

VII. Billing Domain Results and Analysis

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A. Test Results: Billing Work Center/Help Desk Support Evaluation (PPR10)

1.0 Description

The Billing Work Center/Help Desk Support Evaluation (PPR10) was an analysis of the Billing and Collections Center (B&CC) processes and documentation developed and employed by BellSouth to support resellers and Alternative Local Exchange Carriers (ALECs) with billing-related disputes, inquiries and issues. The center's functionality, performance, escalation procedures and security were evaluated. Additionally, the B&CC's functionality was compared with BellSouth's retail practices for parity, to the extent that specific retail analogs were identified.

2.0 Business Process

This section describes BellSouth's business processes used in the B&CC.

2.1 Business Process Description

The B&CC is the organization within BellSouth responsible for resolving billing disputes. A billing dispute is a formal request for resolution of an issue that an ALEC encounters on its bills. Two centers comprise BellSouth's B&CC, one located in Birmingham, Alabama and the other located in Tucker, Georgia. The center in Tucker, Georgia provides support primarily for access billing disputes; while the Birmingham, Alabama center supports the billing disputes of resellers and ALECs³⁷⁹. This evaluation focused only on the billing dispute support provided to resellers and ALECs. Billing disputes are submitted to the appropriate center through email, facsimile or U.S. mail. For all other billing-related problems, issues and questions, ALECs and resellers are directed to contact their designated Account Team/CLEC Care Team. The Account Team/CLEC Care Team accepts billing-related questions and inquiries via email, telephone calls and voicemail.

The Account Team is responsible for addressing ALEC questions and inquiries on access and complex resale products; while the CLEC Care Team handles ALEC questions and inquiries related to UNE and simple resale products. The assignment of an ALEC to an Account Team or to a CLEC Care Team (or both) will depend on the products and services that the ALEC purchases from BellSouth. If it does not receive a response it deems satisfactory, an ALEC may initiate a billing dispute.

When an ALEC detects a billing discrepancy (e.g., incorrect rate; overcharging for a product or service; or an incorrect start date associated with the installation of a product or service) and cannot obtain a satisfactory explanation for the issue, it may submit a billing dispute to BellSouth³⁸⁰. An ALEC may submit a CRIS billing dispute (e.g., a resale discount discrepancy) for resale bills produced in the Customer Record Information System (CRIS) billing system. An ALEC would submit an Integrated Billing Solution (IBS)/Tapestry billing dispute (Unbundled Network Element – Platform (UNE-P) is billed from this billing system) for a UNE-P billing dispute. Finally, if an ALEC wishes to file a billing dispute for a 2-wire Unbundled Analog Designed Loop issue, it would file a Carrier Access Billing System (CABS) UNE billing dispute.

³⁷⁹ BellSouth provides support to a limited number of large ALECs from the Tucker, Georgia center for access and non-access billing-related disputes.

³⁸⁰ Please see the Process Flow for Billing Disputes located on the BellSouth interconnection website at <http://www.interconnection.bellsouth.com/forms/html/billing&collections.html> for a diagram of the dispute resolution process described in the text.

An ALEC³⁸¹ initiates a billing dispute (regardless of issue, product or billing system) by completing the Billing Adjustment Request (BAR) form found on the BellSouth interconnection website³⁸² and submitting it through email, facsimile or U.S. mail. BAR forms are processed in the order in which they are received. Upon receipt of the BAR form, a B&CC service representative checks it for accuracy and completeness. The BAR form is then assigned to a service representative for processing. If it is a CRIS or IBS/Tapestry dispute, it is then logged by the assigned service representative into the Billing Dispute Activity Tracking System (BDATS) where it is assigned a unique tracking number. If it is a CABS dispute, then it is logged into the Automated Claims Adjustment Tracking System (ACATS) where it is assigned a unique tracking number. BDATS and ACATS are internal BellSouth systems that are designed to capture and track billing dispute information submitted by the ALECs and entered by service representatives in the B&CC. An acknowledgement is sent to the ALEC within three business days of receipt of the billing dispute. The BellSouth Billing Guide states that a billing dispute generally takes sixty calendar days to resolve from the date of receipt. An ALEC can obtain status of their dispute using the unique tracking number or its own audit number (submitted on the BAR form) by calling its assigned B&CC service representative.

In analyzing disputes, service representatives use tools such as contracts, customer service records and bills. The service representative may also contact the ALEC to ask for clarification on the dispute. Once the dispute analysis is completed, the service representative may issue a partial or full adjustment to the ALEC's bill or may reject the dispute.

Disputes may be initially rejected for incorrect or incomplete information on the BAR form. They may also be rejected or partially adjusted should the service representative's analysis reveal that the ALEC had been billed correctly (in part or in total). Adjustments for CRIS disputes are made using the Business Office Customer Record Inventory System (BOCRIS) while adjustments for IBS/Tapestry disputes and CABS disputes are made using the IBS/Tapestry system and ACATS respectively. Adjustments will typically appear on the next bill period following the processing of the adjustment. However, if an adjustment is processed within three days of the close of the bill period, the adjustment may not appear until the second bill period following the processing of the adjustment.

The service representative notifies the ALEC of the resolution of its dispute via the BAR form whether a decision is made to make an adjustment or deny the dispute. The dispute is then closed in BDATS or ACATS, depending on the type of dispute. The service representative is responsible for completing the BAR form with the relevant resolution information and returning the dispute form to the ALEC via the method it was received (i.e., email, facsimile, or U.S. mail). An ALEC has five business days to respond if they do not concur with the resolution (as noted on the BAR form). If no response is provided to BellSouth, the dispute is closed and the ALEC is considered to have concurred with the resolution.

An ALEC may escalate the dispute if not satisfied with the result. Escalation procedures are detailed on the BellSouth interconnection website³⁸³. The escalation process is also formally documented within the ALEC's service contract. If the escalation goes beyond the 60-day dispute resolution target, the ALEC is contacted and a new deadline is provided.

³⁸¹ The term "ALEC" will be used to refer to ALECs and Resellers hereinafter, unless otherwise specified.

³⁸² <http://www.interconnection.bellsouth.com/forms/html/billing&collections.html>

³⁸³ <http://www.interconnection.bellsouth.com/forms/html/billing&collections.html>

3.0 Methodology

This section summarizes the test methodology.

3.1 Scenarios

Scenarios were not applicable to this test.

3.2 Test Targets and Measures

The test targets were the processes and procedures employed by BellSouth to support ALEC billing-related disputes, inquiries and issues. Processes and sub-processes targeted include the following:

- ◆ Receive Help Desk calls³⁸⁴;
 - ◆ Answer calls;
 - ◆ Interface with user;
 - ◆ Log calls;
 - ◆ Record severity code;
- ◆ Process Help Desk calls;
 - ◆ Resolve user questions, problems or issues;
- ◆ Receive Disputes;
 - ◆ File disputes;
 - ◆ Process disputes;
 - ◆ Issue adjustment when necessary;
 - ◆ Disposition of disputes;
- ◆ Close Help Desk calls;
 - ◆ Post closure information;
- ◆ Monitor status;
 - ◆ Track status;
 - ◆ Report status;
- ◆ Request escalations;
 - ◆ Identify escalation procedures;
 - ◆ Evaluate escalation procedures;
- ◆ Capacity Management process;
- ◆ Provide security and integrity access; and

³⁸⁴ The core BellSouth process for billing dispute resolution is not handled by a call center. As such, this process area could not be evaluated as part of this test.

- ◆ Manage the Help Desk process.

3.3 Data Sources

The sources of data for this test included interviews conducted with BellSouth personnel, review of BellSouth Work Center Manuals, reseller and CLEC Handbooks, resale process flows and various BellSouth internal reports. KPMG Consulting conducted service observations in the B&CC. BellSouth training curriculum, job aids and methods and procedures were also reviewed.

3.4 Data Generation/Volumes

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

3.5 Evaluation and Analysis Methods

KPMG Consulting conducted process interviews with BellSouth personnel and performed on-site inspections of work operations to obtain data used for evaluating the B&CC. Processes, methods and procedures, organization charts and supporting documentation were collected for evaluation and analysis.

The Billing Work Center/Help Desk Support Evaluation (PPR10) included a checklist of evaluation criteria developed by KPMG Consulting during the initial phase of the BellSouth OSS Evaluation. These evaluation criteria provided the framework and guidelines for the Billing Work Center/Help Desk Support Evaluation (PPR10).

The data collected were analyzed employing the evaluation criteria 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 10-1. For additional exception and observation information, refer to Appendices D and E, respectively. The test criteria and results are presented in Table 10-2.

Table 10-1: PPR10 Exception and Observation Count

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

Table 10-2: PPR10 Evaluation Criteria and Results

Test Reference	Evaluation Criteria	Results	Comments
PPR10-1	The scope of the Billing and Collection Center (B&CC) responsibilities addresses customer inquiries.	Satisfied	<p>The scope of responsibilities of the B&CC and the Account Team/CLEC Care Team was documented on the BellSouth interconnection website³⁸⁵ and in the organization chart of the B&CC. The information included in these documents address customer inquiries. Topical coverage includes:</p> <ul style="list-style-type: none"> ◆ Processing disputes; ◆ Performing dispute analysis; ◆ Responding to the ALEC; ◆ Applying credits and adjustments to the bill; ◆ Escalation procedures; and ◆ General inquiries. <p>KPMG Consulting, in its review of the BellSouth CLEC Billing Guide – Dispute Resolution Overview, located on the BellSouth interconnection website³⁸⁶, confirmed that the dispute resolution processes applicable to CRIS, CABS and IBS/Tapestry billing disputes were documented.</p> <p>KPMG Consulting also reviewed and confirmed that escalation procedures were documented on the BellSouth interconnection website³⁸⁷.</p> <p>Evidence of the scope of responsibilities of the Account Team/CLEC Care Team in handling general customer inquiries is documented in BellSouth’s internal Account/Team CLEC Care Team Procedures.</p>
PPR10-2	The objectives of the B&CC are defined, documented, and communicated to ALECs.	Satisfied	The objectives of the B&CC regarding billing disputes were defined, documented and communicated to ALECs via the BellSouth CLEC Billing Guide – Dispute Resolution. Within this document, ALECs are apprised of

³⁸⁵ CLEC Start-Up Guide at http://www.interconnection.bellsouth.com/guides/html/clec_ar.html and the BellSouth Billing Guide at http://www.interconnection.bellsouth.com/guides/html/understanding_bill.html

³⁸⁶ <http://www.interconnection.bellsouth.com/guides/index.html>

³⁸⁷ <http://www.interconnection.bellsouth.com/forms/html/billing&collections.html>

Test Reference	Evaluation Criteria	Results	Comments
			<p>BellSouth’s target to resolve billing-related disputes within 60 days³⁸⁸. This guide also contains information on dispute resolution, dispute submission, customer inquiries, and escalation procedures. No distinction is made among ALEC CRIS, CABS or IBS/Tapestry disputes regarding this dispute resolution target.</p> <p>KPMG Consulting confirmed this dispute resolution process and target resolution timeframe during interviews held with personnel from the Birmingham, Alabama center on November 2001 and April 2002 and from the Tucker, Georgia center on June 2002.</p> <p>Functions of the B&CC and the Account Team/CLEC Care Team (including answering general inquiries) are also communicated to the ALECs through the CLEC Start-Up Guide provided by the BellSouth Account Manager. KPMG Consulting reviewed both the BellSouth CLEC Billing Guide and the CLEC Start-Up Guide and confirmed that these objectives are defined, documented and communicated to ALECs.</p>
PPR10-3	B&CC service representative responsibilities are defined and documented.	Satisfied	<p>The B&CC process responsibilities were defined and documented in the internal BellSouth Account Team/CLEC Care Team Procedures and the BellSouth CLEC Billing Guide – Dispute Resolution General Overview³⁸⁹.</p> <p>The primary function of the B&CC is to process ALEC disputes (CRIS, CABS and IBS/Tapestry) and apply adjustments to ALEC bills as appropriate. The service representatives within the B&CC are assigned responsibilities including BAR form review, BAR tracking, dispute analysis and dispute closure. The Account Team/CLEC Care Team is assigned the primary responsibility of answering ALEC billing-related questions or inquiries.</p> <p>KPMG Consulting reviewed and confirmed that the BellSouth internal document, Disputes</p>

³⁸⁸ http://www.interconnection.bellsouth.com/guides/other_guides/pdf/chapter2/ch2sec5.pdf

³⁸⁹ http://www.interconnection.bellsouth.com/guides/other_guides/pdf/chapter2/ch2sec5.pdf

Test Reference	Evaluation Criteria	Results	Comments
			<p>– Resale Guidelines for Handling, contains service representative procedures for dispute resolution. KPMG Consulting also reviewed documentation including the BAR Form (RF14161) - Center Delivered Training; the internal Billing Disputes Process (adpfl001); the internal Performance Evaluation Plan - Billing & Collections; and the Performance Management Plan --- Resale & Access documents for evidence that the B&CC service representative responsibilities are defined and documented.</p> <p>KPMG Consulting also confirmed these service representative responsibilities during interviews and onsite observations at the Birmingham, Alabama center on November 2000 and April 2002 and in the Tucker, Georgia center on June 2002 centers.</p>
PPR10-4	Procedures for the filing, the handling and the disposition of ALEC requests exist and are documented.	Satisfied	<p>Procedures for the filing, handling and disposition of disputes were documented in the dispute resolution process and in BellSouth’s internal claim resolution methods and procedures.</p> <p>The Account Team/CLEC Care Team is assigned the primary responsibility of answering ALEC billing-related questions or inquiries. KPMG Consulting reviewed the internal BellSouth Account Team/CLEC Care Team Procedures to confirm that the procedures for handling and resolving these requests are documented.</p> <p>BellSouth’s dispute resolution process is provided on the BellSouth interconnection website³⁹⁰. No distinction is made in the filing, handling and notification of the disposition of a CRIS, IBS/Tapestry and CABS billing dispute.</p> <p>The BellSouth internal document entitled Disputes – Resale Guidelines for Handling contains procedures that service representatives follow for dispute resolution.</p> <p>As noted previously, every billing dispute is submitted to BellSouth using the BAR form. The content of the BAR form is then entered into either BDATS or ACATS for tracking</p>

³⁹⁰ http://www.interconnection.bellsouth.com/guides/other_guides/pdf/chapter2/ch2sec5.pdf

Test Reference	Evaluation Criteria	Results	Comments
			<p>purposes. Upon completion of dispute analysis, the BAR form is used by the service representative to communicate the resolution of the dispute to the ALEC.</p> <p>KPMG Consulting confirmed this information and observed adherence to these processes during onsite visits to the Birmingham, Alabama center in November 2000 and April 2002 and to the Tucker, Georgia center in June 2002. In addition, KPMG Consulting reviewed historical billing dispute documentation provided by BellSouth for CRIS, IBS/Tapestry and CABS billing disputes (including BAR forms, claim acknowledgement emails and BDATS screen prints).</p>
PPR10-5	Systems exist for tracking customer billing disputes.	Satisfied	<p>The Billing Dispute Activity Tracking System (BDATS) existed for tracking CRIS and IBS/Tapestry billing disputes. A tracking number is assigned by BDATS to BAR forms that are tracked through this system. The Automated Claims Adjustment Tracking System (ACATS) exists for tracking CABS billing disputes.</p> <p>Information regarding dispute tracking through BDATS was gathered in an interview conducted in November 2000 (refreshed via conference call in November 2001) and in an interview conducted in April 2002 with the BellSouth Manager Billing and Collections of the Birmingham, Alabama center.</p> <p>Information regarding dispute tracking through ACATS was gathered in interviews conducted in April 2002 at the Birmingham, Alabama center and in June 2002 at the Tucker, Georgia center.</p> <p>KPMG Consulting observed service representatives utilizing BDATS at the B&CC during visits in November 2000 and April 2002 to the Birmingham, Alabama center. In June 2002, KPMG Consulting also observed service representatives utilizing ACATS at the B&CC center in Tucker, Georgia. KPMG Consulting also reviewed screenshots provided by BellSouth from BDATS and ACATS to confirm the existence and, among other aspects, the tracking and reporting functionality of these systems.</p>

Test Reference	Evaluation Criteria	Results	Comments
PPR10-6	Procedures exist and are documented for logging and acknowledging customer disputes.	Satisfied	<p>Procedures existed for logging and acknowledging customer disputes issued via the BAR form. BAR forms for CRIS and IBS/Tapestry billing disputes were logged and tracked in BDATS. For CABS billing disputes, ACATS was used. Service representatives acknowledge receipt of billing disputes by sending the tracking number and contact information to the ALEC once the BAR form was logged. This information was sent in the same manner in which the BAR form was received (i.e. fax, email, or U.S. mail).</p> <p>BellSouth used an internal target of acknowledging customer disputes within three business days.</p> <p>KPMG Consulting reviewed and confirmed that procedures are documented in the BellSouth Billing Disputes Process – Network Services – Customer Services and in the Process Flow for Billing Disputes and can be found on-line³⁹¹. The acknowledgement objective is found in BellSouth internal document BAR Form Center Delivered Training.</p> <p>KPMG Consulting further confirmed this information during interviews conducted in November 2000 (refreshed in November 2001) and in April 2002 with the BellSouth Manager - Billing and Collections at the Birmingham, Alabama center and in an interview in June 2002 with the BellSouth Manager of the Tucker, Georgia center. KPMG Consulting also reviewed the dispute acknowledgement process with service representatives during onsite observations at the Birmingham, Alabama center in November 2000 and April 2002 and at the Tucker, Georgia center in June 2002. In addition, KPMG Consulting reviewed historical billing dispute documentation provided by BellSouth for CRIS, IBS/Tapestry and CABS billing disputes including BAR forms and claim acknowledgement emails.</p>

³⁹¹ http://www.interconnection.bellsouth.com/guides/other_guides/pdf/chapter2/ch2sec5.pdf

Test Reference	Evaluation Criteria	Results	Comments
PPR10-7	The process includes procedures for status tracking.	Satisfied	<p>Procedures existed for dispute status tracking. Customer billing disputes submitted to the B&CC on BAR forms were tracked through BDATS or ACATS as appropriate. Both systems assigned a tracking number. An ALEC can obtain a status of its dispute using the tracking number by calling its assigned service representative. BellSouth status tracking procedures were documented in the BellSouth Process Flow for Billing Disputes, box #6 that can be found on-line³⁹². Fields for the contact name and contact telephone number of the service representative assigned to the billing dispute were also noted on the BAR form available to ALECs on the BellSouth interconnection website.</p> <p>KPMG Consulting confirmed that status tracking is reported in the Billing Dispute Administrative Reports produced by BDATS; in the ACATS Dispute Progress Log (used in the Tucker, Georgia center) and is a function of ACATS. KPMG Consulting also reviewed the BellSouth Account Team/CLEC Care Team Procedures for evidence of procedures for status tracking of ALEC billing-related questions and inquiries. Further, this document notes that the ALEC and the Account Team/CLEC Care Team will negotiate and agree upon the procedures for handling urgent or non-routine contacts during the introductory meeting. A message flagged as urgent will be acknowledged within two business hours after confirmed receipt.</p>
PPR10-8	Procedures for follow-up activities are defined.	Satisfied	<p>BellSouth's dispute resolution follow-up procedures were documented on BellSouth's website³⁹³.</p> <p>A service representative follows up with a customer at three points in the process:</p> <ul style="list-style-type: none"> ◆ on receipt, if errors are detected; ◆ after logging to provide tracking information; and ◆ upon resolution. <p>ALECs are provided with a service</p>

³⁹² http://www.interconnection.bellsouth.com/forms/bar/Process_flow.pdf

³⁹³ http://www.interconnection.bellsouth.com/guides/other_guides/pdf/chapter2/ch2sec5.pdf

Test Reference	Evaluation Criteria	Results	Comments
			<p>representative point of contact and a unique dispute tracking number from BDATS or ACATS to follow-up for status. This information is provided to ALECs on the BAR form. KPMG Consulting further confirmed that these procedures exist during onsite observations of service representatives at the Birmingham, Alabama center in April 2002 and the Tucker, Georgia center in June 2002. In addition, KPMG Consulting reviewed historical billing dispute documentation provided by BellSouth for CRIS, IBS/Tapestry and CABS billing disputes including BAR forms.</p>
PPR10-9	The process includes procedures for closure of disputes.	Satisfied	<p>The dispute resolution process contained steps for closing a dispute. This process was documented in the BellSouth Process Flow for Billing Disputes, boxes # 8-12 and can be found on-line³⁹⁴.</p> <p>KPMG Consulting also reviewed and confirmed that the procedures for closure of disputes are documented in the BellSouth Billing Disputes Process – Network Services – Customer Services and the BellSouth internal document, Disputes - Resale Guidelines for Handling.</p> <p>Service representatives close CRIS, IBS/Tapestry and CABS disputes by making or denying adjustments, updating dispute status, and notifying the ALEC. Resolutions are communicated back to ALECs via the BAR form. As specified in the document, BellSouth CLEC Billing Guide – Dispute Resolution, ALECs have five business days to respond if they do not concur with the resolution; otherwise the dispute is closed and the ALEC is considered to have concurred with the resolution.</p> <p>KPMG Consulting obtained information on closure of disputes during interviews conducted in November 2000, November 2001 and April 2002 with the BellSouth Manager - Billing and Collections at the Birmingham, Alabama center and in a June 2002 interview with the Tucker, Georgia center Manager – Billing and Collections.</p>

