	99	100%
Normal Day-2	1/28/02	99	99	98	98	100%
Peak Day	2/25/02	336	336	334	333	99.70%
Peak Day	3/19/02	151	151	151	151	100%
Sub-Total		**1,061**	**1,061**	**1,050**	**1,046**	**99.62%**
Stress Day	4/9/02	286	286	286	286	100%
Stress Day	4/25/02	277	277	277	277	100%
Total		**1,624**	**1,624**	**1,613**	**1,609**	**99.75%**

Notes:

1. KPMG Consulting applied a benchmark for receipt of FAs of 99%.

2. The O-1 SQM standard for FA timeliness is 95% received within 30 minutes.

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Table 2-34: TAG FOC Response Timeliness for BellSouth Florida LSRs

Test Day	Date	Total LSRs Submitted	LSRs Expected to Receive FOC	FOC		
				Number Received	Number On-Time	Percent On-Time
Normal Day-1	8/16/01	100	88	86	85	98.84%
Normal Day-1	10/30/01	95	90	90	89	98.89%
Normal Day-1	12/5/01	80	77	77	77	100%
Normal Day-1	12/20/01	100	93	93	92	98.92%
Normal Day-2	1/10/02	100	95	94	90	95.74%
Normal Day-2	1/28/02	99	95	94	93	98.94%
Peak Day	2/25/02	336	322	320	306	95.63%
Peak Day	3/19/02	151	141	141	140	99.29%
Sub-Total		**1,061**	**1,001**	**995**	**972**	**97.69%**
Stress Day	4/9/02	286	263	252	252	100%
Stress Day	4/25/02	277	250	250	250	100%
Total		**1,624**	**1,514**	**1,497**	**1,474**	**98.46%**

Notes:

1. The number of LSRs submitted expected to receive FOCs does not include intentional errors submitted.

2. The number of LSRs submitted expected to receive FOCs does not include submitted orders that were not flow-through eligible.

3. KPMG Consulting applied a benchmark for receipt of responses (FOC, CLR, or ERR) of 99%.

4. The O-9 SQM standard for FOC timeliness is 95% received within 3 hours.

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Table 2-35: TAG ERR/CLR Response Timeliness for BellSouth Florida LSRs

Test Day	Date	Total LSRs Submitted	LSRs Expected to Receive ERR/CLR	ERR/CLR		
				Number Received	Number On-Time	Percent On-Time
Normal Day-1	8/16/01	100	2	2	2	100%
Normal Day-1	10/30/01	95	3	2	2	100%
Normal Day-1	12/5/01	80	0	0	0	N/A
Normal Day-1	12/20/01	100	4	4	4	100%
Normal Day-2	1/10/02	100	2	2	2	100%
Normal Day-2	1/28/02	99	2	2	2	100%
Peak Day	2/25/02	336	0	0	0	N/A
Peak Day	3/19/02	151	5	5	5	100%
Sub-Total		**1,061**	**18**	**17**	**17**	**100%**
Stress Day	4/9/02	286	14	14	14	100%
Stress Day	4/25/02	277	10	10	10	100%
Total		**1,624**	**42**	**41**	**41**	**100%**

Notes:

1. KPMG Consulting applied a benchmark for receipt of responses (FOC, CLR, or ERR) of 99%.

2. The O-8 SQM standard for ERR/CLR timeliness is 97% received within 1 hour.

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Table 2-36: LENS FOC Response Timeliness for BellSouth Florida LSRs

Test Day	Date	Total LSRs Submitted	LSRs Expected to Receive FOC	FOC		
				Number Received	Number On-Time	Percent On-Time
Normal Day-1	8/16/01	100	98	98	98	100%
Normal Day-1	10/30/01	100	97	97	96	98.97%
Normal Day-1	12/5/01	99	93	92	90	97.83%
Normal Day-1	12/20/01	95	94	94	94	100%
Normal Day-2	1/10/02	96	95	90	88	97.78%
Normal Day-2	1/28/02	98	94	93	93	100%
Peak Day	2/25/02	1,876	1,686	1,686	1,686	100%
Peak Day	3/19/02	2,466	2,305	2,305	2,305	100%
Sub-Total		**4,930**	**4,562**	**4,555**	**4,550**	**99.89%**
Stress Day	4/9/02	3,884	3,367	3,340	3,339	99.99%
Stress Day	4/25/02	5,034	4,781	4,773	4,773	100%
Total		**13,848**	**12,710**	**12,668**	**12,662**	**99.95%**

Notes:

1. The number of LSRs submitted expected to receive FOCs does not include intentional errors submitted.

2. The number of LSRs submitted expected to receive FOCs does not include submitted orders that were not flow-through eligible.

