

BELLSOUTH

EX PARTE OR LATE FILED

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kathleen.levitz@bellsouth.com

Kathleen B. Levitz
Vice President-Federal Regulatory

202 463-4113
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ORIGINAL

RECEIVED

APR - 4 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

April 3, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th 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 copies of the seven documents listed in the attached letter to Ms. Fox, each of which KPMG filed during the month of March with the Georgia Commission in its Docket 8354-U. Also included is a letter dated March 28, 2000 to David Frey, Manager of KPMG's Georgia testing program, from Leon Bowles, Director of the Georgia Commission's Telecommunications Section. That letter extends the time within which interested parties may file comments on standards and benchmarks that BellSouth proposed be used during the testing of its OSS by KPMG.

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

Sincerely,



Kathleen B. Levitz

Attachment

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

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April 3, 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 several documents that KPMG filed recently with the Georgia Public Service Commission in conjunction with the former's execution of the Georgia Third-Party Testing Plan for BellSouth's Operation Support Systems, or OSS as ordered in the Georgia Commission's Docket No. 8354-U. The documents include:

1. KPMG's Exceptions 23, 24, 25 and 26, and BellSouth's Response to each, filed with the Georgia Commission on March 6, 2000;
2. BellSouth's Amended Responses to KPMG Exceptions 13, 16, 19, 25, and 27, filed on March 21, 2000;
3. KPMG's Exception 7 Closure Report, filed on March 21, 2000;
4. BellSouth's proposed standards and benchmarks to be used in the BellSouth-Georgia OSS Evaluation, filed on March 22, 2000;
5. KPMG's Exception 30 and BellSouth's Response to it, filed on March 24, 2000;
6. BellSouth's Amended Response to KPMG's Exception 26, filed on March 24, 2000; and
7. KPMG's Exception 20 Closure Report, filed on March 27, 2000.

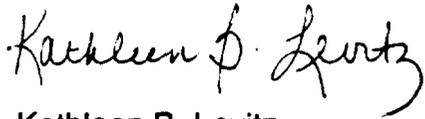
Also enclosed is a copy of a letter from Leon Bowles, Director of the Telecommunications Section of the Georgia Commission to David Frey, manager of the KPMG Georgia testing program dated March 28, 2000. That

letter extends the period within which interested parties may comment on the BellSouth proposed set of standards and benchmarks to be used in the testing process.

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".

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

March 6, 2000

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

RECEIVED

MAR 06 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 23, 24, 25 and 26 along 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





EXCEPTION 23

BellSouth Georgia OSS Testing Evaluation

February 11, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Performance Measurement testing activities associated with the validation of Service Quality Measurement (SQM) calculations and reporting.

Exception:

KPMG cannot replicate five of BellSouth's reported Service Quality Measurements.

Service Quality Measurements (SQMs) are calculated to illustrate BellSouth's operational support system performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes various performance measurement reports for each SQM, and the raw data used to create these reports, for every CLEC engaged in business activity with BellSouth in the state of Georgia¹.

As part of the BellSouth-Georgia OSS Evaluation, KPMG is attempting to replicate these reports (i.e., achieve exactly the results recorded by BellSouth). To complete replication, KPMG has relied on BellSouth's published *PMAP Raw Data User Manual*, where applicable, (which includes instructions to calculate SQM values for certain reports), the corresponding raw data² and technical assistance from BellSouth.

KPMG has been unable to replicate the following five SQMs:

1. *Average Answer Time - Repair Centers* for October 1999 for the CLEC Aggregate.³
2. *Speed of Answer in Ordering Center* for October 1999 and December 1999 for the CLEC Aggregate and BellSouth Retail. (The affected service center components are the BellSouth Residence Service Center, October 1999, and the Local Carrier Service Center, December 1999.)³
3. *Mean Held Order Interval and Distribution Intervals* for December 1999 for the KPMG CLEC.⁴

¹ These reports and raw data may be delivered in hard copy or via a secured Internet site, the Performance Measurement and Analysis Platform (PMAP).

² BellSouth publishes the *PMAP Raw Data User Manual* and corresponding raw data in order to provide the CLEC community the ability to calculate SQM values independently and thus verify their reports. The Manual is posted, and regularly updated, on the PMAP Internet site.

³ BellSouth provided KPMG with the raw data and technical instruction necessary to validate the calculations for this SQM report, since the information is not otherwise available via PMAP.



EXCEPTION 23
BellSouth Georgia OSS Testing Evaluation

4. *Percent Provisioning Troubles within 30 Days of Service Order Activity for November 1999 for an individual CLEC. (The affected reports are Percent Provisioning Troubles within 30 Days CLEC and the Percent Provisioning Troubles within 30 Days POTS CLEC.)*⁴
5. *Firm Order Confirmation Timeliness for December 1999 for the KPMG CLEC. (The affected reports are FOC Timeliness Fully Mechanized CLEC, FOC Timeliness Non-Mechanized CLEC, FOC Timeliness Partially Mechanized CLEC, and FOC Timeliness Total Mechanized CLEC.)*⁴

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth as well as to plan future business activities. KPMG's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the five applicable SQMs may be in question. Without accurate SQMs, CLECs are unable to reliably assess the quality of service received or plan for future business activities.

