



EXCEPTION 18

BellSouth Georgia OSS Testing Evaluation

Date: February 15, 2000

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Order Functional and Documentation Tests (O&P-1, O&P-2, O&P-8, and O&P-9).

Exception

BellSouth (BLS) requirements for values entered in the Line Class of Service data element for EDI and TAG orders are not consistent, and the documentation is incomplete.

The Line Class of Service (LNECLS SVC) data element is a required input on service requests for UNE Port and UNE Loop-Port Combination migrations and new installations. According to BLS ordering guidelines, this field identifies the class of service at the customer's line level (i.e., measured or flat rate)¹.

BLS business rule documentation (*LEO Guide, Volume 1*) does not clearly specify the valid entries for the LNECLS SVC data element and provides no reference to other documentation for locating valid entries. During testing, KPMG submitted UNE Port and UNE Combo service requests via TAG and EDI populating the LNECLS SVC field with one of the following entries, found in other BLS documentation²:

- **UEPRX**: Basic class of service, Port – residence.
- **UEPRL**: 2-wire residence port service – measured.
- **UEPBX**: Basic class of service, Port – business.
- **UEPBL**: 2-wire business port service – measured.

These transactions received varying responses from BLS ordering systems. Response types can be placed into three categories³:

Category 1: UEPRX/UEPBX in LNECLS SVC field (Order received FOC). These service requests contained the residence or business Basic class of service indicator in the LNECLS SVC field. Each of these orders received a Firm Order Confirmation (FOC).

Category 2: UEPRX/UEPBX in LNECLS SVC field (Order received CLR). These service requests were formatted similarly to those in Category 1, with the residence or business Basic class of service indicator in the LNECLS SVC field. These orders

¹ *BellSouth Local Exchange Ordering Guide – Volume 1, Issue 7N*, January 2000, Section 11.3.30.

² *BellSouth Local Exchange Ordering Guide – Volume 3, Issue 3a*, August 1998, Section 3.5.

³ In compiling this information, KPMG verified that all other data elements in each of these orders was correctly populated.



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received Clarifications (CLRs). A number of these service requests were re-submitted with the 2-wire measured port indicator (UEPBL/UEPRL) and received FOCs⁴.

Category 3: UEPRL/UEPBL in LNECLS SVC field (Order received FOC). These service requests contained the residence or business 2-wire measured Port indicator in the LNECLS SVC field. Each of these orders received a FOC.

The following tables present a sample of KPMG service requests falling into each of the three categories.

CATEGORY 1

Purchase Order Number	Order Type	VER	LNECLS SVC on LSR	Response Rcvd	Date of Response
428A124PTJ100002 (CC = 9991)	MV	VER 01	UEPRX	FOC	12/7/99
428A224PTJ100002 (CC = 9991)	MV	VER 01	UEPRX	FOC	12/7/99
441A214PTJ000002 (CC = 9991)	MRS	VER 00	UEPBX	FOC	12/13/99
428A124PTJ100006 (CC = 9994)	MV	VER 01	UEPRX	FOC	12/20/99
625A214PTJ100001 (CC = 9991)	MC	VER 05	UEPBX	FOC	12/22/99
417X223PTM000002 (CC = 9991)	FRS	VER 00	UEPRX	FOC	1/12/00
419F223PTM101002 (CC = 9991)	FD	VER 03	UEPRX	FOC	1/18/00

CATEGORY 2

Purchase Order Number	Order Type	VER	LNECLS SVC on LSR	Response Rcvd	Date of Response
650A224PTJ000001 (CC = 9994)	MV	VER 00	UEPRX	CLR - Error Code 9755 "Missing USOCS (UEPRL, UEPLX, etc.) Please add and resubmit."	1/11/00
		VER 02	UEPRL	CLR - error unrelated to Line Class of Service field	1/26/00
428A124PTJ100008 (CC=9994) VER 00	MV	VER 00	UEPRX	CLR - Error Code 1000 "Missing USOCs (UEPLX, UEPRL, etc.) Please correct and resubmit."	1/13/00
		VER 02	UEPRL	FOC	1/19/00

⁴ One service request received an additional clarification not related to LNECLS SVC entry.