3. KPMG Consulting applied a benchmark for receipt of responses (FOC, CLR, or ERR) of 99%.

4. The O-9 SQM standard for FOC timeliness is 95% received within 3 hours.

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Table 2-37: LENS ERR/CLR Response Timeliness for BellSouth Florida LSRs

Test Day	Date	Total LSRs Submitted	LSRs Expected to Receive ERR/CLR	ERR/CLR		
				Number Received	Number On-Time	Percent On-Time
Normal Day-1	8/16/01	100	2	2	2	100%
Normal Day-1	10/30/01	100	3	3	3	100%
Normal Day-1	12/5/01	99	6	5	2	40.00%
Normal Day-1	12/20/01	95	1	1	1	100%
Normal Day-2	1/10/02	96	1	6	5	83.00%
Normal Day-2	1/28/02	98	4	4	4	100%
Peak Day	2/25/02	1,876	190	190	179	94.00%
Peak Day	3/19/02	2,466	140	140	140	100%
Sub-Total		**4,930**	**347**	**351**	**336**	**95.73%**
Stress Day	4/9/02	3,884	513	513	N/A	N/A
Stress Day	4/25/02	5,034	205	205	205	100%
Total		**13,848**	**1,065**	**1,069**	**541**	**97.30%**

Notes:

1. KPMG Consulting applied a benchmark for receipt of responses (FOC, CLR, or ERR) of 99%.

2. The O-8 SQM standard for ERR/CLR timeliness is 97% received within 1 hour.

3. The timeliness total excludes April 9, 2002 testing. All expected ERR/CLRs were received.

5.0   Parity Evaluation

A parity evaluation was not required for this test.

6.0   Final Summary

This section summarizes the number of test evaluation criteria discussed above and the number that was satisfied or not satisfied at the conclusion of this test.

6.1   Summary of Findings

There were 38 evaluation criteria considered for the POP Volume Performance Test (TVV2). All 38 criteria received a satisfied result.

As all evaluation criteria are satisfied, KPMG Consulting considers the Pre-Order, Order and Provisioning (POP) Volume Performance Test (TVV2) test area satisfied at the time of the final report delivery.

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E.   Test Results: Order Flow-Through Evaluation (TVV3)

1.0   Description

The Order Flow-Through Evaluation (TVV3) assessed the ability of mechanized orders, submitted via the Electronic Data Interchange (EDI), the Telecommunications Access Gateway (TAG), and the Local Exchange Navigation System (LENS)[231], to flow from Alternative Local Exchange Carriers (ALEC) through the interface and into BellSouth's ordering system without manual intervention. Orders eligible to flow-through are defined in the BellSouth Business Rules for Local Ordering (BBR-LO)[232] and the Service Quality Measurement Plan's (SQM's) Local Service Request (LSR) Flow-Through Matrix[233]. Only orders submitted by KPMG Consulting that were eligible to flow-through were included in this evaluation. The list of order types eligible to flow-through was updated during the testing period due to BellSouth documentation changes. Such changes were incorporated into the test as they occurred. Supplements and cancels designed to flow-through were also submitted. KPMG Consulting monitored all flow-through eligible order transactions submitted during the Pre-Order, Order, and Provisioning (POP) Functional Evaluation (TVV1) to verify that the orders flowed through in accordance with BellSouth documentation.

In addition, an analysis of the BellSouth retail ordering functionality was conducted to compare the flow-through capabilities of the retail and wholesale systems.

The Order Flow-Through Evaluation (TVV3) results are intended to reflect the KPMG Consulting ALEC experience. The Metrics Calculations Verification and Validation Review (PMR5) evaluated BellSouth's actual metrics calculations based on the definitions in the BellSouth Operation Support Systems (OSS) Testing SQM[234].

2.0   Business Process

This section describes BellSouth's order flow business process.

2.1   Business Process Description

The following diagrams illustrate the process and system flow for a wholesale, mechanized order from submission through service order generation. Figure 3-1 illustrates the system flow for Digital Subscriber Line (xDSL) orders, and Figure 3-2 illustrates the system flow for Local Number Portability (LNP) orders and all other LSRs.

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[231]As of April 3, 2002, the FPSC has removed RoboTAG from the Florida OSS test (Order # PSC-02-0450-PCO-TP).
[232]BBR-LO, Issue 9K, 9L, 9M, 9N, 9O, 9P, 9Q, 9R, 9S, Release 10.4 and Release 10.5.
[233]BellSouth's Service Quality Measurement Plan LSR Flow-Through Matrix, issued October 2000, and Revised Interim Performance Metrics, Version 3.0, approved by the Florida Public Service Commission on June 1, 2001.
[234]Revised Interim Performance Metrics Version 3.0, approved by the Florida Public Service Commission on June 1, 2001.

