

ORIGINAL

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY



January 31, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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 copies of two documents filed with the Georgia Public Service Commission on January 28, 2000. The first document is KPMG's most recent Interim Status Report on the BellSouth-Georgia OSS Testing Evaluation Plan. The second document contains revisions KPMG has made to Section VII and Appendix D of the BellSouth-Georgia OSS Evaluation Master Test Plan, Version 4.0.

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
Kathleen B. Levitz

Attachment

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

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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

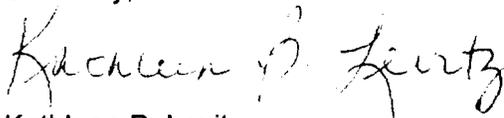
Re: CC Docket No. 98-121 and CC Docket No. 99-295

Dear Ms Fox:

Attached are copies of two documents that were filed with the Georgia Public Service Commission on January 28, 2000. The first is a copy of KPMG's Interim Status Report on the BellSouth-Georgia OSS Testing Evaluation Plan. The second is a copy of changes made by KPMG to Section VII and Appendix D1 of the BellSouth-Georgia OSS Evaluation Master Test Plan, Version 4.0. The only changes to Section VII appear on pages 6 and 7, but because of variances in the pagination of the old and the revised section, I'm sending you a copy of the complete section. Similarly for Appendix D1, only page 44 has changed, but the change affected the pagination and so I've sent you the entire revised Appendix. If you have any questions after reviewing the revision, 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



**BellSouth-GA OSS Testing Evaluation
Interim Status Report
January 28, 2000**

1.0 Document Objective

In this document, KPMG provides an interim summary status report on developments related to the BellSouth-GA OSS Testing Project. A brief overview of key developments is provided in section 2.0. Key upcoming activities are summarized in section 3.0. A more detailed report on specific test items is provided in the table in section 4.0. Each item presented in the table in section 4.0 includes a reference number that identifies the item from a previous status report, where applicable.

2.0 Key Developments

- Order volume testing: KPMG is preparing to commence volume testing and has begun submitting sample resale test cases into the RSIMMS environment to test connectivity and transaction tracking capabilities.
- Order transaction testing: As part of LNP testing, KPMG has begun issuing transactions on behalf of participating CLECs.
- Maintenance and Repair testing:
 - TAFI documentation and functional testing have been completed. Results are currently being analyzed.
 - ECTA functional testing is in progress. KPMG is currently conducting a test of the Mechanized Line Test (MLT) function in the ECTA interface. After ECTA functional test design, a new version of ECTA, containing this feature, was implemented. KPMG expects to complete this test by February 1, 2000.
 - ECTA documentation testing is in progress. KPMG has received copies of Joint Implementation Agreements (JIAs) from two CLECs and is currently reviewing them.
 - ECTA normal volume and peak volume testing have been completed. Results are currently being analyzed.
 - End-to-end testing is in progress. KPMG will conduct a test of ISDN-BRI lines. Original testing parameters must be altered to achieve accurate test results. BellSouth will provision three ISDN-BRI lines for this test. Testing is expected to commence on February 7, 2000.
- Performance results comparison: KPMG has finished the process of replicating the calculations of PMAP-generated and non-PMAP-generated SQMs (Service Quality Measurements).



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- Flow-Trough Evaluation: On January 7, 2000, KPMG and BellSouth filed the *BellSouth Telecommunications OSS Flow-Through Evaluation* version 2.1 with the Georgia Public Service Commission. Version 2.1 expands the evaluation parameters to include flow-through-related interviews with CLEC personnel. Additionally, the *Order Flow Process Diagram* has been updated.
- On January 24, 2000, KPMG and BellSouth filed the *BellSouth Telecommunications, Inc. OSS Evaluation – Georgia Supplemental Test Plan (STP)* with the Georgia Public Service Commission. The STP prescribes test activities in addition to the scope of those detailed in the Master Test Plan. KPMG will receive written CLEC comments on the STP through February 3, 2000.
- KPMG completed a move of its test headquarters to new facilities on January 24, 2000.