⁴ KPMG used the latest available *PMAP Raw Data User Manual (Version 2, 12/15/99)* to validate the calculations for this SQM report.



February 25, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Performance Measurement testing activities associated with the validation of Service Quality Measurement (SQM) calculations and reporting.

Exception:

KPMG cannot replicate five of BellSouth's reported Service Quality Measurements.

Service Quality Measurements (SQMs) are calculated to illustrate BellSouth's operational support system performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes various performance measurement reports for each SQM, and the raw data used to create these reports, for every CLEC engaged in business activity with BellSouth in the state of Georgia¹.

As part of the BellSouth-Georgia OSS Evaluation, KPMG is attempting to replicate these reports (i.e., achieve exactly the results recorded by BellSouth). To complete replication, KPMG has relied on BellSouth's published *PMAP Raw Data User Manual*, where applicable, (which includes instructions to calculate SQM values for certain reports), the corresponding raw data² and technical assistance from BellSouth.

KPMG has been unable to replicate the following five SQMs:

1. *Average Answer Time - Repair Centers* for October 1999 for the CLEC Aggregate.³
2. *Speed of Answer in Ordering Center* for October 1999 and December 1999 for the CLEC Aggregate and BellSouth Retail. (The affected service center components are the BellSouth Residence Service Center, October 1999, and the Local Carrier Service Center, December 1999).³
3. *Mean Held Order Interval and Distribution Intervals* for December 1999 for the KPMG CLEC.⁴

¹ These reports and raw data may be delivered in hard copy or via a secured Internet site, the Performance Measurement and Analysis Platform (PMAP).

² BellSouth publishes the *PMAP Raw Data User Manual* and corresponding raw data in order to provide the CLEC community the ability to calculate SQM values independently and thus verify their reports. The Manual is posted, and regularly updated, on the PMAP Internet site.

³ BellSouth provided KPMG with the raw data and technical instruction necessary to validate the calculations for this SQM report, since the information is not otherwise available via PMAP.

4. *Percent Provisioning Troubles within 30 Days of Service Order Activity* for November 1999 for an individual CLEC. (The affected reports are *Percent Provisioning Troubles within 30 Days CLEC* and the *Percent Provisioning Troubles within 30 Days POTS CLEC*).⁴
5. *Firm Order Confirmation Timeliness* for December 1999 for the KPMG CLEC. (The affected reports are *FOC Timeliness Fully Mechanized CLEC*, *FOC Timeliness Non-Mechanized CLEC*, *FOC Timeliness Partially Mechanized CLEC*, and *FOC Timeliness Total Mechanized CLEC*.)⁴

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth as well as to plan future business activities. KPMG's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the five applicable SQMs may be in question. Without accurate SQMs, CLECs are unable to reliably assess the quality of service received or plan for future business activities.

BellSouth Response

Average Answer Time - Repair Centers for October 1999 for the CLEC Aggregate

Business - KPMG is correct in using B and C customers in replicating this measurement. BellSouth classifies Large Business Customers in four categories - A, B, C and SPOC. A, B and C Customers are Large Business Customers which are routed to specific call-in numbers. SPOC (Single Point of Contact) Customers are also Large Business Customers which have several locations and are routed to one Business Repair Center. BellSouth is currently reporting B and C customers only. In March, BellSouth will begin reporting all Large Business Customers which will include all categories: A, B, C and SPOC. Also, beginning in April, BellSouth will begin reporting small business customers, as well.

Residence - BellSouth has requested and received KPMG's spreadsheets and calculations for this measurement. While BellSouth is verifying KPMG's calculations, BellSouth has also forwarded a corrected copy of the instructions provided to KPMG in their auditing role. However, BellSouth believes this may also be a rounding issue. BellSouth will continue to work with KPMG to resolve this discrepancy.

BRMC - BellSouth has requested KPMG's spreadsheets and calculations and would like to review the formula KPMG is using for replication. BellSouth will continue to work with KPMG to resolve this discrepancy.

⁴ KPMG used the latest available *PMAP Raw Data User Manual (Version 2, 12/15/99)* to validate the calculations for this SQM report.

UNE – BellSouth has requested KPMG's spreadsheets and calculations and would like to review the formula KPMG is using for replication. BellSouth will continue to work with KPMG to resolve this discrepancy.

Speed of Answer in Ordering Center for October 1999 and December 1999 for the CLEC Aggregate and BellSouth Retail.

BellSouth Residence Service Center – KPMG received paper printouts from BellSouth. The field that BellSouth suggested using (DTH) is on the paper printout under a different heading. It also appears that further information and explanation may need to be provided to KPMG for replication of this measurement. BellSouth is forwarding a corrected copy of instructions provided to KPMG in their auditing role. BellSouth has requested KPMG's spreadsheets and calculations in order to continue to work with KPMG to resolve this discrepancy.

Local Carrier Service Center – BellSouth believes the discrepancy may be a rounding issue. BellSouth has requested KPMG's spreadsheets and calculations in order to continue to work with KPMG to resolve this discrepancy.

