

ORIGINAL

BELLSOUTH

BellSouth
Suite 900
1133-21st Street, N.W.
Washington, D.C. 20036-3351

kathleen.levitz@bellsouth.com

Kathleen B. Levitz
Vice President-Federal Regulatory

202 463-4113
Fax 202 463-4198

March 13, 2000

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

RECEIVED

MAR 13 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

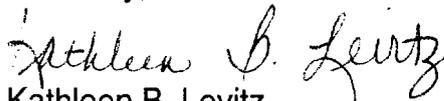
Re: Written Ex Parte in CC Docket No. 98-121
and CC Docket No. 99-295

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 copies of three documents that KPMG filed recently with the Georgia Public Service in connection with KPMG's execution of the Georgia Third-Party Testing Plan for BellSouth's Operation Support Systems, or OSS. KPMG filed the first document, reporting KPMG's Closure of Exceptions 3, 5, and 8, with the Georgia Public Service Commission on February 25, 2000. The second document presented KPMG's Exceptions 16, 17, 18, 19, 20, and 21 and BellSouth's response to each of them. KPMG also filed this document with the Georgia Commission on February 25, 2000. The third document, entitled "BellSouth Telecommunications, inc. OSS Evaluation – Georgia Supplemental Test Plan (STP) Version 1.1" was filed on March 2, 2000.

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)

BellSouth
Suite 900
1133-21st Street, N.W.
Washington, D.C. 20036-3351
kathleen.levitz@bellsouth.com

Kathleen B. Levitz
Vice President-Federal Regulatory

202 463-4113
Fax 202 463-4198

March 13, 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

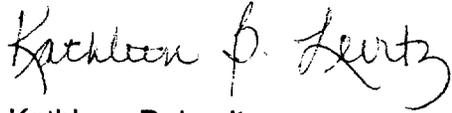
Re: CC Docket No. 98-121 and CC Docket No. 99-295

Dear Ms Fox:

Attached are copies of three documents filed with the Georgia Public Service Commission by KPMG in conjunction with the latter's execution of the Georgia Third-Party Testing Plan for BellSouth's Operation Support Systems, or OSS. The first document contains KPMG's Closure Reports for Exceptions 3, 5, and 8, which KPMG filed with the Georgia Commission on February 25, 2000. The second document sets forth KPMG's Exceptions 16, 17, 18, 19, 20 and 21 and BellSouth's response to each. KPMG also filed this document with the Georgia Commission on February 25, 2000. The third document, entitled "BellSouth Telecommunications, INC. OSS Evaluation – Georgia Supplemental Test Plan (STP) Version 1.1" and filed with the Georgia Commission on March 2, 2000, provides an enhanced description of a plan for additional KPMG testing of BellSouth's OSS systems, interfaces and processes, beyond those described in the Master Test Plan. This last document reflects significant input from the CLEC community. I am sending these filings to you in response to the request that BellSouth share with you documentation related to the third party-testing program currently underway in Georgia. If you have any questions after reviewing the documents, 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,

A handwritten signature in cursive script that reads "Kathleen B. Levitz". The signature is written in black ink and is positioned above the printed name.

Kathleen B. Levitz

Attachments

cc: William Agee
Jake Jennings



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

Telephone 404 222 3000
Fax 404 222 3050

February 25, 2000

RECEIVED
FEB 25 2000
EXECUTIVE SECRETARY
G.P.S.C.

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

**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 Consulting LLC's Closure Reports for Exceptions 3, 5 and 8 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



CLOSURE REPORT FOR EXCEPTION 3
BellSouth Georgia OSS Testing Evaluation

Date: February 10, 2000

RECEIVED

EXCEPTION CLOSURE REPORT

FEB 25 2000

Exception:

EXECUTIVE SECRETARY

Competitive Local Exchange Carriers (CLECs) are not notified when BellSouth initiates changes to published historical performance measurement reports and/or the raw data files associated with these reports after this information has been removed from the Performance Measurement and Analysis Platform (PMAP) web-site.

Summary of Exception:

KPMG identified Exception 3 through performance measurement testing activities associated with the validation of Service Quality Measurement (SQM) calculations.

BellSouth makes its monthly performance measurement reports and related information available to the CLECs primarily through the PMAP web-site. KPMG observed that in cases where BellSouth initiates changes to the performance measurement reports and/or raw data after this information has been removed from the PMAP web site, CLECs are not notified, including CLECs affected by the reporting change.