3.0 Key Upcoming Activities

- KPMG will hold the first CLEC status meeting on Tuesday, February 1, 2000 at the KPMG offices in Atlanta. The meeting will include a discussion of test status, exceptions, the STP, and other relevant test items. KPMG will announce arrangements for future, weekly CLEC status conference calls.
- KPMG will file the next interim status report during the week of February 28, 2000.



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4.0 Specific Item Status

Ref	Item	Status	Issues	Next Step/Resolution
I-2	Test bed development	<ul style="list-style-type: none">Provisioning and validation of the order/pre-order test bed is 99% complete, according to previously submitted requirements.	<ul style="list-style-type: none">A number of test bed specifications must be changed to reflect that ISDN-to-UNE and Centrex-to-UNE conversions are not electronically orderable.	<ul style="list-style-type: none">Once these changes are implemented, BLS and KPMG will complete provisioning and verification, respectively, of the order/pre-order functional test bed.
		<ul style="list-style-type: none">Provisioning and validation of the LNP test bed is 93% complete.	<ul style="list-style-type: none">None.	<ul style="list-style-type: none">KPMG expects BLS to achieve complete provisioning of the LNP test bed by 1/31/00.
		<ul style="list-style-type: none">Provisioning and validation of the RSIMMS volume test bed (for use in normal/peak volume tests) is 100% complete.	<ul style="list-style-type: none">Among the 707 accounts requested by KPMG and provided by BLS, 383 are "live customer" accounts. Due to the normal change rate of customer accounts many of these "live" accounts no longer match the KPMG test bed requirements.	<ul style="list-style-type: none">KPMG and BLS are investigating potential "work arounds" to this problem.
		<ul style="list-style-type: none">Provisioning and validation of the production volume test bed (for use in production system capacity tests) is 100% complete.	<ul style="list-style-type: none">None.	<ul style="list-style-type: none">N/A.



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Ref ¹	Item	Status	Issues	Next Step/Resolution
I-6	EDI functional testing	<ul style="list-style-type: none">• KPMG is proceeding with EDI functional testing for all UNE product types.	<ul style="list-style-type: none">• KPMG uncovered the following: 1) a BLS system problem submitting partial migration loop-port combination service requests via EDI (see Exception² #4). BLS indicated that an EDI system fix was implemented on 1/17/00; 2) a BLS system problem handling coordinated hot cut requests (with CHC field = Y and DFDT field blank) on non-designed (SL1) loop service requests. BLS has indicated that a system fix was implemented to conform to documented BLS business rules; 3) BLS has informed KPMG that ISDN-to-UNE and Centrex-to-UNE conversions are not supported by EDI, as previously indicated.	<ul style="list-style-type: none">• KPMG is in the process of re-testing loop-port partial migrations and coordinated hot cut requests for SL1 loop orders. KPMG will alter test cases and test bed requirements to reflect that ISDN and Centrex-to-UNE conversions are not orderable via EDI.
			<ul style="list-style-type: none">• KPMG is researching the following: 1) Potential BLS system or personnel problems resulting in the failure to return electronic FOC and CN responses on a small number of service requests; 2) A potential BLS system problem resulting in the inability to perform order validation on UNE port and port-loop combination service requests with an LPIC of 5124 (BLS); 3) Potential issues involving order validation on the class of service entry (e.g., UNE port, UNE loop) and the Company Code and Billing Account Number entries; 4) A potential BLS documentation problem with Directory Listing field requirements; 5) A potential BLS system or documentation issue with ATN/EATN requirements for full migrations.	<ul style="list-style-type: none">• KPMG and BLS are working to investigate and resolve these issues.



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Ref	Item	Status	Issues	Next Step Resolution
		<ul style="list-style-type: none">• KPMG and BLS identified a system defect with "Outside Move" orders during resale validity testing.	<ul style="list-style-type: none">• This defect was found to affect both the validity testing and production environments. BLS indicated that a system fix was implemented on 1/17/00.	<ul style="list-style-type: none">• KPMG is in the process of re-testing this order type.
I-7	TAG functional testing	<ul style="list-style-type: none">• KPMG is proceeding with TAG functional testing for all UNE product types.	<ul style="list-style-type: none">• KPMG uncovered the following: 1) a BLS system problem submitting partial migration loop-port combination service requests via TAG (see Exception² #4). BLS indicated that the problem was corrected in the 2.2.0.5 release of the TAG API; 2) a BLS system problem handling coordinated hot cut requests (with CHC field = Y and DFDT field blank) on non-designed (SL1) loop service requests. BLS has indicated that a system fix was implemented to conform to documented BLS business rules; 3) BLS has informed KPMG that ISDN-to-UNE and Centrex-to-UNE conversions are not supported by TAG.	<ul style="list-style-type: none">• KPMG is in the process of re-testing loop-port partial migrations and coordinated hot cut requests for SL1 loop orders. KPMG will alter test cases and test bed requirements to reflect that ISDN and Centrex-to-UNE conversions are not orderable via EDI.