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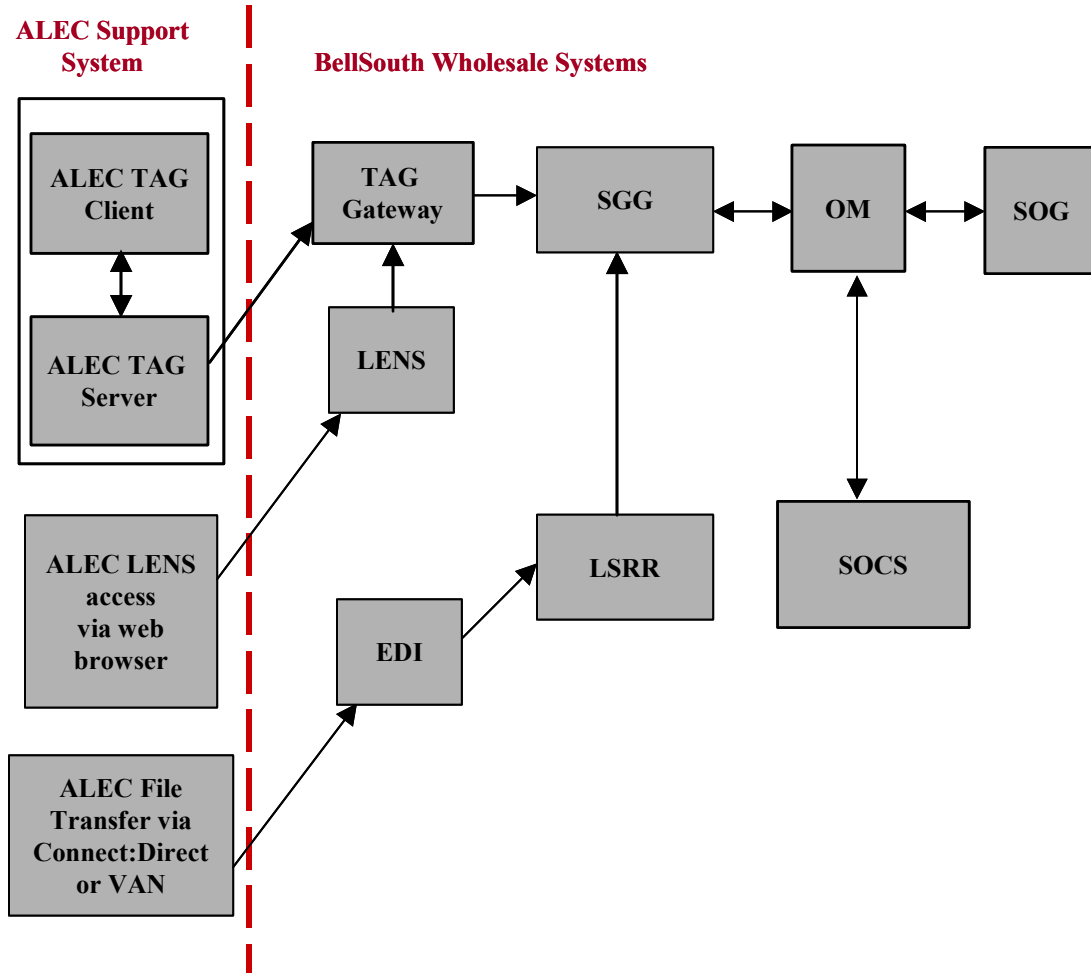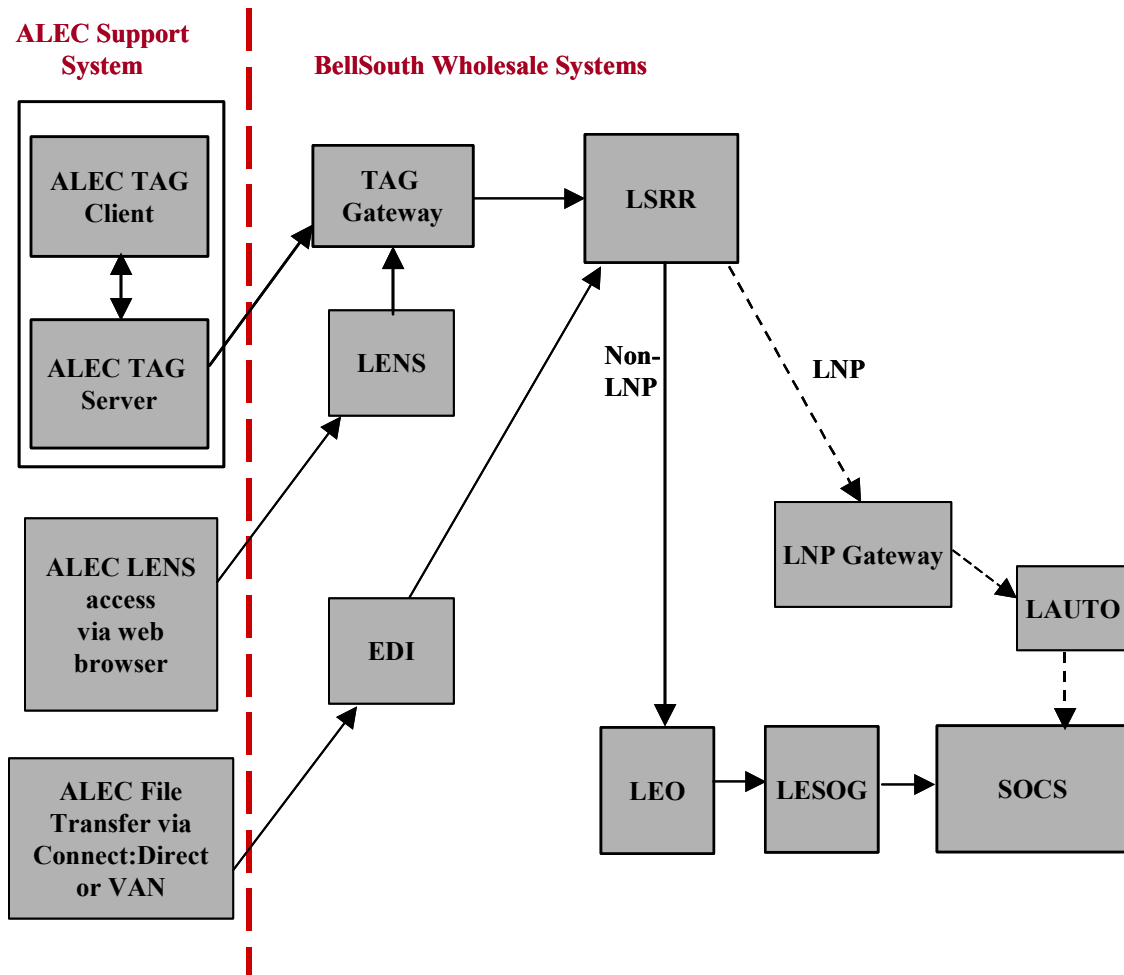*Figure 3-1: Process Systems Flow for a Wholesale Mechanized xDSL Order*