If CLECs are not informed of changes in the reports, they will not have the information needed to accurately monitor BellSouth's service quality performance.

Summary of BellSouth Response:

BellSouth addressed KPMG's observations in Exception 3. BellSouth's response stated:

1. BellSouth has enhanced its CLEC Notification Procedure to include reports that change from previous months. The information regarding which monthly reports are affected and instructions on how to obtain modified reports are being included on the PMAP web-site.
2. The *PMAP User Guide* has been modified to describe the enhanced Notification Procedure, outline the changes made to accommodate this improvement in its process, and instruct CLECs to obtain modified reports.

Summary of KPMG Re-Test Activities:

KPMG reviewed BellSouth's proposed CLEC Notification Procedure to determine if the

CLOSURE REPORT FOR EXCEPTION 3

BellSouth Georgia OSS Testing Evaluation

policies addressed the concerns raised by Exception 3. KPMG also reviewed the documentation in the *PMAP User Guide* to determine if the CLECs were adequately informed of the enhancements and instructed on how to obtain modified reports.

KPMG Re-Test Results:

BellSouth has implemented the following changes to enhance its CLEC notification process:

1. A new location on the PMAP web-site has been created where notification about updates on historical SQM reports will be provided.
2. The new *PMAP User Guide, Version 2.0.4*, dated 12/15/99, has been modified to include a new section providing instructions as to how to obtain updated reports. The new *PMAP User Guide* has been posted to the PMAP web-site.
3. BellSouth has provided proposed changes to the PMAP User Guide to KPMG. These changes specify that BellSouth will respond to all CLEC requests for changed reports within 48 hours, providing either the revised report or an estimated delivery date, based upon the complexity of the request. This new language will appear in the next update of the *PMAP User Guide*.

BellSouth's CLEC notification process has improved significantly since the December implementation of measures to address KPMG's Exception 3. BellSouth now has published processes and procedures in place to notify the CLEC community of changes in past SQM reports.

The Georgia Public Service Commission (GA-PSC) may wish to continue to monitor change notification to verify BellSouth's continued compliance. The GA-PSC may also wish to monitor BellSouth's CLEC notification process during an actual occurrence of change in past SQM report(s).

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, declares Exception 3 closed.

Attachments: None.



CLOSURE REPORT FOR EXCEPTION 5

BellSouth Georgia OSS Testing Evaluation

Date: February 10, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth's rules for submitting supplements to existing service orders are not accurately defined.

Summary of Exception:

A supplement is defined as a new version of an existing service order. CLECs issue supplements to service requests under several circumstances:

- To cancel a pending service order.
- To request a new desired due date.
- To change other aspects of an existing service order (e.g., to correct errors, to reflect changes in an end user's service request).

KPMG has received multiple errors as a result of supplemental service orders submitted via BellSouth's TAG and EDI interfaces. Investigation of these error messages indicated that two specific fields could not be changed when issuing a supplemental order. The following fields create hard errors due to inability to change the field entry on a supplemental order:

1. Company Code (CC)
2. Local Billing Account Number (LOCBAN)

Summary of BellSouth Response:

BellSouth's response to Exception 5 addressed the elements noted in the exception. BellSouth's response stated:

1. The *Local Exchange Ordering Implementation Guide* (LEO Guide) will be updated to define fields that cannot be changed via a Supplement. The date for posting to the web is January 31, 2000.

Summary of KPMG Re-test Activities:

Subsequent to the document's posting on January 31, 2000, KPMG reviewed *LEO Guide, Version N*, which included Note 5:

KPMG Consulting LLC
02/10/00
Page 1 of 2



CLOSURE REPORT FOR EXCEPTION 5

BellSouth Georgia OSS Testing Evaluation

“The following fields can not be changed when issuing a SUP: CC, SC, PON, REQTYP, ACT, LOCBAN, EAN and EATN. In addition, when the NPT field = A, B, or C, it can not be changed to D and when the NPT field = D, it cannot be changed to A, B, or C.”

KPMG Re-test Results:

BellSouth’s *LEO Guide, Version N* has been updated to reflect that the “CC” and “LOCBAN” fields cannot be changed when issuing a supplemental order.

BellSouth’s content improvement to *LEO Guide, Version N* substantially assists the CLECs in successfully submitting supplemental orders.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, declares Exception 5 closed.

Attachments: None.



CLOSURE REPORT FOR EXCEPTION 8

BellSouth Georgia OSS Testing Evaluation

Date: February 10, 2000

EXCEPTION CLOSURE REPORT

Exception:

Firm Order Confirmations (FOCs) are issued by BellSouth on CLEC service orders before facility status has been determined.