³⁹⁴ http://www.interconnection.bellsouth.com/forms/bar/Process_flow.pdf

Test Reference	Evaluation Criteria	Results	Comments
			<p>KPMG Consulting observed representatives following the BellSouth Dispute Resolution process, including closure of disputes during onsite visits to the B&CC center in Birmingham, Alabama in November 2000 and April 2002 and reviewed the process of closure of CABS disputes during an onsite visit to the B&CC center in Tucker, Georgia in June 2002. In addition, KPMG Consulting reviewed historical billing dispute documentation provided by BellSouth for CRIS, IBS/Tapestry and CABS billing disputes including BAR forms and BDATS screen prints.</p>
PPR10-10	<p>The process includes procedures for the timely resolution of claims.</p>	Satisfied	<p>The process contains procedures for the timely resolution of claims. The B&CC had an internal target to resolve CRIS, IBS/Tapestry and CABS billing disputes within 60 days. This target was communicated to the ALECs via the BellSouth CLEC Billing Guide – Dispute Resolution.</p> <p>Information is gathered in BDATS to track and report the age of billing disputes for each customer. Similarly, the B&CC center in Tucker, Georgia has management reports that track the age of CABS disputes (logged in ACATS) by carrier.</p> <p>An objective contained in the service representative Performance Measurement Plan (PMP) is to resolve disputes within the 60-day target. Evidence of adherence to this dispute resolution target was found through review of BDATS report confirming that the 60-day target is being met by BellSouth service representatives for local billing disputes. In addition, KPMG Consulting reviewed historical billing dispute documentation provided by BellSouth for CRIS and IBS/Tapestry billing disputes including BAR forms and BDATS screen prints that confirmed that the 60-day target is being met by BellSouth service representatives for local billing disputes.</p> <p>In addition, KPMG Consulting’s review of historical CABS access billing dispute documentation showed that BellSouth service representatives did not meet the documented 60-day billing dispute resolution target for</p>

Test Reference	Evaluation Criteria	Results	Comments
			<p>some of the CABS billing disputes reviewed.</p> <p>However, it should be noted that this evaluation only encompasses non-access billing dispute issues related to the B&CC.</p>
PPR10-11	Process includes procedures and timelines for issuing adjustments.	Satisfied	<p>The BellSouth dispute resolution process contained procedures and timelines for issuing adjustments. Adjustments for CRIS disputes were made using BOCRIS while adjustments for IBS/Tapestry disputes and CABS disputes were made using the IBS/Tapestry system and ACATS respectively.</p> <p>When an adjustment is processed within three days of the close of a billing period, the credit or debit may not appear on the next ALEC bill. However, the credit or debit will appear no later than the second bill period after the adjustment is issued.</p> <p>KPMG Consulting reviewed and confirmed that the adjustment procedure is outlined in the Process Flow for Billing Disputes, section 10 and can be found on-line³⁹⁵.</p> <p>BellSouth's dispute resolution process is also located on-line³⁹⁶.</p> <p>KPMG Consulting reviewed historical billing dispute documentation provided by BellSouth for CRIS, IBS/Tapestry and CABS billing disputes including BAR forms and bills with adjustments applied to confirm BellSouth's adherence to these procedures.</p>
PPR10-12	The process includes procedures for issue escalation.	Satisfied	<p>Escalation procedures and the handling of issues, problems and disputes were defined and documented in the Work Center Escalation Procedures for Local Services, Appendix A and in the Interconnection Billing & Collection Contact and Escalation Matrix available on the BellSouth interconnection website.</p> <p>The standard Interconnection Agreement Attachment 7 - Section 2.3.1 also references the escalation process as part of the Billing Quality Assurance program.</p> <p>This process is negotiated between the ALEC</p>

³⁹⁵ http://www.interconnection.bellsouth.com/forms/bar/Process_flow.pdf

³⁹⁶ http://www.interconnection.bellsouth.com/guides/other_guides/pdf/chapter2/ch2sec5.pdf

Test Reference	Evaluation Criteria	Results	Comments
			and BellSouth to define the standards, measures and performance requirements for a billing measurement process. This can include a mutually agreed upon escalation process to resolve billing discrepancies. If these terms are embedded in an ALEC's Interconnection Agreement, those ALEC-specific terms will supercede the standards that are generally available.
PPR10-13	The process includes procedures for measuring and reporting the performance of the B&CC.	Satisfied	<p>The BellSouth process included procedures for measuring and reporting the performance of the B&CC. These procedures were documented in the Resale and Access Performance Measure Plan (PMP).</p> <p>The PMP identifies a performance objective for each service representative job function and how it is measured. The PMP also outlines organizational measurements including competencies and skills tracked at the manager level in order to measure the center's overall performance.</p> <p>KPMG Consulting confirmed, through reviews of documentation, including BDATS Billing Dispute Administrative reports and the Combined Group Report Card, that performance objectives, such as the 60-day dispute resolution target, were measured and reported. For the B&CC center in Tucker, Georgia, KPMG Consulting also reviewed management reports that track the age of CABS disputes (logged in ACATS) by carrier and an historical Access Quality Review form for a specific B&CC service representative. Other documentation reviewed to validate the existence of measurement tools included the Performance Review Checklist. This information was also confirmed in interviews conducted with the BellSouth Manager -- Billing and Collections in November 2001 and April 2002 and in June 2002.</p>
PPR10-14	Management oversight responsibilities are defined.	Satisfied	<p>Management oversight responsibilities are defined in the organizational measurements section of the PMP.</p> <p>Managers are measured on their ability to oversee dispute processing and professional development of service representatives.</p> <p>The PMP organizational measurements</p>

Test Reference	Evaluation Criteria	Results	Comments
			<p>section outlines the competencies and skills to be tracked at the manager level. BellSouth Managers are required to conduct service representative performance quality reviews monthly. Managers also are responsible for workforce sizing as outlined in the B&CC Model and process for workforce management.</p> <p>Evidence of the existence of these responsibilities was also provided in an interview conducted in November 2000 (refreshed via conference call in November 2001) and in an interview conducted in April 2002 with the BellSouth Manager -- Billing and Collections at the Birmingham, Alabama center and in an interview and onsite observations conducted in June 2002 at the Tucker, Georgia center. KPMG Consulting also reviewed an historical Access Quality Review form for a specific B&CC service representative at the Tucker, Georgia center as evidence of adherence to management oversight responsibilities.</p>
PPR10-15	A capacity planning process exists which is based on business and transaction volume and resource utilization forecasts.	Satisfied	<p>A capacity planning process existed based on ALEC business and transaction volumes and forecasts resource requirements in the B&CC.</p> <p>The internal Local Carrier Service Center (LCSC) Ordering Force Sizing Model captures statistics on ALEC ordering activity and maintains a historical database of this activity for the purpose of determining optimal force size in the LCSC. Data is reported for the previous year and predicts force requirements for the upcoming year. The B&CC model takes a percentage of the LCSC model to predict force levels for the B&CC.</p> <p>Evidence of the process is contained in the B&CC Model and the LCSC Ordering Force Size Model. Information was also obtained during interviews conducted in Atlanta, Georgia in August 2001 with the BellSouth Manager Interconnection Finance, the BellSouth Manager LCSC Force Model and the BellSouth Manager CWIN.</p> <p>During initial testing, KPMG Consulting determined that BellSouth’s B&CC lacked a formal process for identifying and planning</p>

Test Reference	Evaluation Criteria	Results	Comments
			<p>for changes to personnel levels necessary because of fluctuating volumes. As a result, Exception 37 was issued.</p> <p>KPMG Consulting reviewed documentation provided by BellSouth that confirmed the existence of a capacity planning process for the B&CC. KPMG Consulting also conducted an interview with B&CC management staff on the work force capacity planning process to further confirm the existence of this process. As a result, KPMG Consulting closed Exception 37.</p>
PPR10-16	Process includes procedures for maintaining security and integrity of customer data.	Satisfied	<p>Procedures existed for maintaining security and integrity of customer data. Access to the B&CC physical location was restricted to BellSouth employees.</p> <p>Systems used by service representatives require unique passwords and secure ID's. Electronic documents are stored on shared drives that only authorized personnel can access. Paper documents are stored in locked files.</p> <p>Information was provided in interviews conducted in November 2000 (refreshed via conference call in November 2001) and April 2002 with the BellSouth Manager - Billing and Collections at the Birmingham, Alabama center as well as in June 2002 at the Tucker, Georgia center. Use of passwords and secure IDs was observed in Birmingham, Alabama in November 2000 and April 2002 and in Tucker, Georgia in June 2002.</p>
PPR10-17	Training for BellSouth service representatives is defined and documented.	Satisfied	<p>Training for service representatives was defined and documented by the BellSouth training department and was found in the BellSouth LCSC Billing/Resale Initial Training curriculum.</p> <p>The BellSouth LCSC Billing/Resale Initial Training curriculum document specifies each course required for new BellSouth service representatives. New BellSouth service representatives must successfully complete the Billing and Collections Training course. This training includes procedures for dispute handling and customer contact skills.</p> <p>As new procedures are developed, service representatives receive training as required.</p>

Test Reference	Evaluation Criteria	Results	Comments
			<p>In interviews with BellSouth subject matter experts, KPMG Consulting learned that service representatives had been trained to use the IBS/Tapestry system on an as needed basis. BellSouth also maintains the Corporate Documentation and Information Access (CDIA) intranet website where news and information updates are communicated to employees and urgent messages are distributed. KPMG Consulting obtained and reviewed screen prints from the CDIA website.</p> <p>When a process is changed or improved, the personnel within the B&CC are notified via CDIA messaging, email, updates to the “What’s New/Updated/FYI” book in the CDIA or the development of a training package. Should the process change be significant and require training of greater than one hour in length, then a subject matter expert will develop a Center Delivered Training (CDT) document and email it to Center Management. This CDT will in turn be loaded to CDIA for reference and serve as the basis for training.</p> <p>KPMG Consulting reviewed a process flow documenting what occurs when a process is changed to confirm the existence of this process.</p> <p>Information regarding training of BellSouth personnel was provided in interviews conducted in November 2000 (refreshed via conference call in November 2001) and April 2002 with a BellSouth Manager - Billing and Collections and through documentation reviews.</p>

5.0 Parity Evaluation

This section contains the parity evaluation information for the Billing Work Center/Help Desk Support Evaluation (PPR10).

5.1 Executive Summary

In accordance with the requirements outlined in the Florida Master Test Plan, KPMG Consulting examined processes used by BellSouth to provide billing help desk/work center services for retail and wholesale customers to determine whether the processes are in parity.

In the course of determining the parity between retail and wholesale help desk/work center procedures, KPMG Consulting examined four operational areas: i) systems, ii) personnel, iii) management structure, and iv) facilities. Functional areas were also examined including help desk call processing and work force management for performance, capacity and security. Using these criteria, KPMG Consulting determined that, though certain differences exist between the retail and wholesale help desk/work centers, in most cases, parity exists.

The wholesale B&CC handles wholesale billing disputes on an individual case basis and does not serve as a call center. ALECs can direct billing disputes to the B&CC by fax, email or U.S. mail, then follow-up with a customer representative who is responsible for handling matters for a specific ALEC. Other problems, issues, and questions are directed to the CLEC’s Account Team/CLEC Care Team for resolution.

On the retail side, the centers that handle customer concerns address a broader range of issues than the B&CC. The retail centers are designed to operate as true call centers. The Mid-Market Retail Call Center is responsible for handling billing inquiries as well as Federal Communications Commission (FCC) and Florida Public Service Commission (FPSC) complaints, disputes and customer questions.

5.2 Method of Analysis

KPMG Consulting conducted interviews with BellSouth subject matter experts (SMEs) for both the retail and wholesale customer service processes. Interviews were conducted during November 2000, April 2001, August 2001 and the data was refreshed in November 2001. Additional interviews to evaluate the wholesale customer service processes were conducted in April 2002 and June 2002. KPMG Consulting also reviewed documentation delineating the help desk processes and procedures followed by both the retail and wholesale account teams. These reviews focused on the systems, personnel, management structure, facilities, and functional processes used in the help desk/work center.

5.3 Results

A summary of the results of KPMG Consulting’s parity evaluation is presented in Table 10-3.

Table 10-3: PPR10 Billing Help Desk/Work Center Process Evaluation Parity Review

Process Area	Retail Help Desk	Wholesale Help Desk	KPMG Consulting Comments
Systems	Customer Service Agents (CSA) use the following systems: <ul style="list-style-type: none"> ◆ A Microsoft Access database (untitled) to log and track significant billing 	The B&CC uses the following systems: <ul style="list-style-type: none"> ◆ BDATS and ACATS are used to track and report status on CRIS, IBS/Tapestry and CABS billing 	The systems used for retail and wholesale billing help desk/work center processing are similar in function. Tracking systems used in wholesale and retail billing help desk centers, although not the same, perform similar functions.

Process Area	Retail Help Desk	Wholesale Help Desk	KPMG Consulting Comments
	<p>disputes;</p> <ul style="list-style-type: none"> ◆ BOCRIS is used to access customer records for dispute resolution; and ◆ The Mechanized Online Billing Investigation system (MOBI) is used for investigation and account history. 	<p>disputes and for center administration;</p> <ul style="list-style-type: none"> ◆ BOCRIS, IBS/Tapestry and ACATS are used to access customer records for CRIS, IBS/Tapestry and CABS dispute resolutions respectively; and ◆ The Mechanized Online Billing Investigation system (MOBI) is used for investigation and account history. 	<p>similar functions.</p> <p>Further, systems used for CRIS dispute resolution and investigation are the same.</p> <p>Evidence for this was provided in interviews conducted with center managers in November 2000, April 2001, November 2001, April 2002 and June 2002.</p>
Personnel	<p>Customer Service Agents (CSA) support the Mid-Market Retail Call Center. CSAs are responsible for processing:</p> <ul style="list-style-type: none"> ◆ Billing inquiries; ◆ FCC and PSC Complaints; ◆ Billing disputes; ◆ Customer questions on products and services; and ◆ Customer requests for new service, changes or disconnection of service. <p>CSAs in the Atlanta office are divided into</p>	<p>Service representatives support the B&CC. Service representatives are responsible for processing billing disputes.</p> <p>In the Birmingham, Alabama B&CC³⁹⁷, 46 service representatives are considered the line force, which resolves billing disputes and whose work effort is directed by six managers.</p> <p>Ten staff support managers maintain methods and procedures for the line force group.</p>	<p>Line personnel at the wholesale and retail centers perform similar functions, although the titles differ and the scope of responsibilities for CSAs in the Mid-Market Retail Call Center is broader than that of the service representatives in the B&CC.</p> <p>Evidence for this was provided in interviews conducted with center managers during November 2000, April 2001, November 2001 and April 2002 and in organization charts.</p>

³⁹⁷ As was previously noted, the Birmingham, Alabama B&CC center supports the billing disputes of resellers and ALECs. Since resale and retails customers are billed from the CRIS billing system, the Birmingham, Alabama center is most analogous for this aspect of the retail parity assessment.

Process Area	Retail Help Desk	Wholesale Help Desk	KPMG Consulting Comments
	two groups, a Call Center group of 35 CSAs and a Sales Support Team of 17 CSAs.		
Management Structure	The Mid-Market Retail Call Center handles BellSouth Business Services and Large Retail Accounts. This center is organized with three CSA Managers and one Force Manager. The four managers report to the Center Manager.	The B&CC is in the Network Services organization. The Staff Support group reports to the Senior Manager. Service representatives report to a supervisor who reports to the Senior Manager.	<p>The management structure in the wholesale and retail centers perform similar functions (i.e., managing line level personnel to ensure, that among other responsibilities, that billing disputes are resolved).</p> <p>Although, wholesale and retail call centers are in different organizations and have a different management structure due to the different make up of personnel that staff each center, their functions are similar.</p> <p>Evidence for this was provided in interviews conducted with center managers during November 2000, April 2001, November 2001 and April 2002 and in organizational charts.</p>
Facilities	Mid-Market Retail Call Centers are located in Atlanta, Georgia; Birmingham, Alabama; and Jacksonville, Florida. These call centers provide direct customer support to end users.	The personnel for the B&CC are located in Birmingham, Alabama and Tucker, Georgia. Both locations are not designed to serve as call centers. Rather, these centers process billing disputes received from ALECs by U.S. mail, fax, and email, and make follow up calls only when needed (e.g., a service representative may contact an ALEC if clarification is required for the dispute details noted on the BAR form).	<p>The facilities of the wholesale and retail centers are in different locations. The retail centers serve as call centers while the wholesale centers maintain customer contact primarily through U.S. mail, fax and email. The customers served by the retail centers (i.e., end users) differ from the customers served by the wholesale centers (i.e., ALECs).</p> <p>As such, no analogue is apparent.</p> <p>Evidence of this was provided in interviews conducted with center managers during November 2000, April 2001, November 2001, April 2002 and June 2002.</p>
Help Desk Call Processing	The Mid-Market Retail Call Center receives calls for orders, billing inquiries and disputes as well as questions	The B&CC handles ALEC billing disputes mailed, faxed and emailed to the appropriate center.	Although the resources to which the customers (retail customers and ALECs) must turn for resolution of their billing disputes, questions and inquiries differ, the resources on both the retail and wholesale side perform

Process Area	Retail Help Desk	Wholesale Help Desk	KPMG Consulting Comments
	<p>as well as questions about products and services and service order status.</p> <p>Calls are answered immediately, details are logged and resolution is attempted with the customer on the phone. If the call cannot be resolved immediately, a resolution process is initiated.</p>	<p>ALECs can follow-up with a service representative who is responsible for handling all matters for a specific ALEC after the dispute is validated and logged. The resolution target timeframe for billing disputes is 60 days. Product and service questions are handled by the Account Team/CLEC Care Team. The Account Team/CLEC Care Team will negotiate and agree upon the procedures for handling urgent or non-routine contacts during the introductory meeting. A message flagged as urgent will be acknowledged within two business hours after confirmed receipt. Service order status questions are handled by the Local Customer Service Center (LCSC).</p>	<p>the retail and wholesale side perform similar call processing functions.</p> <p>While retail customers can call a Customer Service Agent with billing questions and disputes. Wholesale customers must contact their Account Team/CLEC Care Team for billing-related questions and U.S. mail, fax or email a BAR form to the B&CC to initiate a dispute.</p> <p>Evidence of this was provided in interviews conducted with center managers during November 2000, April 2001, November 2001, April 2002 and June 2002. The BellSouth CLEC Billing Guide also describes the process for handling wholesale billing disputes; while the BellSouth Account/Team CLEC Care Team Procedures documents the process for handling wholesale billing-related questions and inquiries.</p>
<p>Workforce Performance and Capacity Management</p>	<p>Performance metrics are in place to ensure adherence to approved methods and procedures.</p> <p>CSAs and managers are evaluated based on attainment of objectives established for such areas as dispute resolution, call volume, call abandonment rate, and other standards set by the staff.</p>	<p>The Performance Management Plan (PMP) defines the process for evaluating the performance of the center’s service representatives. The plan includes quantity, quality, and competency measures, performance objectives and tracking procedures.</p> <p>The Local Billing and Collections Center workforce</p>	<p>The retail and wholesale centers have similar performance measurements and workforce management processes.</p> <p>Parity exists where corporate PMPs are in effect as it relates to corporate measures. Examples of such measures include productivity, customer care and job knowledge.</p> <p>Both the wholesale and retail centers have workforce management processes in place for performance and capacity. These processes are unique to each center.</p> <p>Evidence of this was provided in</p>

Process Area	Retail Help Desk	Wholesale Help Desk	KPMG Consulting Comments
	<p>The overall center is evaluated on CSA performance, referrals, behavior competencies, specified call calibration criteria with 17 focus areas, and how well the center is managed.</p> <p>The “Force Manager” controls workforce capacity. Daily reports and call volume statistics are produced and reviewed and resources are shifted between the three call centers as needed.</p>	<p>management model is a function of the LCSC model and is used to predict force levels for the Billing Work Center/Help Desk. Work force forecasts are predicted at 18% of LCSC service representative volumes and 14% of LCSC clerical volumes.</p>	<p>interviews conducted with center managers during April 2001, August 2001 and November 2001 and in the Performance Measurement Plan and capacity management plan for the wholesale center.</p>

5.2.3 Results Summary

Although the retail help desk procedures are not the same as those in the wholesale help desk/work center, KPMG Consulting found functional similarities in the systems, personnel, management structure, help desk call processing and workforce capacity performance and capacity management areas. For the facilities operational area, KPMG Consulting was unable to make an assessment of parity since the retail and wholesale facilities were not analogous. In summary, KPMG Consulting found the Retail and Wholesale Help Desk/Work Centers to be comparable in function and therefore in parity for those aspects that were analogous.

