

ORIGINAL

**BELLSOUTH**

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RECEIVED

FEB 17 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Kathleen B. Levitz**  
Vice President-Federal Regulatory

202 463-4113  
Fax 202 463-4198

February 17, 2000

**EX PARTE OR LATE FILED**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

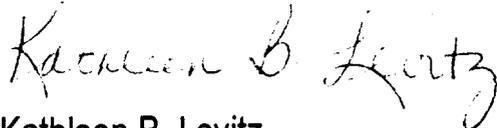
Re: Written Ex Parte in CC Docket No. 98-121  
and CC Docket No. 99-295

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 a copy of Exceptions that KPMG filed with the Georgia Public Service Commission on February 10, 2000, in connection with its execution of the Georgia Third-Party Testing Plan for BellSouth's Operation Support Systems, or OSS. Included in the filing were BellSouth's responses to each of the exceptions KPMG raised in that filing.

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

Sincerely,



Kathleen B. Levitz

Attachment

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

**BellSouth**  
Suite 900  
1133-21st Street, N.W.  
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**Kathleen B. Levitz**  
Vice President-Federal Regulatory

202 463-4113  
Fax 202 463-4198

February 17, 2000

WRITTEN EX PARTE

Ms. Claudia Fox  
Policy and Program Planning Division  
Common Carrier Bureau  
Room 5-C235  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> 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 KPMG Exceptions 10 through 14 arising during KPMG's execution of the Georgia Third-Party Testing Plan for BellSouth's Operation Support Systems, or OSS. These exceptions, as well as BellSouth's responses to each, were filed with the Georgia Public Service Commission on February 10, 2000. I am sending these filings to you in response to your 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, 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 the docket identified above.

Sincerely,

  
Kathleen B. Levitz

Attachment

cc: William Agee  
Jake Jennings



303 Peachtree Street, N.E.  
Suite 2000  
Atlanta, GA 30308

Telephone 404 222 3000  
Fax 404 222 3050

February 10, 2000

Ms. Helen O'Leary  
Executive Secretary  
Georgia Public Service Commission  
47 Trinity Avenue SW, Room 520  
Atlanta, GA 30334

**RECEIVED**  
FEB 10 2000  
EXECUTIVE SECRETARY  
G.P.S.C.

**RE: Investigation into Development of Electronic Interfaces for BellSouth's  
Operational Support Systems; Docket No. 8354-U**

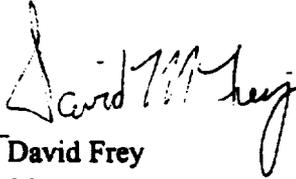
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG LLP's Exceptions 10, 11, 12, 13 and 14 with BellSouth's responses for filing in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,



David Frey  
Manager

Enclosures

cc: Parties of Record



KPMG LLP, KPMG LLP a US limited liability partnership is  
a member of KPMG International, a Swiss association



## EXCEPTION 10

BellSouth Georgia OSS Testing Evaluation

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Date: January 5, 2000

### EXCEPTION REPORT

An exception has been identified as a result of the M & R-1: TAFI Functional Test.

#### Exception:

**Under two circumstances, a TAFI tester was unable to cancel or close a trouble report in the manner described by the *CLEC TAFI End-User Training and User Guide*.**

During functional testing, one scenario required a subsequent trouble report to be removed from the TAFI queue and canceled. Testers were unable to cancel or close the subsequent report, as instructed in the *CLEC TAFI End User Training and User Guide*, after it had been removed from the queue. According to the guide, a subsequent report can be canceled or closed by one for the following methods:

- 1) Answering "yes" to the first subsequent report flow question, "Is this cancel report/okay closeout?"
- 2) Choosing to override TAFI's recommendation using the F12 Limited Sub Override menu and selecting *cancel* or *close*.
- 3) Selecting *cancel* or *close* from the F12 Sub Override menu for a report for which TAFI has not determined a recommended disposition.