Figure 3-2: Process Systems Flow for a Wholesale Mechanized Order (non-xDSL)

2.1.1   LSR Submission

ALECs enter wholesale orders into the BellSouth OSS via one of several interfaces. An ALEC uses the BellSouth LSR Flow-Through Matrix to determine if a product is eligible to be ordered electronically. If a product is not eligible for electronic ordering, the ALEC must submit the order to BellSouth via the Local Carrier Service Center (LCSC) or the Complex Resale Support Group (CRSG), using the BBR-LO. The LSR Flow-Through Matrix designates products that can be electronically ordered as flow-through eligible or not flow-through eligible.

All orders sent through EDI enter BellSouth's OSS through the Local Service Request Router (LSRR). ALEC orders not submitted for Digital Subscriber Line (xDSL) service sent via LENS and TAG are directed from BellSouth's TAG software to LSRR. ALEC orders submitted for xDSL service sent via LENS and TAG are directed from BellSouth's TAG software to the ServiceGate Gateway (SGG).

2.1.2   LSR Order Processing (except LNP and xDSL)

Following entry of orders into the OSS via LSRR, flow-through eligible orders travel through the Local Exchange Ordering (LEO) system and the Local Exchange Service Order Generator (LESOG) to receive a Firm Order Confirmation (FOC) without human intervention.

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LEO and LESOG edit the order for validity. LEO performs the first edit checks that an order receives within the BellSouth systems to determine whether data received on the LSR is correctly formatted and complete. The LEO edits check the LSR for compliance with technical interface specifications[235] and applicable business rules[236], which are used to define format and content requirements for the form and fields. If an error is detected in LEO, the order is returned to the originating ALEC with a Fatal Reject (ERR) error response.

An order that passes LEO edits continues on to LESOG. This system formats the service request into BellSouth service order record format and passes the order to the Service Order Communications System (SOCS) for further processing. If an error on the LSR is detected in LEO or LESOG, the ALEC may receive an Auto-Clarification (CLR), which is a system response requesting corrections or additional information. An order that does not pass edit checks may also fall out for manual processing by representatives in the LCSC. An LCSC representative may either pass the order to SOCS or return a clarification to the originating ALEC. When an ALEC receives an error or clarification, the ALEC is required to revise the order and resubmit.

2.1.3   LNP Order Processing

Mechanized LNP orders submitted through EDI, TAG, or LENS are routed from LSRR to the LNP Gateway instead of to LEO. The LNP Gateway retrieves information related to the LNP request. After passing through the LNP Gateway, LNP orders are passed to the LNP Automation (LAUTO) system to be formatted into BellSouth service order record format. LAUTO then sends the order to SOCS for processing. If an order fails within the LNP Gateway, an Auto CLR is issued or the order falls for manual handling in the LCSC.

2.1.4   xDSL Order Processing

Mechanized xDSL orders submitted via EDI are routed from LSRR to SGG. Orders for xDSL service submitted via TAG and LENS are directed from BellSouth's TAG software to the SGG. xDSL orders submitted via EDI undergo format and completeness edits in SGG to determine whether data received on the LSR is correctly formatted and complete. BellSouth's TAG software performs the comparable edits on xDSL orders submitted via TAG and LENS. SGG formats the request and then passes the orders to the Order Manager (OM), which provides the centralized coordination point for retrieving and acting on the data from the supporting OSSs. OM sends requests to the Service Order Generator (SOG), which formats the service request into BellSouth service order record format and sends it back to OM, which passes the order to SOCS for processing. If an order fails during this process, an Auto CLR is issued or the order falls for manual handling in the LCSC.

2.1.5   Service Order Creation

All order types are sent to SOCS, the BellSouth system that maintains and routes service order images to various BellSouth systems during the provisioning process. SOCS performs service request provisioning activity for BellSouth retail and wholesale orders. If an ALEC order passes edits in SOCS, a service order is generated and a FOC is returned to the ALEC.

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[235]Interface documents that support ordering include the BellSouth EDI Specifications - TCIF 9, the TAG API, and the LENS User Guide.
[236]BellSouth Business Rules for Local Ordering.

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3.0   Methodology

This section summarizes the test methodology.

3.1   Scenarios

The Order Flow-Through Evaluation (TVV3) examined test cases submitted as part of the POP Functional Evaluation (TVV1). Expected results for these test cases were determined using publicly available BellSouth order flow-through documentation. See Table 3-1, 3-2, and 3-3 for the transaction types tested in the Order Flow-Through Evaluation (TVV3).

