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November 1, 2002

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

Dear Mrs. Bayo:

RE: Investigation into the establishment of operations support systems permanent performance measures for incumbent local exchange telecommunications companies (BellSouth Track)
Docket No. 000121A-TL

AT&T Communications of the Southern States, LLC hereby files the attached courtesy copy of the "CLEC Comments on BellSouth's Proposed November PMAP Changes" filed on October 21, 2002 with the Georgia Public Service Commission in Docket No. 7892-U.

Please stamp the extra copy and return to Lisa Riley in the enclosed envelope. Thank you and please contact Ms. Riley on 404-810-7812 if there are any questions regarding this matter.

Sincerely,

Virginia Tate / AD
Virginia Tate

Enclosures

cc: Parties of Record

DOCUMENT NUMBER DATE
12053 NOV-48
EPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. mail on this 1st day of November 2002 to:

(*) Blanca S. Bayo
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Tallahassee, FL 3239-0850

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October 21, 2002

BY HAND DELIVERY

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334

RECEIVED

OCT 21 2002

EXECUTIVE SECRETARY
G.P.S.C.

Re: Performance Measurements for Telecommunications Interconnection,
Unbundling and Resale; Docket No. 7892-U

Dear Mr. McAlister:

Enclosed for filing please find CLEC Comments on BellSouth's Proposed November PMAP Changes in the above-referenced docket.

I have enclosed an original, fifteen (15) copies and enclosed a diskette containing electronic versions of all the documents associated with this filing. After filing the originals, please return two additional copies stamped "filed".

Thank you for your assistance in this matter.

Very truly yours,

Suzanne W. Ockleberry

cc: Parties of Record

RECEIVED

OCT 21 2002

**EXECUTIVE SECRETARY
G.P.S.C.**

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

IN RE: Performance Measurements for)
Telecommunications Interconnection,) **Docket No. 7892-U**
Unbundling and Resale)

**CLEC COMMENTS ON BELL SOUTH'S
PROPOSED NOVEMBER PMAP CHANGES**

Comes Now AT&T Communications of the Southern States, LLC, Birch Telecom, Inc., and MCI WorldCom (collectively "CLECs") pursuant to the Commission Order issued in the above referenced docket on July 19, 2002, and file these Comments seeking to have this Commission reject BellSouth's Proposed November Revisions to the Performance Measurement Analysis Platform ("PMAP"), Item 28 and clarify Item 29.

As part of the July 19, 2002 Order establishing a procedure for implementation of changes to BellSouth's performance measurement calculations, the Commission determined that any change BellSouth makes in response to the audit conducted by KPMG Consulting will be deemed automatically approved. (See: *Order Establishing a procedure for Implementation of Changes to BellSouth's performance Measurement Calculations*, dated July 19, 2002, p. 4). However, BellSouth is inappropriately classifying PMAP changes as being required in response to the KPMG audit, thereby circumventing the 60 day review cycle and approval process required for BellSouth proposed changes as provided for in the July 19, 2002 Commission Order.

For example, BellSouth, in its October 1, 2002¹ filing with this Commission setting forth the proposed November changes, BellSouth indicated that Item 28 addressed

¹ BellSouth also addressed this item in its October 16, 2002 filing.

issues raised in the Florida OSS Testing Evaluation, Observation 176, hereto attached as Exhibit A. Specifically, BellSouth indicated that the Service Quality Measures (SQM) required the exclusion of all disconnects and that currently, "C" orders with disconnect entries are not being excluded. (See *BellSouth October 1, 2002 filing*, p. 12)

As an initial matter, the SQMs for both Georgia and Florida explicitly indicate that "D" and "F" orders are to be excluded, and make no mention of "C" or change orders. Secondly, Observation 176 does not address the issue of appropriate exclusions. The Observation was issued on March 19, 2002 because KPMG found BellSouth's Raw Data User's Manual insufficient for calculating the Average Completion Notice Interval (P-4) metric. BellSouth's March 25, 2002 response to the Observation indicated that it had updated the instructions. However, when KPMG still could not replicate the Average Completion Notice Interval (P-4) metric when it re-tested using March data as suggested by BellSouth, it issued an amended Observation on June 6, 2002 which indicated that it had been unable to replicate BellSouth's reported values due to the existence of one record for non-mechanized retail orders. BellSouth then responded on June 17, 2002 that one record has been misclassified due to a missing CLEC identifier that caused it to be classified as a BellSouth record. (See Exhibit A for KPMG Observation, BellSouth Response, KPMG Amended Observation and BellSouth Response to Amended Observation).