Initially, when the ticket was removed from the queue, TAFI presented testers with the flow question described in method one above. However, when testers selected "yes," the TAFI recommendation on the trouble report screen did not reflect the documented "TOK per customer recommendation." Instead, it stated, "Updating narrative/status information." As TAFI did not recognize the cancellation in the recommendation field, testers had to use the F12 Limited Sub Override as described in method two above to change the recommendation to one that would cancel the report. Upon selection of one of the two cancel options, the TAFI recommendation changed in the trouble ticket as documented, indicating that the ticket would close out. However, after submitting the ticket, testers re-entered the TN to confirm cancellation and found that the ticket had not been cancelled. Testers repeated this scenario with another TN during dial-up testing as well, and experienced the same results.

In a separate scenario, while testing the Multiple Trouble Report function in M & R-1, testers were unable to cancel two submitted trouble tickets. As described in method one above, testers were unable to cancel the tickets by answering "yes" to the subsequent report flow question, "Is this cancel report/okay closeout?" or through the use of the F12 Sub Limited Override menu. Again, the tickets appeared to the user to be cancelled. However, when the TNs were re-entered for verification, the trouble tickets had not been



## EXCEPTION 10

### BellSouth Georgia OSS Testing Evaluation

cancelled. Testers were forced to call the Resale Service Center (RSC) in order to cancel these tickets.

#### Impact

CLECs that are unable to cancel a trouble report as directed in the *CLEC TAFI End-User Training and User Guide* would be impacted in the following ways:

- **Decreasing CLEC customer satisfaction:** A CLEC would not be aware that a ticket had not been canceled unless they had cause to re-enter the TN in TAFI, and noticed that a subsequent report was retrieved, rather than a repeat report. If a CLEC is unaware that a report has not been canceled, the trouble ticket will continue to flow through the system. Depending on the recommendations on the ticket, this might cause BellSouth to take action such as dispatching a technician to perform unwanted or unnecessary work. Unnecessary or unwanted action to CLEC customer accounts would decrease CLEC customer satisfaction.
- **Increasing CLEC operating costs:** If unnecessary or unwanted service calls are made due to improperly canceled trouble tickets, the CLEC would be billed for these service calls. Additionally, if a CLEC is unable to cancel a customer's report using TAFI, CLEC customer service personnel would be required to call the Business Resale Service Center. This would require additional time and effort, and therefore cost, by the CLEC.



January 19, 2000

## EXCEPTION REPORT

An exception has been identified as a result of the M & R-1: TAFI Functional Test.

### Exception:

**Under two circumstances, a TAFI tester was unable to cancel or close a trouble report in the manner described by the *CLEC TAFI End-User Training and User Guide*.**

During functional testing, one scenario required a subsequent trouble report to be removed from the TAFI queue and canceled. Testers were unable to cancel or close the subsequent report, as instructed in the *CLEC TAFI End User Training and User Guide*, after it had been removed from the queue. According to the guide, a subsequent report can be canceled or closed by one for the following methods:

- 1) Answering "yes" to the first subsequent report flow question, "Is this cancel report/okay closeout?"
- 2) Choosing to override TAFI's recommendation using the F12 Limited Sub Override menu and selecting *cancel* or *close*.
- 3) Selecting *cancel* or *close* from the F12 Sub Override menu for a report for which TAFI has not determined a recommended disposition.

Initially, when the ticket was removed from the queue, TAFI presented testers with the flow question described in method one above. However, when testers selected "yes," the TAFI recommendation on the trouble report screen did not reflect the documented "TOK per customer recommendation." Instead, it stated, "Updating narrative/status information." As TAFI did not recognize the cancellation in the recommendation field, testers had to use the F12 Limited Sub Override as described in method two above to change the recommendation to one that would cancel the report. Upon selection of one of the two cancel options, the TAFI recommendation changed in the trouble ticket as documented, indicating that the ticket would close out. However, after submitting the ticket, testers re-entered the TN to confirm cancellation and found that the ticket had not been cancelled. Testers repeated this scenario with another TN during dial-up testing as well, and experienced the same results.