Table 3-1: Resale Order Flow-Through Test Case Scenarios

Activity	Res. POTS	Bus. POTS	Res. ISDN	Bus. ISDN	Centrex	Private Line	PBX
Migration from BellSouth "as is"	X	X	X	X	X		X
ALEC to ALEC migration	X	X					
Feature changes to existing customer	X	X			X		
Migration from BellSouth "as specified"	X	X	X	X			
New customer	X	X			X	X	
Telephone number change	X	X					
Directory change	X	X			X		
Add lines/trunks/circuits	X	X	X	X	X	X	X
Suspend/restore service	X	X					
Disconnect (full and partial)	X	X	X	X	X	X	X
Moves (inside and outside)	X	X					
Convert line to ISDN			X	X			
Migrate from ALEC to BellSouth	X	X					

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Table 3-2: Unbundled Network Element (UNE) Order Flow-Through Test Case Scenarios

Activity	Res. Analog Loop	Bus. Analog Loop	Res. xDSL Capable Loop	Bus. xDSL Capable Loop	Bus. DS1 Loop	Line Sharing [237]	UDC [238]	EEL [239]	Inter-office Facilility
Migration from BellSouth without number porting	X	X	X	X	NA [240]			X	
Migration from BellSouth with INP[241]	NA	NA			NA				
Migration from BellSouth with LNP[242]	X	X			NA [243]				
Migration from ALEC to ALEC	X	X				X			
Add new loops to existing customer	X	X	X	X	X			X	
Add new interoffice DS1/DS3 facilities									X
Purchase loops for a new customer	X	X	X	X	X	X	X	X	
Disconnect (full and partial)	X	X			X			X	NA[244]
Moves (inside and outside)	X	X			X				
Standalone directory change	X	X							
Standalone INP	X	X							
Standalone LNP	X	X							
Convert from UNE-P to UNE loop	X	X							
Convert from Resale to UNE loop	X	X							

---

[237]Line Sharing was added to the BBR-LO in Issue 9I on October 12, 2000.

[238]Unbundled Digital Channel (UDC) was added to the BBR-LO in Issue 9E on July 17, 2000.

[239]Enhanced Extended Link (EEL) was added to the BBR-LO in Issue 9E on July 17, 2000.

[240]BellSouth does not support migration of DS1 facilities.

[241]BellSouth no longer offers Interim Number Portability (INP).

[242]Local Number Portability (LNP).

[243]BellSouth does not support migration of DS1 facilities.

[244]KPMG Consulting was unable to obtain facilities from BellSouth to support Interoffice Facility (IOF) disconnects.

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Table 3-3: UNE-Platform (UNE-P) Order Flow-Through Test Case Scenarios

Activity	Res. POTS	Bus. POTS	Res. ISDN	Bus. ISDN	PBX[245]	DID[246]	DID Trunks[247]
Migration from BellSouth "as is"	X	X	X	X	X	X	X
Migrate from ALEC to ALEC	X	X					
Feature changes to existing customer	X	X					
Migration from BellSouth "as specified"	X	X	X	X			
New customer	X	X	NA[248]	NA			
Telephone number change	X	X					
Directory change	X	X					
Add lines/trunks/circuits	X	X	X	X			X
Suspend/restore service	X	X					
Disconnect (full and partial)	X	X	X	X			
Moves (inside and outside)	X	X					
Convert line to ISDN			X	X			
Migrate from ALEC to BellSouth	X	X					
Convert from Resale to UNE-P	X	X	NA[249]	NA			

3.2   Test Targets and Measures

The test target was the order flow-through performance of Unbundled Network Element (UNE), Residential, Business[250], and LNP orders. Measures were verified in the test by using the following processes and sub-processes:

♦   Flow-through documentation;

♦   Transaction flow-through process;

  ♦   Residential and business resale products and services flow-through orders;

  ♦   Residential and business UNE-Platform (UNE-P) products and services flow-through orders;

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[245]UNE-P PBX was added to the BBR-LO in Issue 9J on December 1, 2000.

[246]UNE-P DID was added to the BBR-LO in Issue 9J on December 1, 2000.

[247]UNE-P DID Trunks were added to the BBR-LO in Issue 9J on December 1, 2000.

[248]BellSouth does not offer new Integrated Switch Digital Network (ISDN) accounts using UNE-P.

[249]BellSouth does not support conversion from Resale ISDN to UNE-P ISDN.

[250]The residential and business elements of the test included resale and UNE-Platform.

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♦ Loop products and services flow-through orders; and

♦ LNP flow-through orders.

3.3 Data Sources

The data collected for the test included the following:

♦ BellSouth Business Rules for Local Ordering;

♦ Service Quality Measurements LSR Flow-Through Matrix;

♦ KPMG Consulting POP Functional Evaluation (TVV1) test cases;

♦ Weekly and monthly flow-through reports generated by BellSouth; and

♦ The BellSouth Telecommunications, Inc. OSS Evaluation Project Master Test Plan (MTP), final Version 3.0.

3.4 Data Generation/Volumes

BellSouth and KPMG Consulting performed the following data collection activities for this test:

♦ KPMG Consulting determined flow-through eligibility for each test case and instance prior to submission. This determination was based on publicly available BellSouth flow-through documentation.

♦ KPMG Consulting generated test transactions as part of the POP Functional Evaluation (TVV1) with distinct Purchase Order Numbers (PONs). Information on these PONs was gathered, including FOC and/or CLR and Completion Notice (CN) status.

♦ BellSouth generated a set of reports from March 2001 through May 2002 that identified the actual flow-through status of transactions as Fully Mechanized (FM) or Partially Mechanized (PM)[251] and transmitted these reports to KPMG Consulting.