However, BellSouth does not state in its proposed November PMAP changes that the solution for Observation 176 is to correct a misclassification of a CLEC record as a BellSouth record as was recorded in its response to KPMG. Rather, BellSouth instead proposes the exclusion of an entire set of records, not previously excluded at all and not

required by the Florida or Georgia SQM. Additionally, BellSouth has also expanded this issue from the one metric (P-4) identified in Observation 176 and applied it to 6 metrics in its proposed November PMAP changes.

Based on the information contained in Observation 176 and BellSouth's Responses thereto, CLECs vehemently disagrees that BellSouth's proposed November PMAP change as outlined in Item 28 is necessary to satisfy Observation 176. Nor should BellSouth be permitted to make unilateral changes to its SQM. Finally, CLECs request that this Commission require that BellSouth, on all future conference calls discussing PMAP Changes, review the specific KPMG exception or Observation documentation which justifies the change and specifically delineate why such change(s) is necessary to satisfy the observation or exception.²

In its October 16, 2002 filing³, BellSouth partially corrected the exclusions described in Item 29 to the Jeopardy Interval Measure (P2-A in Georgia). Exclusion (ii) now states "Exclusion of orders when the jeopardy condition was identified on the commitment date." However, it is unclear if this exclusion is appropriately capturing the information required by this Commission. The exclusion in P2-A states: "Orders with Jeopardy Notice when jeopardy is identified on the due date. *This exclusion only applies when the technician on premises has attempted to provide service but must refer to Engineer or Cable Repair for facility jeopardy.*" (Emphasis added) CLECs request that

² Similarly, the CLECs note that Item 30 states that it addressed Florida Observation 180. However, BellSouth responded on May 8 that it was red-lining its Florida Interim SQM to clarify its process and that effective with March data was changing its process to "include all orders that affect DA, LIDB, or Directory Listing on the list of orders to be reviewed for the Database Update Accuracy report regardless of whether or not there is an error on the service order." Consequently, KPMG noted on its Observations and Exceptions Status Report that as of June 26, 2002, no further action was required. Therefore, it is unclear how BellSouth's proposed November activity described in Item 30 is necessary to satisfy Observation 180. (See attached observation)

³ BellSouth made a filing in this docket on October 16, 2002 to address questions raised by workshop participants as a result of the Data notification workshop held on October 7, 2002.

this Commission require that BellSouth confirm that it has coded its PMAP system to include this limitation on this exclusion.⁴

Finally, in its October 16, 2002 filing, BellSouth addressed the issue of the availability of raw data for excluded items. BellSouth has mischaracterized the purpose of raw data by stating that “the purpose of providing raw data is to enable the CLECs to replicate BellSouth’s performance calculations.” However, in the May 7, 2002 Order in this docket addressing Motions for Reconsideration and Clarification, this Commission clearly stated that “The Commission ordered that BellSouth shall provide access to all of the available raw data (e.g., PMAP, Data Warehouse, raw data) and information necessary for a carrier receiving Performance Reports to *verify the accuracy* of such reports...”⁵ The accuracy of BellSouth’s reports cannot be verified by merely replicating the reports that relied on the data BellSouth chooses to include. The excluded data is also necessary to verify that exclusions have been applied properly and that the underlying data used to produce the reports is accurate and complete. Only then is it meaningful to ensure that the reports have been properly calculated and that those calculations can be replicated. BellSouth completed the unilateral removal of “excluded” data from its raw data files in April 2002, and will not be providing this Commission-ordered information until one year later, in 2003. The Commission should require BellSouth to expedite the process of providing the “excluded” data sooner than 2003.

This 21st day of October, 2002.

CLEC COALITION

⁴ These exclusions have been requested but have not been approved in Florida.

⁵ See May 7, 2001 Order in Docket 7892-U.