6.0 Final Summary

This section summarizes the number of test evaluation criteria discussed in Section 4.1 above and the number that was satisfied or not satisfied at the conclusion of the test.

6.1 Summary of Findings

There were 17 evaluation criteria considered for the Billing Work Center/Help Desk Support Evaluation (PPR10). All 17 evaluation criteria received a satisfied result.

As all evaluation criteria are satisfied, KPMG Consulting considers the Billing Work Center/Help Desk Support Evaluation (PPR10) test area satisfied at the time of final report delivery.

B. Test Results: Daily Usage Production and Distribution – Process Evaluation (PPR12)

1.0 Description

The Daily Usage Production and Distribution - Process Evaluation (PPR12) was an operational analysis of the processes and documentation used by BellSouth to create and transmit the Daily Usage File (DUF), which contains records of billable messages belonging to Alternative Local Exchange Carriers (ALECs). The objective of this test was to determine the accuracy, completeness and timeliness of processes used to produce and transmit DUFs. Additionally, the DUF production and distribution process was compared with BellSouth retail practices for parity, to the extent that specific retail analogs could be identified

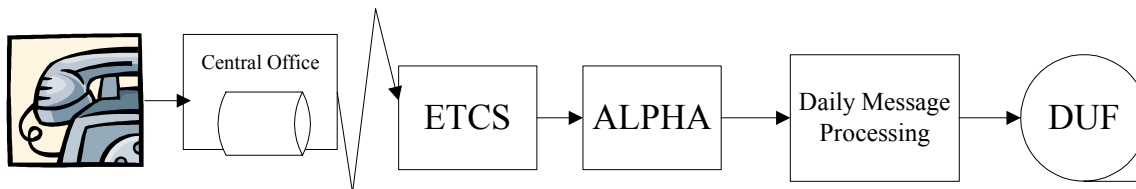
2.0 Business Process

This section summarizes the business processes used in DUF production and distribution.

2.1 Business Process Description

DUFs contain records that provide details of calls that originate from, and are recorded by, BellSouth's switches, as well as records for alternately billed calls³⁹⁸ that originate from other Local Exchange Carriers (LECs). BellSouth processes these message records through multiple systems and identifies the ALECs to which the usage belongs. Records are translated into Exchange Message Interface (EMI) format and are delivered to ALECs on a daily basis via one of the available delivery options: CONNECT:Direct™, LAN-to-LAN or dial-up, as selected by the ALEC.

Figure 12-1: DUF Process



The actual processing of usage occurs as follows:

- ◆ The end user places a call.
- ◆ The call is recorded by the switch, located in the BellSouth central office that serves the originating number.
- ◆ The usage detail is sent to the BellSouth message processing system via the switch collection process. Switch collection occurs on either a time-sensitive (no less than daily), or volume-sensitive (storage capacity of the switch) basis.

³⁹⁸ Alternately-billed calls are calls that are billed to a telephone number other than the originating number, such as collect, third number billed, and calling/credit card calls.

- ◆ On a daily basis, the BellSouth message processing system formats, sorts, and, if necessary, rates the usage. Records are formatted into EMI format for external DUF delivery, and into BellSouth internal proprietary formats for billing. Any errors are placed into re-circulation to await correction.
- ◆ ALEC ownership of the usage is determined by guide files that are established and updated through service order activity.
- ◆ DUF datasets are generated and delivered each business day.
- ◆ The DUF dataset is sent to the ALEC via electronic transmission.

Throughout the processing stream, BellSouth has integrated balancing software (UNITECH) to ensure that the inputs and outputs of each process are reconciled. A manual-balancing group reviews process reports and resolves any out-of-balance conditions.

DUF datasets that are delivered to ALECs are stored for 90 days following creation. After 90 days, the DUF datasets are deleted and retransmission is not possible.

BellSouth's capacity management plan uses a combination of initiatives in addition to the ongoing capture and analysis of historical data to achieve the objectives related to resource planning and performance assurance. The following are examples of the types of initiatives used by BellSouth to maintain necessary service levels:

- ◆ Workload resource usage/service level measurement;
- ◆ Application modeling;
- ◆ Forecasting;
- ◆ Platform workload response time modeling;
- ◆ Platform configuration optimization modeling; and
- ◆ Performance/Availability assurance with exception reporting.

3.0 Methodology

This section summarizes the test methodology.

3.1 Scenarios

Scenarios were not applicable to this test.

3.2 Test Targets and Measures

The test target was to evaluate the accuracy, completeness and timeliness of processes used by BellSouth to produce and distribute the DUF. The test included review of the following processes and sub-processes:

- ◆ DUF Production;
 - ◆ DUF balancing and reconciliation;
 - ◆ Route daily usage;
- ◆ DUF transmission;
 - ◆ Data transmission and cartridge tape delivery to ALEC;

- ◆ Usage history maintenance and retransmission;
 - ◆ DUF backup creation;
 - ◆ DUF backup retrieval and transmission; and
- ◆ Capacity management process.

3.3 Data Sources

The sources of data for this test included the following:

- ◆ Interviews with BellSouth DUF processing subject matter experts;
- ◆ DUF processing documentation provided by BellSouth; and
- ◆ Documentation available on BellSouth’s interconnection website.

3.4 Data Generation/Volumes

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

3.5 Evaluation and Analysis Methods

Process interviews were conducted with BellSouth Subject Matter Experts (SME) to assess BellSouth’s ability to produce, distribute and resend DUFs. Processes, methods and procedures, and supporting documentation were evaluated to substantiate and supplement interview findings. KPMG Consulting interviewed an ALEC and observed the ALEC requesting a DUF resend to verify BellSouth’s compliance with published business rules.

The Daily Usage Production and Distribution - Process Evaluation (PPR12) included a checklist of evaluation measures developed by KPMG Consulting during the initial phase of test activities for the BellSouth OSS Evaluation. These evaluation measures, detailed in the Florida Master Test Plan, provided the framework of norms, standards, and guidelines for the Daily Usage Production and Distribution - Process Evaluation (PPR12).

The data collected were analyzed employing the evaluation criteria referenced in Table 12-2 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 12-1. For additional exception and observation information, refer to Appendices D and E, respectively. The test criteria and results are presented in Table 12-2.

Table 12-1: PPR12 Exception and Observation Count

Activity	Exceptions	Observations
Total Issued	0	0
Total Disposed as of Final Report Date	0	0

Activity	Exceptions	Observations
Total Open as of Final Report Date	0	0

Table 12-2: PPR12 Evaluation Criteria and Results

Test Reference	Evaluation Criteria	Result	Comments
PPR12-1	DUF production and distribution procedures are defined.	Satisfied	BellSouth's DUF production and distribution processes, procedures and process flow charts are described in BellSouth's proprietary Data Delivery documentation covering Usage Processing ³⁹⁹ . Additionally, DUF production and distribution processes are defined in the BellSouth Billing Guide, Chapter IV, which is located on BellSouth's interconnection website ⁴⁰⁰ .
PPR12-2	ALECs are provided with contact information to resolve DUF production and distribution issues.	Satisfied	BellSouth provides ALECs with a CLEC Problem/Issue/File Retransmission form that is completed and submitted to BellSouth DUF support personnel. ALECs are also invited to contact their BellSouth Account Team Member or a BellSouth DUF processing SME via telephone to initiate problem resolution. This information is available in the BellSouth Billing Guide, Chapter IV, located on BellSouth's interconnection website.
PPR12-3	DUF balancing and reconciliation procedures are defined.	Satisfied	Interviews conducted with BellSouth DUF SMEs on October 10, 2000, November 15, 2001, and January 29, 2002 and a review of BellSouth's proprietary DUF production control process documentation, Data Delivery Usage Processing, Chapter II: Controls ⁴⁰¹ demonstrated that the DUF balancing and reconciliation procedures are defined.
PPR12-4	DUF routing and guiding is defined and controlled by documented processes.	Satisfied	KPMG Consulting interviewed BellSouth DUF processing SMEs on October 10, 2000, November 15, 2001, and January 29, 2002 in addition to reviewing BellSouth's DUF usage flow ⁴⁰² . KPMG Consulting determined that BellSouth has a DUF record guiding process in place to route usage to the correct ALEC. Usage is re-circulated until guided or is assigned an error code, designated for manual

³⁹⁹ Issue Date 8/10/98, Revision Date 9/27/99

⁴⁰⁰ http://www.interconnection.bellsouth.com/guides/html/understanding_bill.html

⁴⁰¹ Issue Date 2/17/98, Revision Date 9/23/99

⁴⁰² Data Delivery Usage Processing, Chapter I: Usage Flow to ODUF, Page I.3.7, Issue Date 2/17/98, Revised 9/23/99

Test Reference	Evaluation Criteria	Result	Comments
			error correction, and then reintroduced into the guiding process.
PPR12-5	DUF routing and guiding contains functionality to address pending and completed service order activity.	Satisfied	BellSouth documentation describing usage ownership rules, and the relationship between service order processing and the routing and guiding of usage, is available under Service Order Usage Timeline in the BellSouth Billing Guide, Chapter IV, which is located on BellSouth's interconnection website.
PPR12-6	DUF data delivery options are documented.	Satisfied	DUF delivery options available to ALECs are documented under Delivery Options in the BellSouth Billing Guide, Chapter IV, which is located on BellSouth's interconnection website.
PPR12-7	DUF is prepared and delivered according to a defined production schedule.	Satisfied	<p>BellSouth's proprietary documentation on Usage Processing, Data Delivery, Chapter I: Timing of Optional DUF (ODUF) Messages⁴⁰³ details the timing from the actual recording of the end user's message to the transmission of the related DUF to the ALECs.</p> <p>The DUF transmission schedule is available under Transmission Schedule in the BellSouth Billing Guide, Chapter IV, which is located on BellSouth's interconnection website.</p> <p>KPMG Consulting confirmed that DUF transmissions occur in a timely manner per the defined production schedule.</p>
PPR12-8	ALECs are provided with a status mechanism for tracking retrieval and retransmission requests.	Satisfied	<p>BellSouth provides ALECs with a 24-hour, seven-day per-week contact number for issues pertaining to file transmission. This information is available under File Transmission Assistance in the BellSouth Billing Guide, Chapter IV, which is located on BellSouth's interconnection website.</p> <p>KPMG Consulting observed an ALEC retransmission request through initiation, tracking, and receipt of the requested file. The retransmitted file was delivered to the ALEC in a timely manner and compared to the original DUF; no differences were identified.</p>
PPR12-9	Policies regarding historical availability of archived DUF are documented.	Satisfied	BellSouth documentation describing the 90-day period for which DUFs remain available is available under Controls and Assurance in the BellSouth Billing Guide, Chapter IV: Optional Daily Usage File, which is located on

⁴⁰³ Issue Date: 2/17/98, Revision Date: 9/23/99

Test Reference	Evaluation Criteria	Result	Comments
			BellSouth's interconnection website.
PPR12-10	Procedures for ALEC retrieval and retransmission requests are documented.	Satisfied	<p>BellSouth provides ALECs with a CLEC Problem/Issue/File Retransmission form that is completed and submitted to BellSouth DUF support personnel to formally request retransmission of a DUF. Alternately, ALECs may contact their BellSouth Account Team Member or directly contact BellSouth's DUF processing SME who can initiate the retransmission process. This information is available under File Transmission Assistance in the BellSouth Billing Guide, Chapter IV: Optional Daily Usage File, which is located on BellSouth's interconnection website.</p> <p>KPMG Consulting observed an ALEC retransmission request through initiation, tracking, and receipt of the requested file. The retransmitted file was delivered to the ALEC in a timely manner and compared to the original DUF; no differences were identified.</p>
PPR12-11	Capacity management practices related to DUF production and distribution are documented.	Satisfied	KPMG Consulting reviewed BellSouth's proprietary capacity management requirements document, Capacity Planning Methodology, Practices and Requirements ⁴⁰⁴ . KPMG Consulting found that the capacity management processes are documented.

5.0 Parity Evaluation

This section contains the parity evaluation for the Daily Usage Production and Distribution - Process Evaluation (PPR12).

5.1 Overview

In accordance with the Master Test Plan, KPMG Consulting examined processes employed by BellSouth to produce and distribute usage records for retail customers and those that are employed to produce and distribute DUFs for ALECs to determine whether the processes are in parity. Where processes were found to be analogous, KPMG Consulting compared the retail processes to the wholesale processes to determine the degree of parity performance by BellSouth.

To determine the existence of retail analogs, KPMG Consulting evaluated the degree of similarity in four operational areas including systems, personnel, management structure, and facilities, as well as three functional areas including balancing and reconciliation of data, retention of data, and resend capability. Through this evaluation, KPMG Consulting determined that BellSouth's process for producing and distributing ALEC resale and Unbundled Network Element – Platform (UNE-P) DUFs is in parity with its process in producing and distributing retail usage.

⁴⁰⁴ Version 2.3, issue date December 1, 2000

5.2 Method of Analysis

BellSouth uses the Centralized Message Distribution System (CMDS) to route retail usage to the owning entity. BellSouth uses a proprietary DUF delivery process to route wholesale usage to the owning entity based on Operating Company Number (OCN). In the course of this analysis, KPMG Consulting conducted interviews with BellSouth SMEs responsible for managing CMDS and DUF production and distribution processes for both retail and wholesale services. Interviews were conducted during October 2000 and May 2001. These reviews focused on the systems, personnel, management structure, facilities, and functional processes used for usage production and distribution. Refresh interviews pertinent to the resale process were conducted in November 2001 and pertinent to the new UNE-P process in January 2002.

5.3 Results

A summary of the results of KPMG Consulting’s parity evaluation is presented in Table 12-3:

Table 12-3: PPR12 Daily Usage Production and Distribution Parity Evaluation

Process Target Area	Retail Usage Production and Distribution	Wholesale Usage Production and Distribution	KPMG Consulting Comments
Systems/Process	Retail usage recorded on BellSouth switches is polled via Electronic Toll Collections System (ETCS), processed through ALPHA Message Processor System and placed into a billing system internal format. Usage is then guided to the appropriate account in the Customer Record Information System (CRIS) for local/toll billing. When the billing Revenue Accounting Office (RAO) is different from the originating RAO, the message is sent via CMDS to the owning (billing) entity, which may or may not be BellSouth.	Wholesale usage recorded on BellSouth switches is polled via ETCS, processed through ALPHA Message Processor System and placed into a billing system internal format. Usage is then guided to the appropriate account in the CRIS billing system for resale local/toll billing and in BellSouth Integrated Billing Solutions (IBS) and Carrier Access Billing System (CABS) for UNE-P billing. When the billing RAO is different from the originating RAO, the message is sent via CMDS to the owning (billing) entity, which may or may not be BellSouth. DUF processing requires additional steps to determine wholesale ownership before DUF creation occurs.	The systems used to process retail and resale usage are comparable. There is additional processing involved to determine wholesale ownership within each billing system and to actually create and distribute the DUF. Additional systems such as CABS and IBS are used to process UNE-P usage. From a parity perspective, no material impacts are imposed on the process through the use of these systems.
Personnel	Billing Specialists within the Wholesale Billing Services organization manage the RAO-to-RAO transfer of messages using	Billing Specialists within the Wholesale Billing Services organization manage the DUF production and distribution	Responsibilities are aligned by function rather than by retail or wholesale. Personnel manage work in accordance with methods and

Process Target Area	Retail Usage Production and Distribution	Wholesale Usage Production and Distribution	KPMG Consulting Comments
	CMDS for both retail and wholesale billing.	processes.	procedures that are common to both retail and wholesale billing.
Management Structure	For retail usage production and distribution via CMDS, Billing Specialists in the message processing area report to the manager of Wholesale Enhanced Billing Services.	For wholesale usage production and distribution via DUF, Billing Specialists in the message processing area report to the manager of Wholesale Enhanced Billing Services.	Responsibility and accountability for the production and distribution of retail and wholesale usage fall under the same management organization. There is no division of responsibility by retail versus wholesale.
Facilities	Message processing SMEs are located in Birmingham, Alabama. Retail usage is produced in and distributed via CMDS from the Birmingham, Alabama and Charlotte, North Carolina data centers.	Message processing SMEs are located in Birmingham, Alabama. Wholesale usage is produced in and distributed via DUF from the Birmingham, Alabama and Charlotte, North Carolina data centers.	Data processing is segregated by geographic region and not by retail versus wholesale as evidenced by the usage production and distribution schedules for the Birmingham, Alabama and Charlotte, North Carolina data centers with the exception of the distinction between CMDS and DUF distribution jobs. CMDS distribution is at the billing RAO level with delivery to a usage clearinghouse whereas DUF distribution is at the OCN level to the wholesale customer.
Balancing and Reconciliation	Trending is used to detect switch volume fluctuations that may indicate a polling problem. The balancing and reconciliation of retail usage is accomplished through the use of UNITECH software that compares the number of records in the output of a job to the number of records in the input of the next job in the processing stream.	Trending is used to detect switch volume fluctuations that may indicate a polling problem. The balancing and reconciliation of wholesale usage is accomplished through the use of UNITECH software which compares the number of records in the output of a job to the number of records in the input of the next job in the processing stream. There is an additional manual balancing step for DUF record volumes prior to the actual distribution of the	The UNITECH balancing and reconciliation process employed by BellSouth makes no distinction as to retail versus wholesale with the exception of a final manual balancing step in the wholesale arena. This additional balancing step is unique to wholesale usage. No material impacts from a parity perspective are imposed on the process by this additional balancing step.

Process Target Area	Retail Usage Production and Distribution	Wholesale Usage Production and Distribution	KPMG Consulting Comments
		files.	
Retention of Data	Retail usage data that is distributed via CMDS is retained for a period of 90 days.	DUFs are retained for a period of 90 days.	There is no distinction by retail versus wholesale in the 90 day retention period of transmitted usage data.
Resend Capability	Following receipt of a resend request, retained retail usage CMDS files are available for resend the next business day.	Following receipt of a resend request, retained wholesale DUFs are available for resend the next business day.	There is no distinction by retail versus wholesale in the ability to resend usage.

5.4 Parity Results Summary

Retail usage production and distribution is analogous to wholesale usage production and distribution for both resale and UNE-P usage with minor variations in the final distribution systems and balancing/reconciliation processes. KPMG Consulting determined that BellSouth's process in producing and distributing ALEC resale and UNE-P DUF is in parity with its process in producing and distributing retail usage.

6.0 Final Summary

This section summarizes the number of test evaluation criteria discussed in Section 4.1, Table 12-2 above and the number that were satisfied or not satisfied at the conclusion of this test.

6.1 Summary of Findings

There were 11 evaluation criteria considered for the Daily Usage Production and Distribution - Process Evaluation (PPR12). All 11 evaluation criteria received a satisfied result.

As all evaluation criteria are satisfied, KPMG Consulting considers the Daily Usage Production and Distribution - Process Evaluation (PPR12) test area satisfied at the time of the final report delivery.

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C. Test Results: Bill Production and Distribution Process Evaluation (PPR13)

1.0 Description

The Bill Production and Distribution Process Evaluation (PPR13) was an operational analysis of the processes and procedures employed by BellSouth to produce and distribute wholesale bills. The objective of the evaluation was to determine if these processes were sufficient to ensure that charges for products and services could be accurately billed and delivered in a timely manner. In addition, to the extent that retail analogs were identified, KPMG Consulting examined processes used by BellSouth to produce and distribute bills for retail customers and those used to produce and distribute bills by BellSouth for Alternative Local Exchange Carriers (ALECs) to determine whether the processes were in parity.

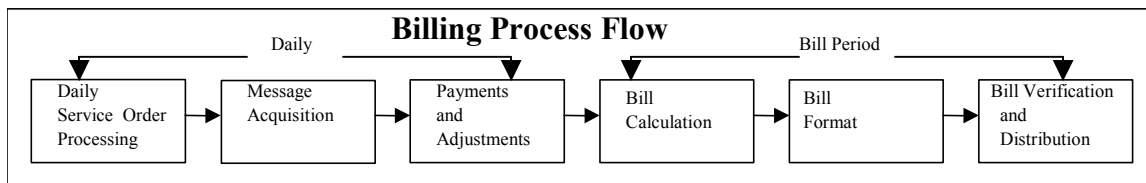
2.0 Business Process

This section describes BellSouth's bill production and distribution business processes.

2.1 Business Process Description

BellSouth's bill production and distribution business processes consist of daily and bill period system sub-processes as shown in Figure 13-1. Daily processing includes service order processing, message acquisition, payments and adjustments. Bill processing, which runs when each bill period ends, includes bill calculation, bill format, bill verification, and bill distribution.