Mean Held Order Interval and Distribution Intervals for December 1999 for the KPMG CLEC

The Raw Data User Guide (RDUG) has been corrected to consecutively number the steps. The new RDUG is dated February 15, 2000 and is posted on the PMAP website.

Percent Provisioning Troubles within 30 Days of Service Order Activity for November 1999 for an individual CLEC.

The Percent Provisioning within 30 days measure has been corrected as of the January reports. This problem occurred only when an end user customer moved from one CLEC/BST to another CLEC/BST. If for example the end user changed to a different provider during the report period and issued a trouble report on that line, the data would show that the telephone number belonged to two different companies during the period and would incorrectly assign the trouble to the one with the lowest OCN. This resulted in the outcome discussed above. In addition, the report was not matching dates on the order to trouble or cust. Id's (CLEC identifiers). The issue has been resolved by matching dates to the CLEC order with the dates for the trouble reports in addition to matching telephone number and cust. Id.

Firm Order Confirmation Timeliness for December 1999 for the KPMG CLEC.

The product "Combos" is included in UNE Other. BellSouth is currently in the process of disaggregating Combos (Loop + Port) into a separate product category. However, there have been no significant sales of this product at this time.



EXCEPTION 24
BellSouth Georgia OSS Testing Evaluation

Date: February 12, 2000

EXCEPTION REPORT

An exception has been identified as a result of the TAG Pre-Order Functional Test (PRE-1).

Exception:

BellSouth's TAG interface does not deliver timely responses to pre-order transactions.

Through February 4, 2000, KPMG has submitted 366 pre-order transactions that have received a response from the BellSouth OSS¹. On aggregate, twenty-nine percent (29%) of responses from TAG API took longer than 15 seconds to arrive². For pre-order test transactions, KPMG's experience indicates that pre-order responses from BellSouth's TAG API are not timely (i.e., took longer than 15 seconds) for the following query types³:

- **Customer Service Record Query (CSRQ):** 7% of API responses (1 of 14) were received in greater than 15 seconds.
- **Telephone Number Selection Query (TNSQ):** 8% of API responses (3 of 40) were received in greater than 15 seconds.
- **Telephone Number Assignment Query (TNAQ):** 10% of API responses (6 of 60) were received in greater than 15 seconds.
- **Address Validation Query by Telephone Number (AVQ_TN):** 28% of API responses (11 of 39) were received in greater than 15 seconds.
- **Appointment Availability Query (AAQ):** 24% of API responses (31 of 129) were received in greater than 15 seconds.
- **Address Validation Query (AVQ):** 61% of API responses (28 of 46) were received in greater than 15 seconds.
- **Telephone Number Assignment Query for Multi-Line Hunting Numbers (TNAQ_MLH):** 67% of API responses (2 of 3) were received in greater than 15 seconds.
- **Service Availability Query (SAQ):** 74% of API responses (25 of 34) were received in greater than 15 seconds.

¹ An additional 158 "Invalid Data Exception" responses were also received. Since this response type is delivered from the TAG Client residing on the CLEC's premises, timeliness data for these responses is not included in this report.

² Because pre-ordering information is often accessed while the customer is on the line, 15 seconds is used as a benchmark timeframe to allow for reasonably efficient customer interaction, for purposes of this exception.

³ Transaction sample sizes are based on interim results and do not represent significant sample sizes in some cases.



EXCEPTION 24

BellSouth Georgia OSS Testing Evaluation

The following tables provide a detailed breakdown of pre-order response timeliness data, broken down by pre-order query type, for BellSouth TAG pre-order responses.

CSRQ

6350b88b00000005	01/10/00 16:48:25	01/10/00 16:48:43	18
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TNSQ

476cc81700000001	01/27/00 12:06:06	01/27/00 12:06:23	17
1eb7fb6000000001	01/21/00 11:38:24	01/21/00 11:38:48	24
5adc57a400000001	01/27/00 09:58:09	01/27/00 09:58:35	26

TNAQ

266d261300000001	01/14/00 12:48:13	01/14/00 12:48:34	21
33df943300000001	01/10/00 13:48:26	01/10/00 13:48:47	21
3ebd981800000001	01/19/00 15:22:36	01/19/00 15:23:01	25
360e45b200000001	01/17/00 09:20:31	01/17/00 09:20:58	27
489415ab00000001	02/02/00 14:53:01	02/02/00 14:53:28	27
226b34e900000001	01/25/00 10:11:53	01/25/00 10:12:22	29

AVQ TN

6bd2892200000001	01/19/00 15:52:00	01/19/00 15:52:16	16
42b4f92600000001	01/24/00 11:44:27	01/24/00 11:44:43	16
59c89a7d00000001	01/27/00 16:28:48	01/27/00 16:29:05	17
0970bb8b00000005	01/10/00 15:16:43	01/10/00 15:17:00	17
5e12451a00000001	12/22/99 13:26:18	12/22/99 13:26:36	18
127e824b00000001	01/18/00 11:30:32	01/18/00 11:30:51	19
3eccc43e00000001	01/20/00 14:12:36	01/20/00 14:12:55	19
0970bb8b00000006	01/10/00 15:17:00	01/10/00 15:17:19	19
0511a32700000002	01/14/00 11:16:42	01/14/00 11:17:02	20
2e637dc400000001	01/19/00 13:46:26	01/19/00 13:46:48	22
0511a32700000001	01/14/00 11:11:54	01/14/00 11:12:44	50