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Ref	Item	Status	Issues	Next Step Resolution
			<ul style="list-style-type: none">• KPMG is researching the following: 1) Potential BLS system or personnel problems resulting in the failure to return electronic FOC and CN responses on a small number of service requests; 2) A potential BLS system problem resulting in the inability to perform order validation on UNE port and port-loop combination service requests with an LPIC of 5124 (BLS); 3) Potential issues involving order validation on the class of service entry (e.g., UNE port, UNE loop) and the Company Code and Billing Account Number entries; 4) A potential BLS documentation problem with Directory Listing field requirements; 5) A potential BLS system or documentation issue with ATN/EATN requirements for full migrations.	<ul style="list-style-type: none">• KPMG and BLS are working to investigate and resolve these issues.
		<ul style="list-style-type: none">• KPMG and BLS identified a system defect with "Outside Move" orders during resale validity testing.	<ul style="list-style-type: none">• This defect was found to affect both the validity testing and production environments. BLS indicated that a system fix was implemented on 1/17/00.	<ul style="list-style-type: none">• KPMG is in the process of re-testing this order type.
I-8	CRIS/CABS Invoicing Functional Test	<ul style="list-style-type: none">• KPMG has completed review and evaluation of supporting documentation submitted by BLS.	<ul style="list-style-type: none">• None.	<ul style="list-style-type: none">• N/A.
		<ul style="list-style-type: none">• KPMG has completed the process evaluation and is compiling its findings.	<ul style="list-style-type: none">• None	<ul style="list-style-type: none">• N/A.
		<ul style="list-style-type: none">• KPMG has begun validation of bills resulting from test transactions.	<ul style="list-style-type: none">• KPMG is awaiting delivery of some Customer Service Records (CSRs) and bills from BLS. Validation of these accounts has been suspended until BLS provides complete record sets.	<ul style="list-style-type: none">• Upon receipt of the required bill media, KPMG will begin validation activities.



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II-1	Metrics	<ul style="list-style-type: none">• KPMG finished the process of replicating the calculations of PMAP-generated and non-PMAP-generated SQM values for an individual CLEC in BLS's August report.	<ul style="list-style-type: none">• None.	<ul style="list-style-type: none">• N/A.
		<ul style="list-style-type: none">• KPMG has requested that BLS provide a schedule for producing expedited reports and raw data for the KPMG CLEC in February and March.	<ul style="list-style-type: none">• KPMG requested these expedited reports and raw data in order to evaluate KPMG CLEC January data prior to 02/15/00 and February data prior to 03/15/00.	<ul style="list-style-type: none">• BLS will confirm its ability to produce these expedited reports and raw data and inform KPMG of the projected date of receipt.
		<ul style="list-style-type: none">• KPMG is updating the replication programs to apply to December PMAP-generated SQM values for the KPMG CLEC.	<ul style="list-style-type: none">• KPMG has found some potential discrepancies between the values KPMG calculated and values reported by BLS; affected SQMs are "Percent Provisioning Troubles within 30 Days," "Mean Held Order Interval," and "FOC Timeliness".	<ul style="list-style-type: none">• KPMG is investigating these potential discrepancies with BLS.
		<ul style="list-style-type: none">• KPMG has replicated the majority of October and November non-PMAP-generated SQM values for the CLEC aggregate.	<ul style="list-style-type: none">• KPMG has found some potential discrepancies between the values KPMG calculated and values reported by BLS; affected SQMs are "Percent Provisioning Troubles within 30 Days," "Mean Held Order Interval," and "FOC Timeliness".	<ul style="list-style-type: none">• KPMG is investigating these potential discrepancies with BLS.
II-4	Volume test	<ul style="list-style-type: none">• KPMG has begun to submit sample Resale test cases into the RSIMMS environment to test connectivity and transaction tracking capabilities.	<ul style="list-style-type: none">• None.	<ul style="list-style-type: none">• N/A.
		<ul style="list-style-type: none">• LNP functionality has been established in the RSIMMS environment.	<ul style="list-style-type: none">• None.	<ul style="list-style-type: none">• KPMG will test implementation of LNP functionality.