Figure 13-1: Billing Process



In addition, bill balancing and capacity management procedures are executed throughout the billing process.

BellSouth has three billing systems that handle billing of local service products offered by BellSouth to ALECs. Resale local service products are billed out of the Customer Record Information System (CRIS). Certain Unbundled Network Elements (UNEs) such as unbundled switch ports, Unbundled Network Element - Platform⁴⁰⁵ (UNE-P), and non-design SL1 loops are billed out of the Integrated Billing Solution (IBS)/Tapestry system, and design SL2 loops as well as access services are billed out of the Carrier Access Billing System (CABS).

2.1.1 Service Order Processing

The CABS and CRIS systems receive completed service orders from the Service Order Communications System (SOCS) where they are rated using the Universal Service Order Code (USOC) rate file, checked for errors and, if error free, posted to the appropriate CRIS/CABS accounts. For products billed out of the IBS/Tapestry system, completed service orders are passed

⁴⁰⁵ Also referred to as loop/port combination.

from SOCS to the CRIS system where USOC edits are run before they are sent to IBS/Tapestry for rating and billing.

Orders that error out after provisioning and are completed in SOCS prior to billing, are written to the service order hold file and corrected offline by the Service Order Correction Group. The service order hold file is the repository for orders that were sent to CRIS, CABS or IBS/Tapestry but did not pass the pre-determined edits. The Service Order Correction Group uses documented Service Order Error Correction Methods and Procedures, Volume V, Part 1, to correct CRIS and CABS orders and the Wholesale Billing Guide, (Usage Section) to correct IBS/Tapestry orders. Orders in the hold files are processed on a daily basis. Once resolved, the orders are released into the billing streams. BellSouth uses several reports to manage this process, which include the Hold File Daily Error Corrections Report, Monthly Service Order Error Analysis report and the CABS/Service Order Processing Universal Service Order Errors report.

2.1.2 Message Processing

Message processing entails recording Automatic Message Accounting (AMA) usage (billable and non-billable), collecting, packaging and sending the data to the Revenue Accounting Offices (RAO) mainframe computers. BellSouth's Florida RAOs are located in Jacksonville, Miami and Ft. Lauderdale. The Electronic Toll Collection System (ETCS) collects and edits AMA usage by polling switches throughout each day to provide timely delivery to billing systems at four-hour intervals. Controls are in place to compare daily usage levels to historical trends and warn of deviations in expected levels. Front-end processing performs edits, formats data, and distributes usage to downstream processing systems. ALPHA and Recording Volume Verification (RVV) are the two mainframe flow-tracking tools used for usage collection analysis purposes by BellSouth. ALPHA is a system that translates usage from the AMA format into an internal BellSouth format for processing to the bill. The ALPHA system will send the usage records to the CRIS and IBS/Tapestry systems for rating and billing. With the introduction of the IBS/Tapestry, no local usage is billed out of the CABS system. In the ALPHA system, there are controls to ensure that the number of records received by ALPHA tallies with the number of records passed on to the billing systems. The RVV system is used to track daily usage volumes and identify errors or unusual trends in volume based on historical data. The RVV system also provides the volume of usage recorded and can provide this information by specific criteria such as call type, record type, hourly volumes and specific dates

2.1.2.1 Usage Validation

Bill Production Managers in the Billing Control group perform monthly cycle checks to verify that usage rates are consistent with contract and/or tariff rates.

Usage processing systems (e.g., ALPHA, ETCS and CRIS) edit usage for accuracy and completeness and send resale usage errors to the Message Investigation Center (MIC). UNE usage errors are sent to the BellSouth Reject and Verification Online (BRAVO) system, (maintained by the Wholesale Usage Group) for correction. Usage that cannot post to an account or be properly rated is sent to these error correction groups. The MIC and Wholesale Usage Groups are responsible for managing and investigating usage that fails to meet internal and industry format specifications (e.g., Exchange Messaging Interface (EMI)) and cannot be processed normally through the billing systems. After receiving errors from usage editing, the MIC uses the Collection of Online Usage Errors (CLUE) application to organize message errors with common characteristics for more efficient investigation. The Wholesale Usage Group uses an Error Code Document that provides a description and corrective action for the errors. Once

resolved, corrected usage may be released for billing, deleted (when no revenue was earned), or marked as un-billable (when revenue was earned but cannot be billed e.g., when there is insufficient information on a usage record to identify the party to be billed).

The CLUE and BRAVO systems feed the Interdepartmental Billing Information System (IBIS), which creates error cases⁴⁰⁶ and allows the error correction groups to communicate and track errors between BellSouth departments. IBIS cases are prioritized based on the severity (critical, high and normal) of the underlying problem. The category of each IBIS case is dependent on the volume and monetary value of the error. All wholesale and retail usage IBIS cases are prioritized in this manner as stated in the BellSouth Interface Agreement – Regional Guidelines for the BellSouth Billing, Inc (BBI) Network Infrastructure Service Center. Errors are categorized as they are received and are classified into the following categories:

- ◆ Critical (24-hour turnaround)
- ◆ High (3-day⁴⁰⁷ turnaround)
- ◆ Normal (5-day turnaround)

Each of the above categories has associated escalation timeframes.

2.1.3 Payments and Adjustments

The Centralized Reconciliation Group (CRG) within the Treasury Organization compares payments received to bank deposits to ensure payments and deposits are in balance. Once payments are received, they are transferred to the Cash Processing Group for entry into the Financial Database (FDB). Payments are extracted from the FDB and are posted during the bill calculation stage. If the payment cannot be posted to the customer account, it is captured on the Errors and Unidentified Financial Transactions Report. Investigation of unapplied payments is usually completed within 24 hours and the payment is posted to the correct account.

Adjustments may result from contract disputes, commission rulings or billing disputes. Adjustments related to CRIS or IBS/Tapestry are made online in the Billing Operations Business Office Customer Record Information System (BOCRIS) and post to the appropriate account during the next billing cycle. Adjustments applied to CABS accounts are entered into the Automated Claims Adjustment Tracking System (ACATS) that interfaces directly with CABS. These CABS adjustments will generally post to the appropriate account within the next billing cycle.

2.1.4 Bill Calculation

The main bill calculation activities conducted during the billing cycle include:

- ◆ Collection of recurring charges, non-recurring charges, usage charges, existing balances and other billable events since the previous billing cycle for inclusion on the current bill;
- ◆ Calculation of other charges and credits (OC&Cs) for fractional recurring and non-recurring charges;
- ◆ Application of adjustments and discounts;

⁴⁰⁶ An error case is a grouping of errors with similar attributes such as error type and billing number. This is done to allow for mass correction of errors where possible.

⁴⁰⁷ Business days

- ◆ Application of surcharges, late payment charges and taxes; and
- ◆ Calculation of sub-totals and bill totals.

2.1.5 *Bill Format*

The formatting process produces several formatted bills based on specific criteria available to and requested by each customer. There are five different media options for wholesale bills. These media options are:

- ◆ Paper;
- ◆ CD-ROM (Paper Image);
- ◆ Tape Media - Cartridge Tape (BDT – Bill Data Tape);
- ◆ Tape Media - Round Reel (BDT);
- ◆ BDT format provided over CONNECT:Direct™, 3.5” Floppy disk or File Transfer Protocol (FTP); and
- ◆ Exchange Data Interface (EDI) format provided over CONNECT:Direct™.

2.1.6 *Bill Distribution*

Wholesale bills are produced at two bill distribution centers in Birmingham, Alabama and Alpharetta, Georgia. The Birmingham, Alabama Bill Distribution Center is responsible for processing the following bills:

- ◆ Customized Large User Bills (CLUB), which is a CRIS paper bill.
- ◆ Carrier Access Billing System (CABS) bills which are available in paper, CR-ROM, floppy disk and BDT.

The Alpharetta, Georgia bill distribution center specifically processes retail bills, i.e. consumer and small business bills.

2.1.7 *Bill Verification*

In the Birmingham, Alabama Bill Distribution Center, procedures are in place to check the quality of printed bills. To ensure completeness of a bill print, sequence numbers are checked and control reports are used to ensure that all bills have been produced. Electronic bills and each paper bill (CABS and CLUB) are checked to ensure that expected accounts were produced on the bill. For each billing cycle, BellSouth personnel review a sample of CD-ROMs and a sample of paper bills as a quality control measure. Paper bills are checked for print legibility and CD-ROMs are tested to ensure they are not blank.

In the Alpharetta, Georgia Bill Distribution Center, bills are checked by quantity with no sampling involved (e.g., 1000 bills in and 1000 bills out). Machine operators perform a visual quality control check of sample bills every 30 minutes. Once quality checks are completed, the bills are placed into envelopes and sent to the US Postal Service. For the electronic bills, check-off sheets are also used by BellSouth personnel to ensure that bills for all accounts were produced.

2.1.7.1 *Bill Media and Address Changes*

For ALECs, billing address and media changes are handled through the Wholesale Billing Support (WeBS) group. WeBS is considered an extension of the ALEC's account manager for order processing. WeBS maintains electronic address information on the Customer Billing Options (CBO) table. Address information for paper bills is submitted through the service order process by the Local Carrier Service Center (LCSC) and is posted to the account in the appropriate billing system. Address errors are identified and corrected through the service order error correction process. For electronic bills, the WeBS group is responsible for updating the CBO table directly and this feeds the billing systems for creating bills in the medium requested by the customer.

2.1.8 Bill Balancing

Balancing activities are embedded in the billing application systems and occur throughout all phases of the billing process. The Billing Control group has responsibility for monitoring bill-balancing activities to ensure data completeness, rating accuracy, billing accuracy and system change control. Checks and balances, both systematic and manual, exist to ensure that balances carried forward reflect adjustments and payments received during the previous billing period. To ensure accuracy, Billing Control samples about 700 bills after every rate change for every product.

Retail usage billing has a Run-to-Run group that performs end-of-billing cycle balancing activities to ensure that the data that left ALPHA was received and processed by the appropriate downstream billing systems.

Control reports include RVV reports for reconciliation of usage volumes, Summary of Controlling Records - Proof of Balance reports and Errors and Unidentified Financial Transactions reports. These reports are used for both wholesale and retail usage reconciliation.

2.1.8.1 Out of Balance Conditions

Billing out-of-balance conditions are referred to subject matter experts (SMEs) who investigate and assign a severity code. Severe problems may trigger a stop in the billing cycle run while the problem is resolved (e.g., when a required input file such as a payments file is missing). Multiple jobs run in the production environment during a billing cycle run. If a fatal error occurs when a job is running, the cycle may have to be rerun. Trouble tickets are filed to correct problems. Every situation is unique and requires an assessment of the nature of the problem, customer impact, timeframes for correction, impact on the customer service group, etc.

2.1.9 Capacity Management

Capacity Management procedures ensure the availability of the billing system and other operational support systems (OSS) hardware and network transport elements designed to handle increases in transaction volumes. Processing growth forecasts are completed for the entire BellSouth region and a state-by-state analysis is performed and updated semi-annually. Inputs to the forecasting process include historical data supplied by the LCSC and internal BellSouth business plans. Process outputs center on an estimate of system resources required to support future growth. Capacity planners project future growth for a minimum of one year and a maximum of two years.

2.1.9.1 Capacity Management Responsibilities

Capacity planners for BellSouth Technology Services Inc. (BTSI), also known as BellSouth Technology Group (BTG) analyze data collected by Electronic Data Systems (EDS), a contractor,

and develop quarterly forecasts with semi-annual updates. Four people are responsible for midrange server capacity and three people are responsible for BellSouth internal network planning capacity. The BBI System Designers are responsible for using the port usage⁴⁰⁸ forecasts and developing them into hardware requirements

2.1.9.2 Capacity Management Tracking

The BellSouth Forecasting group collects revenue forecasts and projections for the number of services ordered in a given period. The OSS Product Manager draws upon these forecasts as an input into Local Service Requests (LSR) volume projections. This analysis is sent to the BellSouth Information Technology (IT) Systems Modeling group and includes a growth curve and the monthly growth of actual LSRs. The IT Systems Modeling team uses the forecasted data to assist in their capacity planning of hardware and network resources.

2.1.9.3 Capacity Management Senarios

Capacity Planners use a combination of system statistics and application metrics to plan capacity on an application-by-application basis when established utilization thresholds are met.

The BTSI Information Technology Capacity Planning Strategy White Paper (White Paper) outlines the methodology, practices and requirements to define the processes to allow IT to forecast and acquire appropriate resources.

The White Paper outlines possible scenarios of change within the context of system demands and includes normal incremental growth, sudden unexpected increase in demand and implementation of a new system requiring additional resource capacity in a short time.

3.0 Methodology

This section summarizes the test methodology.

3.1 Scenarios

Scenarios were not applicable to this test.

3.2 Test Targets and Measures

The test targets were the processes and procedures employed by BellSouth to support the issuance of accurate, complete, and timely wholesale bills. Processes that enable an ALEC to request and obtain copies of prior period bills were also examined. Following is a list of the processes and sub-processes that were included in the evaluation. Procedures to:

- ◆ Balance cycle;
 - ◆ Define balancing and reconciliation procedures;
 - ◆ Produce control reports;
 - ◆ Release cycle;
- ◆ Deliver bill media;
- ◆ Maintain bill history;

⁴⁰⁸ This refers to the projection of call volumes that will affect network usage.

- ◆ Maintain billing information;
- ◆ Access billing information;
- ◆ Request resend; and
- ◆ Capacity Management.

3.3 *Data Sources*

Primary data sources provided by BellSouth include the Telecommunications End User Flow Overview – Section 6 Billing Process, the CLEC Billing Guide located on BellSouth's interconnection web site and the Wholesale Billing Guide. Interviews were conducted with BellSouth Florida's personnel and data gathered from these interviews were used to support the analysis of BellSouth documentation. Other data sources include reports from ALPHA, BOCRIS, CRIS, IBS/Tapestry, BRAVO and IBIS.

3.4 *Data Generation/Volumes*

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

3.5 *Evaluation and Analysis Methods*

Information about the processes used in the production, distribution, and resending of bills was obtained through a series of interviews with BellSouth SMEs, as well as through inspections of relevant BellSouth internal and external documentation.

Processes, operational methods and procedures, organizational charts, and supporting documentation were evaluated to determine whether BellSouth's procedures were sufficient to support the production and distribution of accurate, complete and timely bills and resends of prior period bills.

The Bill Production and Distribution Process Evaluation (PPR13) included a checklist of evaluation criteria developed by KPMG Consulting during the initial phase of the BellSouth OSS Evaluation. These evaluation criteria provided the framework and guidelines for the Bill Production and Distribution Process Evaluation (PPR13).

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

3.0 *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 13-1. For additional exception and observation information, refer to Appendices D and E, respectively. The test criteria and results are presented in Table 13-2.

Table 13-1: PPR13 Exception and Observation Count

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

Table 13-2: PPR13 Evaluation Criteria and Results

Test Reference	Evaluation Criteria	Result	Comments
Completeness			
PPR13-1-1	Scope and objectives of the bill cycle balancing process encompass wholesale customer requirements.	Satisfied	<p>Interviews conducted with BellSouth SMEs in the organizations that support wholesale billing between September 2000 and May 2002, as well as KPMG Consulting's review of supporting documents and reports, indicate that the scope and objectives of the bill cycle balancing process encompass wholesale customer requirements.</p> <p>These processes include:</p> <ul style="list-style-type: none"> ◆ Ensuring service orders are accounted for and correctly posted; ◆ Ensuring usage is accounted for and correctly applied; ◆ Ensuring errors are detected and corrected; ◆ Ensuring payments and adjustments are applied; and ◆ Ensuring account balances are accurately rolled forward. <p>Evidence of the above process is documented in the Telecommunications End User Flow Overview - Section 6 Billing Process and the following documentation and reports:</p> <ul style="list-style-type: none"> ◆ Summary of Controlling Records and Proof of Balance Report; ◆ Hold File Daily Error Corrections Report; ◆ Errors and Unidentified Financial Transactions Report; ◆ Web-based BellSouth Billing Guide; and ◆ Carrier Access Tracking and Trending System (CATTS) Reports; and the IBIS Trouble Ticket and Case Log.
PPR13-1-2	Cycle balancing responsibilities	Satisfied	Bill cycle balancing responsibilities and activities are defined

Test Reference	Evaluation Criteria	Result	Comments
	responsibilities are defined.		<p>are defined.</p> <p>KPMG Consulting conducted interviews between September 2000 and May 2002 and reviewed the following BellSouth supporting documentation and reports which include definitions of cycle balancing responsibilities:</p> <ul style="list-style-type: none"> ◆ Hold File Daily Error Corrections Report; ◆ Summary of Controlling Records -Proof of Balance Report; ◆ Errors and Unidentified Financial Transactions Report; ◆ BellSouth Billing Inc. Organization Charts; and ◆ Wholesale Billing Guide, Section 1.4.2.
PPR13-1-3	Cycle balancing procedures exist to identify and resolve out-of-balance conditions.	Satisfied	<p>Cycle balancing processes exist to identify and resolve out-of-balance conditions.</p> <p>KPMG Consulting conducted interviews between September 2000 and May 2002 and reviewed the following BellSouth supporting documentation which includes a description of procedures and reports used to resolve out-of-balance conditions:</p> <ul style="list-style-type: none"> ◆ Service Order Error Correction Procedures; ◆ Wholesale Billing Guide; Controls/Revenue Assurance Section; ◆ Hold File Daily Error Corrections Report; ◆ Summary of Controlling Records Report; and ◆ Proof of Balance Report.
PPR13-1-4	Process includes reasonability checks to identify errors not susceptible to pre-determined balancing procedures.	Satisfied	<p>KPMG Consulting has noted the existence of processes that include reasonability checks to catch errors not susceptible to pre-determined balancing procedures.</p> <p>Interviews conducted between February 2002 and May 2002 revealed that reasonability checks exist for usage data entry based on historical volume tracking and expected input. Supporting documentation and reports reviewed include:</p> <ul style="list-style-type: none"> ◆ RVV Reports; ◆ Guiding Errors Document; and ◆ Mainframe and ALPHA Reports.