Wack

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swo*

Date: March 19, 2002

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review. (PMR5)

Observation:

KPMG Consulting cannot replicate the values in the "Provisioning: Average Completion Notice Interval" Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001). KPMG Consulting found that BellSouth's instructions in the Raw Data User Manual are insufficient for calculating the metrics values for this SQM. (PMR5)

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. The Florida Public Service Commission mandates that BellSouth publish monthly performance measurement reports of SQM values for the Competitive Local Exchange Carriers (CLECs) engaged in business activity with BellSouth in the State of Florida.¹ BellSouth provides CLEC Aggregate processed data² (PMAP raw data³) as requested to KPMG Consulting.

Issue:

KPMG Consulting found the computation instructions for the "Provisioning: Average Completion Notice Interval" SQM to be insufficient for calculating metrics values.

BellSouth's instructions in the Raw Data User Manual (RDUM) do not clearly address how users should calculate values reported in the ACNI Mech and Non Mech reports.

- Step five of the RDUM states,
Filter on mechztn_id field to identify mechanization of the service request.
 - *For Mechanized, only include mechztn_id = 0*
 - *For Non-mechanized only include, mechztn_id = 2*

¹ These reports are posted on the PMAP Web site.

² The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data."

³ The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the September 25, 2001 version 2.1.09 of the Manual.

OBSERVATION 176
BellSouth Florida OSS Testing Evaluation

- *For Partially-mech only include, mechztn_id = 1*

There are three categories listed in the instructions, but only two reports posted, making it unclear which mechztn_ids should be used with which reports.

In August 2001 data, KPMG Consulting also identified records coded with mechztn_id=3. This mechztn_id is not mentioned in the RDUM and it is unclear how the end user should treat this data.

Without adequate instructions, KPMG Consulting is unable to replicate metrics values for this SQM.

KPMG Consulting will attempt replication of this metric with data from PMAP 4.0 when it becomes available.

Impact:

BellSouth's insufficient documentation prevents CLECs from calculating the metrics values for the "Provisioning: Average Completion Notice Interval" SQM. Without accurate documentation, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

**FLORIDA OSS BELLSOUTH'S RESPONSE TO OBSERVATION
176**



Florida OSS Test
Observation 176

March 25, 2002

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review. (PMR5)

Observation:

KPMG Consulting cannot replicate the values in the "Provisioning: Average Completion Notice Interval" Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001). KPMG Consulting found that BellSouth's instructions in the Raw Data User Manual are insufficient for calculating the metrics values for this SQM. (PMR5)

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. The Florida Public Service Commission mandates that BellSouth publish monthly performance measurement reports of SQM values for the Competitive Local Exchange Carriers (CLECs) engaged in business activity with BellSouth in the State of Florida.¹ BellSouth provides CLEC Aggregate processed data² (PMAP raw data³) as requested to KPMG Consulting.

Issue:

KPMG Consulting found the computation instructions for the "Provisioning: Average Completion Notice Interval" SQM to be insufficient for calculating metrics values.

BellSouth's instructions in the Raw Data User Manual (RDUM) do not clearly address how users should calculate values reported in the ACNI Mech and Non Mech reports.

Step five of the RDUM states,
*Filter on mechztn_id field to identify mechanization of the service request.
For Mechanized, only include mechztn_id = 0*

¹ These reports are posted on the PMAP Web site.

² The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data."

³ The PMAP Raw Data User Manual includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the September 25, 2001 version 2.1.09 of the Manual.

FLORIDA OSS BELLSOUTH'S RESPONSE TO OBSERVATION 176

For Non-mechanized only include, mechztn_id = 2

For Partially-mech only include, mechztn_id = 1

There are three categories listed in the instructions, but only two reports posted, making it unclear which mechztn_ids should be used with which reports.

In August 2001 data, KPMG Consulting also identified records coded with mechztn_id=3. This mechztn_id is not mentioned in the RDUM and it is unclear how the end user should treat this data.

Without adequate instructions, KPMG Consulting is unable to replicate metrics values for this SQM.

KPMG Consulting will attempt replication of this metric with data from PMAP 4.0 when it becomes available.

Impact:

BellSouth's insufficient documentation prevents CLECs from calculating the metrics values for the "Provisioning: Average Completion Notice Interval" SQM. Without accurate documentation, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

BellSouth Response:

BellSouth updated the instructions in the Raw Data User Manual for "Provisioning: Average Completion Notice Interval" SQM with the release of the v2.1.10 RDUM. This update addresses KPMG's replication issue and will allow KPMG to retest this metric prior to the release of PMAP 4.0.