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II-5	Change management	<ul style="list-style-type: none">• KPMG has completed all interviews with BLS personnel responsible for electronic interfaces, technical documentation, the change request tracking system, and the change control process.	<ul style="list-style-type: none">• None.	<ul style="list-style-type: none">• N/A.
		<ul style="list-style-type: none">• KPMG has completed document reviews of current BLS change management processes and their posted change notifications.	<ul style="list-style-type: none">• KPMG issued an exception on 11/23/99 asserting that BLS's change management process does not include clearly defined and reasonable intervals for notifying customers about changes to electronic interfaces and supporting documentation.	<ul style="list-style-type: none">• BLS is developing a revised change management process that addresses deficiencies noted in the exception.
		<ul style="list-style-type: none">• KPMG attended and observed BLS's CLEC Change Control Steering Committee meeting on 01/26/00.	<ul style="list-style-type: none">• None.	<ul style="list-style-type: none">• At the suggestion of a participating CLEC member, BLS has scheduled a two-day change control workshop for 02/16/00 – 02/17/00. This meeting will include CLEC Steering Committee members and BLS change control personnel working together to improve key elements of the existing change control process. Many of the discussion topics include those identified by KPMG as deficiencies in BLS's current change management process.
III-1	Flow-Through Evaluation	<ul style="list-style-type: none">• KPMG met with BLS to clarify business rules and flow through report logic.	<ul style="list-style-type: none">• A small percentage of LSRs reported as flow-through appear to have fallen out after reaching SOCS in each of the months validated.	<ul style="list-style-type: none">• BLS has reviewed sample LSRs and agreed that certain "Z" processing status LSRs will no longer be counted as CLEC errors. BLS continues to research remaining issues, as identified by KPMG.
		<ul style="list-style-type: none">• KPMG has completed validation of the November reports	<ul style="list-style-type: none">• None.	<ul style="list-style-type: none">• N/A.



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		<ul style="list-style-type: none"> KPMG is reviewing a sample of LSR fallout for correct categorization. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> N/A.
		<ul style="list-style-type: none"> KPMG is reviewing LSR errors to reconcile overall flow through experienced by CLECs in the nine-state region against BLS reporting. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> KPMG will continue to review all KPMG CLEC test LSRs based on information (FOC, clarification requested, etc.) returned to the CLEC by BLS and raw data in BLS's performance measurements database.
		<ul style="list-style-type: none"> KPMG will meet with CLECs to discuss flow through reporting. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> KPMG will incorporate results from these meetings into findings for the Flow-Through Evaluation.
III-2	CLEC Participation - Ordering	<ul style="list-style-type: none"> KPMG has initiated UNE-LNP and CLEC-to-CLEC migration orders using CLEC-provided facilities. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> KPMG will continue testing.
III-3	Capacity Management	<ul style="list-style-type: none"> BLS has responded partially to KPMG's initial request for capacity management system and process documentation and interviewee lists. 	<ul style="list-style-type: none"> BLS has not yet provided CPU Utilization and Trending Graph/Reports, EDI Monthly Volume Reports, Monitoring Procedures Documentation, and Billing application documentation. 	<ul style="list-style-type: none"> BLS is identifying appropriate personnel to provide the information/documents that remain outstanding.
		<ul style="list-style-type: none"> KPMG conducted five additional interviews of BLS personnel with Transport Performance Monitoring, Transport Capacity Planning, Midrange Performance Monitoring, and Midrange Capacity Planning responsibilities. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> N/A.
		<ul style="list-style-type: none"> BLS provided and KPMG reviewed network configuration and performance data. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> N/A.



