

ORIGINAL

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Kathleen B. Levitz
Vice President-Federal Regulatory

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January 11, 2000

RECEIVED

JAN 11 2000 EX PARTE OR LATE FILED

Ms. Magalie Roman Salas
Secretary

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

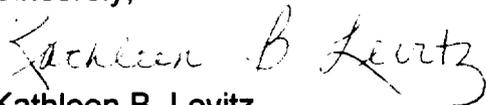
Re: Written Ex Parte in CC Docket No. 98-121
and CC Docket No. 99-295

Dear Ms. Salas:

This is to inform you that BellSouth Corporation has made a written ex parte to Claudia Fox, a senior attorney in the Common Carrier Bureau's Policy and Program Planning Division, with copies of that ex parte going also to William Agee and Jake Jennings. That ex parte consists of a copy of an Exception that KPMG filed with the Georgia Public Service Commission on January 10, 2000, in connection with KPMG's execution of the Georgia Third-Party Testing Plan for BellSouth's Operation Support Systems, or OSS. Included with the Exception is BellSouth's response to it.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, for each of the dockets identified above, we are filing two copies of this notice and that written ex parte presentation. Please associate this notification with the record in each of those proceedings.

Sincerely,



Kathleen B. Levitz

Attachment

cc: Claudia Fox (w/o attachment)
William Agee (w/o attachment)
Jake Jennings (w/o attachment)

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January 11, 2000

WRITTEN EX PARTE

Ms. Claudia Fox
Policy and Program Planning Division
Common Carrier Bureau
Room 5-C235
Federal Communications Commission
The Portals
445 12th St. S.W.
Washington, D.C. 20554

RECEIVED

JAN 11 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 98-121 and CC Docket No. 99-295

Dear Ms Fox:

Attached is a copy of KPMG Exception 4 arising during KPMG's execution of the Georgia Third-Party Testing Plan for BellSouth's Operation Support Systems, or OSS. Exceptions 4 and BellSouth's response to the exception were filed with the Georgia Public Service Commission on January 10, 2000. I am sending these filings to you in response to the request that BellSouth share with you any status reports prepared by KPMG as part of the third party testing program currently underway in Georgia. If you have any questions after reviewing the report, please call me at 202.463.4113.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, for each of the dockets identified above, I am filing two copies of this written ex parte presentation with the Secretary of the Commission and requesting that it be associated with the record in those dockets.

Sincerely,


Kathleen B. Levitz

Attachment

cc: William Agee
Jake Jennings



EXCEPTION 4
BellSouth Georgia OSS Testing Evaluation

RECEIVED

Date: December 15, 1999

JAN 10 2000

EXCEPTION REPORT

EXECUTIVE SECRETARY

An exception has been identified as a result of the EDI and TAG Order Full P&S Tests (O&P-1 and O&P-2).

Exception:

BellSouth's electronic ordering systems do not provide the functionality required for submitting partial migration service requests for loop-port combinations.

Background

CLECs perform partial migrations when a multi-line customer wishes to migrate only a portion of its existing lines from BellSouth to a new Local Service Provider. Partial migration ordering capability was implemented in BellSouth's electronic interfaces (LENS, EDI, and TAG) on March 28, 1999.

Documentation on Partial Migration Orders

The business rule documentation for creating service orders is contained in Volume 1 of the *Local Exchange Ordering (LEO) Guide*. Specific rules for ordering partial migrations are provided with reference to the following four fields:

- Account Number (AN)
- Account Telephone Number (ATN)
- Existing Account Number (EAN)
- Existing Account Telephone Number (EATN)

As documented in the current version of the *LEO Guide, Issue 7L*, the following rules apply when submitting a service order for partial migration:

1. Either the AN or ATN field must be populated. Only one of these two fields is allowed.¹
2. Either the EAN or the EATN field must be populated. Only one of these two fields is allowed.²

¹ Field Element 4.3.1.5 - AN: Note 1: Required when the ATN field is not populated and the request is for Partial Migration, Subsequent Partial Migration, or Subsequent Full Migration. Note 3: Prohibited when the ATN field is populated. Field Element 4.3.1.6 - ATN: Note 1: Required when the AN field is not populated and the request is for Partial Migration, Subsequent Partial Migration, or Subsequent Full Migration. Note 3: Prohibited when the AN field is populated.

² Field Element 5.5.3.2 - EAN: Note 1: Required when the EATN field is not populated and the request is for Partial Migration, Subsequent Partial Migration, or Subsequent Full Migration. Note 3: Prohibited when the EATN field is populated.



EXCEPTION 4

BellSouth Georgia OSS Testing Evaluation

System Functionality for Partial Migration Orders

KPMG submitted multiple service orders via TAG and EDI for partial migrations for loop-port combinations following the rules outlined in the *LEO Guide*. Errors were returned on each order. The specific error messages received were:

1. Error Code TAG2120VAL. "EATN, EAN, ATN or AN are prohibited on this type of REQ TYP/ACT Type Combination."
2. EDI clarification - no error code provided on response. "Activity 'V' on partial migration, ATN or AN cannot be an existing account."