There are two reports posted for Average Completion Notice Interval. Both mechanized and partially mechanized service request (Mech_id = 0 and Mech_id = 1) are used to calculate the ACNI Mech SQM report. When calculating the ACNI Non Mech SQM report use Mech_id = 2.

FLORIDA OSS BELLSOUTH'S AMENDED RESPONSE TO OBSERVATION 176



Florida OSS Test
Observation 176

April 25, 2002

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review. (PMR5)

Observation:

KPMG Consulting cannot replicate the values in the "Provisioning: Average Completion Notice Interval" Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001). KPMG Consulting found that BellSouth's instructions in the Raw Data User Manual are insufficient for calculating the metrics values for this SQM.

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. The Florida Public Service Commission mandates that BellSouth publish monthly performance measurement reports of SQM values for the Competitive Local Exchange Carriers (CLECs) engaged in business activity with BellSouth in the State of Florida.¹ BellSouth provides CLEC Aggregate processed data² (PMAP raw data³) as requested to KPMG Consulting.

Issue:

KPMG Consulting found the computation instructions for the "Provisioning: Average Completion Notice Interval" SQM to be insufficient for calculating metrics values.

BellSouth's instructions in the Raw Data User Manual (RDUM) do not clearly address how users should calculate values reported in the ACNI Mech and Non Mech reports.

- o Step five of the RDUM states,
*Filter on mechztn_id field to identify mechanization of the service request.
For Mechanized, only include mechztn_id = 0*

¹ These reports are posted on the PMAP Web site.

² The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data."

³ The PMAP Raw Data User Manual includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the September 25, 2001 version 2.1.09 of the Manual.

FLORIDA OSS BELLSOUTH'S AMENDED RESPONSE TO OBSERVATION 176

For Non-mechanized only include, mechztn_id = 2

For Partially-mech only include, mechztn_id = 1

There are three categories listed in the instructions, but only two reports posted, making it unclear which mechztn_ids should be used with which reports.

In August 2001 data, KPMG Consulting also identified records coded with mechztn_id=3. This mechztn_id is not mentioned in the RDUM and it is unclear how the end user should treat this data.

Without adequate instructions, KPMG Consulting is unable to replicate metrics values for this SQM.

KPMG Consulting will attempt replication of this metric with data from PMAP 4.0 when it becomes available.

Impact:

BellSouth's insufficient documentation prevents CLECs from calculating the metrics values for the "Provisioning: Average Completion Notice Interval" SQM. Without accurate documentation, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

BellSouth Response:

BellSouth updated the instructions in the Raw Data User Manual for "Provisioning: Average Completion Notice Interval" SQM with the release of the v2.1.10 RDUM. This update addresses KPMG's replication issue and will allow KPMG to retest this metric prior to the release of PMAP 4.0.

There are two reports posted for Average Completion Notice Interval. Both mechanized and partially mechanized service request (Mech_id = 0 and Mech_id = 1) are used to calculate the ACNI Mech SQM report. When calculating the ACNI Non Mech SQM report use Mech_id = 2.

BellSouth Amended Response:

BellSouth discovered an additional issue with the February data for the "Provisioning: Average Completion Notice Interval" SQM. This issue has been addressed with the March data. KPMG Consulting should move to the March data month to continue replication testing for this measure.

AMENDED OBSERVATION 176
BellSouth Florida OSS Testing Evaluation

Date: June 6, 2002

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review. (PMR5)

Observation:

KPMG Consulting cannot replicate the values in the “Provisioning: Average Completion Notice Interval” Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001). KPMG Consulting found that BellSouth’s instructions in the Raw Data User Manual are insufficient for calculating the metrics values for this SQM.

Background:

SQMs are calculated to illustrate BellSouth’s Operational Support System performance. The Florida Public Service Commission mandates that BellSouth publish monthly performance measurement reports of SQM values for the Competitive Local Exchange Carriers (CLECs) engaged in business activity with BellSouth in the State of Florida.¹ BellSouth provides CLEC Aggregate processed data² (PMAP raw data³) as requested to KPMG Consulting.

Issue:

KPMG Consulting found the computation instructions for the “Provisioning: Average Completion Notice Interval” SQM to be insufficient for calculating metrics values.

BellSouth’s instructions in the Raw Data User Manual (RDUM) do not clearly address how users should calculate values reported in the ACNI Mech and Non Mech reports.