In a separate scenario, while testing the Multiple Trouble Report function in M & R-1, testers were unable to cancel two submitted trouble tickets. As described in method one above, testers were unable to cancel the tickets by answering "yes" to the subsequent report flow question, "Is this cancel report/okay closeout?" or through the use of the F12

Sub Limited Override menu. Again, the tickets appeared to the user to be cancelled. However, when the TNs were re-entered for verification, the trouble tickets had not been cancelled. Testers were forced to call the Resale Service Center (RSC) in order to cancel these tickets.

### **BST Response**

By design, TAFI will not allow a dispatched report to be closed (since a field technician is in control of the report). Per the documentation, the user can provide narrative info (i.e., trouble OK now) for the field technician to see.

The procedure for processing multiple trouble reports has been mechanized in TAFI. The updated *CLEC TAFI End-User Training and User Guide* will reflect the proper procedure for closing these reports. The guide will be available on the web February 1, 2000.



## EXCEPTION 11

BellSouth Georgia OSS Testing Evaluation

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Date: January 5, 2000

### EXCEPTION REPORT

An exception has been identified as a result of the M&R-1: TAFI Functional Test and M&R-8: TAFI Documentation Evaluation.

#### Exception:

**The host request error and reset communications functions do not operate as described by the *CLEC TAFI End-User Training and User Guide*.**

**Host Request Errors:** A host request error is the inability for TAFI to access one of the downstream systems in order to either gather information or send information during trouble report creation. According to the *CLEC TAFI End-User Training and User Guide*, when encountering a host request error, a user should queue the report until connections are re-established. Then, a user should "bring up the additional data window, highlight the transaction they want to execute and then depress F5 to reset/resend the transaction."

During testing, in two cases where host request errors occurred, when testers re-sent transactions by pressing the F5 key as instructed, a message was received stating that the host request type could not be reset. TAFI then returned to the trouble report screen as though no transaction had been executed. Once returned to the trouble report screen, testers were able to hit enter, and the reports were processed. Thus the F5 key failed to operate as stated in the manual.

**Reset Communications:** When TAFI is unable to access a downstream system, it generates a communications error message. According to the *CLEC TAFI End-User Training and User Guide*, when this happens a TAFI user can correct this problem by bringing up the additional data window using F11, selecting the 'Reset Communications' option, highlighting the link that reported the error, and pressing enter.

During the testing of one scenario, when selecting F11, testers noted that 'Reset Communications' was no longer listed as an option, as is described in the *CLEC TAFI End-User Training and User Guide*.

#### Impact

The inability to perform the host request error & reset communications functions, as stated in the manual, can require a CLEC to either: 1) phone in the trouble, or 2) attempt to process the ticket through trial and error. Both of these possibilities decrease CLEC personnel's productivity, and add cost to the CLEC operation. In addition, as a result of the additional calls to BellSouth, other CLEC customers may remain in the caller queue longer, thus decreasing customer satisfaction.



January 19, 2000

## EXCEPTION REPORT

An exception has been identified as a result of the M&R-1: TAFI Functional Test and M&R-8: TAFI Documentation Evaluation.

### Exception:

**The host request error and reset communications functions do not operate as described by the *CLEC TAFI End-User Training and User Guide*.**

**Host Request Errors:** A host request error is the inability for TAFI to access one of the downstream systems in order to either gather information or send information during trouble report creation. According to the *CLEC TAFI End-User Training and User Guide*, when encountering a host request error, a user should queue the report until connections are re-established. Then, a user should "bring up the additional data window, highlight the transaction they want to execute and then depress F5 to reset/re-send the transaction."