Test Reference	Evaluation Criteria	Result	Comments
			<p>Additionally, the bill verification process exists to identify errors not susceptible to predetermined balancing procedures. The following documentation and reports support this process:</p> <ul style="list-style-type: none"> ◆ BBI – BellSouth Billing Inc., NCS - Network & Carrier Services (BBI/ NCS) Interdepartmental Billing Investigation System (IBIS) Document; ◆ Wholesale Billing Guide; Bill Verification Section; and ◆ Daily OC&C Report – Bill Verification Checklist.
PPR13-1-5	Process includes procedures to ensure all payments and adjustments are captured and applied.	Satisfied	<p>Processes exist to ensure all payments and adjustments are captured and applied.</p> <p>KPMG Consulting conducted interviews between September 2000 and May 2002 and reviewed the following BellSouth documentation, which support of this process:</p> <ul style="list-style-type: none"> ◆ The Telecommunications End User Flow Overview - Section 6 Billing Process; ◆ Wholesale Billing Guide, Accounts Receivable Section; and ◆ Pro Payment Processing Flow. <p>The following reports are used to support the process:</p> <ul style="list-style-type: none"> ◆ Errors and Unidentified Financial Transactions Report; and ◆ Summary of Controlling Records and Proof of Balance Report.
PPR13-1-6	Process includes procedures to ensure all service order activity is properly captured and applied.	Satisfied	<p>BellSouth’s service order and billing processing systems ensure that all orders entered are captured, tracked, edited and applied to customer accounts.</p> <p>KPMG Consulting reviewed the following BellSouth documentation which describes and supports the service order processes and procedures:</p> <ul style="list-style-type: none"> ◆ Telecommunications End User Flow Overview - Section 6 Billing Process; ◆ Wholesale Billing Guide; Service Order/ Customer, Controls/Revenue Assurance Section and Bill Verification Sections;

Test Reference	Evaluation Criteria	Result	Comments
			<ul style="list-style-type: none"> ◆ Service Order Error Correction Procedures; and ◆ Service Order Failed Report (lists mechanized orders that require manual intervention). <p>Reports used by BellSouth include:</p> <ul style="list-style-type: none"> ◆ Hold File Daily Error Corrections Report for CRIS, CABS and IBS/Tapestry; ◆ Monthly Service Order Error Analysis Report; ◆ IBS Service Order Error Log; and ◆ Bill and Unmatched CSR Order Verification Report for CABS. <p>The rules for guiding service order activity to the correct customer account are embedded in the billing systems. Orders which have errors are written to a hold file and are investigated by the Service Order Correction Group using documented error correction procedures.</p> <p>The Monthly Service Order Error Analysis Report is used to verify the status of the orders and that errors on the hold file are investigated and resolved. KPMG Consulting reviewed example of reports to verify that service orders with errors are corrected and posted to the bill.</p>
PPR13-1-7	Process includes procedures to ensure all customer usage is properly captured.	Satisfied	<p>BellSouth’s usage processing systems contain controls to ensure all usage is properly captured for processing.</p> <p>KPMG Consulting conducted interviews between September 2000 and May 2002 and reviewed the following BellSouth documentation and reports which describe procedures to ensure customer usage is properly captured:</p> <ul style="list-style-type: none"> ◆ Telecommunications End User Flow Overview - Section 6 Billing Process; ◆ Wholesale Billing Guide; Controls/Revenue Assurance and Usage Sections; ◆ BBI and Network & Carrier Services (NCS) Interface Agreement; ◆ RVV Volume Reconciliation Reports; ◆ BRAVO Error Summary Report;

Test Reference	Evaluation Criteria	Result	Comments
			<ul style="list-style-type: none"> ◆ CATTs Report; and ◆ ALPHA Recirculate Report – Pending UNE Orders Log.
PPR13-1-8	Process includes procedures to ensure customer profile changes such as change of address and bill media preferences are captured and applied.	Satisfied	<p>Procedures exist to ensure customer profile changes for address and bill media are captured and applied.</p> <p>KPMG Consulting conducted interviews between September 2000 and May 2002 and reviewed the following documentation which describe the procedures used by BellSouth in processing bill media and address changes:</p> <ul style="list-style-type: none"> ◆ Telecom End User Flow Overview; and ◆ CLEC Billing Invoice Delivery Database Report. <p>Changes to customer profiles are handled by the WeBS group through maintenance of the Customer Billing Options Database, which is a database containing the CLEC’s selected billing options.</p>
PPR13-1-9	Process includes procedures to ensure bill history retention requirements are operationally satisfied.	Satisfied	<p>Procedures exist to ensure bill history retention requirements are operationally satisfied.</p> <p>KPMG Consulting conducted interviews between September 2000 and May 2002 and confirmed that resale bill data is retained in BOCRIS, and the Mechanized Online Billing Inquiry System (MOBI). BOCRIS is used to store and retrieve bill history on-line for three months. MOBI stores bill history for three years.</p> <p>Bills rendered out of the IBS/Tapestry and the CABS systems are retained in the BBI Data Server for a period of seven years. BOCRIS is also used to retrieve historical IBS/Tapestry bills while the BOCABS interface is used to retrieve historical CABS bills.</p> <p>KPMG Consulting reviewed the following BellSouth supporting documentation:</p> <ul style="list-style-type: none"> ◆ Wholesale Billing Guide; Bill Distribution – BBI Data Server Interface/Input; and ◆ Bill Verification Section, Chapter VII: Accessing MOBI. <p>Additional information was also found in the BellSouth Telecommunications End User Flow Overview Section 6 Billing Process and the</p>

Test Reference	Evaluation Criteria	Result	Comments
			MOBI on-line request form.
PPR13-1-10	Process includes procedures to retrieve and transmit historical billing information.	Satisfied	<p>Historical bill data can be retrieved from MOBI using BOCRIS and MOBI for resale bills and IBS/Tapestry bills and from the BBI Data Server using ICABS for CABS bills.</p> <p>Through the BellSouth account manager, ALECs can request historical bill data from the BellSouth Bill Production Group. Bill verification clerks access one of the retention systems and request a bill resend.</p> <p>KPMG Consulting conducted interviews between September 2000 and May 2002 and reviewed the following BellSouth supporting documentation:</p> <ul style="list-style-type: none"> ◆ Wholesale Billing Guide; Controls/Revenue Assurance – Resend a Previously Rendered Bill; ◆ Wholesale Billing Guide; Bill Distribution – BBI Data Server Interface/Input; and ◆ Bill Verification section, chapter VII: Accessing MOBI. <p>Additional information was also found in the MOBI on-line request form and the Bill Resend Request form.</p>
PPR13-1-11	Bill delivery responsibilities and activities are defined.	Satisfied	<p>Bill delivery responsibilities and activities are defined.</p> <p>KPMG Consulting conducted interviews between September 2000 and May 2002 and reviewed the following BellSouth supporting documentation:</p> <ul style="list-style-type: none"> ◆ Birmingham Bill Distribution Center Roles and Responsibilities; ◆ Wholesale Accounts Organizational Chart; and ◆ Bell South Wholesale Billing Guide. <p>Reports that support the process include:</p> <ul style="list-style-type: none"> ◆ Bill Distribution Monthly Reports; ◆ Bill Distribution Center Annual Workday Release %, Post Billing Real Worksheet; ◆ Alpharetta Bill Distribution Center Central Report; ◆ CLEC Billing Invoice Delivery Database Reports;

Test Reference	Evaluation Criteria	Result	Comments
			<ul style="list-style-type: none"> ◆ UNE Bill and CSR Pages Report; and ◆ UNE Customer Tape Distribution Report.
PPR13-1-12	Process includes procedures to ensure creation of customer bills on appropriate medium.	Satisfied	<p>Procedures exist to ensure creation of customer bills on appropriate medium.</p> <p>The WeBS group manages BellSouth bill media issues, reprint and resend issues. The paper CLUB bill is the default bill for ALEC Customers. ALECs may select an alternate bill medium. CLEC media selections are maintained on a Customer Billing Options Database, which is maintained by the WeBS group. This database feeds the bill to ensure that bills are created in the appropriate medium.</p> <p>KPMG Consulting conducted interviews between September 2000 and May 2002 and reviewed the media options which are documented in the BellSouth CLEC Billing Guide Chapter 3 Billing and Delivery Options. This information can be found on the BellSouth interconnection website⁴⁰⁹.</p>
Accuracy			
PPR13-2-1	Process includes procedures to ensure rate table updates are accurate and timely.	Satisfied	<p>Procedures exist to ensure rate table updates are accurate and timely.</p> <p>KPMG Consulting conducted interviews between September 2000 and May 2002 and reviewed documentation that describes the procedures for rate table updates. The documents include:</p> <ul style="list-style-type: none"> ◆ The 9157 Rate Change Checklist (to control changes to resale rates); ◆ Request for Scheduling of a Large Scale Rate Change; ◆ Wholesale Billing Guide; Rating/Pricing Section for IBS/Tapestry Rate Updates; and ◆ Bill Verification Checklist.
PPR13-2-2	The process includes procedures to ensure recurring and non-recurring rates are accurately applied.	Satisfied	<p>Processes exist to ensure recurring and non-recurring rates are accurately applied. The Billing Control group verifies correct application of rate information based on contracts and/or tariffs daily.</p> <p>KPMG Consulting conducted interviews between September 2000 and May 2002 and reviewed the</p>

⁴⁰⁹ The BellSouth wholesale website is located at www.interconnection.bellsouth.com.

Test Reference	Evaluation Criteria	Result	Comments
	applied.		<p>following BellSouth documentation which describes the application of recurring and non-recurring rates are verified.</p> <ul style="list-style-type: none"> ◆ Wholesale Billing Guide; Service Order/Customer Section; and ◆ Bill Verification Checklist. <p>KPMG Consulting also validated that rates were accurately applied in the TVV11 test.</p>
PPR13-2-3	Process includes internal change management procedures to prioritize, test and implement system changes.	Satisfied	<p>Change management procedures exist to introduce, prioritize, test and implement billing work requests, as defined by the Billing Control Group.</p> <p>KPMG Consulting conducted interviews between September 2000 and May 2002 and reviewed the Configuration Management Tracking System Job Aid, which provides instructions on the following activities:</p> <ul style="list-style-type: none"> ◆ Create/Submit work requests; ◆ Feasibility estimate; ◆ Develop project scope; ◆ Develop requirements and acceptance criteria; ◆ Analysis and design; ◆ Project scope/definition/plan; and ◆ Testing/implementation/close.
PPR13-2-4	A process exists to ensure customer usage is accurately applied.	Satisfied	<p>Processes exist to ensure usage is accurately applied to the appropriate account.</p> <p>KPMG Consulting conducted interviews between September 2000 and May 2002 and reviewed the following supporting documentation and reports:</p> <ul style="list-style-type: none"> ◆ The BellSouth Telecommunications End User Flow Overview - Section 6 Billing Process; ◆ The MIC Measurement Summary Report is used to ensure that resale usage errors are corrected and that the usage is processed through to bills; and ◆ The BRAVO Error Summary Report is used to ensure that UNE usage errors are corrected and usage is billed to the correct customer account.

Test Reference	Evaluation Criteria	Result	Comments
PPR13-2-5	Process provides for quality check of printed bills.	Satisfied	<p>BellSouth has a process for checking quality of printed bills.</p> <p>Bills are checked for quality at the Alpharetta, Georgia and Birmingham, Alabama bill production facilities. Controls include visual checks, page counts and printer monitoring.</p> <p>KPMG Consulting conducted interviews between September 2000 and May 2002 and reviewed the BellSouth Post Billing Real Worksheet, which specifies the quality checks utilized for printed bills.</p>
Timeliness			
PPR13-3-1	Process includes procedures to ensure bills are shipped or transmitted according to the established schedule.	Satisfied	<p>Procedures exist to ensure bills are shipped or transmitted according to schedule KPMG Consulting conducted interviews between September 2000 and May 2002. BellSouth representatives noted the following internal timelines defined for shipping bills:</p> <ul style="list-style-type: none"> ◆ CRIS and IBS/Tapestry bills are shipped within six business days from the bill date; and ◆ CABS bills are shipped within seven calendar days from the bill date. <p>Bills are logged prior to shipment and the shipping/transmission date is noted on the CLEC Billing Invoice Delivery Database Report.</p> <p>KPMG Consulting reviewed BellSouth supporting reports which are used to track the dates on which the bills are shipped or transmitted:</p> <ul style="list-style-type: none"> ◆ The CLUB Work Day Reports; and ◆ The CLEC Billing Invoice Delivery Database Report.
PPR13-3-2	Bill delivery process performance measures are defined, measured and reviewed.	Satisfied	<p>Bill delivery process performance measures are defined, measured and reviewed. The BellSouth Florida Interim Performance Metrics, B-2 Mean Time to Deliver Invoices document defines the goal as 75% of bills mailed by the fifth work day and 98% by the sixth work day.</p> <p>The following reports are used by the bill production team to establish and track the bill date, bill enclosed date, and mailed date:</p> <ul style="list-style-type: none"> ◆ The CLUB Work Day Report;

Test Reference	Evaluation Criteria	Result	Comments
			<ul style="list-style-type: none"> ◆ The Daily Status Bill Distribution Report; and ◆ The CLEC Billing Invoice Delivery Database Report. <p>Management uses these reports to evaluate bill delivery performance.</p>
PPR13-3-3	Process includes procedures to ensure all customer usage is billed according to an established schedule.	Satisfied	<p>Processes exist to ensure customer usage has been billed according to an established schedule within two bill cycles.</p> <p>KPMG Consulting reviewed the following BellSouth supporting documentation:</p> <ul style="list-style-type: none"> ◆ Telecommunications End User Flow Overview Section 6 Billing Process; and ◆ Wholesale Billing Guide. <p>The following reports are used to support usage processing:</p> <ul style="list-style-type: none"> ◆ RVV Reports; ◆ The Mainframe and ALPHA Reports with Guiding Errors Document; ◆ MIC Measurement Summary; and ◆ BRAVO Error Summary Report.
Planning			
PPR13-4-1	The scope of the capacity management procedures is defined.	Satisfied	<p>The scope of capacity management procedures is defined.</p> <p>KPMG Consulting conducted interviews between September 2000 and May 2002 and reviewed BellSouth Capacity Management documentation.</p> <p>Capacity management procedures for CRIS and CABS are defined in the BellSouth Capacity Planning Methodology, Practices and Requirements document.</p> <p>KPMG Consulting noted that the capacity management procedures defined for the IBS/Tapestry system to forecast demand, monitor utilization and initiate load balancing was ineffective when BellSouth experienced a spike in order volumes leading to delayed CLEC bills. As a result, KPMG Consulting issued Exception 169.</p> <p>BellSouth cleared the backlog of delayed bills and revised the IBS/Tapestry Capacity</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>Management Process to address the scalability issues identified in Exception 169. KPMG Consulting reviewed the documented Capacity Management Process for IBS/Tapestry and found that it addressed the scalability issues raised in Exception 169 and closed the exception.</p> <p>The IBS Capacity Management document defines the scope of capacity planning process for the IBS/Tapestry system.</p>
PPR13-4-2	Capacity management responsibilities and activities are defined.	Satisfied	<p>Capacity management responsibilities and activities are defined.</p> <p>KPMG Consulting conducted interviews between September 2000 and May 2002 and reviewed BellSouth capacity management documentation.</p> <p>The responsibilities for capacity planning for the CRIS and CABS systems are defined in the BellSouth Capacity Planning Methodology, Practices and Requirements document and in the IBS Capacity Management document for the IBS/Tapestry system.</p>
PPR13-4-3	A process exists to track business and transaction volumes for use in the capacity planning process.	Satisfied	<p>BellSouth has a process to track business and transaction volumes for use in the capacity planning process.</p> <p>KPMG Consulting conducted interviews between September 2000 and May 2002 and reviewed BellSouth capacity management documentation.</p> <p>The BellSouth Capacity Planning Methodology, Practices and Requirements, the BellSouth Capacity Planning and Management – Standard Operating Procedures and the IBS Capacity Management documents provide the processes used to track business and transaction volumes for use in the capacity planning process.</p> <p>KPMG Consulting noted that the capacity management procedures defined for the IBS/Tapestry system to forecast demand, monitor utilization and initiate load balancing was ineffective when BellSouth experienced a spike in order volumes leading to delayed CLEC bills. As a result, KPMG Consulting issued Exception 169.</p> <p>BellSouth cleared the backlog of delayed bills and revised the IBS/Tapestry Capacity Management Process to address the scalability issues identified in Exception 169. KPMG Consulting reviewed the documented Capacity</p>

Test Reference	Evaluation Criteria	Result	Comments
			Management Process for IBS/Tapestry and found that it addressed the scalability issues raised in Exception 169 and closed the exception.
PPR13-4-4	The capacity planning process uses defined business scenarios, conditions and forecasts to trigger the addition of capacity.	Satisfied	<p>BellSouth has a process, which relies on defined business scenarios, conditions and forecasts to trigger the addition of capacity.</p> <p>KPMG Consulting conducted interviews between September 2000 and May 2002 and reviewed BellSouth Capacity Management documentation, which indicate the business scenarios and forecasting process used to trigger the addition of capacity.</p> <p>This process is outlined in the BellSouth Capacity Planning Methodology, Practices and Requirements and the IBS Capacity Management document.</p> <p>KPMG Consulting noted that the capacity management procedures defined for the IBS/Tapestry system to forecast demand, monitor utilization and initiate load balancing was ineffective when BellSouth experienced a spike in order volumes leading to delayed CLEC bills. As a result, KPMG Consulting issued Exception 169. BellSouth cleared the backlog of delayed bills and revised the IBS/Tapestry Capacity Management Process to address the scalability issues identified in Exception 169. KPMG Consulting reviewed the documented Capacity Management Process for IBS/Tapestry and found that it addressed the scalability issues raised in Exception 169 and closed the exception.</p>

5.0 Parity Evaluation

This section contains the parity evaluation for the Bill Production and Distribution Process Evaluation (PPR13).

5.1 Overview

In accordance with the Florida Master Test Plan, KPMG Consulting examined processes employed by BellSouth to produce and distribute bills to retail customers and those that are employed to produce and distribute bills to ALECs to determine whether the processes are in parity. Based on this review, KPMG Consulting determined that BellSouth's performance in producing and distributing ALEC resale bills is in parity with BellSouth's performance in producing and distributing retail bills.

5.2 Method of Analysis

KPMG Consulting conducted interviews with BellSouth SMEs for both the retail and wholesale billing processes. Interviews were conducted in September 2000 and March 2001. KPMG Consulting also reviewed documentation delineating the billing processes and procedures followed by both the retail and wholesale Account Teams. These reviews focused on the systems, personnel, management structure, facilities, and functional processes used for billing.

5.3 Results

A summary of the results of KPMG Consulting’s evaluation is presented in Table 13-3.

Table 13-3: Resale Bill Production and Distribution Parity Evaluation

Process Target Area	Retail Billing	Wholesale Billing	KPMG Consulting Comments
Systems/Process	The CRIS billing system is used to bill retail accounts. Sub-systems support the handling of balancing functions, cash applications, usage processing, service order processing and rating.	The CRIS billing system is used for resale accounts. The CABS and IBS/Tapestry systems are used to bill UNE products. Sub-systems support the handling of balancing functions, cash applications, usage processing, service order processing and rating.	Although there are different systems for billing retail and UNE products, the processes are similar for bill creation and distribution. There is no distinction made between an ALEC resale or UNE account and a retail account in the processes used to process bills once the data has entered the billing systems.
Personnel	CRIS support personnel manage retail accounts. These personnel include Error Correction Specialists under the direction of the MIC Manager and Billing Specialists reporting to the Manager of Billing Control, the Bill Verification Supervisor, the Manager of BOCRIS, the Manager of Usage Billing, and the Bill Distribution and Production Managers.	CRIS support personnel manage resale accounts. These personnel include Error Correction Specialists under the direction of the MIC Manager and Billing Specialists reporting to the Manager of Billing Control. The CABS and IBS/Tapestry Support personnel manage UNE accounts. The personnel include the Wholesale Usage Group, the Wholesale Accounts Processing and Support Group and the Service Order Correction Group. The Bill Verification Supervisor, the Manager of BOCRIS,	The personnel who handle both retail and wholesale accounts have similar functional job descriptions. Personnel manage work in accordance with methods and procedures that are similar for both retail and wholesale billing.

Process Target Area	Retail Billing	Wholesale Billing	KPMG Consulting Comments
		<p>the Manager of Usage Billing, and the Bill Distribution and Production Managers all handle retail and wholesale accounts.</p>	
<p>Management Structure</p>	<p>For retail accounts, BBI Operations associates and CRIS support personnel report to the Senior Director of Billing Operations and Support, the Director Retail Billing Operations and the Director - CRIS Operations.</p>	<p>For resale and UNE accounts, BBI Operations associates and CRIS and CABS support personnel report to the Senior Director of Billing Operations and Support, and the Director - CRIS Operations.</p>	<p>The management structure at the Senior Director level and Director level is identical for retail and wholesale accounts as evidenced by the BBI organization chart and SME interviews.</p>
<p>Facilities</p>	<p>Retail bills are produced in the Birmingham, Alabama or Charlotte, North Carolina data processing centers.</p> <p>Printing takes place in the Alpharetta, Georgia and Birmingham, Alabama facilities.</p>	<p>Wholesale bills are produced in the Birmingham, Alabama or Charlotte, North Carolina data processing centers.</p> <p>Printing takes place in the Alpharetta, Georgia and Birmingham, Alabama facilities.</p>	<p>Data processing is segregated by geographic region and not by type of account. The facilities used to produce retail bills are the same as those used to produce wholesale bills.</p> <p>No distinction is made by account type as evidenced by the production schedules for the Birmingham, Alabama and Charlotte, North Carolina centers and the Bill Distribution Report for the Birmingham, Alabama and Alpharetta, Georgia facilities.</p>

Process Target Area	Retail Billing	Wholesale Billing	KPMG Consulting Comments
Bill Balancing	<p>Bill Balancing processes for retail accounts include:</p> <ul style="list-style-type: none"> ◆ Error correction; ◆ SO controls; ◆ Usage controls; ◆ Payment controls; and ◆ Balance forwarded. 	<p>Bill Balancing processes for resale accounts include:</p> <ul style="list-style-type: none"> ◆ Error correction; ◆ SO controls; ◆ Usage controls; ◆ Payment controls; and ◆ Balance forwarded. 	<p>Balancing processes and procedures used for wholesale bills are identical to those used for retail bills.</p> <p>For bill balancing processes, no distinction is made by type of account and no significant differences are noted between balancing of retail and the balancing of wholesale accounts.</p>
Account Structure	<p>Retail monthly recurring and non-recurring charges (MRCs) are billed at the billing telephone number (BTN) level.</p> <p>Retail bills include charges for all applicable products provisioned on the BTN and associated working telephone numbers for a given billing period.</p> <p>Details of charges are presented at the appropriate telephone number level.</p>	<p>Monthly recurring and non-recurring charges for ALEC-owned lines are billed to the ALEC’s billing account number and broken down at the telephone number or circuit level for each end user.</p> <p>Wholesale bills include charges for all applicable products provisioned on working telephone numbers or circuits for a given billing period.</p>	<p>Charges are applied in a similar manner for retail and wholesale bills. Details of charges are presented in a similar way. This is evident when comparing paper bills.</p> <p>The process for applying monthly recurring and non-recurring charges is the same for retail and wholesale bill production.</p>
Usage Processing	<p>Retail usage is billed and rated on a per-message or per-minute basis. Directly dialed messages are detailed at the originating telephone number level and billed to the BTN for a given billing period.</p>	<p>Resale usage is billed and rated on a per-message or per-minute basis. Directly dialed messages are detailed at the originating telephone number level and billed to the BTN for a given billing period. A resale discount is applied at the detail level for detail-rated calls and the aggregate level for aggregate-rated calls.</p> <p>UNE usage is billed and rated by the</p>	<p>The usage processing for both retail and resale is identical. There is an additional rating component for resale usage in which the appropriate resale discount is applied.</p> <p>Common daily message processing systems and the CRIS and IBS/Tapestry billing systems are used to process both retail and wholesale usage using similar processes.</p>

Process Target Area	Retail Billing	Wholesale Billing	KPMG Consulting Comments
		IBS/Tapestry system. Usage is applied to each customer account in the IBS/Tapestry system.	