- Step five of the RDUM states,
- Filter on mechztn_id field to identify mechanization of the service request.*
- For Mechanized, only include mechztn_id = 0
 - For Non-mechanized only include, mechztn_id = 2
 - For Partially-mech only include, mechztn_id = 1

¹ These reports are posted on the PMAP Web site.

² The term “processed data” refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term “PMAP raw data.”

³ The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the September 25, 2001 version 2.1.09 of the Manual.

AMENDED OBSERVATION 176
BellSouth Florida OSS Testing Evaluation

There are three categories listed in the instructions, but only two reports posted, making it unclear which mechzt_n_ids should be used with which reports.

In August 2001 data, KPMG Consulting also identified records coded with mechzt_n_id=3. This mechzt_n_id is not mentioned in the RDUM and it is unclear how the end user should treat this data.

Without adequate instructions, KPMG Consulting is unable to replicate metrics values for this SQM.

KPMG Consulting will attempt replication of this metric with data from PMAP 4.0 when it becomes available.

Amendment – KPMG Consulting reviewed BellSouth’s Response to Observation 176⁴ and re-tested using March 2002 data. However, KPMG Consulting was unable to replicate the BellSouth reported values for this SQM. The discrepancies are listed in the following table.

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
1	Non Mechanized; Retail Business; Non-Dispatch	<10 Circuits; 0-1 Hours	1	1	100.00%	N/A
2	Non Mechanized; Retail Business; Non-Dispatch	<10 Circuits; Average Completion Notice Interval	0.85	1	0.85	N/A
3	Non Mechanized; Retail Residence & Business (POTS); Non-Dispatch	<10 Circuits; 0-1 Hours	1	1	100.00%	N/A

⁴ Florida OSS BellSouth’s Amended Response to Observation 176, 4/25/02.

AMENDED OBSERVATION 176
BellSouth Florida OSS Testing Evaluation

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
4	Non Mechanized; Retail Residence & Business (POTS); Non-Dispatch	<10 Circuits; Average Completion Notice Interval	0.85	1	0.85	N/A
5	Non Mechanized; Retail Residence & Business; Non-Dispatch	<10 Circuits; 0-1 Hours	1	1	100.00%	N/A
6	Non Mechanized; Retail Residence & Business; Non-Dispatch	<10 Circuits; Average Completion Notice Interval	0.85	1	0.85	N/A
7	Non Mechanized; Retail Residence, Business and Design; Non-Dispatch	<10 Circuits; 0-1 Hours	1	1	100.00%	N/A
8	Non Mechanized; Retail Residence, Business and Design; Non-Dispatch	<10 Circuits; Average Completion Notice Interval	0.85	1	0.85	N/A

AMENDED OBSERVATION 176
BellSouth Florida OSS Testing Evaluation

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
9	Non Mechanized; Retail Residence and Business Dispatch - IN; Non-Dispatch	<10 Circuits; 0-1 Hours	1	1	100.00%	N/A
10	Non Mechanized; Retail Residence and Business Dispatch - IN; Non-Dispatch	<10 Circuits; Average Completion Notice Interval	0.85	1	0.85	N/A

Impact:

KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the "Provisioning: Average Completion Notice Interval" SQM may be in question. Without accurate SQMs, CLECs may not be able to assess the quality of service received or plan for future business activities reliably.

FLORIDA OSS BELLSOUTH'S RESPONSE TO AMENDED OBSERVATION 176



Florida OSS Test
Amended Observation 176

June 17, 2002

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review. (PMR5)

Observation:

KPMG Consulting cannot replicate the values in the "Provisioning: Average Completion Notice Interval" Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001). KPMG Consulting found that BellSouth's instructions in the Raw Data User Manual are insufficient for calculating the metrics values for this SQM.

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. The Florida Public Service Commission mandates that BellSouth publish monthly performance measurement reports of SQM values for the Competitive Local Exchange Carriers (CLECs) engaged in business activity with BellSouth in the State of Florida.¹ BellSouth provides CLEC Aggregate processed data² (PMAP raw data³) as requested to KPMG Consulting.

Issue:

KPMG Consulting found the computation instructions for the "Provisioning: Average Completion Notice Interval" SQM to be insufficient for calculating metrics values.

BellSouth's instructions in the Raw Data User Manual (RDUM) do not clearly address how users should calculate values reported in the ACNI Mech and Non Mech reports.