AAQ

6b6f6cd300000001	01/19/00 12:01:23	01/19/00 12:01:40	17
1681716800000001	01/20/00 13:47:48	01/20/00 13:48:05	17
1681716800000007	01/20/00 17:40:13	01/20/00 17:40:30	17
0a23f0b800000005	01/14/00 19:25:09	01/14/00 19:25:26	17
1681716800000005	01/20/00 17:39:07	01/20/00 17:39:24	17
1681716800000008	01/20/00 17:40:34	01/20/00 17:40:51	17
6b6f6cd300000002	01/19/00 13:41:30	01/19/00 13:41:48	18
6b6f6cd300000005	01/19/00 13:43:02	01/19/00 13:43:21	19
375f0cb500000003	01/11/00 14:29:12	01/11/00 14:29:31	19
375f0cb500000004	01/11/00 14:29:31	01/11/00 14:29:50	19
375f0cb500000005	01/11/00 14:29:50	01/11/00 14:30:10	20
6b6f6cd300000007	01/19/00 13:43:53	01/19/00 13:44:13	20

KPMG Consulting LLC

03/06/00

Page 2 of 4



EXCEPTION 24
BellSouth Georgia OSS Testing Evaluation

6b6f6cd300000003	01/19/00 13:41:48	01/19/00 13:42:08	20
328b9f7c00000002	01/18/00 11:30:51	01/18/00 11:31:11	20
7b36a40c0000000A	01/19/00 16:16:09	01/19/00 16:16:29	20
674a9f2c00000001	12/16/99 17:35:41	12/16/99 17:36:01	20
489d9f6500000001	01/12/00 08:48:25	01/12/00 08:48:46	21
6b6f6cd300000004	01/19/00 13:42:23	01/19/00 13:42:44	21
375f0cb500000008	01/11/00 14:37:26	01/11/00 14:37:47	21
293f1fec00000004	01/19/00 15:25:12	01/19/00 15:25:36	24
5b21d97b00000001	12/21/99 14:05:26	12/21/99 14:05:50	24
0a23f0b800000004	01/14/00 18:41:09	01/14/00 18:41:35	26
375f0cb500000006	01/11/00 14:30:11	01/11/00 14:30:38	27
0a23f0b800000002	01/14/00 18:19:50	01/14/00 18:20:19	29
504bb3f700000001	01/14/00 10:57:16	01/14/00 10:57:45	29
6b6f6cd300000006	01/19/00 13:43:21	01/19/00 13:43:53	32
375f0cb500000001	01/11/00 14:28:02	01/11/00 14:28:34	32
375f0cb500000002	01/11/00 14:28:34	01/11/00 14:29:12	38
0a23f0b800000003	01/14/00 18:21:55	01/14/00 18:22:33	38
1681716800000002	01/20/00 13:48:05	01/20/00 13:48:44	39
375f0cb500000007	01/11/00 14:30:38	01/11/00 14:31:18	40

AVQ

0283274200000001	01/20/00 11:54:48	01/20/00 11:55:04	16
09f2a6d600000001	01/27/00 13:38:09	01/27/00 13:38:26	17
29729afa00000001	02/01/00 15:38:34	02/01/00 15:38:51	17
08cd1b0f00000003	12/17/99 14:00:31	12/17/99 14:00:48	17
6c5721be00000001	01/14/00 09:59:01	01/14/00 09:59:19	18
7e7e99f500000001	01/25/00 12:01:30	01/25/00 12:01:49	19
48cf235d00000001	01/19/00 09:40:47	01/19/00 09:41:07	20
6c5721be00000003	01/14/00 10:25:22	01/14/00 10:25:43	21
08cd1b0f00000001	12/17/99 12:32:36	12/17/99 12:33:00	24
719f344800000002	01/12/00 13:35:22	01/12/00 13:35:48	26
719f344800000001	01/12/00 11:22:00	01/12/00 11:22:26	26
0627219300000001	01/03/00 16:27:28	01/03/00 16:27:54	26
29729afa00000002	02/01/00 17:07:38	02/01/00 17:08:05	27
29729afa00000002	02/01/00 16:08:19	02/01/00 16:08:47	28
2349fe3a00000001	02/02/00 14:26:25	02/02/00 14:26:53	28
4aef970400000001	01/19/00 13:41:01	01/19/00 13:41:29	28
6c5721be00000007	01/14/00 10:51:36	01/14/00 10:52:05	29
3b1ec9e700000001	02/03/00 16:53:19	02/03/00 16:53:49	30
29729afa00000002	02/01/00 16:47:29	02/01/00 16:48:01	32
465e924100000002	01/13/00 12:58:43	01/13/00 12:59:15	32
465e924100000001	01/13/00 12:28:12	01/13/00 12:28:44	32
3b1ec9e700000002	02/03/00 17:03:22	02/03/00 17:03:55	33
2349fe3a00000001	02/02/00 14:11:44	02/02/00 14:12:18	34
6c5721be00000009	01/14/00 11:00:16	01/14/00 11:00:50	34
026eb23300000001	12/17/99 17:51:42	12/17/99 17:52:16	34
6c5721be00000008	01/14/00 10:56:41	01/14/00 10:57:16	35
08cd1b0f00000002	12/17/99 12:47:18	12/17/99 12:47:55	37
6c5721be00000006	01/14/00 10:41:44	01/14/00 10:42:39	55