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IV-1	TAFI Functional Testing	<ul style="list-style-type: none">• KPMG conducted two telephone interviews with a high-volume TAFI CLEC user to discuss TAFI documentation.	<ul style="list-style-type: none">• None.	<ul style="list-style-type: none">• N/A.
		<ul style="list-style-type: none">• TAFI functional testing is complete and analysis of results is in progress.	<ul style="list-style-type: none">• None.	<ul style="list-style-type: none">• N/A.
IV-2	ECTA Functional Testing	<ul style="list-style-type: none">• ECTA Functional Testing for the Mechanized Line Test function (MLT) is currently being conducted. All other functional tests have been completed and Exceptions², where appropriate, have been reported to BLS.	<ul style="list-style-type: none">• After test design, a new version of ECTA containing the MLT function was implemented.	<ul style="list-style-type: none">• KPMG expects to complete this testing activity by 2/1/00.
IV-3	ODUF/ADUF Usage Functional Test	<ul style="list-style-type: none">• KPMG has completed the review of documentation submitted by BLS.	<ul style="list-style-type: none">• None.	<ul style="list-style-type: none">• N/A.
		<ul style="list-style-type: none">• KPMG is continuing the usage process evaluation.	<ul style="list-style-type: none">• None.	<ul style="list-style-type: none">• N/A.
		<ul style="list-style-type: none">• KPMG has completed its validation of DUF records and is compiling the findings.	<ul style="list-style-type: none">• None.	<ul style="list-style-type: none">• N/A.
IV-4	CRIS/CABS Invoicing Documentation Evaluation	<ul style="list-style-type: none">• KPMG has completed interviews with BLS SMEs.	<ul style="list-style-type: none">• None.	<ul style="list-style-type: none">• N/A.
		<ul style="list-style-type: none">• BLS has gathered and submitted documents relating to CLEC training and program development and technical specifications for billing media to KPMG. KPMG is reviewing the documents.	<ul style="list-style-type: none">• None.	<ul style="list-style-type: none">• N/A.



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Ref ¹	Item	Status	Issues	Next Step/Resolution
IV-5	Exceptions	<ul style="list-style-type: none"> KPMG's Exception² #1, regarding Pre-ordering, will undergo review based on information provided by BLS. 	<ul style="list-style-type: none"> KPMG indicated that BLS does not currently provide comprehensive and usable business rule documentation for submitting electronic pre-order transactions via the TAG interface. 	<ul style="list-style-type: none"> KPMG and BLS met to clarify several issues regarding BLS material provided to address the exception. BLS expects to issue updated pre-order business rules on February 7, 2000. Subsequently, KPMG will perform re-testing activities.
		<ul style="list-style-type: none"> KPMG is currently awaiting BLS material in order to conduct re-testing of Exception² #2, regarding Change Management. 	<ul style="list-style-type: none"> KPMG indicated that BLS's change management process does not include clearly defined and reasonable intervals for notifying customers about changes to electronic interfaces and supporting documentation. 	<ul style="list-style-type: none"> KPMG will complete re-testing activities as soon as necessary material has been received from BLS.
		<ul style="list-style-type: none"> KPMG submitted Exception² #3, regarding Performance Measurements, and the BLS response to the GA-PSC on 1/04/00. The GA-PSC has posted the Exception and the BLS response on their web site. 	<ul style="list-style-type: none"> KPMG indicated that CLECs are not notified when BLS initiates changes to published historical performance measurement reports and/or raw data files associated with these reports after this information has been removed from the PMAP web site. 	<ul style="list-style-type: none"> BLS has enhanced its Notification Procedure to include reports that have already been removed from the PMAP web site. This enhancement has been documented in the PMAP User's Guide and the web site. KPMG has reviewed BellSouth's PMAP web site and expects to recommend to the PSC that the exception be closed. KPMG will continue to monitor the site to observe the processing of any change events.
		<ul style="list-style-type: none"> KPMG submitted Exception² #4, regarding Ordering & Provisioning, and the BLS response to the GA-PSC on 1/10/00. The GA-PSC has posted the Exception and the BLS response, on their web site. 	<ul style="list-style-type: none"> KPMG indicated that TAG and EDI do not provide the functionality required for submitting partial migration service requests for loop-port combinations. 	<ul style="list-style-type: none"> BLS implemented a coding change to address the exception on 1/17/00. KPMG is currently involved in re-testing activities. In addition, KPMG has upgraded to TAG version 2.2.0.5.