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625A214PEJ100002 (CC=9991)	MC	VER 00	UEPBX	CLR – No Error Code “Invalid line class of Svc for requested service”	1/17/00
		VER 01	UEPBL	FOC	2/2/00
626A224PEJ100003 (CC=9991)	MC	VER 00	UEPRX	CLR – No Error Code “Invalid line class of Svc for requested service”	1/17/00

CATEGORY 3

Purchase Order Number	Order Type	VER	LNECLS SVC on LSR	Response Rcvd	Date of Response
626A224PTJ100002 (CC = 9991)	MC	VER 04	UEPRL	FOC	12/13/00
626A224PTJ101002 (CC = 9991)	MC	VER 00	UEPRL	FOC	12/30/99
395A213PTM100001 (CC = 9994)	FA	VER 00	UEPBL	FOC	1/18/00
406C213PTM100002 (CC = 9994)	FV	VER 02	UEPBL	FOC	1/18/00

Impact

The absence of complete documentation and consistent BLS responses with respect to values allowed in the LNECLS SVC field could impact CLECs in the following ways:

- **Increase in operating costs.** Without comprehensive documentation specifying valid field entries, a CLEC may be forced to submit multiple service requests to correct errors. Once confirmation responses are received on service requests, a CLEC may duplicate the format of the particular order type in an automated fashion. Identifying the cause of new errors and implementing process fixes (automated or manual) to correct the problem requires additional time, effort and expense.
- **Decrease in Customer Satisfaction.** Re-submission of additional service orders will lead to an overall delay in the provisioning of service to CLEC customers. These delays will likely result in a decrease in CLEC customer satisfaction.



February 21, 2000

EXCEPTION REPORT

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BLS business rule documentation (*LEO Guide, Volume 1*) does not clearly specify the valid entries for the LNECLS SVC data element and provides no reference to other documentation for locating valid entries. During testing, KPMG submitted UNE Port and UNE Combo service requests via TAG and EDI populating the LNECLS SVC field with one of the following entries, found in other BLS documentation²:

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The following tables present a sample of KPMG service requests falling into each of the three categories.

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CATEGORY 2

Purchase Order Number	Order Type	VER	LNECLS SVC on LSR	Response Rcvd	Date of Response
650A224PTJ000001 (CC = 9994)	MV	VER 00	UEPRX	CLR - Error Code 9755 "Missing USOCs (UEPRL, UEPLX, etc.) Please add and resubmit."	1/11/00
		VER 02	UEPRL	CLR - error unrelated to Line Class of Service field	1/26/00
428A124PTJ100008 (CC=9994) VER 00	MV	VER 00	UEPRX	CLR - Error Code 1000 "Missing USOCs (UEPLX, UEPRL, etc.) Please correct and resubmit."	1/13/00
		VER 02	UEPRL	FOC	1/19/00
625A214PEJ100002 (CC=9991)	MC	VER 00	UEPBX	CLR - No Error Code "Invalid line class of Svc for requested service"	1/17/00
		VER 01	UEPBL	FOC	2/2/00

⁴ One service request received an additional clarification not related to LNECLS SVC entry.

626A224PEJ100003 (CC=9991)	MC	VER 00	UEPRX	CLR - No Error Code "Invalid line class of Svc for requested service"	1/17/00
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CATEGORY 3

Purchase Order Number	Order Type	VER	LNECLS SVC on LSR	Response Rcvd	Date of Response
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626A224PTJ101002 (CC = 9991)	MC	VER 00	UEPRL	FOC	12/30/99
395A213PTM100001 (CC = 9994)	FA	VER 00	UEPBL	FOC	1/18/00
406C213PTM100002 (CC = 9994)	FV	VER 02	UEPBL	FOC	1/18/00

Impact

The absence of complete documentation and consistent BLS responses with respect to values allowed in the LNECLS SVC field could impact CLECs in the following ways:

- **Increase in operating costs.** Without comprehensive documentation specifying valid field entries, a CLEC may be forced to submit multiple service requests to correct errors. Once confirmation responses are received on service requests, a CLEC may duplicate the format of the particular order type in an automated fashion. Identifying the cause of new errors and implementing process fixes (automated or manual) to correct the problem requires additional time, effort and expense.
- **Decrease in Customer Satisfaction.** Re-submission of additional service orders will lead to an overall delay in the provisioning of service to CLEC customers. These delays will likely result in a decrease in CLEC customer satisfaction.