EXCEPTION 24

BellSouth Georgia OSS Testing Evaluation

TNAQ MLH

1c6f810300000001	12/17/99 09:55:02	12/17/99 09:55:21	19
747015d000000001	01/11/00 13:29:21	01/11/00 13:29:48	27

SAQ

5de5320e00000001	01/10/00 13:09:27	01/10/00 13:09:51	24
544d062100000001	01/11/00 14:43:30	01/11/00 14:43:55	25
5de5320e00000009	01/10/00 13:45:33	01/10/00 13:46:29	58
5de5320e0000000M	01/10/00 14:11:14	01/10/00 14:12:10	56
03ad03af00000002	01/25/00 11:55:41	01/25/00 11:56:38	57
777c580b00000003	01/19/00 17:12:36	01/19/00 17:13:33	57
23c06a5e00000003	01/19/00 09:39:27	01/19/00 09:40:24	57
777c580b00000002	01/19/00 16:17:17	01/19/00 16:18:14	57
26c3f1a500000002	01/27/00 14:07:54	01/27/00 14:08:51	57
3666980400000002	01/18/00 14:02:25	01/18/00 14:03:23	58
061bc28f00000001	01/24/00 11:44:46	01/24/00 11:45:44	58
3275334f00000001	01/25/00 12:06:20	01/25/00 12:07:18	58
0646afbd00000001	01/20/00 12:12:37	01/20/00 12:13:36	59
26c3f1a500000001	01/27/00 13:59:52	01/27/00 14:00:51	59
0646afbd00000002	01/20/00 13:48:44	01/20/00 13:49:44	60
3666980400000001	01/18/00 13:50:02	01/18/00 13:51:02	60
23cbda9100000001	01/14/00 17:17:10	01/14/00 17:18:10	60
03ad03af00000001	01/25/00 11:53:37	01/25/00 11:54:38	61
5b21ce5800000001	01/19/00 13:34:32	01/19/00 13:35:33	61
0646afbd00000003	01/20/00 14:12:55	01/20/00 14:13:58	63
5de8bdab00000002	01/14/00 10:25:55	01/14/00 10:26:59	64
23c06a5e00000002	01/19/00 09:38:20	01/19/00 09:39:25	65
7b35ddf800000001	01/17/00 13:48:37	01/17/00 13:49:44	67
2ff15c3600000001	01/12/00 08:46:36	01/12/00 08:47:43	67
23c06a5e00000001	01/19/00 09:37:07	01/19/00 09:38:18	71

Impact

The inability of a CLEC to receive timely pre-order responses from BellSouth will have the following impact on CLECs:

Decreased Customer Satisfaction: Delays in receiving pre-order responses will prevent a CLEC from obtaining information necessary to efficiently process a customer's service request. As a result, customer satisfaction with the CLEC will likely decrease.



February 25, 2000

EXCEPTION REPORT

An exception has been identified as a result of the TAG Pre-Order Functional Test (PRE-1).

Exception:

BellSouth's TAG interface does not deliver timely responses to pre-order transactions.

Through February 4, 2000, KPMG has submitted 366 pre-order transactions that have received a response from the BellSouth OSS¹. On aggregate, twenty-nine percent (29%) of responses from TAG API took longer than 15 seconds to arrive².

For pre-order test transactions, KPMG's experience indicates that pre-order responses from BellSouth's TAG API are not timely (i.e., took longer than 15 seconds) for the following query types³:

- **Customer Service Record Query (CSRQ):** 7% of API responses (1 of 14) were received in greater than 15 seconds.
- **Telephone Number Selection Query (TNSQ):** 8% of API responses (3 of 40) were received in greater than 15 seconds.
- **Telephone Number Assignment Query (TNAQ):** 10% of API responses (6 of 60) were received in greater than 15 seconds.
- **Address Validation Query by Telephone Number (AVQ_TN):** 28% of API responses (11 of 39) were received in greater than 15 seconds.
- **Appointment Availability Query (AAQ):** 24% of API responses (31 of 129) were received in greater than 15 seconds.
- **Address Validation Query (AVQ):** 61% of API responses (28 of 46) were received in greater than 15 seconds.
- **Telephone Number Assignment Query for Multi-Line Hunting Numbers (TNAQ_MLH):** 67% of API responses (2 of 3) were received in greater than 15 seconds.

¹ An additional 158 "Invalid Data Exception" responses were also received. Since this response type is delivered from the TAG Client residing on the CLEC's premises, timeliness data for these responses is not included in this report.

² Because pre-ordering information is often accessed while the customer is on the line, 15 seconds is used as a benchmark timeframe to allow for reasonably efficient customer interaction, for purposes of this exception.