These errors contradict the BellSouth documentation for creating partial migration service orders.

KPMG discussed these errors with its BellSouth customer service manager (CSM). The CSM presented KPMG's submitted service orders and the resultant error messages to system programmers responsible for TAG and EDI. BellSouth confirmed that these service order errors were indicative of a system fault.

Impact

Rejection of service orders submitted via electronic interfaces for partial migrations for loop-port combinations could impact CLECs in the following ways:

- **Increase in operating costs.** The inability to order this service via mechanized processes would force a CLEC to submit manual (i.e., via FAX) service orders to obtain a customer's desired service type. As manual submission requires more person-hours per order, increases in labor resources would be required.
- **Decrease in customer satisfaction.** If a CLEC is forced to submit orders manually, a CLEC's order fulfillment/completion process will necessarily be slowed. The inability to fulfill service orders in a timely fashion will negatively impact customer perception of a CLEC's service quality.



December 21, 1999

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Order Functional Test (O&P-1 and O&P-2)

Exception:

BellSouth's electronic systems do not provide the functionality required for submitted partial migration service requests for loop-port combination.

Background

CLECs perform partial migrations when a multi-line customer wishes to migrate only a portion of its existing lines from BellSouth to a new Local Service Provider. Partial migration ordering capability was implemented in BellSouth's electronic interfaces (LENS, EDI and TAG) on March 28, 1999.

Documentation on Partial Migration Orders

The business rule documentation for creating service orders is contained in Volume 1 of the *Local Exchange Ordering (LEO) Guide*. Specific rules for ordering partial migrations are provided with reference to the following four fields:

- A. Account Number (AN)
- B. Account Telephone Number (ATN)
- C. Existing Account Number (EAN)
- D. Existing Account Telephone Number (EATN)

As documented in the current version of the *LEO Guide, Issue 7L*, the following rules apply when submitted a service order for partial migration:

1. Either the AN or ATN field must be populated. Only one of these two fields is allowed.¹
2. Either the EAN or the EATN field must be populated. Only one of these two fields is allowed.²

¹ Field Element 4.3.1.5 - AN: Note 1: Required when the ATN field is not populated and the request is for Partial Migration, Subsequent Partial Migration, or Subsequent Full Migration. Note 3: Prohibited when the ATN field is populated. Field Elements 4.3.1.6 - ATN: Note 1: Required when the AN field is not populated and the request is for Partial Migration, Subsequent Partial Migration, or Subsequent Full Migration. Note 3: Prohibited when the AN field is populated.

System Functionality for Partial Migration Orders

KPMG submitted multiple service orders via TAG and EDI for partial migration for loop-port combination following the rules outlined in the *LEO Guide*. Errors were returned on each order. The specific error messages received were:

1. Error Code TAL2120VAL, "EATN, EAN, ATN or AN are populated on this type of REQ TYP/ACT Type Combination"
2. EDI clarification - no error code provided on response - Activity "V" on partial migration, ATN or AN cannot be an existing account."

These errors contradict the BellSouth documentation for creating partial migration service orders.

KPMG discussed these errors with its BellSouth customer service manager (CSM). The CSM presented KPMG's submitted service orders and the resultant error messages to system programmers responsible for TAG and EDI. BellSouth confirmed that these service order errors were indicative of a system fault.

Impact

Rejection of service orders submitted via electronic interfaces for partial migrations for loop-port combinations could impact CLECs in the following ways:

- A. **Increase in operating costs.** The inability to order this service via mechanized processes would force a CLEC to submit manual (i.e., via FAX) service orders to obtain a customer's desired service type. As manual submission requires more person-hours per order, increases in labor resources would be required.
- B. **Decrease in customer satisfaction.** If a CLEC is forced to submit orders manually, a CLEC's order fulfillment/completion process will necessarily be slowed. The inability to fulfill service orders in a timely fashion will negatively impact customer perception of a CLEC's service quality.

RESPONSE

There is a coding problem in TAG version 2.2.0.4, being used by KPMG, which does not recognize the AN, ATN, EAN and EATN fields as valid for REQ TYP M. Upgrading to 2.2.0.5 production code will resolve the TAG2120VAL error. V2.2.0.5 is the most current version of TAG in production today.

² Field Element 5.5.3.2 - EAN: Note 1: Required when the EATN field is not populated and the request is for Partial Migration, Subsequent Partial Migration, or Subsequent Full Migration. Note 3. Prohibited when the EATN field is populated.

The error message encountered on the LSR submitted via EDI was not correct. A coding change is scheduled for implementation on 1/17/00 which will allow the main telephone number to be migrated.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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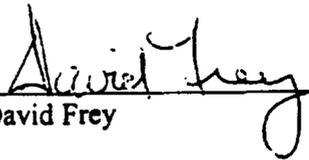
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This 10th day of December 1999.


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