BellSouth Response

In the next scheduled update of the LEO IG, Volume 1 Port Form 11.3.30 LNECLS SVC – Line Class Service Valid entries will be added as follows:

Valid Entries: UEPRL = RES
 UEPBL = BUS
 UEPPL = PBX
 UEPRC = RES with Caller ID
 UEPBC = BUS with Caller ID

Additionally, incorrect or invalid line class of service LSRs, as referenced in Category 2, automatically clarify back to the CLEC, which was the case with the last 2 requests listed above. The first two requests were clarified due to the service either being final or suspended, so further editing was not necessary.



EXCEPTION 19
BellSouth Georgia OSS Testing Evaluation

Date: February 14, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Performance Measurement Review.

Exception:

BellSouth does not adequately document changes in versions of the *BellSouth Service Quality Measurements Performance Reports*.

BellSouth describes the definitions, exclusions, levels of disaggregation, and calculation of performance measurements in the document entitled *BellSouth Service Quality Measurements Performance Report* ("the SQM manual"). BellSouth publishes the SQM manual on a secured web site called the Performance Measurement and Analysis Platform (PMAP) web site.

KPMG observed that when a new version of the SQM manual appears, it does not include a description of changes relative to the previous version. Thus, when BellSouth publishes an updated SQM manual, it is difficult to track changes in the performance measurement processes.

Impact

The Georgia PSC requires BellSouth to provide the CLECs with performance measurements regarding BellSouth's business functions (pre-ordering, ordering, provisioning, maintenance & repair, billing, and others). The SQM manual is the primary document describing how performance is measured. CLECs rely on the SQM manual as a reference document when assessing the quality of service provided by BellSouth. If BellSouth does not provide adequate documentation of changes in the SQM manual, the ability of the CLECs to monitor BellSouth's service quality is impaired.



February 18, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Performance Measurement Review.

Exception:

BellSouth does not adequately document changes in versions of the *BellSouth Service Quality Measurements Performance Reports*.

BellSouth describes the definitions, exclusions, levels of disaggregation, and calculation of performance measurements in the document entitled *BellSouth Service Quality Measurements Performance Report* ("the SQM manual"). BellSouth publishes the SQM manual on a secured web site called the Performance Measurement and Analysis Platform (PMAP) web site.

KPMG observed that when a new version of the SQM manual appears, it does not include a description of changes relative to the previous version. Thus, when BellSouth publishes an updated SQM manual, it is difficult to track changes in the performance measurement processes.

Impact

The Georgia PSC requires BellSouth to provide the CLECs with performance measurements regarding BellSouth's business functions (pre-ordering, ordering, provisioning, maintenance & repair, billing, and others). The SQM manual is the primary document describing how performance is measured. CLECs rely on the SQM manual as a reference document when assessing the quality of service provided by BellSouth. If BellSouth does not provide adequate documentation of changes in the SQM manual, the ability of the CLECs to monitor BellSouth's service quality is impaired.

BellSouth Response

Beginning February 25, 2000, BellSouth will post two versions of the SQM on the web. One unmarked version will be made available, along with a version marked in legislative format which will display the changes. Deleted information will be struck through and added information will be underlined. This will allow those who wish to identify the portions that have been changed. BellSouth also will begin publishing updates to the SQM quarterly on an as needed basis, beginning April 1, 2000.



EXCEPTION 20
BellSouth Georgia OSS Testing Evaluation

Date: February 14, 2000

EXCEPTION REPORT

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

Exception:

BellSouth technicians cannot initiate a Verify Repair Completion request.

The ECTA Gateway is designed to allow a BellSouth maintenance center to generate a request to a CLEC to verify that a reported trouble can be closed when either repairs for a designed trouble report have been completed, or testing on a non-designed ticket indicates that no trouble is currently present¹. During the course of functional testing, KPMG discovered that this feature is not functioning. According to BellSouth representatives, the Work Force Administration (WFA) systems are not properly defined with the authorization scripts for the General Access Customer Advocacy Center (ACAC) to allow them to initiate these authorization requests.

Impact

The Verify Repair Completion function automates the process of requesting and consenting to closure of a trouble ticket. Without this functionality, it is necessary for BellSouth maintenance personnel to contact a CLEC upon supposed completion of repair activities in order to be able to close out a trouble ticket, or to find out from the CLEC that a trouble still exists. Relying on such contact subverts the intention of the electronically-bonded ECTA system to eliminate extraneous forms of communication and contradicts BellSouth's support of this function in compliance with ANSI standards. In addition, inability to use this functionality adds additional requirements on CLECs to communicate and enter information into their ECTA interface or other OSS systems.