³ Transaction sample sizes are based on interim results and do not represent significant sample sizes in some cases.

- **Service Availability Query (SAQ):** 74% of API responses (25 of 34) were received in greater than 15 seconds.

The following tables provide a detailed breakdown of pre-order response timeliness data, broken down by pre-order query type, for BellSouth TAG pre-order responses.

CSRO

6350b88b00000005	01/10/00 16:48:25	01/10/00 16:48:43	18
------------------	-------------------	-------------------	----

TNSO

476cc81700000001	01/27/00 12:06:06	01/27/00 12:06:23	17
1eb7fb6000000001	01/21/00 11:38:24	01/21/00 11:38:48	24
5adc57a400000001	01/27/00 09:58:09	01/27/00 09:58:35	26

TNAO

266d261300000001	01/14/00 12:48:13	01/14/00 12:48:34	21
33df943300000001	01/10/00 13:48:26	01/10/00 13:48:47	21
3ebd981800000001	01/19/00 15:22:36	01/19/00 15:23:01	25
360e45b200000001	01/17/00 09:20:31	01/17/00 09:20:58	27
489415ab00000001	02/02/00 14:53:01	02/02/00 14:53:28	27
226b34e900000001	01/25/00 10:11:53	01/25/00 10:12:22	29

AVQ TN

6bd2892200000001	01/19/00 15:52:00	01/19/00 15:52:16	16
42b4f92600000001	01/24/00 11:44:27	01/24/00 11:44:43	16
59c89a7d00000001	01/27/00 16:28:48	01/27/00 16:29:05	17
0970bb8b00000005	01/10/00 15:16:43	01/10/00 15:17:00	17
5e12451a00000001	12/22/99 13:26:18	12/22/99 13:26:36	18
127e824b00000001	01/18/00 11:30:32	01/18/00 11:30:51	19
3eccc43e00000001	01/20/00 14:12:36	01/20/00 14:12:55	19
0970bb8b00000006	01/10/00 15:17:00	01/10/00 15:17:19	19
0511a32700000002	01/14/00 11:16:42	01/14/00 11:17:02	20
2e637dc400000001	01/19/00 13:46:26	01/19/00 13:46:48	22
0511a32700000001	01/14/00 11:11:54	01/14/00 11:12:44	50

AAQ

6b6f6cd300000001	01/19/00 12:01:23	01/19/00 12:01:40	17
1681716800000001	01/20/00 13:47:48	01/20/00 13:48:05	17
1681716800000007	01/20/00 17:40:13	01/20/00 17:40:30	17
0a23f0b800000005	01/14/00 19:25:09	01/14/00 19:25:26	17
1681716800000005	01/20/00 17:39:07	01/20/00 17:39:24	17
1681716800000008	01/20/00 17:40:34	01/20/00 17:40:51	17
6b6f6cd300000002	01/19/00 13:41:30	01/19/00 13:41:48	18
6b6f6cd300000005	01/19/00 13:43:02	01/19/00 13:43:21	19
375f0cb500000003	01/11/00 14:29:12	01/11/00 14:29:31	19
375f0cb500000004	01/11/00 14:29:31	01/11/00 14:29:50	19
375f0cb500000005	01/11/00 14:29:50	01/11/00 14:30:10	20

6b6f6cd300000007	01/19/00 13:43:53	01/19/00 13:44:13	20
6b6f6cd300000003	01/19/00 13:41:48	01/19/00 13:42:08	20
328b9f7c00000002	01/18/00 11:30:51	01/18/00 11:31:11	20
7b36a40c0000000A	01/19/00 16:16:09	01/19/00 16:16:29	20
674a9f2c00000001	12/16/99 17:35:41	12/16/99 17:36:01	20
489d9f8500000001	01/12/00 08:48:25	01/12/00 08:48:46	21
6b6f6cd300000004	01/19/00 13:42:23	01/19/00 13:42:44	21
375f0cb500000008	01/11/00 14:37:26	01/11/00 14:37:47	21
293f1fec00000004	01/19/00 15:25:12	01/19/00 15:25:36	24
5b21d97b00000001	12/21/99 14:05:26	12/21/99 14:05:50	24
0a23f0b800000004	01/14/00 18:41:09	01/14/00 18:41:35	26
375f0cb500000006	01/11/00 14:30:11	01/11/00 14:30:38	27
0a23f0b800000002	01/14/00 18:19:50	01/14/00 18:20:19	29
504bb3f700000001	01/14/00 10:57:16	01/14/00 10:57:45	29
6b6f6cd300000006	01/19/00 13:43:21	01/19/00 13:43:53	32
375f0cb500000001	01/11/00 14:28:02	01/11/00 14:28:34	32
375f0cb500000002	01/11/00 14:28:34	01/11/00 14:29:12	38
0a23f0b800000003	01/14/00 18:21:55	01/14/00 18:22:33	38
1681716800000002	01/20/00 13:48:05	01/20/00 13:48:44	39
375f0cb500000007	01/11/00 14:30:38	01/11/00 14:31:18	40