3.5 Evaluation and Analysis Methods

The evaluation process was composed of the following work steps:

♦ Review BellSouth flow-through documentation[252];

♦ Identify expected flow-through cases based on the BellSouth flow-through documentation;

♦ Develop a report and validation process to track flow-through status;

♦ Submit transactions via EDI, TAG, LENS, and RoboTAG[253];

♦ Receive and analyze the BellSouth flow-through report;

♦ Compare expected flow-through outcome to actual flow-through outcome;

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[251]These reports included the monthly LSR detail reports produced as a part of Ordering Measure O-6: CLEC LSR Information of the Revised Interim Performance Metrics, Version 3.00, Issued June 2001, as well as weekly reports requested by KPMG Consulting.
[252]BellSouth Business Rules for Local Ordering and the SQM LSR Flow-Through Matrix.
[253]As of April 3, 2002, the FPSC has removed RoboTAG from the Florida OSS test (Order # PSC-02-0450-PCO-TP). Further testing of through this interface was suspended.

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♦ Generate a set of reports providing data on expected, unexpected, and missing PONs;

♦ Identify and analyze unexpected results;

♦ Issue observations or exceptions when applicable;

♦ Monitor retests for unexpected results when a system fix or documentation change is issued by BellSouth in response to an observation or exception; and

♦ Perform analysis on flow-through findings to determine if evaluation criteria were satisfied.

The Order Flow-Through Evaluation (TVV3) included a checklist of evaluation measures developed by KPMG Consulting during the initial phase of the BellSouth OSS Evaluation. These evaluation criteria provided the framework of norms, standards, and guidelines for the Order Flow-Through Evaluation (TVV3).

The data collected were analyzed employing the evaluation criteria detailed in Section 4.1 below.

4.0   Results

This section contains the overall test results.

4.1   Results Summary

The number of exceptions and observations issued during the life of the test is provided in Table 3-4. For additional exception and observation information, refer to Appendices D and E respectively. The test criteria and results are presented in Table 3-5.

Table 3-4: TVV3 Exception and Observation Count

Activity	Exceptions	Observations
Total Issued	5	5
Total Disposed as of Final Report Date	2	5
Total Remaining Open as of Final Report	3	0

Table 3-5: TVV3 Evaluation Criteria and Results

Test Reference	Evaluation Criteria	Result	Comments
TVV3-1	BellSouth systems process residential resale and UNE-P order transactions in accordance with published flow-through rules.	Satisfied	BellSouth systems process residential resale and UNE-P order transactions in accordance with published flow-through rules. KPMG Consulting used the O-3: Percent Flow-Through Service Requests (Summary) SQM standard for residential resale and UNE-P order transactions. The standard is 95% flow-through. During the initial production testing from March 13, 2001 through November 25, 2001, KPMG Consulting issued 696 residential resale

Test Reference	Evaluation Criteria	Result	Comments
			and UNE-P orders that were expected to flow-through BellSouth systems. Of the 696 orders, 577 (82.90%) flowed through.
			Exception 86 was issued to detail that BellSouth's performance on residential flow-through through June 29, 2001 was below the SQM standard. BellSouth's response to Exception 86 indicated that defects and features were implemented in releases in September 2001 and November 2001 to address flow-through problems.
			KPMG Consulting began retesting on November 26, 2001. During production retesting from November 26, 2001 through February 17, 2002, KPMG Consulting issued 221 residential resale and UNE-P orders that were expected to flow-through BellSouth systems. Of the 221 orders, 188 (85.07%) flowed through.
			Based on retesting results through January 4, 2002, KPMG Consulting amended Exception 86. The amendment noted that BellSouth's performance on residential flow-through was below the SQM standard of 95%. BellSouth's response to Amended Exception 86 indicated that a defect modification was completed in a release in February 2002 to address orders that fell out for manual handling due to a calculate due date problem.
			KPMG Consulting began a second retest on February 28, 2002. During the production second retest from February 28, 2002 through May 15, 2002, KPMG Consulting issued 442 residential resale and UNE-P orders that were expected to flow-through BellSouth systems. Of the 442 orders, 417 (94.34%) flowed through.
			Based on retesting results through March 31, 2002, KPMG Consulting issued Third Amended Exception 86. The amendment noted that BellSouth's performance on residential flow-through was below the SQM standard. BellSouth's response noted that some planned manual fall-out items should be excluded from calculations. The response also indicated that a documentation defect would be corrected in May 2002, LCSC methods and procedures would be updated in May 2002, and BellSouth

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Test Reference	Evaluation Criteria	Result	Comments
			would provide additional training to representatives who handled LSRs in error.
			Following BellSouth's response, KPMG Consulting determined that during the full second retest, conducted from February 28, 2002 through May 15, 2002, BellSouth's residential flow-through performance was 94.34%. Although the test percentage is below the benchmark of 95%, the statistical evidence is not strong enough to conclude that the performance is below the benchmark with 95% confidence. The inherent variation in the process is large enough to have produced the substandard result, even with a process that is operating above the benchmark standard. The p-value, which indicates the chance of observing this result when the benchmark is being met, is 0.2920, above the 0.0500 cut-off for a statistical conclusion of failure.
			Exception 86 is closed.
			See Table 3-6: Detailed Results for Residential Products for additional details.
TVV3-2	BellSouth systems process UNE[254] order transactions in accordance with published flow-through rules.	Not Satisfied	BellSouth systems do not process UNE order transactions in accordance with published flow-through rules.
			KPMG Consulting used the O-3: Percent Flow-Through Service Requests (Summary) SQM standard for UNE order transactions. The standard is 85% flow-through.
			During the initial production testing from March 13, 2001 through November 25, 2001, KPMG Consulting issued 566 UNE orders that were expected to flow-through BellSouth systems. Of the 566 orders, 416 (73.50%) flowed through. The initial flow-through test did not include Digital Subscriber Line (DSL) orders.
			Exception 122 was issued detailing that BellSouth did not provide flow-through classification information on the LSR Detail Report[255] for DSL orders. Exception 122 remains open pending corrective action taken

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[254]UNE transactions include analog and digital loops.
[255]Ordering Measure O-6 of the SQM Plan.