Summary of Exception:

Through interviews with BellSouth personnel and review of BellSouth documentation, KPMG has discovered that BellSouth issues FOCs on CLEC service orders before facility availability is confirmed. After receiving a valid service order from a CLEC, BellSouth issues a FOC which includes a committed service date. Subsequent to a FOC's issuance, BellSouth's Loop Facilities Assignment Control System (LFACS) attempts to assign a facility to the service order. If the necessary facility is deemed non-available, a PF (Pending Facility) status¹ is issued on a service order and the CLEC is notified of the service order's changed status².

Summary of BellSouth Response:

BellSouth is providing parity of service to retail and CLEC customers. A Firm Order Confirmation, FOC, is returned to the CLEC when an error free service order is generated. A firm due date is provided to retail customers when an error free service order is submitted to the Service Order Communications System, SOCS. If a jeopardy condition arises for a CLEC, a Jeopardy Notice is sent to the CLEC. If a jeopardy condition arises for a retail customer, the retail service representative attempts to contact the customer to inform them of the jeopardy condition. The electronic notification given to the CLEC assures that the CLEC is notified. Manual calls to retail customers do not have as high of a success rate for notification; thus BellSouth is providing favorable notification service to the CLEC.

Summary of KPMG Re-test Activities:

KPMG spoke with representatives from BellSouth's Local Carrier Service Center (LCSC) and Address Facilities Inventory Group (AFIG) to verify BellSouth's process for

¹ Pending Facility status is issued to service orders where no facility is available for provisioning.

² According to the BellSouth Facility Based Advisory Guide Issue 4.1 – October 22, 1999, Section 4g: H. Firm Order Confirmation, "If there is a post-FOC facility problem, the CLEC will be informed of the estimated service date."



CLOSURE REPORT FOR EXCEPTION 8

BellSouth Georgia OSS Testing Evaluation

handling retail customer jeopardy conditions. KPMG learned that both retail customers and CLECs receive similar treatment. While receipt of an FOC prior to determining facility status presents operational problems for a CLEC, BellSouth retail customers are not accorded preferential treatment.

KPMG Re-test Results:

Based on re-test activities, KPMG has determined that parity exists between BellSouth's retail and CLEC customers with regard to the issuance of an FOC prior to facility status confirmation.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, declares Exception 8 closed.

Attachments: None.

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
Plaza Level East
Atlanta, GA 30334-4600

Newton M. Galloway
Newton Galloway & Associates
Suite 400 First Union Bank Tower
100 South Hill Street
Griffin, GA 30229

Charles A. Hudak, Esq.
Gerry, Friend & Sapronov, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346-2131

Kent Heyman, General Counsel
MGC Communications
3301 N. Buffalo Drive
Las Vegas, NV 89129

Suzanne W. Ockleberry
AT&T
1200 Peachtree Street, NE
Suite 8100
Atlanta, GA 30309

John M. Stuckey, Jr.
Terri M. Lyndall
Webb, Stuckey & Lindsey
Harris Tower, Peachtree Center
7 Lenox Pointe, N.E.
Atlanta, GA 30324

Charles V. Gerkin, Jr.
Smith, Gambrell & Russell, LLP
Promenade II, Suite 3100
1230 Peachtree Street, N.E.
Atlanta, GA 30309-3592

Frank B. Strickland
Wilson, Strickland & Benson
One Midtown Plaza, Suite 1100
1360 Peachtree Street, NE
Atlanta, GA 30309

Jeremy D. Marcus, Esq.
Blumenfeld & Cohen
Co-Counsel for Rhythm, aka ACI Corp.
1625 Massachusetts Avenue, N.W.
Suite 300
Washington, DC 20036

Scott A. Sapperstein
Sr. Policy Counsel
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619

John P. Silk
Georgia Telephone Association
1900 Century Boulevard, Suite 8
Atlanta, GA 30345

Thomas K. Bond
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, GA 30334

Eric J. Branfman
Richard M. Rindler
Swidler & Berlin
3000 K Street, NW, Suite 300
Washington, DC 20007

Robert A. Ganton
Regulatory Law Office
Dept. Army
Suite 700
901 N. Stuart Street
Arlington, VA 22203-1837

Peter C. Canfield
Dow Lohnes & Albertson
One Ravinia Drive, Suite 1600
Atlanta, GA 30346