AVQ

0283274200000001	01/20/00 11:54:48	01/20/00 11:55:04	16
09f2a6d600000001	01/27/00 13:38:09	01/27/00 13:38:26	17
29729afa00000001	02/01/00 15:38:34	02/01/00 15:38:51	17
08cd1b0f00000003	12/17/99 14:00:31	12/17/99 14:00:48	17
6c5721be00000001	01/14/00 09:59:01	01/14/00 09:59:19	18
7e7e99f500000001	01/25/00 12:01:30	01/25/00 12:01:49	19
48cf235d00000001	01/19/00 09:40:47	01/19/00 09:41:07	20
6c5721be00000003	01/14/00 10:25:22	01/14/00 10:25:43	21
08cd1b0f00000001	12/17/99 12:32:36	12/17/99 12:33:00	24
719f344800000002	01/12/00 13:35:22	01/12/00 13:35:48	26
719f344800000001	01/12/00 11:22:00	01/12/00 11:22:26	26
0627219300000001	01/03/00 16:27:28	01/03/00 16:27:54	26
29729afa00000002	02/01/00 17:07:38	02/01/00 17:08:05	27
29729afa00000002	02/01/00 16:08:19	02/01/00 16:08:47	28
2349fe3a00000001	02/02/00 14:26:25	02/02/00 14:26:53	28
4acf970400000001	01/19/00 13:41:01	01/19/00 13:41:29	28
6c5721be00000007	01/14/00 10:51:36	01/14/00 10:52:05	29
3b1ec9e700000001	02/03/00 16:53:19	02/03/00 16:53:49	30
29729afa00000002	02/01/00 16:47:29	02/01/00 16:48:01	32
465e924100000002	01/13/00 12:58:43	01/13/00 12:59:15	32
465e924100000001	01/13/00 12:28:12	01/13/00 12:28:44	32
3b1ec9e700000002	02/03/00 17:03:22	02/03/00 17:03:55	33
2349fe3a00000001	02/02/00 14:11:44	02/02/00 14:12:18	34
6c5721be00000009	01/14/00 11:00:16	01/14/00 11:00:50	34
026eb23300000001	12/17/99 17:51:42	12/17/99 17:52:16	34
6c5721be00000008	01/14/00 10:56:41	01/14/00 10:57:16	35
08cd1b0f00000002	12/17/99 12:47:18	12/17/99 12:47:55	37
6c5721be00000006	01/14/00 10:41:44	01/14/00 10:42:39	55

TNAQ_MLH

1c6f810300000001	12/17/99 09:55:02	12/17/99 09:55:21	19
747015d000000001	01/11/00 13:29:21	01/11/00 13:29:48	27

SAQ

5de5320e00000001	01/10/00 13:09:27	01/10/00 13:09:51	24
544d062100000001	01/11/00 14:43:30	01/11/00 14:43:55	25
5de5320e00000009	01/10/00 13:45:33	01/10/00 13:46:29	56
5de5320e0000000M	01/10/00 14:11:14	01/10/00 14:12:10	56
03ad03af00000002	01/25/00 11:55:41	01/25/00 11:56:38	57
777c560b00000003	01/19/00 17:12:36	01/19/00 17:13:33	57
23c06a5e00000003	01/19/00 09:39:27	01/19/00 09:40:24	57
777c560b00000002	01/19/00 16:17:17	01/19/00 16:18:14	57
26c3f1a500000002	01/27/00 14:07:54	01/27/00 14:08:51	57
3666980400000002	01/18/00 14:02:25	01/18/00 14:03:23	58
061bc28f00000001	01/24/00 11:44:46	01/24/00 11:45:44	58
3275334f00000001	01/25/00 12:06:20	01/25/00 12:07:18	58
0646afb000000001	01/20/00 12:12:37	01/20/00 12:13:36	59
26c3f1a500000001	01/27/00 13:59:52	01/27/00 14:00:51	59
0646afb000000002	01/20/00 13:48:44	01/20/00 13:49:44	60
3666980400000001	01/18/00 13:50:02	01/18/00 13:51:02	60
23cbda9100000001	01/14/00 17:17:10	01/14/00 17:18:10	60
03ad03af00000001	01/25/00 11:53:37	01/25/00 11:54:38	61
5b21ce5800000001	01/19/00 13:34:32	01/19/00 13:35:33	61
0646afb000000003	01/20/00 14:12:55	01/20/00 14:13:58	63
5de8bdab00000002	01/14/00 10:25:55	01/14/00 10:26:59	64
23c06a5e00000002	01/19/00 09:38:20	01/19/00 09:39:25	65
7b35ddf800000001	01/17/00 13:48:37	01/17/00 13:49:44	67
2ff15c3600000001	01/12/00 08:46:36	01/12/00 08:47:43	67
23c06a5e00000001	01/19/00 09:37:07	01/19/00 09:38:18	71

Impact

The inability of a CLEC to receive timely pre-order responses from BellSouth will have the following impact on CLECs:

Decreased Customer Satisfaction: Delays in receiving pre-order responses will prevent a CLEC from obtaining information necessary to efficiently process a customer's service request. As a result, customer satisfaction with the CLEC will likely decrease.