¹ The BellSouth ECTA Gateway is designed to support the Verify Repair Completion function as outlined in ANSI T1.228. Page 27 of Appendix B in the *Joint Implementation Agreement (JIA) for Electronic Communications Trouble Administration (ECTA) Gateway for Local Service* Version 10/07/98 outlines the use of the closeOutVerification object used to enable this function for designed trouble reports. In addition, BellSouth representatives have reported that this functionality can be exercised on a subset of non-designed trouble reports as well.



February 18, 2000

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

Exception:

BellSouth technicians cannot initiate a Verify Repair Completion request.

The ECTA Gateway is designed to allow a BellSouth maintenance center to generate a request to a CLEC to verify that a reported trouble can be closed when either repairs for a designed trouble report have been completed, or testing on a non-designed ticket indicates that no trouble is currently present¹. During the course of functional testing, KPMG discovered that this feature is not functioning. According to BellSouth representatives, the Work Force Administration (WFA) systems are not properly defined with the authorization scripts for the General Access Customer Advocacy Center (ACAC) to allow them to initiate these authorization requests.

Impact

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BellSouth Response

Authorization scripts were added in WFA to correct this problem in January of 2000.

¹ The BellSouth ECTA Gateway is designed to support the Verify Repair Completion function as outlined in ANSI T1.228. Page 27 of Appendix B in the *Joint Implementation Agreement (JIA) for Electronic Communications Trouble Administration (ECTA) Gateway for Local Service Version 10/07/98* outlines the use of the closeOutVerification object used to enable this function for designed trouble reports. In addition, BellSouth representatives have reported that this functionality can be exercised on a subset of non-designed trouble reports as well.



EXCEPTION 21
BellSouth Georgia OSS Testing Evaluation

Date: February 15, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Flow-Through Evaluation.

Exception:

Local Service Requests (LSRs) were improperly categorized for *Percent Flow Through Service Request Reports*.

During KPMG's review of the Percent Flow Through Service Request Reports (flow-through reports) for September, October and November, a number of inaccuracies were observed. These inaccuracies are grouped into two general categories:

SOCS Fall-Out: Approximately 1.39% of LSRs for the period reviewed are classified as successful flow-through, yet also have error codes associated with them¹. KPMG determined that, during an attempt to format a service order, these orders completed LEO edits successfully, but failed additional edits in SOCS. Depending on the failure type, the service order may be cancelled. In each of these cases, the LSR is routed to the LCSC for review. The LCSC review results in either a request for clarification to the CLEC or correction of the error by a BLS service representative and re-queuing into SOCS. Since manual intervention (or a return of the LSR to the CLEC) was required to complete these orders, these LSRs should not be reported as flow-through.

"Z" Processing Status: Approximately 0.57% of LSRs for the period reviewed were counted as "CLEC-caused fallout," yet did not receive error codes or messages and were not routed to the LCSC for review². In these cases, each LSR received a "Z" processing status. A "Z" processing status is assigned to an LSR when a supplemental order (i.e., a second LSR with a new version of the same PON) is received during processing of the original LSR. LSRs assigned a "Z" processing status are not routed to the LCSC, nor is the CLEC notified as in other cases of "CLEC-caused fallout." Through the normal ordering process, the supplemental order replaces the original LSR as the CLEC's service request. However, the original LSR remains in "Z" processing status and is recorded as "CLEC-caused fallout," even though the CLEC has received the requested service (via the supplemental order) and no review by a BLS representative or notification of the CLEC took place.

¹ For the months September 1999 - November 1999, the aggregate total of LSRs in this category was 4,641 out of 334,721 (1.39%).

² For the months September 1999 - November 1999, the aggregate total of LSRs in this category was 1,892 out of 334,721 (0.57%).



EXCEPTION 21
BellSouth Georgia OSS Testing Evaluation

Impact

Incorrectly categorizing LSRs in the *Percent Flow Through Service Request Reports* will impact CLECs in the following way:

Inaccurate flow-through reporting. By incorrectly categorizing LSRs, BLS is reporting inaccurate flow-through information to the CLECs and the Georgia Public Service Commission. Inaccurate reporting misleads CLECs and the Commission as to the efficiency of order processing and levels of customer service provided by BellSouth.