Step five of the RDUM states,
Filter on mechztn_id field to identify mechanization of the service request.
- For Mechanized, only include mechztn_id = 0

¹ These reports are posted on the PMAP Web site.

² The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data."

³ The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the September 25, 2001 version 2.1.09 of the Manual.

FLORIDA OSS BELL SOUTH'S RESPONSE TO AMENDED OBSERVATION 176

- For Non-mechanized only include, mechztn_id = 2
- For Partially-mech only include, mechztn_id = 1

There are three categories listed in the instructions, but only two reports posted, making it unclear which mechztn_ids should be used with which reports.

In August 2001 data, KPMG Consulting also identified records coded with mechztn_id=3. This mechztn_id is not mentioned in the RDUM and it is unclear how the end user should treat this data.

Without adequate instructions, KPMG Consulting is unable to replicate metrics values for this SQM.

KPMG Consulting will attempt replication of this metric with data from PMAP 4.0 when it becomes available.

Amendment – KPMG Consulting reviewed BellSouth's Response to Observation 176⁴ and re-tested using March 2002 data. However, KPMG Consulting was unable to replicate the BellSouth reported values for this SQM. The discrepancies are listed in the following table.

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
1	Non Mechanized; Retail Business; Non-Dispatch	<10 Circuits; 0-1 Hours	1	1	100.00%	N/A
2	Non Mechanized; Retail Business; Non-Dispatch	<10 Circuits; Average Completion Notice Interval	0.85	1	0.85	N/A
3	Non Mechanized; Retail Residence & Business (POTS); Non-Dispatch	<10 Circuits; 0-1 Hours	1	1	100.00%	N/A
4	Non Mechanized; Retail Residence & Business (POTS); Non-Dispatch	<10 Circuits; Average Completion Notice Interval	0.85	1	0.85	N/A
5	Non Mechanized; Retail Residence & Business; Non-Dispatch	<10 Circuits; 0-1 Hours	1	1	100.00%	N/A
6	Non Mechanized; Retail Residence & Business; Non-Dispatch	<10 Circuits; Average Completion Notice Interval	0.85	1	0.85	N/A

⁴ Florida OSS BellSouth's Amended Response to Observation 176, 4/25/02.

**FLORIDA OSS BELLSouth'S RESPONSE TO AMENDED
OBSERVATION 176**

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
7	Non Mechanized; Retail Residence, Business and Design; Non-Dispatch	<10 Circuits; 0-1 Hours	1	1	100.00%	N/A
8	Non Mechanized; Retail Residence, Business and Design; Non-Dispatch	<10 Circuits; Average Completion Notice Interval	0.85	1	0.85	N/A
9	Non Mechanized; Retail Residence and Business Dispatch - IN; Non-Dispatch	<10 Circuits; 0-1 Hours	1	1	100.00%	N/A
10	Non Mechanized; Retail Residence and Business Dispatch - IN; Non-Dispatch	<10 Circuits; Average Completion Notice Interval	0.85	1	0.85	N/A

Impact:

KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the "Provisioning: Average Completion Notice Interval" SQM may be in question. Without accurate SQMs, CLECs may not be able to assess the quality of service received or plan for future business activities reliably.

BellSouth Response:

The issue that KPMG identified with the "Provisioning: Average Completion Notice Interval" SQM is due to a misclassification of 1 record that spans across the 10 buckets listed in the table above. This record was classified as a BST record, due to a missing CLEC identifier on the order. This occurred because it was a partial port-out of business lines. Test Director RQ 1277 was entered to report this type of an order as a CLEC generated order. BellSouth will provide an implementation date when this Test Director has been through the CCB scheduling process.

FLORIDA OSS BELLSOUTH'S AMENDED RESPONSE TO AMENDED OBSERVATION 176



Florida OSS Test
Amended Observation 176

October 8, 2002

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review. (PMR5)

Observation:

KPMG Consulting cannot replicate the values in the "Provisioning: Average Completion Notice Interval" Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001). KPMG Consulting found that BellSouth's instructions in the Raw Data User Manual are insufficient for calculating the metrics values for this SQM.