James M. Tennant
Low Tech Designs, Inc.
1204 Saville Street
Georgetown, SC 29440

Peyton S. Hawes Jr.
127 Peachtree Street, NE
Suite 1100
Atlanta, GA 30303-1810

Mark Brown
Director of Legal and Government Affairs
MediaOne, Inc.
2925 Courtyards Drive
Norcross, GA 30071

Jeffrey Blumenfeld
Elise P. W. Kiely
Blumenfeld & Cohen
1625 Massachusetts Ave, N.W.
Suite 300
Washington, DC 20036

James G. Harralson
BellSouth Long Distance
32 Perimeter Center East
Atlanta, GA 30346

Charles F. Palmer
Troutman Sanders LLP
5200 NationsBank Plaza
600 Peachtree Street, NE
Atlanta, GA 30308-2216

Judith A. Holiber
One Market
Spear Street Tower, 32nd Floor
San Francisco, CA 94105

Laureen McGurk Seeger
Morris, Manning & Martin
1600 Atlanta Financial Center
3343 Peachtree Road, NE
Atlanta, GA 30326-1044

Daniel Walsh
Assistant Attorney General
Office of the Attorney General
40 Capitol Square
Atlanta, GA 30334-1300

Cecil L. Davis Jr.
NEXTLINK Georgia, Inc.
4000 Highlands Parkway
Smyrna, GA 30082

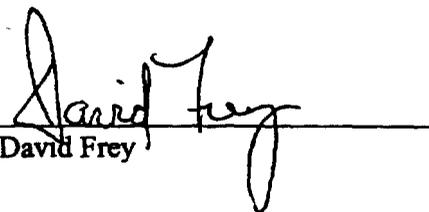
John McLaughlin
KMC Telecom Inc.
Suite 170
3025 Breckinridge Boulevard
Duluth, GA 30096

James A. Schendt
Regulatory Affairs Manager
Interpath Communications, Inc.
P. O. Box 13961
Durham, NC 27709-3961

William R. Atkinson
Sprint Communications Co. L.P.
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339

Fred McCallum, Jr.
125 Perimeter Center West
Room 376
Atlanta, GA 30346

This 25th day of February 2000.


David Frey

KPMG Consulting LLC
303 Peachtree Street, N.E.
Suite 2000
Atlanta, Georgia 30308
(404) 222-3000



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

Telephone 404 222 3000
Fax 404 222 3050

February 25, 2000

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

RECEIVED
FEB 25 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 Consulting LLC's Exceptions 16, 17, 18, 19, 20, 21 and 22 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 U.S. limited liability partnership, is
a member of KPMG International, a Swiss association.



EXCEPTION 16
BellSouth Georgia OSS Testing Evaluation

RECEIVED

Date: February 10, 2000

FEB 25 2000

EXCEPTION REPORT

EXECUTIVE SECRETARY
G.P.S.C.

The following exception has been identified as a result of the CRIS/CABS Functional Test (BLG-1).

Exception:

BellSouth issued multiple bills containing erroneous information to the KPMG CLEC.

As a result of billing transaction tests, BellSouth issued bills associated with a variety of service activities to the KPMG CLEC. Multiple bills received by the KPMG CLEC contain erroneous information, such as: 1) Undocumented charges; 2) Incorrect Rates; 3) Mislabeled information.

Undocumented Charges

USOC VE1R2: During the months of October 1999 through December 1999, BellSouth billed the KPMG CLEC \$0.25 each month for a UNE service component identified by the Universal Service Order Code (USOC) VE1R2 (Virtual Expanded Interconnection). USOC VE1R2 is not defined in applicable BellSouth tariffs or in rate spreadsheets created for the KPMG CLEC in lieu of an Interconnection Agreement.

Upon inquiry, BellSouth informed KPMG that the USOC VE1R2 was added to the BellSouth rate tables in 1997 and is applicable to all CLECs. The monthly-recurring rate established for this USOC is \$0.30. BellSouth applied a business discount of 17.3%, resulting in a monthly-recurring charge of \$0.25.