February 22, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Flow-Through Evaluation.

Exception:

Local Service Requests (LSRs) were improperly categorized for *Percent Flow Through Service Request Reports*.

During KPMG's review of the Percent Flow Through Service Request Reports (flow-through reports) for September, October and November, a number of inaccuracies were observed. These inaccuracies are grouped into two general categories:

SOCS Fall-Out: Approximately 1.39% of LSRs for the period reviewed are classified as successful flow-through, yet also have error codes associated with them¹. KPMG determined that, during an attempt to format a service order, these orders completed LEO edits successfully, but failed additional edits in SOCS. Depending on the failure type, the service order may be cancelled. In each of these cases, the LSR is routed to the LCSC for review. The LCSC review results in either a request for clarification to the CLEC or correction of the error by a BLS service representative and re-queuing into SOCS. Since manual intervention (or a return of the LSR to the CLEC) was required to complete these orders, these LSRs should not be reported as flow-through.

"Z" Processing Status: Approximately 0.57% of LSRs for the period reviewed were counted as "CLEC-caused fallout," yet did not receive error codes or messages and were not routed to the LCSC for review². In these cases, each LSR received a "Z" processing status. A "Z" processing status is assigned to an LSR when a supplemental order (i.e., a second LSR with a new version of the same PON) is received during processing of the original LSR. LSRs assigned a "Z" processing status are not routed to the LCSC, nor is the CLEC notified as in other cases of "CLEC-caused fallout." Through the normal ordering process, the supplemental order replaces the original LSR as the CLEC's service request. However, the original LSR remains in "Z" processing status and is recorded as "CLEC-caused fallout," even though the CLEC has received the requested service (via the supplemental order) and no review by a BLS representative or notification of the CLEC took place.

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BellSouth Response

SOCS Fall-Out

BellSouth implemented a code change to the flow through program which adds a requirement to the way in which flow through is counted. Flow through is currently counted when an LSR enters SOCS electronically and a service order number is assigned. Potentially, if an additional SOER error is on the service order, it will drop out to the LCSC for manual handling even-though a service order number has been assigned and it has been counted as flow through. The code modification will change the point at which an LSR is counted as flow through to when an LSR reached a status for an FOC to be issued. This change will be effective with the report published in March for February data.

"Z" Processing Status

BellSouth implemented a code change in the flow through program on 2/11/00 to remove the LSRs that received a "Z" processing status and were recorded as CLEC caused fallout. The change is reflected in the report published in February for January data. These "Z" status LSRs are now counted as BST caused fallout.



EXCEPTION 22
BellSouth Georgia OSS Testing Evaluation

Date: February 15, 2000

EXCEPTION REPORT

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

Exception:

BellSouth disconnected retail accounts on loop migration orders without re-connecting the UNE loop component.

In response to two loop migration¹ local service requests (LSRs), KPMG has received an error message indicating that the "Account is Final".

To process migration LSRs, BellSouth generates two internal service orders:

1. Disconnect Order;
2. New Connect Order.

Two migration service requests that contained errors were submitted via TAG. As a result of the errors in the LSRs, each dropped out for manual handling by BellSouth Local Carrier Service Center (LCSC) representatives. A Clarification (CLR) was transmitted back to KPMG for each LSR. While KPMG was investigating the error cause and preparing a supplemental service request based on the CLR, BellSouth order activity continued².

According to BellSouth, the LCSC representative canceled one of the two internal service orders, the New Connect Order, in each migration order. The corresponding Disconnect Order was allowed to proceed through the BellSouth service order processing systems.

As a result, BellSouth disconnected the end user's retail service without reconnecting their service with KPMG. Since KPMG's view of the LSR status indicated the orders were in erred status, supplemental service requests were issued. In response to these supplements, KPMG received CLR messages stating that the customer accounts were "final," or disconnected.

¹ On a loop migration order, the CLEC requests end user conversion from BellSouth retail service to CLEC UNE service.

² Issuance of a CLR indicates that order processing cannot continue without further error-free information. Therefore, when a CLR has been transmitted to a CLEC on a service request, BellSouth service processing should cease.



EXCEPTION 22
BellSouth Georgia OSS Testing Evaluation

The following service requests received Final Account errors. The Final Account messages came in response to supplemental service requests issued to clear an initial CLR.