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. The Florida Public Service Commission mandates that BellSouth publish monthly performance measurement reports of SQM values for the Competitive Local Exchange Carriers (CLECs) engaged in business activity with BellSouth in the State of Florida.¹ BellSouth provides CLEC Aggregate processed data² (PMAP raw data³) as requested to KPMG Consulting.

Issue:

KPMG Consulting found the computation instructions for the "Provisioning: Average Completion Notice Interval" SQM to be insufficient for calculating metrics values.

BellSouth's instructions in the Raw Data User Manual (RDUM) do not clearly address how users should calculate values reported in the ACNI Mech and Non Mech reports.

Step five of the RDUM states,
Filter on mechztn_id field to identify mechanization of the service request.

¹ These reports are posted on the PMAP Web site.

² The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data."

³ The PMAP Raw Data User Manual includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the September 25, 2001 version 2.1.09 of the Manual.

FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO AMENDED OBSERVATION 176

- For Mechanized, only include mechztn_id = 0
- For Non-mechanized only include, mechztn_id = 2
- For Partially-mech only include, mechztn_id = 1

There are three categories listed in the instructions, but only two reports posted, making it unclear which mechztn_ids should be used with which reports.

In August 2001 data, KPMG Consulting also identified records coded with mechztn_id=3. This mechztn_id is not mentioned in the RDUM and it is unclear how the end user should treat this data.

Without adequate instructions, KPMG Consulting is unable to replicate metrics values for this SQM.

KPMG Consulting will attempt replication of this metric with data from PMAP 4.0 when it becomes available.

Amendment – KPMG Consulting reviewed BellSouth's Response to Observation 176⁴ and re-tested using March 2002 data. However, KPMG Consulting was unable to replicate the BellSouth reported values for this SQM. The discrepancies are listed in the following table.

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
1	Non Mechanized; Retail Business; Non-Dispatch	<10 Circuits; 0-1 Hours	1	1	100.00%	N/A
2	Non Mechanized; Retail Business; Non-Dispatch	<10 Circuits; Average Completion Notice Interval	0.85	1	0.85	N/A
3	Non Mechanized; Retail Residence & Business (POTS); Non-Dispatch	<10 Circuits; 0-1 Hours	1	1	100.00%	N/A
4	Non Mechanized; Retail Residence & Business (POTS); Non-Dispatch	<10 Circuits; Average Completion Notice Interval	0.85	1	0.85	N/A
5	Non Mechanized; Retail Residence & Business; Non-Dispatch	<10 Circuits; 0-1 Hours	1	1	100.00%	N/A

⁴ Florida OSS BellSouth's Amended Response to Observation 176, 4/25/02.

FLORIDA OSS BELLSOUTH'S AMENDED RESPONSE TO AMENDED OBSERVATION 176

	Measurement	Category	KPMG Consulting- Calculated Numerator	KPMG Consulting- Calculated Denominator	KPMG Consulting- Calculated Value	BellSouth Reported Value
6	Non Mechanized; Retail Residence & Business; Non- Dispatch	<10 Circuits; Average Completion Notice Interval	0.85	1	0.85	N/A
7	Non Mechanized; Retail Residence, Business and Design; Non- Dispatch	<10 Circuits; 0-1 Hours	1	1	100.00%	N/A
8	Non Mechanized; Retail Residence, Business and Design; Non- Dispatch	<10 Circuits; Average Completion Notice Interval	0.85	1	0.85	N/A
9	Non Mechanized; Retail Residence and Business Dispatch - IN; Non-Dispatch	<10 Circuits; 0-1 Hours	1	1	100.00%	N/A
10	Non Mechanized; Retail Residence and Business Dispatch - IN; Non-Dispatch	<10 Circuits; Average Completion Notice Interval	0.85	1	0.85	N/A

Impact:

KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the "Provisioning: Average Completion Notice Interval" SQM may be in question. Without accurate SQMs, CLECs may not be able to assess the quality of service received or plan for future business activities reliably.

BellSouth Response:

The issue that KPMG identified with the "Provisioning: Average Completion Notice Interval" SQM is due to a misclassification of 1 record that spans across the 10 buckets listed in the table above. This record was classified as a BST record, due to a missing CLEC identifier on the order. This occurred because it was a partial port-out of business lines. Test Director RQ 1277 was entered to report this type of an order as a CLEC generated order. BellSouth will provide an implementation date when this Test Director has been through the CCB scheduling process.