5.4 Parity Results Summary

Retail billing is analogous to wholesale billing. KPMG Consulting noted no differences in performance in the production of retail and wholesale bills and concludes the two are in parity.

6.0 Final Summary

This section summarizes the number of test evaluation criteria discussed in Table 13-2 and the number that was satisfied or not satisfied at the conclusion of this test.

6.1 Summary of Findings

There were 24 evaluation criteria considered for the Bill Production and Distribution Process Evaluation (PPR13). All 24 evaluation criteria are received a satisfied result.

Since all evaluation criteria are satisfied, KPMG Consulting considers the Bill Production and Distribution Process Evaluation (PPR13) satisfactory at the time of final report delivery.

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D. Test Results: Billing Functional Usage Evaluation (TVV10)

1.0 Description

The Billing Functional Usage Evaluation (TVV10) analyzed BellSouth's daily message processing to ensure usage record types including access records, rated records, unrated records, and credit records appeared in accordance with defined guidelines on the Daily Usage File (DUF). KPMG Consulting examined BellSouth's ability to capture customer telephone usage as data records and validated that the resulting records were complete, accurate and delivered in a timely manner to Alternative Local Exchange Carriers (ALECs). During the test, KPMG Consulting acted as a non-facilities-based ALEC providing Resale and Unbundled Network Elements – Platform (UNE-P) services to business and residential customers. As part of its normal business process, BellSouth captured information about each instance of network usage for the KPMG Consulting ALEC and delivered the data to KPMG Consulting.

The objective of the Billing Functional Usage Evaluation (TVV10) was to test the completeness, accuracy, and timeliness of DUF delivery by BellSouth.

During the testing period, BellSouth upgraded its UNE billing system. The results reflected in this draft represent KPMG Consulting's findings subsequent to the implementation of the UNE billing upgrade.

2.0 Business Process

This section describes BellSouth's business process used to generate and distribute DUFs to the ALECs.

2.1 Business Process Description

DUFs contain records that provide details of calls that originate from, and are recorded by, BellSouth's switches, as well as records for alternately billed calls⁴¹⁰ that originate from other Local Exchange Carriers (LECs). BellSouth processes these message records through multiple systems and identifies the ALECs to which the usage belongs. Records are translated into Exchange Message Interface (EMI) format and are delivered to ALECs on a daily basis via one of the available delivery options: CONNECT:Direct,TM LAN-to-LAN, or dial-up, as selected by the ALEC.

The actual processing of usage occurs as follows:

- ◆ The end-user places a call;
- ◆ The call is recorded by the switch, located in the BellSouth central office, that serves the originating number;
- ◆ The usage detail is sent to the BellSouth message processing system via the switch collection process. Switch collection occurs on either a time-sensitive (no less than daily), or volume-sensitive (storage capacity of the switch) basis;
- ◆ The BellSouth message processing system formats, sorts, and, if necessary, rates the usage. This process was changed from once daily to multiple times daily as part of the January 2002

⁴¹⁰ Alternately-billed calls are calls that are billed to a telephone number other than the originating number, such as collect, third number billed, and calling/credit card calls.

UNE billing upgrade. Records are formatted into EMI format for external DUF delivery and into BellSouth internal proprietary formats for billing. Any errors are placed into recirculation to await correction;

- ◆ ALEC ownership of the usage is determined by guide files that are established and updated through service order activity;
- ◆ DUF datasets are generated and delivered each business day; and
- ◆ The DUF dataset is sent to the ALEC via electronic transmission.

Throughout the processing stream, BellSouth has integrated balancing software (UNITECH) to ensure that the inputs and outputs of each process are reconciled. A manual-balancing group reviews process reports and resolves any out-of-balance conditions.

3.0 Methodology

This section summarizes the test methodology.

3.1 Scenarios

This transaction-based evaluation used scenarios representative of resale and UNE-P products and services offered to business and residential customers in Florida. The scenarios represented available switch technologies (i.e., DMS100, 5ESS, EWSD, and TOPS), product and service types, and service order types. The service order scenarios included conversions of account ownership from one LEC to another (known as migrations), feature changes and/or class of service changes.

Once the scenarios were defined, the orders were scheduled and executed. Migration orders were submitted with a specific due date. Test calls were placed before, after, and on the migration date to evaluate DUF delivery during the migration process.

KPMG Consulting also developed test cases emulating a variety of telephone calls typically made by business and residential customers. The test cases included local, intra-LATA toll and long distance calls, as well as operator-assisted and completed call types.

Test scripts were created by combining test scenarios with test cases in a variety of permutations. The test scripts applied real-world call types against representative customer accounts. KPMG Consulting testers executed the test scripts in the field by placing test calls on lines provisioned in BellSouth central offices and external locations.

3.2 Test Targets and Measures

The Billing Functional Usage Evaluation (TVV10) targeted the completeness of the DUF, the accuracy of the data contained in the DUF records, and the age of the calls within the DUF, which indicates the timeliness of DUF delivery to ALECs.

3.3 Data Sources

The sources of data for this test included reviews of documentation supplied by BellSouth at the request of KPMG Consulting and the following items:

- ◆ Completed test scripts by KPMG Consulting;
- ◆ DUFs received from BellSouth;

- ◆ EMI guidelines manual (V.17, released in April 2000); and
- ◆ ALEC billing and DUF information available on BellSouth’s interconnection website.

3.4 Data Generation/Volumes

KPMG Consulting placed multiple call types across the state of Florida on a variety of BellSouth switch types. Table 10-1 identifies the locations and switch types from which calls were placed:

Table 10-1: TVV10 Test Calling Locations

Central Office	Address	Switch Type
Belmont	605 West Garden Street, Pensacola, Florida	EWSD
Clay Street	301 West Bay Street, Jacksonville, Florida	DMS100
Annex	777 South Flagler Drive, West Palm Beach, Florida	5ESS
Opa Locka	13305 Northwest 45 th Avenue, Opa Locka, Florida	5ESS
Sand Lake	7900 Mandarin Drive, Orlando, Florida	5ESS
Main Relief	450 East Las Olas Boulevard, Fort Lauderdale, Florida	DMS100

3.5 Evaluation and Analysis Methods

Execution of the Billing Functional Usage Evaluation (TVV10) required BellSouth to establish a test bed of accounts based on KPMG Consulting requirements, against which test calls were placed. The test calls consisted of commonly placed incoming and outgoing call types generated over various switch types. KPMG Consulting testers recorded specific information about the calls, such as: call-from number, call-to number, call time and duration.

Tester call logs were examined to determine which calls should appear on the DUF. Calls not expected to appear on the DUF were evaluated to ensure that no DUF record was received. For test calls that should have appeared on the DUF, KPMG Consulting examined the DUF data to locate a valid record meeting the specifications of the call as it was recorded in the test call log.

DUF records were further examined to ensure that the appropriate ALEC received them and that the records adhered to EMI guidelines. DUF records received from BellSouth were examined to ensure that the file trailer contained an accurate count of DUF records.

DUF timeliness, as defined in the BellSouth Operations Support Systems (OSS) Service Quality Measurements (SQMs) Plan, Florida Interim Performance Metrics, June 1, 2001, Version 3.0, was measured by counting the number of calendar days between the day of the creation of the message and the day the usage information was made available, i.e. the transmission date to the ALEC.

The Billing Functional Usage Evaluation (TVV10) included a checklist of evaluation criteria developed by KPMG Consulting during the initial phase of the BellSouth OSS Evaluation. These evaluation criteria provided the framework for the norms, standards, and guidelines for the test.

The data collected were analyzed employing the evaluation criteria referenced in Section 4.1, Table 10-3.

4.0 Results

This section identifies 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 10-2. For additional exception and observation information, refer to Appendices D and E, respectively. The test criteria and results are presented in Table 10-3.

Table 10-2: TVV10 Exception and Observation Activity

Activity	Exceptions	Observations
Total Issued	8	6
Total Disposed of as of Final Report Date	8	6
Total Open as of Final Report Date	0	0

Table 10-3: TVV10 Evaluation Criteria and Results

Test Reference	Evaluation Criteria	Result	Comments
TVV10-1	Expected DUF records are received by the correct owner.	Satisfied	<p>Expected DUF records were provided to the correct owner.</p> <p>BellSouth did not have a documented standard for receipt of DUF records transmitted to ALECs; therefore KPMG Consulting applied a benchmark of 95%.</p> <p>KPMG Consulting conducted an initial DUF test in December 2000. KPMG Consulting executed 2,204 test calls for which DUF records were expected. DUF records were received for 1,868 (85%) of the 2,204 test calls. Exception 31 was issued describing these results.</p> <p>KPMG Consulting conducted a retest in May and June 2001 following programming changes implemented by BellSouth. KPMG Consulting executed 2,382 test calls for which DUF records were expected. DUF records were received for 2,268 (95%) of the 2,382 test calls. As a result, Exception 31 was closed.</p> <p>Based on the May and June 2001 retest data, KPMG Consulting identified that DUF records were not received for customer service calls from two of the central offices tested. As a result, Exception 79 was issued. Following discussions with BellSouth and the Florida Public Service Commission (FPSC), KPMG Consulting determined that ALEC end-user customers should use the ALEC's customer service rather than BellSouth's customer</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>service. Exception 79 was closed based upon this conclusion.</p> <p>KPMG Consulting conducted a second retest in December 2001 due to DUF timeliness issues (see criterion TVV10-6). KPMG Consulting executed 598 test calls for which DUF records were expected. DUF records were received for 529 (88%) of the 598 test calls. Exception 149 was issued.</p> <p>BellSouth provided information in its response to Exception 149 regarding additional DUF records that were sent following the conclusion of KPMG Consulting’s initial analysis of the second retest. KPMG Consulting performed additional analysis to include the late records. Following this analysis, KPMG Consulting determined that BellSouth sent DUF records related to 572 (96%) of the 598 test calls placed. As a result, Exception 149 was closed.</p> <p>KPMG Consulting conducted further retesting in April and May 2002 following the Tapestry upgrade by BellSouth. KPMG Consulting executed 10,040 test calls for which DUF records were expected. DUF records were received for 9,659 (96%) of the 10,040 test calls.</p> <p>See Tables TVV10-4 and TVV10-5 for more information.</p>
TVV10-2	Unexpected DUF records were not received.	Satisfied	<p>KPMG Consulting did not receive unexpected DUF records during the initial testing conducted in December 2000.</p> <p>BellSouth did not have a documented standard for receipt of unexpected DUF records transmitted to ALECs; therefore KPMG Consulting applied a benchmark of 95%.</p> <p>KPMG Consulting placed 930 test calls for which DUF records were not expected. A review of the records received was conducted to determine if any unexpected DUF records were received.</p> <p>Following the DUF retest in May and June 2001, KPMG Consulting noted that for nine (0.3%) of the completed test scripts expected to generate DUF records, multiple DUF records were received for the same test call. Exception 83 was issued as a result.</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>KPMG Consulting conducted an additional DUF retest in December 2001 to test resale usage billing and DUF functionality following additional BellSouth programming changes. No duplicate records were generated from the 598 test calls. As a result, Exception 83 was closed.</p> <p>KPMG Consulting conducted further retesting in April and May 2002 following the Tapestry upgrade by BellSouth. KPMG Consulting executed 2,358 test calls for which DUF records were not expected. KPMG Consulting received no unexpected DUF records during this retest.</p>
TVV10-3	DUF record packs are complete.	Satisfied	<p>DUF record packs were complete.</p> <p>BellSouth did not have a documented standard for pack record completeness; therefore KPMG Consulting applied a benchmark of 95%.</p> <p>KPMG Consulting reviewed 95 DUF record packs generated during the December 2000 DUF test and confirmed that all 95 (100%) record packs contained the number of records indicated by the respective pack trailer records.</p> <p>KPMG Consulting reviewed 96 DUF record packs generated during the May and June 2001 DUF retest and confirmed that all 96 (100%) record packs contained the number of records indicated by the respective pack trailer records.</p> <p>KPMG Consulting reviewed 25 DUF record packs generated during the December 2001 resale DUF retest and confirmed that all 25 (100%) record packs contained the number of records indicated by the respective pack trailer records.</p> <p>KPMG Consulting reviewed 151 DUF record packs generated during the April and May 2002 DUF retest and confirmed that all 151 (100%) record packs contained the number of records indicated by the respective pack trailer records.</p>
TVV10-4	DUF records adhere to EMI guidelines.	Satisfied	<p>DUF records adhered to the EMI guidelines.</p> <p>BellSouth did not have a documented standard for EMI guideline adherence; therefore KPMG Consulting applied a benchmark of 95%.</p> <p>KPMG Consulting reviewed 2,676 DUF records produced by BellSouth during the December 2000 DUF test and confirmed that</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>all 2,676 (100%) were formatted in accordance with EMI guidelines.</p> <p>KPMG Consulting reviewed 3,598 DUF records produced by BellSouth during the May and June 2001 DUF retest and confirmed that all 3,598 (100%) were formatted in accordance with EMI guidelines.</p> <p>KPMG Consulting reviewed 731 DUF records produced by BellSouth during the December 2001 resale DUF retest and confirmed that all 731 (100%) were formatted in accordance with EMI guidelines.</p> <p>KPMG Consulting reviewed 13,737 DUF records produced by BellSouth during the April and May 2002 DUF retest and confirmed that all 13,737 (100%) were formatted in accordance with EMI guidelines.</p>
TVV10-5	DUF record fields are accurately populated.	Satisfied	<p>DUF record fields were accurately populated.</p> <p>BellSouth did not have a documented standard for DUF record accuracy; therefore KPMG Consulting applied a benchmark of 100%.</p> <p>KPMG Consulting reviewed DUF records received from BellSouth to determine the accuracy of data contained in the records.</p> <p>KPMG Consulting reviewed the 2,675 DUF records received related to the December 2000 test and noted that, while 2,388 (89%) records were accurately populated, 147 (6%) had inaccurate data in the “to number” field for customer service calls where the NPA (area code) contained the letter “F” rather than the expected numeric digits. As a result, KPMG Consulting issued Exception 29. KPMG Consulting also received 140 (5%) records where the “to number” field contained “F” in the line number rather than the expected numeric digits. As a result, Exception 30 was issued.</p> <p>A DUF retest was conducted following programming changes made by BellSouth in May and June 2001. KPMG Consulting reviewed the 3,598 related records to determine the accuracy of the DUF record. All 3,598 (100%) records were confirmed to have accurately populated “to number” fields. As a result, Exceptions 29 and 30 were closed.</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>KPMG Consulting conducted further retesting in April and May 2002 following the Tapestry upgrade by BellSouth. KPMG Consulting reviewed the 13,737 related records to determine the accuracy of DUF field population. The fields in all 13,737 (100%) records were accurately populated.</p>
TVV10-6	DUFs are delivered to the ALEC in a timely manner.	Satisfied	<p>DUF were delivered to the ALEC in a timely manner.</p> <p>BellSouth did not have a documented standard for DUF delivery timeliness; therefore KPMG Consulting applied a benchmark of 95% within six calendar days for this evaluation criterion.</p> <p>KPMG Consulting conducted the initial DUF test in December 2000 when 2,675 DUF records were received. 2,518 (94%) DUF records were received within six calendar days. Exception 13 was issued as a result.</p> <p>KPMG Consulting conducted a retest in May and June 2001 following programming changes implemented by BellSouth. KPMG Consulting received 3,598 DUF records from the May and June 2001 retest, of which 2,953 (82%) were received within six calendar days.</p> <p>Following further programming changes by BellSouth, KPMG Consulting conducted a second retest in December 2001 to test resale usage billing and DUF functionality. KPMG Consulting received 731 DUF records from the December 2001 retest, of which 702 (96%) were received within six calendar days. As a result Exception 13 was closed.</p> <p>Based on BellSouth’s response to Exception 149 (see criterion TVV10-1), KPMG Consulting conducted additional analysis on the December 2001 DUF retest data following delivery of additional related DUF records after closure of Exception 13. The inclusion of these additional records in the analysis revised the total to 948 DUF records from the December 2001 retest. 702 (74%) of the DUF records were received within six calendar days. As a result, Exception 159 was issued.</p> <p>KPMG Consulting conducted further retesting in April and May 2002 following the Tapestry upgrade by BellSouth. KPMG Consulting received 13,737 DUF records from this retest,</p>

Test Reference	Evaluation Criteria	Result	Comments
			of which 13,357 (97%) were received within six calendar days. As a result Exception 159 was closed. See Table TVV10-6 for more information.

4.2 Additional Data

Table TVV10-4: Tester Log Entry Breakdown

Category	Count
Total Number of Test Scripts not expected to produce a DUF record	2,358
Total Number of Test Scripts expected to produce a DUF record	10,040
Total Number of Test Scripts	12,398

Table TVV10-5: DUF Matching Analysis

Category	Count	Percentage of Total
Total Number of Test Scripts expected to produce DUF record(s) that resulted in matching DUF record(s)	9,659	96.2%
Total Number of Test Scripts expected to produce DUF record(s) that did not result in matching DUF record(s)	381	3.8%
Total Number of Test Scripts expected to produce DUF record(s)	10,040	100%

Table TVV10-6: DUF Timeliness Analysis

Record Receipt	Count	Percentage	Cumulative Percentage
DUF records received within 1 business day	10,035	73.1%	73.1%
DUF records received within 2 business days	1,776	12.9%	86.0%
DUF records received within 3 business days	386	2.8%	88.8%
DUF records received within 4 business days	557	4.0%	92.8%
DUF records received within 5 business days	458	3.3%	96.1%
DUF records received within 6 business days	145	1.1%	97.2%
DUF records received within >6 business days	380	2.8%	100%
Total DUF records received	13,737	100%	

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 six evaluation criteria considered for the Billing Functional Usage Evaluation (TVV10). All six evaluation criteria received a satisfied result.

As all evaluation criteria are satisfied, KPMG Consulting considers the Billing Function Usage Evaluation (TVV10) test area satisfied at the time of the final report delivery.

E. Test Results: Functional Carrier Bill Evaluation (TVV11)

1.0 Description

The Functional Carrier Bill Evaluation (TVV11) was a review of BellSouth's ability to deliver timely and accurate bills to Alternative Local Exchange Carriers (ALECs). This evaluation examined the content and timeliness of delivery of carrier bills received by KPMG Consulting in the role of a virtual ALEC (CKS). This evaluation examined resale, Unbundled Network Elements (UNE) and Unbundled Network Elements – Platform (UNE-P) accounts, as processed by the Customer Records Information System (CRIS) billing system and Carrier Access Billing System (CABS) to determine if BellSouth accurately billed usage charges, monthly recurring charges, and non-recurring charges. The evaluation included a review of three types of bill format: CD ROM, Billing Output Specification Bill Data Tape (BOS BDT) and the paper bill.

During the testing period, BellSouth upgraded its UNE billing system to the Tapestry System. Tapestry is an upgrade to the CRIS UNE and UNE-P rating, bill formatting and accounts receivable processes. The results reflected in this report represent KPMG Consulting's findings inclusive of the implementation of the UNE billing upgrade.

2.0 Business Process

This section provides a description of the carrier bill process at BellSouth.

2.1 Business Process Description

BellSouth produces many types of bills that are distributed monthly. Each bill type covers a specific set of products and services. Resale bills are produced by the CRIS billing system, which also produces bills for BellSouth's retail customers. UNE and UNE-P bills are processed through CRIS, CABS, and, as of January 2002, the Integrated Billing Solution (Tapestry/IBS). Resale services are those BellSouth retail services purchased by ALECs or resellers and resold to their end user customers. UNE services are network elements (e.g. port, loop) sold separately to the ALECs.

BellSouth's ALEC bills are structured in a hierarchical manner. At the top of the hierarchy is the Master Account or "Q" account. A unique Master Account identifies each type of service. Charges for individual Billing Telephone Numbers (BTNs) and Earning Telephone Numbers⁴¹¹ (ETNs) are aggregated under the "Q" Account. Table 11-1 describes the bill types, types of service, and bill formats selected for evaluation.

⁴¹¹ ETN is the sub-account where the service is charged or earned.