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Test Reference	Evaluation Criteria	Result	Comments
			by BellSouth.
			During production retesting from November 26, 2001 through February 17, 2002, KPMG Consulting issued 196 UNE orders that were expected to flow-through BellSouth systems. Of the 196 orders, 161 (82.14%) flowed through.
			Exception 136 was issued detailing that BellSouth's performance on UNE flow-through during testing through January 4, 2002 was below the SQM standard. BellSouth's response to Exception 136 indicated that a defect modification was completed in a release in February 2002 to address orders that fell out for manual handling due to a calculate due date problem.
			KPMG Consulting began its second retest on February 28, 2002. During the production second retest from February 28, 2002 through May 15, 2002, KPMG Consulting issued 378 UNE orders that were expected to flow-through BellSouth systems. Of the 378 orders, 282 (74.60%) flowed through.
			Based on retesting results through March 24, 2002, KPMG Consulting issued Second Amended Exception 136. The amendment noted that BellSouth's performance on UNE flow-through was below the SQM standard. BellSouth's response indicated that a system enhancement was opened and implemented on June 1, 2002, to increase the opportunity for flow-through of xDSL migration orders.
			Exception 136 remains open.
			See Table 3-7: Detailed Results for UNE Products for additional details.
TVV3-3	BellSouth systems process business resale and UNE-P order transactions in accordance with published flow-through rules.	Satisfied	BellSouth systems process business resale and UNE-P order transactions in accordance with published flow-through rules.
			KPMG Consulting used the O-3: Percent Flow-Through Service Requests (Summary) SQM standard for business resale and UNE-P order transactions. The standard is 90% flow-through.
			During the initial production testing from March 13, 2001 through November 25, 2001, KPMG Consulting issued 691 business resale

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Test Reference	Evaluation Criteria	Result	Comments
			and UNE-P orders that were expected to flow-through BellSouth systems. Of the 691 orders, 621 (89.87%) flowed through.
			Exception 86 was issued to note that BellSouth's performance on business flow-through through June 29, 2001 was below the SQM standard. BellSouth's response to Exception 86 indicated that defects and features were implemented in releases in September 2001 and November 2001 to address flow-through problems.
			KPMG Consulting began retesting on November 26, 2001. Based on retesting results through January 4, 2002, KPMG Consulting amended Exception 86. The amendment noted that BellSouth's performance on business flow-through was below the SQM standard of 90%. BellSouth's response to Amended Exception 86 indicated that a defect modification was completed in a release in February 2002 to address orders that fell out for manual handling due to a calculate due date problem.
			During the entire production retesting from November 26, 2001 through February 17, 2002, KPMG Consulting issued 199 business resale and UNE-P orders that were expected to flow-through BellSouth systems. Of the 199 orders, 189 (94.97%) flowed through.
			KPMG Consulting conducted a retest of business resale and UNE-P order transactions[256]. KPMG Consulting began its second production retest on February 28, 2002; although business flow-through was not a target of this retest, business transactions were submitted to retest other areas of failure.
			Based on production results through March 31, 2002, KPMG Consulting issued Third Amended Exception 86. The amendment noted that BellSouth's performance on business flow-through was below the SQM standard of 90%. BellSouth's response noted that some planned manual fallout items should be excluded from

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[256]When a test result indicates system and/or representative performance deficiencies for a specific criteria, KPMG Consulting's methodology is to conduct a retest of related evaluation criteria; report results; and issue observations or exceptions.

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Test Reference	Evaluation Criteria	Result	Comments
			calculations. The response also indicated that a documentation defect would be corrected in May 2002, LCSC methods and procedures would be updated in May 2002, and BellSouth would provide additional training to representatives who handled LSRs in error.
			During the entire second production retest from February 28, 2002 through May 15, 2002, KPMG Consulting issued 533 business resale and UNE-P orders that were expected to flow-through BellSouth systems. Of the 533 orders, 487 (91.37%) flowed through.
			Exception 86 is closed.
			See Table 3-8: Detailed Results for Business Products for additional details.
TVV3-4	BellSouth systems process LNP order transactions in accordance with published flow-through rules.	Not Satisfied	BellSouth systems do not process LNP order transactions in accordance with published flow-through rules.
			KPMG Consulting used the SQM standard O-3 for LNP order transactions. The standard is 85% flow-through.
			During production testing from March 13, 2001 through November 25, 2001, KPMG Consulting issued 110 LNP orders that were expected to flow-through BellSouth systems. Of the 110 orders, 79 (71.82%) flowed through.
			Exception 121 was issued detailing that BellSouth's performance on LNP flow-through was below the SQM standard of 85%. BellSouth's response to Exception 121 indicated that KPMG Consulting should exclude several items because the orders were planned fallout. BellSouth also posted a red-line SQM to clarify LNP planned manual fallout on supplemental (SUP) orders.
			Based on BellSouth's response, KPMG Consulting conducted an LNP flow-through retest. During the LNP flow-through retest from November 30, 2001 through April 30, 2002, KPMG Consulting issued 34 LNP orders that were expected to flow-through BellSouth systems. Of the 34 orders, 26 (76.47%) flowed through.
			KPMG Consulting issued Amended Exception 121 to note that BellSouth's LNP flow-through retest performance was below the SQM