BellSouth Amended Response:

Test Director RQ 1277 has been replaced by Test Director RQ1292 and has been scheduled for November data.

**FLORIDA OSS BELLSOUTH'S RESPONSE TO OBSERVATION
180**



Florida OSS Test
Observation 180

May 8, 2002

OBSERVATION REPORT

An observation has been identified as a result of the Metrics Definitions and Standards Development and Documentation Verification and Validation Review. (PMR2)

Observation:

KPMG Consulting has found that BellSouth's method of sampling records used for the calculation of the "Database Update Information: Percent Database Update Accuracy" Service Quality Measurement (SQM) may produce inaccurate results.

Background:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting reviewed the *Florida Interim Performance Metrics* document.¹ KPMG Consulting evaluated the accuracy, completeness, and consistency of each SQM's stated definition, calculation and business rules.

Issue:

Based on the methodology used² by BellSouth to sample orders that are used to calculate the "Database Update Information: Percent Database Update Accuracy" Service Quality Measurement (SQM), KPMG Consulting believes the method may result in a biased sample and the resulting measurement may be inaccurate.

- Per the Business Rules listed in the SQM, "a statistically valid sample of CLEC orders is pulled each month. The sample will be used to test the accuracy of the database update process." In reality, BellSouth pulls a sample of completed service orders and not a sample of the original CLEC orders.
- The sample of service orders pulled is a subset of the sample used for measuring the "Provisioning: Service Order Accuracy" SQM. Only those service orders that are found to be "correct" in the Service Order Accuracy

¹ KPMG Consulting used the June 1, 2001, version 3.00 of the *Florida Interim Performance Metrics* document as a basis to perform this test. The Business Rules listed in this Observation are listed in the *Florida Interim Performance Metrics* document published in June 2001.

² KPMG Consulting reviewed BellSouth's internal documentation that details the sampling methodology used to calculate the "Database Update Information: Percent Database Update Accuracy."

FLORIDA OSS BELL SOUTH'S RESPONSE TO OBSERVATION 180

review are used in the sample for testing the "Database Update Information: Percent Database Update Accuracy" SQM.

Impact:

By using completed service orders as the sampling universe, BellSouth is not following the process stated in the SQM. Furthermore, by using a subset of service orders already sampled for the "Provisioning: Service Order Accuracy" SQM, the resulting service orders may not be a statistically valid sample of orders required to calculate the "Database Update Information: Percent Database Update Accuracy." Inaccurate samples for calculating the "Database Update Information: Percent Database Update Accuracy" SQM would result in the estimate of the measure not accurately reflecting the quality of service provided.

BellSouth Response:

In response to the following Issue raised in the Observation:

"Per the Business Rules listed in the SQM, 'a statistically valid sample of CLEC orders is pulled each month. The sample will be used to test the accuracy of the database update process.' In reality, BellSouth pulls a sample of completed service orders and not a sample of the original CLEC orders."

CLECs submit a Local Service Request (LSR) to BellSouth, which generates a service order(s). Since the intent of this measure is to determine the accuracy of the data in the Directory Assistance, LIDB, and Directory Listings databases, the sample must be taken from completed service orders. These completed service orders are the CLEC service orders.

BellSouth is in the process of updating the Redline SQM to further clarify the language for this metric. BellSouth will provide the redline when it is produced.

In response to the following Issue raised in the Observation:

"The sample of service orders pulled is a subset of the sample used for measuring the 'Provisioning: Service Order Accuracy' SQM. Only those service orders that are found to be "correct" in the Service Order Accuracy measurement."

The service orders to be reviewed by BellSouth for the Database Update Accuracy report are derived from the SOA review process. Currently, if a service order has an error in any of the SOA report affecting fields that order is excluded from the Database Update Accuracy review. Effective with the March completed service orders, BellSouth will include all orders that affect DA, LIDB, or Directory Listing on the list of orders to be reviewed for the Database Update Accuracy report regardless of whether or not there is an error on the service order.

CERTIFICATE OF SERVICE

Docket 7892-U

I hereby certify that on October 21, 2002, I served copies of the foregoing “CLEC Comments to BellSouth’s Proposed November PMAP Changes” by placing a copy of same in prepaid envelopes, addressed to all parties of record in this proceeding, and by depositing said envelopes and their contents in the United States Mail in Atlanta, Georgia.

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This 21st day of October, 2002.



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