Representative occurrences of this charge are found on the following invoices:

<u>Telephone Number</u>	<u>Account Number</u>	<u>Invoice Date</u>
912-744-0966	706 Q97 9808 808	12/17/99
912-744-2438	706 Q97 9808 808	12/17/99
706-722-4087	706 Q85 8252 252	10/5/99
706-722-4181	706 Q85 8252 252	10/5/99
706-722-5472	706 Q85 8252 252	10/5/99
706-722-8138	706 Q85 8252 252	12/5/99
706-722-9523	706 Q85 8252 252	12/5/99
770-933-8597	770 Q85 8252 252	10/5/99
770-933-9532	770 Q85 8252 252	10/5/99
706-722-8138	706 Q85 8252 252	11/5/99
706-722-9523	706 Q85 8252 252	11/5/99



EXCEPTION 16
BellSouth Georgia OSS Testing Evaluation

USOC SOME C: The USOC SOME C (a charge assessed for mechanized CLEC service order requests) was incorrectly applied for non-CABS orders. The existence of this USOC and its associated monthly charge is not documented in the BellSouth tariffs. The rate spreadsheet created for the KPMG CLEC in lieu of an Interconnection Agreement lists the charge for the USOC SOME C as a one-time charge of \$5.00 for CABS orders; no such charge appears for non-CABS orders.

Representative occurrences of errors are detailed on the following invoices:

<u>Q-Account</u>	<u>Earning TN</u>	<u>Invoice Date</u>
706 Q85-4226 226	912U480010	10/17/99
706 Q85-4226 226	706U579269	10/17/99

USOC UEAC2¹: BellSouth billed the KPMG CLEC for the monthly recurring charge and non-recurring charge for the USOC UEAC2 (2-Wire Cross-Connect for Provisioning) at a rate of \$0.00. The non-recurring and monthly recurring rate assessed by BellSouth for the USOC UEAC2 for SL1 loops is not listed in the rate spreadsheets created for the KPMG CLEC in lieu of an Interconnection Agreement. In addition, this USOC is not defined in applicable BellSouth tariffs.

Representative occurrences of this charge can be found on the following invoices:

<u>Q-Account</u>	<u>Circuit ID</u>	<u>Invoice Date</u>
706 Q85-4226 226	40.TYNU.526413	10/17/99
706 Q85-4226 226	40.TYNU.526414	10/17/99

Incorrect Rates

USOC UEAL2²: BellSouth billed the KPMG CLEC a \$0.00 monthly recurring charge for the USOC UEAL2. The USOC UEAL2 is listed in the rate spreadsheet as a monthly recurring charge of \$19.57 for SL2 Loops and \$16.51 for SL1 Loops. This USOC is not defined in applicable BellSouth tariffs.

Representative occurrences of this error are detailed below.

<u>Q-Account</u>	<u>Circuit ID</u>	<u>Invoice Date</u>
706 Q85-4226 226	50.TYNU.500910	10/17/99
706 Q85-4226 226	50.TYNU.500911	10/17/99
706 Q85-4226 226	50.TYNU.501081	01/17/00

¹ These errors had no net monetary effect on the KPMG CLEC bills.

² These errors resulted in an under-charge to the KPMG CLEC.



EXCEPTION 16
BellSouth Georgia OSS Testing Evaluation

706 Q85-4226 226 50.TYNU.500896 01/17/00

Mislabeled Information

Mislabeled in Detail of Adjustments Applied: The KPMG CLEC submitted several Billing Adjustment Investigation Requests to BellSouth. KPMG requested adjustments of \$17.16 for USOC UEPBL and for \$12.60 for USOC VE1R2. A third adjustment was requested for \$125.00 for an overpayment on the account. These adjustment requests were processed and the credits were applied on the 12/17/99 invoice of Billing Account Number 770-Q97-9808-808. The three adjustments requested were aggregated and labeled as "Credit for Service Disconnected." Although BellSouth documentation does not address specifics regarding adjustment details, aggregating adjustments denies a CLEC the ability to validate specific adjustments credited against those requested.

Impact

Issuing bills containing erroneous information will have the following effect on CLECs:

- **Altering expected operating costs.** All applicable charges should appear in Interconnection Agreements or in BellSouth Intra-State or Inter-State tariff documentation. By not adhering to rate documentation, BellSouth alters a CLEC's expected operating costs, and could affect CLEC budgetary planning and related activities.
- **Increased resource usage.** Regardless of the net monetary effect of incorrect charges upon a CLEC's bills, a CLEC will be forced to regularly reconcile these bills – identifying and correcting the incorrect charges and discovering and disaggregating mislabeled charges. The necessity of an extensive validation of each bill will increase CLEC resource utilization, thereby increasing operating costs.



February 17, 2000

EXCEPTION REPORT

The following exception has been identified as a result of the CRIS/CABS Functional Test (BLG-1).

Exception:

BellSouth issued multiple bills containing erroneous information to the KPMG CLEC.