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Ref	Item	Status	Issues	Next Step/Resolution
		<ul style="list-style-type: none"> KPMG submitted Exception² #5, regarding Ordering & Provisioning, and the BLS response to the GA-PSC on 1/13/00. The GA-PSC has posted the Exception and the BLS response. 	<ul style="list-style-type: none"> KPMG indicated that BLS's rules for submitting supplements to existing service orders are not accurately defined. 	<ul style="list-style-type: none"> BLS will update the <i>Local Exchange Ordering Implementation Guide</i> to define fields that cannot be changed via a supplement. BLS expects to post the updated document to its web site on 1/31/00. Subsequently, KPMG will begin re-testing activities.
		<ul style="list-style-type: none"> KPMG submitted Exception² #6, regarding Maintenance and Repair, and the BLS response to the GA-PSC on 1/13/00. The GA-PSC has posted the Exception and the BLS response. 	<ul style="list-style-type: none"> KPMG indicated that multiple instances of inaccuracies in TAFI documentation and deficiencies in distribution of updates have been identified. 	<ul style="list-style-type: none"> BLS expects to update the document by 2/1/00. Subsequently, KPMG will begin re-testing activities.
		<ul style="list-style-type: none"> KPMG submitted a Draft Exception², regarding Ordering and Provisioning, to BLS on 12/9/99. 	<ul style="list-style-type: none"> KPMG indicated that recently released versions of BLS's <i>Local Exchange Ordering (LEO) Guide</i> contains errors. 	<ul style="list-style-type: none"> Based on BLS's response, KPMG has withdrawn the draft exception.
		<ul style="list-style-type: none"> KPMG submitted a Draft Exception², regarding Maintenance and Repair, to BLS on 1/14/00. 	<ul style="list-style-type: none"> KPMG indicated that under two circumstances, a TAFI tester was unable to cancel or close a trouble report in the manner described in the <i>CLEC TAFI End-User Training and User Guide</i>. 	<ul style="list-style-type: none"> BLS forwarded an initial response to KPMG on 1/21/00. KPMG is currently evaluating BLS's response and has submitted clarifying questions.
		<ul style="list-style-type: none"> KPMG submitted a Draft Exception², regarding Maintenance and Repair, to BLS on 1/14/00. 	<ul style="list-style-type: none"> KPMG indicated that the host request error and reset communications functions do not operate as described in the <i>CLEC TAFI End-User Training and User Guide</i>. 	<ul style="list-style-type: none"> BLS forwarded an initial response to KPMG on 1/21/00. KPMG is currently evaluating BLS's response and has submitted clarifying questions.
		<ul style="list-style-type: none"> KPMG submitted a Draft Exception², regarding Maintenance and Repair, to BLS on 1/14/00. 	<ul style="list-style-type: none"> KPMG indicated that the BLS ECTA Gateway does not allow CLECs to process trouble reports for SL1 circuits. 	<ul style="list-style-type: none"> BLS forwarded an initial response to KPMG on 1/21/00. KPMG is currently evaluating BLS's response and has submitted clarifying questions.
		<ul style="list-style-type: none"> KPMG submitted a Draft Exception², regarding Maintenance and Repair, to BLS on 1/14/00. 	<ul style="list-style-type: none"> KPMG indicated that the ECTA Gateway does not accurately notify CLECs when invalid information is entered into a trouble ticket. 	<ul style="list-style-type: none"> BLS forwarded an initial response to KPMG on 1/21/00. KPMG is currently evaluating BLS's response and has submitted clarifying questions.