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**Reset Communications:** When TAFI is unable to access a downstream system, it generates a communications error message. According to the *CLEC TAFI End-User Training and User Guide*, when this happens a TAFI user can correct this problem by bringing up the additional data window using F11, selecting the 'Reset Communications' option, highlighting the link that reported the error, and pressing enter.

During the testing of one scenario, when selecting F11, testers noted that 'Reset Communications' was no longer listed as an option, as is described in the *CLEC TAFI End-User Training and User Guide*.

### Impact

The inability to perform the host request error & reset communications functions, as stated in the manual, can require a CLEC to either: 1) phone in the trouble, or 2) attempt to process the ticket through trial and error. Both of these possibilities decrease CLEC personnel's productivity, and add cost to the CLEC operation. In addition, as a result of the additional calls to BellSouth, other CLEC customers may remain in the caller queue longer, thus decreasing customer satisfaction.

**BST Response**

The *CLEC TAFI End-User Training and User Guide* will be updated 2/1/00 to reflect the current operation of the system.

As information, TAFI now accesses legacy systems via Navigator contracts over BOSIP as opposed to terminal emulation over Datakit. Therefore the Reset Communications option is no longer applicable. The Host Request Error functionality does work for specific transactions and the updated documentation will be more specific.

## EXCEPTION 12

BellSouth Georgia OSS Testing Evaluation

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Date: January 5, 2000

### EXCEPTION REPORT

An exception has been identified as a result of the ongoing Maintenance and Repair ECTA Functional Test (M&R-2).

#### Exception:

**The ECTA Gateway does not accurately notify CLECs when invalid information is entered into a trouble ticket.**

Examples of inaccurate notification are described as follows:

- 1. The ECTA Gateway did not inform KPMG of an improper value transmitted for the troubleType object.**

Within the ECTA Gateway, the troubleType object of a trouble report allows a CLEC to describe the trouble condition. The troubleType object is used by the ECTA Gateway to specify the type of automatic testing that a circuit will undergo, as well as to guide the BellSouth Maintenance Administrator in performing repairs. During the course of functional testing, KPMG intentionally submitted an incorrect non-numeric value for the troubleType object<sup>1</sup>. The ECTA Gateway created a trouble ticket and sent back the normal successful trouble ticket response. The ECTA Gateway did not indicate that any erroneous information had been included in this instance. KPMG examined the trouble ticket created, and discovered that the ECTA Gateway had assigned a value of NDT (No Dial Tone) to the troubleType object.

- 2. The ECTA Gateway did not inform KPMG of an improper value transmitted for the closeOutVerification object.**

The ECTA Gateway generates a request for a CLEC to verify that a reported trouble has been corrected when either repairs to a WFA ticket have been completed, or when automated testing on an LMOS ticket indicates that no trouble is present. The closeOutVerification object allows a CLEC to respond to this request. Through this response, the CLEC indicates either that they concur that the trouble has been corrected and the report may be closed, or that the trouble has not been corrected and the report should remain open. During the course of functional testing, KPMG intentionally submitted an incorrect value for the closeOutVerification object<sup>2</sup>. The

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<sup>1</sup> Valid troubleType entries are numeric as defined in ANSI T1.227.

<sup>2</sup> The allowable values for this attribute are: 0 (NoAction), 1 (Verified), 2 (Denied), 3 (DeniedActivityDurationDisputed) or 4 (DeniedCloseOutNarrDisputed). KPMG submitted a value of 9.



## **EXCEPTION 12**

### **BellSouth Georgia OSS Testing Evaluation**

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response for this transaction did not indicate that testers had submitted an invalid entry. KPMG examined the trouble ticket and found that the ECTA Gateway had assigned a value of "2" (Denied) to the closeOutVerification object.

#### **Impact**

Failure of the ECTA Gateway to indicate to a CLEC that invalid values have been entered into trouble tickets results in improper information appearing on trouble tickets. Uncorrected errors on invalid trouble report entries could result in trouble tickets being improperly handled.