As a result of billing transaction tests, BellSouth issued bills associated with a variety of service activities to the KPMG CLEC. Multiple bills received by the KPMG CLEC contain erroneous information, such as: 1) Undocumented charges; 2) Incorrect Rates; 3) Mislabeled information.

Undocumented Charges

USOC VE1R2: During the months of October 1999 through December 1999, BellSouth billed the KPMG CLEC \$0.25 each month for a UNE service component identified by the Universal Service Order Code (USOC) VE1R2 (Virtual Expanded Interconnection). USOC VE1R2 is not defined in applicable BellSouth tariffs or in rate spreadsheets created for the KPMG CLEC in lieu of an Interconnection Agreement.

Upon inquiry, BellSouth informed KPMG that the USOC VE1R2 was added to the BellSouth rate tables in 1997 and is applicable to all CLECs. The monthly-recurring rate established for this USOC is \$0.30. BellSouth applied a business discount of 17.3%, resulting in a monthly-recurring charge of \$0.25.

Representative occurrences of this charge are found on the following invoices:

<u>Telephone Number</u>	<u>Account Number</u>	<u>Invoice Date</u>
912-744-0966	706 Q97 9808 808	12/17/99
912-744-2438	706 Q97 9808 808	12/17/99
706-722-4087	706 Q85 8252 252	10/5/99
706-722-4181	706 Q85 8252 252	10/5/99
706-722-5472	706 Q85 8252 252	10/5/99
706-722-8138	706 Q85 8252 252	12/5/99
706-722-9523	706 Q85 8252 252	12/5/99
770-933-8597	770 Q85 8252 252	10/5/99
770-933-9532	770 Q85 8252 252	10/5/99
706-722-8138	706 Q85 8252 252	11/5/99
706-722-9523	706 Q85 8252 252	11/5/99

USOC SOMEC: The USOC SOMEC (a charge assessed for mechanized CLEC service order requests) was incorrectly applied for non-CABS orders. The existence of this USOC and its associated monthly charge is not documented in the BellSouth tariffs. The rate spreadsheet created for the KPMG CLEC in lieu of an Interconnection Agreement lists the charge for the USOC SOMEC as a one-time charge of \$5.00 for CABS orders; no such charge appears for non-CABS orders.

Representative occurrences of errors are detailed on the following invoices:

<u>Q-Account</u>	<u>Earning TN</u>	<u>Invoice Date</u>
706 Q85-4226 226	912U480010	10/17/99
706 Q85-4226 226	706U579269	10/17/99

USOC UEAC2¹: BellSouth billed the KPMG CLEC for the monthly recurring charge and non-recurring charge for the USOC UEAC2 (2-Wire Cross-Connect for Provisioning) at a rate of \$0.00. The non-recurring and monthly recurring rate assessed by BellSouth for the USOC UEAC2 for SL1 loops is not listed in the rate spreadsheets created for the KPMG CLEC in lieu of an Interconnection Agreement. In addition, this USOC is not defined in applicable BellSouth tariffs.

Representative occurrences of this charge can be found on the following invoices:

<u>Q-Account</u>	<u>Circuit ID</u>	<u>Invoice Date</u>
706 Q85-4226 226	40.TYNU.526413	10/17/99
706 Q85-4226 226	40.TYNU.526414	10/17/99

Incorrect Rates

USOC UEAL2²: BellSouth billed the KPMG CLEC a \$0.00 monthly recurring charge for the USOC UEAL2. The USOC UEAL2 is listed in the rate spreadsheet as a monthly recurring charge of \$19.57 for SL2 Loops and \$16.51 for SL1 Loops. This USOC is not defined in applicable BellSouth tariffs.

Representative occurrences of this error are detailed below.

<u>Q-Account</u>	<u>Circuit ID</u>	<u>Invoice Date</u>
706 Q85-4226 226	50.TYNU.500910	10/17/99
706 Q85-4226 226	50.TYNU.500911	10/17/99
706 Q85-4226 226	50.TYNU.501081	01/17/00
706 Q85-4226 226	50.TYNU.500896	01/17/00

¹ These errors had no net monetary effect on the KPMG CLEC bills.

² These errors resulted in an under-charge to the KPMG CLEC.