Table 11-1: Bill Types and Formats Reviewed for the Functional Carrier Bill Evaluation Test

Bill Type	Description	Format
Resale Bill	<ul style="list-style-type: none"> ◆ Resale services ◆ Administrative charges (e.g., bill media) 	<ul style="list-style-type: none"> ◆ Customized Large User Bill (CLUB) paper bill ◆ Diskette Analyzer Bill (DAB) paper image CD-ROM
“N” Bill	<ul style="list-style-type: none"> ◆ SL1 Loops (2-Wire Analog Non-Designed Loops) 	<ul style="list-style-type: none"> ◆ Paper ◆ Billing Output Specifications-Billing Data Tape (BOS BDT) ◆ CBOS paper image CD-ROM
CABS	<ul style="list-style-type: none"> ◆ SL2 Loops (2-Wire Analog Designed Loops) 	<ul style="list-style-type: none"> ◆ Billing Output Specifications-Billing Data Tape (BOS BDT) ◆ DAB paper image CD-ROM
“J” Bill	<ul style="list-style-type: none"> ◆ 2-Wire Analog Ports ◆ 2-Wire Analog Port-Loop Combinations ◆ Associated usage 	<ul style="list-style-type: none"> ◆ Paper ◆ BOS-BDT ◆ DAB Paper Image CD-ROM

3.0 Methodology

This section summarizes the test methodology.

3.1 Scenarios

The analysis of carrier bill content was dependent on the successful execution of ordering, provisioning and usage generation scenarios. The test cases included resale, UNE and UNE-P service offerings.

Scenarios that included execution of the following activities were performed on test lines during the Functional Carrier Bill Evaluation (TVV11) test:

- ◆ Retail to resale conversion with or without changes (BellSouth end-user customer converts to an ALEC);
- ◆ Retail to UNE-P conversion with or without changes (BellSouth end-user converts to a ALEC);
- ◆ Retail to UNE conversion (BellSouth end-user customer converts to ALEC);
- ◆ Feature changes to existing customer;
- ◆ Add new customer;
- ◆ Suspend and restore service;
- ◆ Telephone number change;
- ◆ Directory change;

- ◆ Add lines;
- ◆ Disconnect service (customer disconnects service);
- ◆ Moves (inside and outside);
- ◆ Convert line to Integrated Services Digital Network (ISDN);
- ◆ Resale to retail conversion (ALEC end-user converts to BellSouth);
- ◆ UNE to retail conversion (ALEC end-user converts to BellSouth);
- ◆ Resale to UNE-P migration (ALEC end-user migrates to UNE-P from resale);
- ◆ Resale to UNE migration (ALEC end-user migrates to UNE from resale);
- ◆ UNE-P to UNE Loop migration (ALEC end-user migrates to UNE from UNE-P);
- ◆ Standalone Local Number Portability (LNP); and
- ◆ ALEC-to-ALEC migration.

These scenarios were executed for: resale, UNE and UNE-P accounts across nine central offices and three BellSouth switch-types. The Florida central offices include Gainesville (CFLD), Ft. Lauderdale (FLDS), Jacksonville (JX), Miami (MMID), Opa Locka/Miami (MMIP), Orlando (ORSL), Panama City Beach (PCB), Pensacola (PNSB) and West Palm Beach (WPB).

Table 11-2: Central Office Locations and Switch Type

Central Office	Address	Switch Type
Gainesville (CFLD)	112 SE 1 st Avenue, Gainesville, Florida	5ESS
Ft. Lauderdale (FLDS)	450 East Las Olas Boulevard, Ft. Laud., Florida	DMS100
Jacksonville (JX)	301 West Bay Street, Jacksonville, Florida	DMS100
Miami (MMID)	45 NW 5 th Street, Miami, Florida	5ESS
Opa Locka/Miami (MMIP)	13305 Northwest 45 th Ave., Opa Locka, Florida	5ESS
Orlando (ORSL)	7900 Mandarin Drive, Orlando, Florida	5ESS
Panama City Beach (PCB)	604 Nautilus Street, Panama City Beach, Florida	DMS100
Pensacola (PNSB)	605 West Garden Street, Pensacola, Florida	EWSD
West Palm Beach (WPB)	777 South Flagler Drive, W. Palm Beach, Florida	5ESS

3.2 Test Targets and Measures

This test targeted the timely delivery of bills and the accurate, complete and timely appearance of charges on the appropriate bills in accordance with industry guidelines and BellSouth published specifications. The following sub-processes constitute the test target:

- ◆ Carry balance forward;
- ◆ Verify billing accounts;
- ◆ Verify recurring charges;
- ◆ Bills and delivery;

- ◆ Verify one-time charges;
- ◆ Verify prorated recurring charges;
- ◆ Verify usage charges;
- ◆ Verify discounts;
- ◆ Verify adjustments;
- ◆ Verify late charges⁴¹²; and
- ◆ Receive bill copy.

3.3 Data Sources

The information collected for the test was obtained from:

- ◆ CLEC Start-Up Guide for Interconnection Services;
- ◆ Interconnection Agreement between BellSouth and CKS, Inc.;
- ◆ General Subscriber Service Tariff;
- ◆ BellSouth CLEC Billing Guide;
- ◆ Wholesale Billing document;
- ◆ Exchange Message Interface (EMI) documentation;
- ◆ FCC Tariff;
- ◆ BellSouth bill samples; and
- ◆ Understanding Your Bill Manual.

Billing data was obtained from paper bills that were the subject of the Functional Carrier Bill Evaluation (TVV11) received during the months of December 2000 through June 2001 for resale bills⁴¹³. Test results were refreshed using data from resale bills generated during October 2001 through January 2002⁴¹⁴. Data for UNE and UNE-P was obtained from bills generated March 2002 through May 2002 after the Tapestry⁴¹⁵ system was implemented.

3.4 Data Generation/Volumes

Based on test bed requirements developed by KPMG Consulting, BellSouth provisioned test lines and circuits to provide a mix of line types specified in the Florida Master Test Plan (MTP). Data included in the bill validation component of the evaluation were gathered from multiple sources including Local Service Requests (LSRs), Firm Order Confirmations (FOCs), service order

⁴¹² KPMG Consulting incurred no late charges due to the internal process established for prompt credits to BellSouth. As a result, no late charges were applied to our bills as would be expected.

⁴¹³ For evaluation criteria TVV11-3-3, resale bill production timeliness was evaluated using invoices generated from 2/2002 through 5/2002 coinciding with the UNE and UNE-P bill production timeliness evaluation.

⁴¹⁴ Refresh data were gathered using the original accounts that were not disconnected as part of the initial test. Refresh data for non-recurring charges (NRC) were gathered from available paper bills received during October 2001 through January 2002. These NRCs refreshed 80% of the original NRC test occurrences.

⁴¹⁵ Tapestry is a major upgrade to the CRIS UNE and UNE-P rating, bill formatting and accounts receivable processes.

Completion Notices (CNs), Customer Service Records (CSRs), Daily Usage Files (DUFs), and billing records sent to KPMG Consulting in paper, BOS BDT and CD ROM format.

3.5 *Evaluation and Analysis Methods*

KPMG Consulting selected resale, UNE and UNE-P product and service offerings for evaluation based on the requirements documented in the MTP, Appendix A, Test Cases.

Bill validation for individual accounts was conducted over a three-month period. This included one month to establish a correct baseline bill, one month for order activity, and one month for post activity validation. Expected results were defined for each test case.

The following bills were generated and evaluated for most customers:

- ◆ Bills from the first month are considered the baseline bills where customers, created for this test, are billed for the first time from the initial test bed. These bills were produced prior to the execution of any transactions that affect selected customers.
- ◆ Bills from the second and third months were produced after selected test cases were executed. The second month's bills include activity such as pro-rates, disconnects, migrations, adjustments, etc. The third month's bills may or may not include order activity. Some customers were created during the test execution and only received bills after the second month.

BellSouth documentation was reviewed to gather information related to bill structure, content, and bill elements for each of the relevant bill formats. KPMG Consulting conducted meetings with BellSouth subject matter experts (SMEs) to review bill format layouts and to determine the applicable rate elements for various services. Using this information, KPMG Consulting constructed a detailed test plan and bill validation procedures.

KPMG Consulting developed expected results for each test case based on the policies, business rules, and rate structure specified in BellSouth documentation and procedures. Expected results were compared to bills produced by BellSouth to verify that charges were appropriately and accurately billed.

Validation procedures included examination of recurring and non-recurring charges, pro-ration calculations, service establishment and disconnection dates, adjustments, late payment charges and unpaid balances. KPMG Consulting also evaluated bills that contained usage charges for billable messages to verify the accuracy of the usage billing components, rates and quantities.

Bill formats were reviewed to verify that required elements (e.g., pro-rations, Other Charges & Credits (OC&C), recurring charges, usage charges, etc.) appeared on the appropriate bill. Bills also were evaluated for compliance with criteria related to:

- ◆ Bill format, at the Master "Q" Account and BTN levels;
- ◆ Bill calculations cross check totals, bill content; and
- ◆ Timeliness of bill delivery.

The metric, Mean Time to Deliver Invoices (B-2), as defined in the June 2001 Florida Service Quality Measurements Interim Performance Metrics, was measured during this evaluation. According to the metric, CRIS bills will be released to the Post Office within six business days including the bill date and CABS bills within eight calendar days not inclusive of the bill date. KPMG Consulting did not observe the actual mailing of bills by BellSouth. Therefore, for

purposes of this analysis, carrier bill delivery timeliness was determined by counting the number of business days from and including the bill date to the postmark date for CRIS bills, and by counting the number of calendar days from but not including the bill date to the postmark date for CABS. The BOS BDT was evaluated for syntax and content. Syntax was checked by creating a program that contained business rules for developing the BOS BDT file as published in Telcordia's CABS BOS Version 36 and BellSouth's CABS BOS Differences List for Version 36⁴¹⁶. The KPMG Consulting program compared files created in December 2001 through April 2002 to business rules and reported any deviations. The BOS BDT content was checked by creating a report similar to the bills represented. The report was then manually compared to its corresponding paper bill for equality in services, charges and phrases.

The Functional Carrier Bill Evaluation (TVV11) included a checklist of evaluation criteria developed by KPMG Consulting during the initial phase of the BellSouth OSS Evaluation. These evaluation criteria provide the framework of norms, standards and guidelines for the Functional Carrier Bill Evaluation (TVV11).

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 11-3. For additional exception and observation information, refer to Appendices D and E, respectively. The test criteria and results are presented in Table 11-4.

Table 11-3: TVV11 Exception and Observation Count

Activity	Exceptions	Observations
Total Issued	10	7
Total Disposed as of Final Report Date	10	6
Total Open as of Final Report Date	0	1

Table 11-4: TVV11 Evaluation Criteria and Results

Test Reference	Evaluation Criteria	Result	Comments
Completeness			
TVV11-1-1	The appropriate major bill sections appear on paper format bills per BellSouth documentation.	Satisfied	BellSouth accurately reflected the appropriate major bill section on the paper format bills. In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of the appropriate major bill sections appear on paper

⁴¹⁶ Dated February 4, 2002

Test Reference	Evaluation Criteria	Result	Comments
			<p>format bills.</p> <p>KPMG Consulting evaluated 60 CRIS resale bills from December 2000 through June 2001 to ensure major sections appeared on the paper format bills as expected. All 60 (100%) resale paper bills received from BellSouth had the appropriate major bill sections.</p> <p>KPMG Consulting evaluated 137 CRIS resale bills from October 2001 through January 2002 to refresh the original resale data. All 137 (100%) refreshed resale bills received from BellSouth had the appropriate major bill sections.</p> <p>KPMG Consulting evaluated 40 UNE bills from March 2002 through June 2002 to ensure major sections appeared on the paper format bills as expected. All 40 (100%) of the UNE paper bills received from BellSouth had the appropriate major bill sections.</p> <p>KPMG Consulting evaluated 68 UNE-P bills from March 2002 through June 2002 to ensure major sections appeared on the paper format bills as expected. All 68 (100%) UNE-P paper bills received from BellSouth had the appropriate major bill sections.</p> <p>The major sections reviewed included:</p> <ul style="list-style-type: none"> ◆ Summary of Charges Billed; ◆ Index of Charges Billed; ◆ Payments and Adjustments; ◆ Earning Number Detail pages; ◆ USOC Summary; and ◆ Billing Number Charges. <p>The bill types evaluated include CLUB, “N” and “J” paper formats and Diskette Analyzer Bill (DAB) paper image CD-ROM.</p>
TVV11-1-2	The appropriate sub-accounts appear under the correct Master Account on paper format bills.	Satisfied	<p>Appropriate sub-accounts appeared under the correct Master Account on BellSouth paper bills.</p> <p>In the absence of a defined standard,</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>KPMG Consulting assigned a benchmark of 95% of the appropriate sub-accounts appear under the correct Master Account.</p> <p>KPMG Consulting evaluated 60 CRIS resale bills from December 2000 through June 2001 and found that all 60 (100%) appropriate sub-accounts appeared under the correct Master Account.</p> <p>KPMG Consulting evaluated 137 CRIS resale bills from October 2001 through January 2002 to refresh the original resale data and found that all 137 (100%) of the appropriate sub-accounts appeared under the correct Master Account.</p> <p>KPMG Consulting evaluated 40 UNE bills from March 2002 through June 2002 and found that all 40 (100%) of the appropriate sub-accounts appeared under the correct Master Account for all sub-accounts evaluated.</p> <p>KPMG Consulting evaluated 68 UNE-P bills from March 2002 through June 2002 and found that all 68 (100%) of the appropriate sub-accounts appeared under the correct Master Account for all sub-accounts evaluated.</p>
TVV11-1-3	The appropriate data appears in each of the major bill sections on paper format bills.	Satisfied	<p>Appropriate data appeared in each major bill section on the BellSouth paper bills.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of the appropriate data appears in each of the major bill sections.</p> <p>KPMG Consulting evaluated 60 CRIS resale bills from December 2000 through June 2001 and found that the appropriate data appeared on each of the major bill sections under the Master Account for all 60 (100%) of the test cases.</p> <p>KPMG Consulting evaluated 137 CRIS resale bills from October 2001 through January 2002 to refresh the original</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>resale data and found that the appropriate data appeared on each of the major bill sections under the Master Account for all 137 (100%) of the test cases.</p> <p>KPMG Consulting evaluated 40 UNE bills from March 2002 through June 2002 and found that the appropriate data appeared on each of the major bill sections under the Master Account for all 40 (100%) of the test cases.</p> <p>KPMG Consulting evaluated 68 UNE-P bills from March 2002 through June 2002 and found that the appropriate data appeared on each of the major bill sections under the Master Account on all 68 (100%) of the test cases.</p> <p>The data reviewed included:</p> <ul style="list-style-type: none"> ◆ Billing Account Number (BAN); ◆ Earning Telephone Number (ETN); ◆ Operating Company Number (OCN); ◆ Bill Date; and ◆ Page numbers.
Accuracy			
TVV11-2-1	Recurring rates on resale invoices are consistent with applicable tariffs and/or contract rates.	Satisfied	<p>BellSouth applied recurring rates on resale invoices consistent with applicable tariffs and/or contract rates.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of the recurring rates on resale invoices are consistent with applicable tariffs.</p> <p>KPMG Consulting evaluated 874 recurring charges on 60 resale bills from December 2000 through June 2001. All 874 (100%) resale monthly recurring charges reviewed were consistent with applicable tariffs and/or contract rates.</p> <p>KPMG Consulting evaluated 1,644 recurring charges on 137 resale bills from October 2001 through January</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>2002 to refresh the original data. All 1,644 (100%) resale monthly recurring charges reviewed were consistent with applicable tariffs and/or contract rates.</p> <p>Documentation used in the evaluation included BellSouth’s bill formats defined in the Understanding Your Bill manual, tariffs detailing the charges evaluated, and the Interconnection Agreement between BellSouth and CKS.</p>
TVV11-2-2	<p>Recurring rates on UNE invoices are consistent with applicable tariffs and/or contract rates.</p>	Satisfied	<p>BellSouth applied recurring rates on UNE invoices consistent with applicable tariffs and/or contract rates.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of the recurring rates on UNE invoices are consistent with applicable tariffs and/or contract rates.</p> <p>During initial testing, KPMG Consulting issued Exception 62 when BellSouth billed incorrect contract rates. This exception was closed after BellSouth addressed the issue and subsequent testing under the new Tapestry upgrade was complete.</p> <p>KPMG Consulting evaluated 122 recurring charges on 40 UNE bills from March 2002 through June 2002. All 122 (100%) of the monthly recurring charges reviewed were consistent with applicable tariffs and/or contract rates.</p> <p>Documentation used in the evaluation included tariffs detailing the charges evaluated, and the Interconnection Agreement between BellSouth and CKS.</p>
TVV11-2-3	<p>Recurring rates on UNE-P invoices are consistent with applicable tariffs and/or contract rates.</p>	Satisfied	<p>BellSouth applied recurring rates on UNE-P invoices consistent with applicable tariffs and/or contractual rates.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of the recurring rates on UNE-P invoices are consistent</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>with applicable tariffs.</p> <p>During initial testing, KPMG Consulting issued Exception 60 when BellSouth failed to cease billing on disconnected auxiliary lines. This exception was closed after BellSouth corrected an ordering system problem and subsequent testing was complete.</p> <p>During initial testing, KPMG Consulting also issued Exception 62 when BellSouth billed incorrect contract rates. This exception was closed after BellSouth addressed the issue and subsequent testing under the new Tapestry upgrade was complete.</p> <p>KPMG Consulting evaluated 532 recurring charges on 68 UNE-P bills from March 2002 through June 2002. All 532 (100%) of the monthly recurring charges reviewed were consistent with applicable tariffs and/or contract rates.</p> <p>Documentation used in the evaluation included BellSouth’s bill formats defined in the Understanding Your Bill manual, tariffs detailing the charges evaluated, and the Interconnection Agreement between BellSouth and CKS.</p>
TVV11-2-4	Non-recurring rates on resale invoices are consistent with applicable tariffs and/or contract rates.	Satisfied	<p>BellSouth applied non-recurring rates on resale invoices consistent with the applicable tariffs and/or contract rates.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of the non-recurring rates on resale invoices are consistent with applicable tariffs.</p> <p>KPMG Consulting evaluated 103 resale non-recurring rates on 60 resale bills from December 2000 through June 2001. All 103 (100%) resale non-recurring rates reviewed were accurately billed.</p> <p>KPMG Consulting evaluated 12 resale non-recurring rates on 137 resale bills from October 2001 through January 2002 to refresh the original data. All</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>12 (100%) refreshed resale non-recurring rates reviewed were accurately billed.</p> <p>Documentation used in the evaluation included BellSouth’s bill formats, the Understanding Your Bill manual, and tariffs detailing the charges evaluated.</p>
TVV11-2-5	<p>Non-recurring rates on UNE invoices are consistent with applicable tariffs and/or contract rates.</p>	Satisfied	<p>BellSouth applied non-recurring rates on UNE invoices consistent with the applicable tariffs and/or contract rates.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of the non-recurring rates on UNE invoices are consistent with applicable tariffs.</p> <p>KPMG Consulting evaluated 204 non-recurring charges on 40 UNE bills from March 2002 through June 2002. All 204 (100 %) non-recurring charges reviewed were consistent with applicable tariffs and/or contract rates.</p> <p>During ongoing testing, KPMG Consulting issued Exception 172 upon detection of an incorrect non-recurring rate for mechanized service order activity. BellSouth corrected a rate table in response to this exception. In July 2002, KPMG Consulting reevaluated 13 mechanized service order charges on two invoices and found the expected rate being billed. As a result, KPMG Consulting closed Exception 172.</p> <p>Documentation used in the evaluation included BellSouth’s bill formats defined in the Understanding Your Bill manual, tariffs detailing the charges evaluated, and the Interconnection Agreement between BellSouth and CKS.</p>
TVV11-2-6	<p>Non-recurring rates on UNE-P invoices are consistent with applicable tariffs and/or contract rates.</p>	Satisfied	<p>BellSouth applied non-recurring rates on UNE-P invoices consistent with the applicable tariff and/or contract.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of the non-recurring rates on UNE-P invoices are</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>consistent with applicable tariffs.</p> <p>KPMG Consulting evaluated 399 non-recurring charges on 68 UNE-P bills from March 2002 through June 2002. All 399 (100%) of the non-recurring charges reviewed were consistent with applicable tariffs and/or contract rates.</p> <p>Documentation used in the evaluation included BellSouth’s bill formats defined in the Understanding Your Bill manual, tariffs detailing the charges evaluated, and the Interconnection Agreement between BellSouth and CKS.</p>
TVV11-2-7	Totals reflect accurate sums on resale invoices.	Satisfied	<p>BellSouth totals on resale invoices reflected accurate sums.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of totals reflect accurate sums on resale invoices.</p> <p>KPMG Consulting evaluated 226 line totals on 60 resale bills from December 2000 through June 2001 for accuracy of sums. All 226 (100%) of the totals reflected accurate sums.</p> <p>KPMG Consulting evaluated 548 line totals on 137 resale bills from October 2001 through January 2002 to refresh the original data. All 548 (100%) of the totals reflected accurate sums.</p> <p>Calculations evaluated include:</p> <ul style="list-style-type: none"> ◆ Total Amount Due; ◆ Total OC&Cs; ◆ Total Local Usage; ◆ Total Current Charges; and ◆ Total Monthly Local Service. <p>KPMG Consulting used the formula provided by BellSouth in the Bill Overview sessions and BellSouth’s Understanding Your Bill manual for calculating the line totals.</p>
TVV11-2-8	Totals reflect accurate sums on UNE invoices.	Satisfied	BellSouth totals on UNE invoices reflected accurate sums.