Examples of how CLEC operations could be affected include:

- Workforce management disruptions and higher operating costs resulting from allocation of CLEC personnel to re-submit trouble tickets.
- Reductions in customer satisfaction due to an inability to quickly and accurately correct operational trouble.



January 19, 2000

## **EXCEPTION REPORT**

An exception has been identified as a result of the ongoing Maintenance and Repair ECTA Functional Test (M&R-2).

### **Exception:**

**The ECTA Gateway does not accurately notify CLECs when invalid information is entered into a trouble ticket.**

Examples of inaccurate notification are described as follows:

- 1. The ECTA Gateway did not inform KPMG of an improper value transmitted for the troubleType object.**

Within the ECTA Gateway, the troubleType object of a trouble report allows a CLEC to describe the trouble condition. The troubleType object is used by the ECTA Gateway to specify the type of automatic testing that a circuit will undergo, as well as to guide the BellSouth Maintenance Administrator in performing repairs. During the course of functional testing, KPMG intentionally submitted an incorrect non-numeric value for the troubleType object<sup>1</sup>. The ECTA Gateway created a trouble ticket and sent back the normal successful trouble ticket response. The ECTA Gateway did not indicate that any erroneous information had been included in this instance. KPMG examined the trouble ticket created, and discovered that the ECTA Gateway had assigned a value of NDT (No Dial Tone) to the troubleType object.

- 2. The ECTA Gateway did not inform KPMG of an improper value transmitted for the closeOutVerification object.**

The ECTA Gateway generates a request for a CLEC to verify that a reported trouble has been corrected when either repairs to a WFA ticket have been completed, or when automated testing on an LMOS ticket indicates that no trouble is present. The closeOutVerification object allows a CLEC to respond to this request. Through this response, the CLEC indicates either that they concur that the trouble has been corrected and the report may be closed, or that the trouble has not been corrected and the report should remain open. During the course of functional testing, KPMG

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<sup>1</sup> Valid troubleType entries are numeric as defined in ANSI T1.227.

intentionally submitted an incorrect value for the closeOutVerification object<sup>2</sup>. The response for this transaction did not indicate that testers had submitted an invalid entry. KPMG examined the trouble ticket and found that the ECTA Gateway had assigned a value of "2" (Denied) to the closeOutVerification object.

### **Impact**

Failure of the ECTA Gateway to indicate to a CLEC that invalid values have been entered into trouble tickets results in improper information appearing on trouble tickets. Uncorrected errors on invalid trouble report entries could result in trouble tickets being improperly handled.

Examples of how CLEC operations could be affected include:

- Workforce management disruptions and higher operating costs resulting from allocation of CLEC personnel to re-submit trouble tickets.
- Reductions in customer satisfaction due to an inability to quickly and accurately correct operational trouble.

### **Response:**

- (1) The ECTA gateway assumes that the manager submits valid troubleType objects and it does not perform validation edits. In a traditional Manager/Agent gateway relationship, both parties adhere to the ANSI T1.227 standards, therefore, value validation is not required. During testing, the BellSouth gateway was accessed from a non-Manager interface which did not have the same safeguards in place.

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<sup>2</sup> The allowable values for this attribute are: 0 (NoAction), 1 (Verified), 2 (Denied), 3 (DeniedActivityDurationDisputed) or 4 (DeniedCloseOutNarrDisputed). KPMG submitted a value of 9.



**EXCEPTION 13**  
BellSouth Georgia OSS Testing Evaluation

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Date: January 10, 2000

**EXCEPTION REPORT**

An exception has been identified as a result of the M & R-1: TAFI Functional Test.