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Test Reference	Evaluation Criteria	Result	Comments
			standard of 85%. Exception 121 remains open. See Table 3-9: Detailed Results for LNP Products for additional details.
TVV3-5	BellSouth flow-through documentation is complete, accurate, and clear.	Satisfied	BellSouth flow-through documentation is complete, accurate, and clear. KPMG Consulting evaluated order flow-through documentation available on the BellSouth website. During KPMG Consulting's initial review of BellSouth's flow-through documentation, the documentation was found to be incomplete and inconsistent, and Exception 33 was issued. BellSouth updated the LSR Flow-Through Matrix to include missing information and updated product flow-through information in the LSR Flow-Through Matrix[257] to address the issues identified in Exception 33. KPMG Consulting found that the documentation was updated and is complete. Exception 33 was closed.

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[257]BellSouth's SQM Plan LSR Flow-Through Matrix, June 2001.

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4.2   Additional Data

Table 3-6: Detailed Results for Residential Products

Initial Test: March 13, 2001 – November 25, 2001	
Number of Expected Flow-Through FOCs	696
Number of Flow-Through FOCs	577
Percent Flow-Through	82.90%
SQM Benchmark	95%
First Retest: November 26, 2001 – February 17, 2002	
Number of Expected Flow-Through FOCs	221
Number of Flow-Through FOCs	188
Percent Flow-Through	85.07%
SQM Benchmark	95%
Second Retest: February 28, 2002 – May 15, 2002	
Number of Expected Flow-Through FOCs	443
Number of Flow-Through FOCs	417
Percent Flow-Through	94.13%
SQM Benchmark	95%

Table 3-7: Detailed Results for UNE Products

Initial Test: March 13, 2001 – November 25, 2001	
Number of Expected Flow-Through FOCs	566
Number of Flow-Through FOCs	416
Percent Flow-Through	73.50%
SQM Benchmark	85%
First Retest: November 26, 2001 – February 17, 2002	
Number of Expected Flow-Through FOCs	196
Number of Flow-Through FOCs	161
Percent Flow-Through	82.14%
SQM Benchmark	85%
Second Retest: February 28, 2002 – May 15, 2002	
Number of Expected Flow-Through FOCs	378
Number of Flow-Through FOCs	282
Percent Flow-Through	74.60%
SQM Benchmark	85%

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Table 3-8: Detailed Results for Business Products

Initial Test: March 13, 2001 – November 25, 2001	
Number of Expected Flow-Through FOCs	691
Number of Flow-Through FOCs	621
Percent Flow-Through	89.87%
SQM Benchmark	90%
First Retest: November 26, 2001 – February 17, 2002	
Number of Expected Flow-Through FOCs	199
Number of Flow-Through FOCs	189
Percent Flow-Through	94.97%
SQM Benchmark	90%
Second Retest: February 28, 2002 – May 15, 2002	
Number of Expected Flow-Through FOCs	533
Number of Flow-Through FOCs	487
Percent Flow-Through	91.37%
SQM Benchmark	90%

Table 3-9: Detailed Results for LNP Products

Initial Test: March 13, 2001 – November 25, 2001	
Number of Expected Flow-Through FOCs	110
Number of Flow-Through FOCs	79
Percent Flow-Through	71.82%
SQM Benchmark	85%
Retest: November 26, 2001 – April 30, 2002	
Number of Expected Flow-Through FOCs	34
Number of Flow-Through FOCs	26
Percent Flow-Through	76.47%
SQM Benchmark	85%

5.0   *Parity Evaluation*

KPMG Consulting conducted a retail-wholesale functionality comparison as included in the Master Test Plan. This comparison found that retail order requests entered into the BellSouth

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systems by retail customer contact representative result in a service order format that can be transmitted directly to SOCS.

ALECs use the industry-standard LSR format to submit wholesale orders via electronic interfaces. The LSR goes through an edit and service order generation process to translate the LSR into a service order format that is then transmitted directly to SOCS.

Retail orders do not experience fallout that can be compared to the fallout experienced by wholesale orders. Retail orders can only have an message returned to the same retail representatives who submitted the orders. Wholesale orders can have an error message returned to the originating ALEC representative, or they can drop to the LCSC for manual handling.

The wholesale equivalents of the BellSouth retail representatives are the representatives in the LCSC. The LCSC representatives process the LSRs that have fallen out of the wholesale ordering systems and input these requests, using a BellSouth service order negotiation system, into a SOCS compatible service order format that is directly transmitted to SOCS.

6.0   Final Summary

This section summarizes the number of test evaluation criteria discussed above and the number that was satisfied or not satisfied at the conclusion of this test.

6.1   Summary of Findings

There were five evaluation criteria considered for the Order Flow-Through Evaluation (TVV3). Three evaluation criteria received a satisfied result. Two evaluation criteria received a not satisfied result.

Due to the not satisfied evaluation criteria (TVV3-2 and TVV3-4), it is KPMG Consulting's opinion that significant issues remain unresolved in the TVV3 testing area.

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