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Ref	Item	Status	Issues	Next Step Resolution
		<ul style="list-style-type: none"> KPMG submitted a Draft Exception², regarding Maintenance and Repair, to BLS on 1/14/00. 	<ul style="list-style-type: none"> KPMG indicated that numerous undocumented messages intended for BLS's personnel are generated by TAFI and sent to CLECs during trouble report creation and processing. 	<ul style="list-style-type: none"> BLS forwarded an initial response to KPMG on 1/21/00. KPMG is currently evaluating BLS's response and has submitted clarifying questions.
		<ul style="list-style-type: none"> KPMG submitted a Draft Exception², regarding Maintenance and Repair, to BLS on 1/14/00. 	<ul style="list-style-type: none"> KPMG indicated that BLS TAFI applications do not allow CLECs to process trouble reports for ISDN lines as described in the <i>CLEC TAFI End-User Training and User Guide</i>. 	<ul style="list-style-type: none"> BLS forwarded an initial response to KPMG on 1/21/00. KPMG is currently evaluating BLS's response and has submitted clarifying questions.
		<ul style="list-style-type: none"> KPMG submitted a Draft Exception², regarding Ordering and Provisioning, to BLS on 1/14/00. 	<ul style="list-style-type: none"> KPMG indicated that FOCs are issued by BLS on CLEC service orders before facility status has been determined. 	<ul style="list-style-type: none"> KPMG will file this exception and BLS's response with the GA-PSC.
V-1	Maintenance and Repair End-To-End Functional Testing	<ul style="list-style-type: none"> The M&R end-to-end test bed has been completed. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> N/A.
		<ul style="list-style-type: none"> KPMG is preparing to conduct a test of ISDN-BRI lines. 	<ul style="list-style-type: none"> Original testing parameters must be altered in order to achieve accurate test results. 	<ul style="list-style-type: none"> KPMG will request provisioning of three ISDN-BRI lines and begin testing on 2/7/00.
V-2	Provisioning Verification	<ul style="list-style-type: none"> KPMG has conducted interviews with Network Personnel, UNE Center, RCMAG and LCSC personnel to understand and analyze the BLS provisioning process. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> KPMG is scheduling additional interviews with Central Office and Recent Change Management Administration Group personnel.
		<ul style="list-style-type: none"> KPMG has scheduled interviews with CLEC personnel to understand BLS provisioning process from the CLEC perspective. 	<ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> N/A.



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Ref ¹	Item	Status	Issues	Next Step Resolution
		<ul style="list-style-type: none">• KPMG is continuing provisioning verification activities for transactions initiated during TAG and EDI functional testing.	<ul style="list-style-type: none">• Verification activities will include site inspections, validation of switch translations, and post-activity CSR runs by BLS personnel.	<ul style="list-style-type: none">• Verification activities will continue through the completion of EDI and TAG functional testing.
V-3	Pre-ordering, Ordering and Provisioning	<ul style="list-style-type: none">• An interview was conducted for the LNP Guide with BLS subject matter experts.• KPMG has instituted a test process whereby the <i>BLS Documentation Issues Report</i> is submitted to BLS representatives weekly for review and comment.	<ul style="list-style-type: none">• The process for submitting updates to the BLS web site is unclear.• KPMG uncovered the following: 1) Potential documentation problems relating to ordering multiple features for a single TN; 2) Potential problems with requirements for the REFNUM field in the Directory Listing form.	<ul style="list-style-type: none">• BLS will research this issue.• KPMG and BLS continue to research these issues.
V-4	ODUF/ADUF Documentation Evaluation	<ul style="list-style-type: none">• KPMG has completed its review of ODUF/ADUF documentation and is analyzing the results.	<ul style="list-style-type: none">• None.	<ul style="list-style-type: none">• N/A.

¹ Referencing Methodology: An item referenced as I-n indicates that the item was first discussed in the July 22, 1999 status report. An item referenced as II-n indicates that the item was first referenced in the September 10, 1999 status report. An item referenced as III-n indicates that the item was first referenced in the October 21, 1999 report. An item referenced as IV-n indicates that the item was first referenced in the November 19, 1999 report. An item referenced as V-n indicates that the item was first referenced in the December 17, 1999 report. An item referenced as VI-n is new for this report.

² According to the exception process agreed to by KPMG, BellSouth and the Georgia Public Service Commission, when KPMG discovers a potential component defect (e.g., a deficiency in a procedure, system or document) written substantiation is submitted to BellSouth detailing KPMG's findings. BellSouth provides a written response to this finding. KPMG's written substantiation is considered a "Draft Exception" until the potential defect has been confirmed. If KPMG's assessment of the potential error is determined to be inaccurate, KPMG will withdraw the Draft Exception. If the issue is substantiated, the Draft Exception and BellSouth response will be submitted to and published by the Commission. and the parties will agree on resolution steps.