Mislabeled Information

Mislabeled in Detail of Adjustments Applied: The KPMG CLEC submitted several Billing Adjustment Investigation Requests to BellSouth. KPMG requested adjustments of \$17.16 for USOC UEPBL and for \$12.60 for USOC VE1R2. A third adjustment was requested for \$125.00 for an overpayment on the account. These adjustment requests were processed and the credits were applied on the 12/17/99 invoice of Billing Account Number 770-Q97-9808-808. The three adjustments requested were aggregated and labeled as "Credit for Service Disconnected." Although BellSouth documentation does not address specifics regarding adjustment details, aggregating adjustments denies a CLEC the ability to validate specific adjustments credited against those requested.

Impact

Issuing bills containing erroneous information will have the following effect on CLECs:

- **Altering expected operating costs.** All applicable charges should appear in Interconnection Agreements or in BellSouth Intra-State or Inter-State tariff documentation. By not adhering to rate documentation, BellSouth alters a CLEC's expected operating costs, and could affect CLEC budgetary planning and related activities.
- **Increased resource usage.** Regardless of the net monetary effect of incorrect charges upon a CLEC's bills, a CLEC will be forced to regularly reconcile these bills – identifying and correcting the incorrect charges and discovering and disaggregating mislabeled charges. The necessity of an extensive validation of each bill will increase CLEC resource utilization, thereby increasing operating costs.

BellSouth Response

Undocumented Charges – USOC VE1R2

The standard agreements refer to the applicable tariffs if specific rates are not provided in the contracts. For Virtual Collocation, that tariff is the F.C.C. Tariff No. 1. However, no service comparable to a DS0 cross-connect is described in that Tariff. To resolve this gap, rates for this specific USOC were developed by the Virtual Interconnection Product Team. A recurring rate of \$0.30 per month was authorized for use when this service was ordered by and provisioned for a customer.

The USOC, VE1R2, was added into the applicable rating tables and was incorrectly set to apply the resale discount. This setting will be removed by 2/23/00 and all occurrences of the discounted rate on CLEC accounts will be revised to reflect this change.

Undocumented Charges – USOC SOME C

An Interconnection Agreement was not signed with the initial Test Manager. Updates were made in the various billing tables based on the anticipated services that would be

ordered. It was decided not to include the USOC SOMEK on the CRIS tables because that USOC was already loaded with statewide rates from the Standard Interconnection Agreement (non-recurring charge of \$3.50).

For CABS, no such statewide rate was available so it was determined that a specific rate would be included. Absent any specific agreement, a rate of \$5.00 was used.

Undocumented Charges – USOC UEAC2

Absent an Interconnection Agreement, when setting up rates for this test updates were made in the various billing tables based on the anticipated services that would be ordered. This USOC was not foreseen as an item that would appear on orders during the test. As such, the rate defaulted to zero. This USOC is listed in the Standard Interconnection Agreement.

Incorrect Rates – USOC UEAL2

The USOC, UEAL2, was updated to the CRIS rate tables only for residence classes of service. The accounts which contain these USOCs are defined as business accounts. As such, the rate defaulted to zero. The USOC will be added to the CRIS rate file for business classes of service by 2/23/00. This will correct the rates on a going forward basis. Further analysis will be completed to determine when all occurrences of the USOC of CLEC accounts will be revised to reflect this charge.

Mislabeled Information

The adjustments requested were labeled as credits for disconnected service due to an error in mapping these types of transactions to the OBF "J" bill phrases. The labels will be changed to match the phrases used for processing adjustments for retail customers by 04/19/00.

The aggregation of adjustments seen on the "J" bills is identical to the manner in which these types of transactions are aggregated in the billing systems for retail customers. As such, parity is provided and no changes are required.



EXCEPTION 17

BellSouth Georgia OSS Testing Evaluation

Date: February 4, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Change Management Practices Review (CM-1).

Exception:

BellSouth's change management process for updating the Interconnection Services Local Exchange Carriers – OSS Information Center Web site allows for defects in postings.

As a result of evaluation interviews with BellSouth personnel, KPMG has noted the absence of an effective process for updating the Interconnection Services Local Exchange Carriers – OSS Information Center Web site.

The following list includes descriptions of inaccurate postings to, or omissions from, the BellSouth Interconnection Services' Web site, resulting from an ineffective change management process. These error types create confusion among the CLECs, which depend on this information to effectively transact business with BellSouth. In each case, a description of an error identified by KPMG is provided, along with the date of the posting.