Test Reference	Evaluation Criteria	Result	Comments
			<p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of totals reflect accurate sums on UNE invoices.</p> <p>KPMG Consulting evaluated 131 line totals on 40 UNE bills from March 2002 through June 2002 for accuracy of sums. All 131 (100%) of the totals reflected accurate sums.</p> <p>Calculations evaluated include:</p> <ul style="list-style-type: none"> ◆ Total Amount Due; ◆ Total OC&Cs; ◆ Total Current Charges; and ◆ Total Monthly Local Service. <p>KPMG Consulting used the formula provided by BellSouth in the Bill Overview sessions and BellSouth’s Understanding Your Bill manual for calculating the line totals.</p>
TVV11-2-9	Totals reflect accurate sums on UNE-P invoices.	Satisfied	<p>BellSouth totals on UNE-P invoices reflected accurate sums.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of totals reflect accurate sums on UNE-P invoices.</p> <p>KPMG Consulting evaluated 271 line totals on 68 UNE-P bills from March 2002 through June 2002 for accuracy of sums. All 271 (100%) of the totals reflected accurate sums.</p> <p>Calculations evaluated include:</p> <ul style="list-style-type: none"> ◆ Total Amount Due; ◆ Total OC&Cs; ◆ Total Local Usage; ◆ Total Current Charges; and ◆ Total Monthly Local Service. <p>KPMG Consulting used the formula provided by BellSouth in the Bill Overview sessions and BellSouth’s Understanding Your Bill manual for calculating the line totals.</p>

Test Reference	Evaluation Criteria	Result	Comments
TVV11-2-10	Cross totals are correct on resale invoices.	Satisfied	<p>BellSouth accurately reflected cross totals on resale invoices.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of cross totals are correct on resale invoices.</p> <p>KPMG Consulting evaluated 166 cross totals on 60 resale bills from December 2000 through June 2001 to ensure cross total accuracy. All 166 (100%) of the cross-total calculations were accurate.</p> <p>KPMG Consulting evaluated 295 cross totals on 137 resale bills from October 2001 through January 2002 to refresh the original data. All 295 (100%) of the cross-total calculations were accurate. The bill sections evaluated include:</p> <ul style="list-style-type: none"> ◆ Total Amount of Last Bill; ◆ Total Amount Due; ◆ Total Local Usage; and ◆ Total Current Charges. <p>Documentation used in the evaluation included BellSouth bill formats defined in the Understanding Your Bill manual.</p>
TVV11-2-11	Cross-totals are correct on UNE invoices.	Satisfied	<p>BellSouth accurately reflected cross totals on UNE invoices.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of cross totals are correct on UNE invoices.</p> <p>KPMG Consulting evaluated 84 cross totals on 40 UNE bills from March 2002 through June 2002 to ensure cross total accuracy. All 84 (100%) of the cross-total calculations were accurate.</p> <p>The bill sections evaluated include:</p> <ul style="list-style-type: none"> ◆ Total Amount of Last Bill; ◆ Total Amount Due; and

Test Reference	Evaluation Criteria	Result	Comments
			<p>◆ Total Current Charges.</p> <p>The bill types evaluated include “N” paper and DAB paper image CD-ROM formats.</p> <p>Documentation used in the evaluation included BellSouth bill formats defined in the Understanding Your Bill manual.</p>
TVV11-2-12	Cross-totals are correct on UNE-P invoices.	Satisfied	<p>BellSouth accurately reflected cross totals on UNE-P invoices.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of cross totals are correct on UNE-P invoices.</p> <p>KPMG Consulting evaluated 182 cross totals on 68 UNE-P bills from March 2002 through June 2002 to ensure cross total accuracy. All 182 (100%) of the cross-total calculations were accurate.</p> <p>The bill sections evaluated include:</p> <ul style="list-style-type: none"> ◆ Total Amount of Last Bill; ◆ Total Amount Due; ◆ Total Local Usage; and ◆ Total Current Charges. <p>The bill types evaluated include “J” paper and DAB paper image CD-ROM formats.</p> <p>Documentation used in the evaluation included BellSouth bill formats defined in the Understanding Your Bill manual.</p>
TVV11-2-13	Prorated calculations on resale invoices correspond with tariff and/or published definitions.	Satisfied	<p>BellSouth accurately applied prorated calculations on resale invoices. These charges corresponded with tariffs and/or published documentation.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of prorated calculations on resale invoices correspond with tariff and/or published definitions.</p> <p>KPMG Consulting evaluated 352</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>prorated resale charges on 60 resale bills from December 2000 through June 2001 to ensure prorated calculations on resale invoices correspond with tariff and/or published definitions. All 352 (100%) of the prorated resale charges were accurately calculated.</p> <p>KPMG Consulting evaluated 174 prorated resale charges on 137 resale bills from October 2001 through January 2002 to refresh the original data. All 174 (100%) of the prorated resale charges were accurately calculated.</p> <p>Documentation used in the evaluation included bill samples, BellSouth’s Understanding Your Bill manual, and applicable tariffs.</p>
TVV11-2-14	Prorated calculations on UNE invoices correspond with tariff and/or published definitions.	Satisfied	<p>BellSouth accurately applied prorated calculations on UNE invoices. These charges corresponded with tariffs and/or published documentation.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of prorated calculations on UNE invoices correspond with tariff and/or published definitions.</p> <p>During initial testing, KPMG Consulting issued Exception 138 when BellSouth failed to issue credits for reduced rates. This exception was closed after BellSouth addressed the issue and subsequent testing under the new UNE upgrade was complete.</p> <p>KPMG Consulting evaluated 109 prorated UNE charges on 40 UNE bills from March 2002 through June 2002 to ensure prorated calculations on UNE invoices correspond with tariff and/or published definitions. All 109 (100%) of the prorated UNE charges were accurately calculated.</p> <p>Documentation used in the evaluation included BellSouth’s bill formats defined in the Understanding Your Bill</p>

Test Reference	Evaluation Criteria	Result	Comments
			manual, tariffs detailing the charges evaluated, and the Interconnection Agreement between BellSouth and CKS.
TVV11-2-15	Prorated calculations on UNE-P invoices correspond with tariff and/or published definitions.	Satisfied	<p>BellSouth accurately applied prorated calculations on UNE-P invoices. These charges corresponded with tariffs and/or published documentation.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of prorated calculations on UNE-P invoices correspond with tariff and/or published definitions.</p> <p>During initial testing, KPMG Consulting issued Exception 138 when BellSouth failed to issue credits for reduced rates. This exception was closed after BellSouth addressed the issue and subsequent testing under the new UNE upgrade was complete.</p> <p>KPMG Consulting evaluated 297 prorated UNE-P charges on 68 UNE-P bills from March 2002 through June 2002 to ensure prorated calculations on UNE-P invoices correspond with tariff and/or published definitions. All 297 (100%) of the prorated UNE-P charges were accurately calculated.</p> <p>Documentation used in the evaluation included BellSouth’s bill formats defined in the Understanding Your Bill manual, tariffs detailing the charges evaluated, and the Interconnection Agreement between BellSouth and CKS.</p>
TVV11-2-16	Unbundled Minutes of Use (MOUs) charges are billed in accordance with BellSouth business rules, tariffs and/or contractual terms.	Satisfied	<p>KPMG Consulting determined that MOU charges were billed in accordance with the BellSouth business rules, tariffs and/or contractual terms.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of unbundled MOU charges are billed in accordance with BellSouth business rules, tariffs and/or contractual terms.</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>KPMG Consulting evaluated 16 unbundled MOU charges on 8 UNE-P bills from December 2000 through January 2001 to ensure they were billed in accordance with BellSouth business rules, tariffs and/or contract rates. None of the charges were accurate, thus BellSouth failed to meet the 95% benchmark in all unbundled MOU rate categories.</p> <p>KPMG Consulting issued Exception 44 concerning incorrect quantities on Unbundled Switching and Transport Usage.</p> <p>KPMG Consulting amended Exception 44 based on test results following BellSouth system changes and rework of expected results for the May through June 2001 period following business rule clarification and documentation changes by BellSouth. The revised analysis revealed that 11 (69%) of the 16 charges were correct.</p> <p>Following additional retesting in April and May 2002, KPMG Consulting evaluated 36 unbundled MOU charges on 18 UNE-P bills from May and June 2002 and found that 36 (100%) of the 36 charges were correct. KPMG Consulting closed Exception 44.</p>
TVV11-2-17	Unbundled Transport Usage charges are billed in accordance with BellSouth business rules, tariffs and/or contractual terms.	Satisfied	<p>KPMG Consulting determined that Unbundled Transport Usage charges were billed in accordance with the BellSouth business rules, tariffs and/or contractual terms.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of unbundled transport usage charges are billed in accordance with BellSouth business rules, tariffs and/or contractual terms.</p> <p>KPMG Consulting evaluated 48 Unbundled Transport Usage charges on 8 UNE-P bills from December 2000 through January 2001 to ensure they were billed in accordance with BellSouth business rules, tariffs and/or contract rates. None of the 48 charges</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>were accurate, thus BellSouth failed to meet the 95% benchmark in all unbundled transport rate categories.</p> <p>KPMG Consulting issued Exception 44 concerning incorrect quantities on Unbundled Switching and Transport Usage.</p> <p>Review of December 2000 and January 2001 bills revealed BellSouth failed to bill UNE-P transport charges for distances greater than 35 miles. KPMG Consulting issued Exception 47. This exception was closed after a retest showed the deficiency had been corrected on June 2001 and July 2001 bills.</p> <p>KPMG Consulting amended Exception 44 based on test results following BellSouth system changes and rework of expected results for the May 2001 through June 2001 period following business rule clarification and documentation changes by BellSouth. The revised analysis revealed that 28 (58%) of the 48 charges were correct.</p> <p>Following additional retesting in April 2002 and May 2002, KPMG Consulting evaluated 108 unbundled MOU charges on 18 UNE-P bills from May 2002 and June 2002 and found that 108 (100%) of the 108 charges were correct. KPMG Consulting closed Exception 44.</p>
TVV11-2-18	Unbundled Operator Surcharges and special usage-related charges are billed in accordance with BellSouth business rules, tariffs and/or contractual terms.	Satisfied	<p>BellSouth accurately billed Operator Surcharges and special usage-related charges in accordance with the BellSouth business rules, tariffs and/or contractual terms.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of unbundled operator surcharges and special usage-related charges are billed in accordance with BellSouth business rules, tariffs and/or contractual terms.</p> <p>KPMG Consulting evaluated 66 Unbundled Operator Surcharges and</p>

Test Reference	Evaluation Criteria	Result	Comments
			special usage-related charges on 11 UNE-P bills from December 2000 through January 2002 to ensure they were billed in accordance with BellSouth business rules, tariffs and/or contract rates. All 66 (100%) of the Unbundled Operator Surcharges and special usage-related charges were accurately billed.
TVV11-2-19	Resale usage is billed in accordance with BellSouth business rules, tariffs and/or contractual terms.	Satisfied	<p>BellSouth accurately billed resale usage in accordance with the BellSouth business rules, tariffs and/or contractual terms.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of resale usage is billed in accordance with BellSouth business rules, tariffs and/or contractual terms.</p> <p>In the course of analyzing usage data obtained from the Functional Usage Evaluation (TVV10), KPMG Consulting identified 45 missing charges for calls made during the usage test. KPMG Consulting issued Exception 43.</p> <p>KPMG Consulting conducted a retest in May 2001 and June 2001 and found nine bills that reflected 77 incorrect usage charges for calls made during the usage test. KPMG Consulting issued Exception 96.</p> <p>Following additional retesting in December 2001, KPMG Consulting noted that all expected usage charges appeared on bills and closed Exception 43. During this same retest, 17 bills reflected 144 incorrect usage charges for calls made during the usage test.</p> <p>KPMG Consulting issued Exception 111 concerning BellSouth’s policy of retaining call detail for 30 days. This exception resulted from BellSouth’s inability to investigate issues raised in Exceptions 43 and 96 due to the age of the data. This exception was closed following revisions to BellSouth’s call detail retention policies that lengthened</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>the timeframe for which this data is retained.</p> <p>KPMG Consulting amended Exception 96 based on test results following BellSouth system changes and rework of December 2001 expected results following business rule clarification by BellSouth. The revised analysis revealed that 139 (97%) of the 144 charges were correct.</p> <p>Following additional system changes by BellSouth, resale usage billing was tested in the April 2002 and May 2002 retest necessitated by the Tapestry upgrade for UNE-P usage billing.</p> <p>KPMG Consulting examined 539 usage charges reflected on 21 bills. Exception 96 was closed after this examination revealed that 539 (100%) of the 539 charges were correct.</p>
TVV11-2-20	Resale Operator Surcharges and special usage-related charges are billed in accordance with BellSouth business rules, tariffs and/or contractual terms.	Satisfied	<p>BellSouth billed Resale Operator Surcharges and special usage-related charges in accordance with the BellSouth business rules, tariffs and/or contractual terms.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of resale operator surcharges and special usage-related charges are billed in accordance with BellSouth business rules, tariffs and/or contractual terms.</p> <p>In the course of analyzing usage data obtained from the Functional Usage Evaluation (TVV10), KPMG Consulting identified 45 missing charges for calls made during the usage test. KPMG Consulting issued Exception 43.</p> <p>KPMG Consulting conducted a retest during May 2001 and June 2001 and found eight bills that reflected 70 incorrect usage charges for calls made during the usage test. KPMG Consulting issued Exception 96.</p> <p>Following additional retesting in December 2001, KPMG Consulting</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>noted that all expected usage charges appeared on bills and closed Exception 43. During this same retest, 14 bills reflected 105 incorrect usage charges for calls made during the usage test.</p> <p>KPMG Consulting amended Exception 96 based on test results following BellSouth system changes and rework of December 2001 expected results following business rule clarification by BellSouth. The revised analysis revealed that 101 (96%) of the 105 charges were correct.</p> <p>Following additional system changes by BellSouth, resale usage billing was tested in the April 2002 and May 2002 retest necessitated by the Tapestry upgrade for UNE-P usage billing.</p> <p>KPMG Consulting examined 408 operator surcharges and special usage-related charges reflected on 21 bills. Exception 96 was closed after this examination revealed that 405 (100%) of the 405 charges were correct.</p>
TVV11-2-21	Calling plan allowances are applied correctly for resale usage.	Satisfied	<p>BellSouth accurately applied calling plan allowances for resale usage.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of calling plan allowances are applied correctly to resale usage.</p> <p>KPMG Consulting conducted one test and two retests that included accounts with call plan allowances. The first test, conducted during December 2000, included nine accounts with 322 calls subject to call plans. The second test, conducted during May 2001, included six accounts with 915 calls subject to call plans. The third test, conducted during December 2001, included five accounts with 108 calls subject to call plans.</p> <p>All 20 (100%) calling plan allowances were accurately applied to resale usage in accordance with BellSouth business rules and tariffs.</p>

Test Reference	Evaluation Criteria	Result	Comments
TVV11-2-22	Format and content of the BOS BDT is complete and accurate.	Satisfied	<p>BellSouth’s BOS BDT was complete and accurate.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a benchmark of 95% of the format and content of the BOS BDT is complete and accurate.</p> <p>KPMG Consulting evaluated 35 BOS BDT bills from February 2002 through April 2002 for complete and accurate format. KPMG Consulting also evaluated 35 BOS BDT bills from March 2002 through April 2002 for complete and accurate content. All 35 (100%) BOS BDT bills were complete and accurate in format and content.</p>
TVV11-2-23	ALEC invoice accuracy is comparable to BellSouth invoice accuracy	Satisfied	<p>ALEC invoice accuracy was comparable to BellSouth invoice accuracy.</p> <p>The Florida Interim Performance Metric B-1: Invoice Accuracy defined standard is parity with BellSouth’s invoice accuracy.</p> <p>BellSouth’s retail invoice accuracy over the test period December 2000 through March 2002 averaged 98.3%.</p> <p>Of the 60 resale bills tested from December 2000 through June 2001 and 137 resale bills tested from October 2001 through January 2002, all 197 (100%) of the Total Billed Revenue charges were accurate. Of the 105 UNE bills tested from March 2002 through May 2002, all 105 (100%) of the Total Billed Revenue charges were accurate.</p>
Timeliness			
TVV11-3-1	Invoices reflect timely service order activity.	Satisfied	<p>BellSouth invoices reflected timely service order activity.</p> <p>BellSouth’s Florida Interim Performance Metrics B-7: Recurring Charge Completeness and B-8: Non-recurring Charge Completeness defined standard for each is 90% of charges must appear on UNE invoices within 30 days and timeliness of</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>charges on resale invoices is in parity with BellSouth retail.</p> <p>KPMG Consulting evaluated activity from 51 resale service orders issued from December of 2000 through June of 2001. All 51 (100%) of the service order activity related to recurring and non-recurring charges was reflected on the first billing cycle after the service order completed.</p> <p>BellSouth’s retail recurring charge completeness during the first resale test averaged 81% and non-recurring charges averaged 92%.</p> <p>KPMG Consulting evaluated activity from 12 service orders issued from October 2001 through January 2002 to refresh the original resale data. All 12 (100%) of the service order activity related to recurring and non-recurring charges was reflected on the first billing cycle after the service order completed.</p> <p>BellSouth’s retail recurring charge completeness during the resale refresh test averaged 85% and non-recurring charges averaged 89%.</p> <p>KPMG Consulting evaluated activity from 15 UNE service orders issued from March 2002 through May 2002. All 15 (100%) of the service order activity related to recurring and non-recurring charges was reflected on the first billing cycle after the service order completed.</p> <p>KPMG Consulting evaluated activity from 45 UNE-P service orders issued from March 2002 through May 2002. All 45 (100%) of the service order activity related to recurring and non-recurring charges was reflected on the first billing cycle after the service order completed.</p>
TVV11-3-2	Invoices reflect timely call event activity.	Satisfied	<p>BellSouth invoices reflected timely call event activity.</p> <p>In the absence of a defined standard, KPMG Consulting assigned a</p>

Test Reference	Evaluation Criteria	Result	Comments
			<p>benchmark of 98% of the call events are reflected on invoices within two cycles.</p> <p>KPMG Consulting evaluated 1,845 call events for timeliness. 1,840 (99.7%)⁴¹⁷ of 1,845 call events were reflected on the bills within two bill cycles.</p>
TVV11-3-3	Paper and CD ROM bills are sent in a time frame consistent with bill production schedules defined in BellSouth documentation.	Satisfied	<p>KPMG Consulting determined that paper and CD ROM bills were sent in a time frame consistent with bill production schedules defined in BellSouth documentation.</p> <p>BellSouth’s Florida Interim Performance Metrics B2: Mean Time to Deliver Invoices defined standard is CRIS bills will be released for delivery within six business days and CABS bills will be released for delivery within eight calendar days.</p> <p>KPMG Consulting evaluated the delivery timeliness for 76 resale bills between February 2002 and May 2002. BellSouth released the sampled paper bills to the post office in an average of 3.28 business days. These bills were measured against the CRIS metric.</p> <p>KPMG Consulting also evaluated the delivery times for 32 paper and CD ROM UNE and UNE-P bills from March 2002 through May 2002 evaluated under the CRIS metric. BellSouth released the sampled bills to the post office in an average of 8.2 business days.</p> <p>KPMG Consulting also evaluated the delivery times for 10 CD ROM UNE bills from March 2002 through May 2002 produced under the CABS metric. BellSouth released the bills to the Post Office in an average of 5.1 calendar days.</p> <p>As a result of the delayed UNE and UNE-P bills measured under the CRIS metric, Exception 164 was opened. Following additional retesting in May</p>

⁴¹⁷ Five of the 1,252 calls never appeared on the bills and are included in Exception 43.

Test Reference	Evaluation Criteria	Result	Comments
			2002, KPMG Consulting reevaluated the delivery times of 37 paper and CD ROM bills from May 2002 evaluated under the CRIS metric. BellSouth released the sampled bills to the post office in an average of 5.5 business days. As a result, KPMG Consulting closed Exception 164.

5.0 Parity Evaluation

A parity evaluation is 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 29 evaluation criteria considered for the Functional Carrier Bill Evaluation (TVV11) test. All 29 evaluation criteria received a satisfied result.

As all evaluation criteria are satisfied, KPMG Consulting considers the Functional Carrier Bill Evaluation (TVV11) test area satisfied at the time of the final report delivery.

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