**Exception:**

**Numerous undocumented messages intended for BellSouth are generated by TAFI during trouble report creation and processing.**

During functional testing, KPMG encountered spurious, BellSouth-specific messages generated by the TAFI application. None of the messages received was related to the data entered. Examples of the messages include:

1. A CPNI warning message stating, "CPNI data unavailable do not use this customer as a sales opportunity."
2. A message stating, "System may contain fragmented CPNI data, to be used only consistent with your CPNI training. Not to be used for sales and marketing purposes."
3. A message instructing the TAFI user to, "Take trouble in GA WFA/C<sup>1</sup>".
4. A message instructing the TAFI user to get their customer's email address and provide BellSouth's small business web site address.
5. A message stating, "Pending Backtalk."<sup>2</sup>

**Impact**

Ways in which CLECs are impacted by these undocumented, BellSouth-specific messages include:

- Messages such as 1, 2 and 3 above will create confusion for a CLEC. CLEC TAFI Users will be unsure as to the proper course of action. A CLEC will likely attempt to ascertain the source for and cause of these messages. Such action will result in slower response intervals, decreased customer satisfaction, and possible changes in workforce management.
- Messages such as 4 and 5 instruct CLECs to take an action or await action which involve a customer becoming aware of BellSouth's involvement in the CLEC

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<sup>1</sup> GA WFA/C refers to the Georgia WFA Center which controls a BellSouth backend system intended to handle designed circuits. This message was received for a trouble ticket relating to POTS lines.

<sup>2</sup> Backtalk refers to a BellSouth service which calls customers with a recorded message to update the status of a trouble ticket. During playback, the recorded message makes explicit reference to BellSouth.



## **EXCEPTION 13**

### **BellSouth Georgia OSS Testing Evaluation**

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maintenance and repair process. For example, message 4 instructs the TAFI user to direct the customer to BellSouth's small business web site address. Message 5 involves an automated BellSouth system which calls the customer when the trouble has been corrected. Following either of these actions will result in a CLEC inadvertently directing or exposing their customers to contact with their competitor. This could ultimately result in customer confusion and decreased customer satisfaction with the CLEC.



January 19, 2000

## **EXCEPTION REPORT**

An exception has been identified as a result of the M & R-1: TAFI Functional Test.

### **Exception:**

**Numerous undocumented messages intended for BellSouth are generated by TAFI during trouble report creation and processing.**

During functional testing, KPMG encountered spurious, BellSouth-specific messages generated by the TAFI application. None of the messages received was related to the data entered. Examples of the messages include:

1. A CPNI warning message stating, "CPNI data unavailable do not use this customer as a sales opportunity."
2. A message stating, "System may contain fragmented CPNI data, to be used only consistent with your CPNI training. Not to be used for sales and marketing purposes."
3. A message instructing the TAFI user to, "Take trouble in GA WFA/C<sup>1</sup>".
4. A message instructing the TAFI user to get their customer's email address and provide BellSouth's small business web site address.
5. A message stating, "Pending Backtalk.<sup>2</sup>"

### **Impact**

Ways in which CLECs are impacted by these undocumented, BellSouth-specific messages include:

- Messages such as 1, 2 and 3 above will create confusion for a CLEC. CLEC TAFI Users will be unsure as to the proper course of action. A CLEC will likely attempt to ascertain the source for and cause of these messages. Such action will result in slower response intervals, decreased customer satisfaction, and possible changes in workforce management.
- Messages such as 4 and 5 instruct CLECs to take an action or await action which involve a customer becoming aware of BellSouth's involvement in the CLEC

<sup>1</sup> GA WFA/C refers to the Georgia WFA Center which controls a BellSouth backend system intended to handle designed circuits. This message was received for a trouble ticket relating to POTS lines.

<sup>2</sup> Backtalk refers to a BellSouth service which calls customers with a recorded message to update the status of a trouble ticket. During playback, the recorded message makes explicit reference to BellSouth.

maintenance and repair process. For example, message 4 instructs the TAFI user to direct the customer to BellSouth's small business web site address. Message 5 involves an automated BellSouth system which calls the customer when the trouble has been corrected. Following either of these actions will result in a CLEC inadvertently directing or exposing their customers to contact with their competitor. This could ultimately result in customer confusion and decreased customer satisfaction with the CLEC.