Purchase Order Number	VER	Initial CLR Date Rcvd	Initial CLR Message	"Final Account" CLR Message - Date Rcvd
305A122PTH102002 ³ (CC = 9994)	00	12/22/99	"BAN 2 should be populated with Q account info. Please resubmit."	1/13/00 Account is Final
305A122PTH102001 ⁴	00	12/17/99	"ACT Code of "V" invalid with REQTYP "AB". If Disconnecting TN send separate order."	1/13/00 Account is Final

Impact

Continuing service activity after issuing a CLR, in this case disconnecting retail service without reconnecting the UNE loop component, can cause a significant disruption of service to CLEC customers, and will result in diminished CLEC customer satisfaction.

³ The original PON for this customer's order was 305A122PTH101002. Since the supplemental service request was issued more than 10 days after receipt of the CLR notice, KPMG submitted a new PON to continue the service request. PONs with CLRs outstanding greater than 10 days are cancelled by BLS.

⁴ The original PON for this customer's order was 305A122PTH101001.



February 21, 2000

EXCEPTION REPORT

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305A122PTH102001 ⁴	00	12/17/99	"ACT Code of "V" invalid with REQTYP "AB". If Disconnecting TN send separate order."	1/13/00 Account is Final

Impact

Continuing service activity after issuing a CLR, in this case disconnecting retail service without reconnecting the UNE loop component, can cause a significant disruption of service to CLEC customers, and will result in diminished CLEC customer

BellSouth Response

BellSouth modified logic in the Local Exchange Service Order Generator on February 12, 2000. With the change, all service orders mechanically generated will be mechanically cancelled if the orders encounter errors during the creation process. This modification will prevent the situation referenced in the above table.

³ The original PON for this customer's order was 305A122PTH101002. Since the supplemental service request was issued more than 10 days after receipt of the CLR notice, KPMG submitted a new PON to continue the service request. PONs with CLRs outstanding greater than 10 days are cancelled by BLS.

⁴ The original PON for this customer's order was 305A122PTH101001.

CERTIFICATE OF SERVICE

Docket No. 8354-U

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

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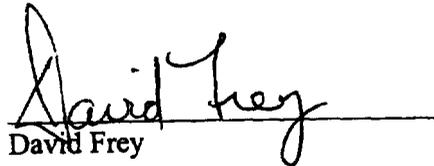
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This 25th day of February 2000.


David Frey

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March 2, 2000

DELIVERED BY HAND

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue, S.W., Room 520
Atlanta, Georgia 30334-5701

RECEIVED

MAR 02 2000

EXECUTIVE SECRETARY
G.P.S.C.

Re: *In re: Investigation Into Development of Electronic Interfaces for
BellSouth's Operations Support Systems; Docket No. 8354-U*

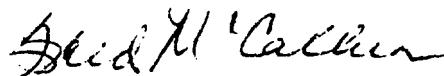
Dear Ms. O'Leary:

Enclosed please find an original and twenty-eight (28) copies, as well as an electronic copy, of BellSouth Telecommunications, Inc. OSS Evaluation – Georgia Supplemental Test Plan (STP) Version 1.1 for filing in the above-referenced matter. I would appreciate your filing same and returning copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

In accordance with the Georgia Public Service Commission's (GPSC) January 12, 2000 Order, and significant input from the CLEC community, Version 1.1 of the STP provides an enhanced description of a plan for additional KPMG tests of BellSouth OSS systems, interfaces, and processes, beyond those described in the GPSC-approved Master Test Plan.

KPMG will accept comments on the Proposed STP from Georgia CLECs and other parties of record until close of business, Monday, March 6, 2000. CLEC comments should be directed by U.S. mail to Christopher Casey at KPMG Consulting, 270 Peachtree Street, N.E., Suite 1050, Atlanta, GA 30303, or by email at christophercasey@kpmg.com.

Very truly yours,



Fred McCallum Jr.

FJM:nvd
Enclosures

cc: Parties of Record

199564/199495

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, **BellSouth Telecommunications, Inc. OSS Evaluation – Georgia Supplemental Test Plan, Version 1.1**, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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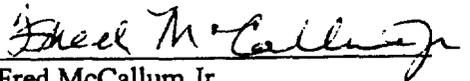
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This 2nd day of March, 2000.


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