1. **12/10/99** - Selecting *TAG Programmer's Job Aid – Version 5, September 1999* link actually produced the document *TAG Programmer's Job Aid – Version 5.1, September 1999*.
2. **12/15/99** - The *TAG Programmer's Job Aid – Version 5, July 1999* (an older version) appeared with no Carrier Notification.
3. **12/15/99** - Both the *TAG API Reference Guide 2.2.0.5* and *TAG Programmer's Job Aid – Version 5, September 1999* were removed with no Carrier Notification.
4. **1/17/00** - The *TAG API Reference Guide 3.0.1.x* and *TAG Programmer's Job Aid – Version 6.0, January 15, 2000* appeared with no Carrier Notification.
5. **1/17/00** - The *TAG Programmer's Job Aid – Version 5, July 1999* was removed with no Carrier Notification.
6. **1/18/00** - Carrier Notification SN91081631 was posted describing the release of TAG Release 2.2.0.6. Neither this nor another Carrier Notification announced the posting of the associated technical specification documentation that was provided to coincide with the update of this interface.
7. **1/21/00** - The *TAG API Reference Guide 2.2.0.5* reappeared (ref. item #3 above) with no Carrier Notification.

Impact

An ineffective change management process for updating the Interconnection Services Local Exchange Carriers - OSS Information Center Web site will negatively impact CLECs by causing:



EXCEPTION 17
BellSouth Georgia OSS Testing Evaluation

1. Emergency allocations of resources to address required systems or procedural changes immediately.
2. Additional resource, time, and cost expenditures to examine the Web site regularly for unannounced changes in systems and supporting documentation.

Each of these issues leads to increases in CLEC operating costs.



February 16, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Change Management Practices Review (CM-1).

Exception:

BellSouth's change management process for updating the Interconnection Services Local Exchange Carriers – OSS Information Center Web site allows for defects in postings.

As a result of evaluation interviews with BellSouth personnel, KPMG has noted the absence of an effective process for updating the Interconnection Services Local Exchange Carriers – OSS Information Center Web site.

The following list includes descriptions of inaccurate postings to, or omissions from, the BellSouth Interconnection Services' Web site, resulting from an ineffective change management process. These error types create confusion among the CLECs, which depend on this information to effectively transact business with BellSouth. In each case, a description of an error identified by KPMG is provided, along with the date of the posting.

1. **12/10/99** - Selecting *TAG Programmer's Job Aid – Version 5, September 1999* link actually produced the document *TAG Programmer's Job Aid – Version 5.1, September 1999*.
2. **12/15/99** - The *TAG Programmer's Job Aid – Version 5, July 1999* (an older version) appeared with no Carrier Notification.
3. **12/15/99** - Both the *TAG API Reference Guide 2.2.0.5* and *TAG Programmer's Job Aid – Version 5, September 1999* were removed with no Carrier Notification.
4. **1/17/00** - The *TAG API Reference Guide 3.0.1.x* and *TAG Programmer's Job Aid – Version 6.0, January 15, 2000* appeared with no Carrier Notification.
5. **1/17/00** - The *TAG Programmer's Job Aid – Version 5, July 1999* was removed with no Carrier Notification.
6. **1/18/00** - Carrier Notification SN91081631 was posted describing the release of TAG Release 2.2.0.6. Neither this nor another Carrier Notification announced the posting of the associated technical specification documentation that was provided to coincide with the update of this interface.
7. **1/21/00** - The *TAG API Reference Guide 2.2.0.5* reappeared (ref. item #3 above) with no Carrier Notification.

Impact

An ineffective change management process for updating the Interconnection Services Local Exchange Carriers - OSS Information Center Web site will negatively impact CLECs by causing:

1. Emergency allocations of resources to address required systems or procedural changes immediately.
2. Additional resource, time, and cost expenditures to examine the Web site regularly for unannounced changes in systems and supporting documentation.

Each of these issues leads to increases in CLEC operating costs.

BellSouth Response

BellSouth agrees that Carrier Notification was not provided when some documents were changed or removed from the Interconnection website. Effective with TAG Release 2.2.0.7, which is scheduled for implementation March 11, 2000, we will specifically reference documents, e.g. TAG API Reference Guide and TAG Programmer's Job Aid, impacted by the software upgrade.

Some documents were inadvertently deleted when the Interconnection website was redesigned. We are in the process of recovering deleted documents to re-post on the site. The TAG Programmer's Job Aid, V5.1 is one of the documents removed in error and was re-posted 2/8/00.

The link problem referenced in item 1 was human error. We have several check points in our current process for ensuring the accuracy of documents. The last check is by the document owner to ensure the format and content are correct. If problems are found, errors are corrected immediately. In the above instance, the final check may have been overlooked. We are in the process of reeducating all document owners on the process to prevent future link problems.