### **BST Response**

The proper handling of CPNI data is a FCC requirement. Since BST cannot control how the CLEC's user uses this data, TAFI provides a warning message every time the user accesses a customer's record.

The other BellSouth specific messages indicated above will be removed with the next schedule release, 3/31/00. The 'Pending BackTalk' message should never be displayed since CLEC reports are not routed to the BackTalk system. Investigation is in progress and corrective action will be taken when the root cause has been pinpointed.



**EXCEPTION 14**  
BellSouth Georgia OSS Testing Evaluation

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Date: January 10, 2000

**EXCEPTION REPORT**

An exception has been identified as a result of the M & R-1: TAFI Functional Test.

**Exception:**

**The BellSouth TAFI applications does not allow CLECs to process trouble reports for ISDN lines as described in the *CLEC TAFI End User Training and User Guide*.**

During functional testing, KPMG was unable to execute four of the fifteen planned scenarios designed for processing trouble on ISDN lines. The *CLEC TAFI End User Training and User Guide* states that "trouble reports for TN based...services such as integrated services digital network (ISDN) voice...can be entered through the TAFI application." During CLEC TAFI training, BellSouth explained that entry of ISDN-related trouble must be done in override capacity rather than through the typical flow<sup>1</sup>. However, when testers attempted to enter TNs for ISDN lines, the TAFI system rejected the TNs before override capacity could be initiated.

**Impact**

The inability of a CLEC to enter a trouble ticket for an ISDN line into TAFI will result in the need for a CLEC to call the appropriate BellSouth service center in order to report the trouble. This decreased functionality will result in slower response intervals, decreased customer satisfaction, and the need for changes in workforce management.

---

<sup>1</sup> During typical flow, when the TN is entered, TAFI guides the user through a series of questions designed to identify the trouble involved. In override capacity, the user presses the F12 key and writes a brief description of the trouble.



January 19, 2000

## EXCEPTION REPORT

An exception has been identified as a result of the M & R-1: TAFI Functional Test.

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The BellSouth TAFI applications does not allow CLECs to process trouble reports for ISDN lines as described in the *CLEC TAFI End User Training and User Guide*.

During functional testing, KPMG was unable to execute four of the fifteen planned scenarios designed for processing trouble on ISDN lines. The *CLEC TAFI End User Training and User Guide* states that "trouble reports for TN based...services such as integrated services digital network (ISDN) voice...can be entered through the TAFI application." During CLEC TAFI training, BellSouth explained that entry of ISDN-related trouble must be done in override capacity rather than through the typical flow<sup>1</sup>. However, when testers attempted to enter TNs for ISDN lines, the TAFI system rejected the TNs before override capacity could be initiated.

### Impact

The inability of a CLEC to enter a trouble ticket for an ISDN line into TAFI will result in the need for a CLEC to call the appropriate BellSouth service center in order to report the trouble. This decreased functionality will result in slower response intervals, decreased customer satisfaction, and the need for changes in workforce management.

### BST Response

The *CLEC TAFI End-User Training and User Guide* will be updated 2/1/00 to reflect the current operation of the system.

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<sup>1</sup> During typical flow, when the TN is entered, TAFI guides the user through a series of questions designed to identify the trouble involved. In override capacity, the user presses the F12 key and writes a brief description of the trouble.

**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:

Jim Hurt, Director  
Consumers' Utility Counsel  
2 Martin Luther King Jr. Drive  
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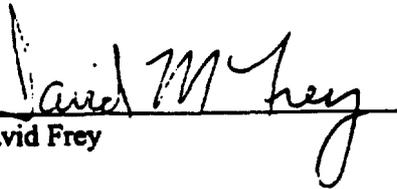
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