BellSouth Response

The turnaround time in the TAG gateway averages 2 seconds. The slow response time is occurring in the Business Logic Processor, BLP. Updates, to improve all pre-order transaction response times in the BLP, will be implemented March 13, 2000 with TAG Release 2.2.0.7.



EXCEPTION 25
BellSouth Georgia OSS Testing Evaluation

Date: February 14, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Systems Capacity Management Evaluations (PRE-6, O&P-6, BLG-3, M&R-5, M&R-6).

Exception:

BellSouth's systems capacity management process does not include established ongoing procedures for forecasting business volumes and transactions.

Based on interview sessions and documentation reviews conducted as part of the PRE-6, O&P-6, BLG-3, M&R-5, and M&R-6 Tests, KPMG has observed that BellSouth's systems capacity management process does not include established, ongoing procedures for forecasting business volumes and transactions for its mainframe (EDI, LEO, SOCS, CRIS, CABS, ADUF, ODUF) and mid-range (TAG, LESOG, LNP, TAFI, ECTA) electronic interfaces. BellSouth's capacity management process should contain safeguards and procedures to plan for and manage projected growth in the use of these interfaces.

Key elements of a comprehensive capacity management process include:

- Collection, reporting, analysis, and verification of 1) system performance, 2) system resource utilization, and 3) business and transaction volume data
- Forecasting of business volumes and transactions
- Consideration of business requirements and existing system capacity, usage, and performance data during the capacity planning process

Impact:

The absence of a business volume and transaction forecasting process, which is directly linked to the capacity management of the aforementioned interfaces, could result in unexpected system capacity constraints. These constraints could adversely affect CLEC business operations in the following ways:

- **Decrease in customer satisfaction.** The inability to obtain customer records, provide service availability dates, assign telephone numbers, etc. will affect a CLEC's ability to deliver timely service to its end-user customers. This will result in a decrease in CLEC customer satisfaction.
- **Decrease in revenue.** The inability to perform timely, accurate, and automated ordering and billing functions will prevent a CLEC from properly delivering and collecting for services provided to end-user customers. This will result in a decrease in CLEC revenue.



February 24, 2000

EXCEPTION REPORT

An exception has been identified as a result of the ongoing Systems Capacity Management Evaluations (PRE-6, O&P-6, BLG-3, M&R-5, M&R-6).

Exception:

BellSouth's systems capacity management process does not include established ongoing procedures for forecasting business volumes and transactions.

Based on interview sessions and documentation reviews conducted as part of the PRE-6, O&P-6, BLG-3, M&R-5, and M&R-6 Tests, KPMG has observed that BellSouth's systems capacity management process does not include established, ongoing procedures for forecasting business volumes and transactions for its mainframe (EDI, LEO, SOCS, CRIS, CABS, ADUF, ODUF) and mid-range (TAG, LESOG, LNP, TAFI, ECTA) electronic interfaces. BellSouth's capacity management process should contain safeguards and procedures to plan for and manage projected growth in the use of these interfaces.

Key elements of a comprehensive capacity management process include:

- Collection, reporting, analysis, and verification of 1) system performance, 2) system resource utilization, and 3) business and transaction volume data
- Forecasting of business volumes and transactions
- Consideration of business requirements and existing system capacity, usage, and performance data during the capacity planning process

Impact:

The absence of a business volume and transaction forecasting process, which is directly linked to the capacity management of the aforementioned interfaces, could result in unexpected system capacity constraints. These constraints could adversely affect CLEC business operations in the following ways:

- **Decrease in customer satisfaction.** The inability to obtain customer records, provide service availability dates, assign telephone numbers, etc. will affect a CLEC's ability to deliver timely service to its end-user customers. This will result in a decrease in CLEC customer satisfaction.
- **Decrease in revenue.** The inability to perform timely, accurate, and automated ordering and billing functions will prevent a CLEC from properly delivering and collecting for services provided to end-user customers. This will result in a decrease in CLEC revenue.

BellSouth Response

BellSouth has implemented a Capacity Management Group within the Asset Management District of the Engineering and Design Organization. This group, formed in late 1999, has established several processes designed to move toward a comprehensive capacity management process. The following specific actions are underway:

- A. Collection, reporting and analysis of capacity trends for system resources are being tracked for a majority of the systems managed by IT within the Midrange Services Model (MSM). All systems that do not have technical problems will have reporting by the end of the second quarter. Of the systems mentioned above, TAG and LNP generate reports on a monthly basis. The LESOG application was initially designated as a stable system and reporting was instituted on an annual basis; a decision on frequency of reporting intervals will be reviewed with the user community by the end of February. The TAFI system utilized the SAR reporting capabilities which are more difficult to trend, but processes will be in place to handle this by June 30, 2000. The Capacity Management Group reviews these reports and is responsible for investigating systems whose trended growth will rise above the system engineering levels within the next 18 months. Recommendations are then forwarded to specific asset planners, as well as the solutions designers, who work with the application contacts to implement detailed plans involving methods to reduce growth; funding for new systems, if required; detailed system solutions; and timing of acquisitions.
- B. Specific personnel handle all day-to-day performance analysis for both Mid-Range and Main Frame systems. Exception reports are generated to the BellSouth capacity planning personnel when these problems are viewed as capacity related. These resources assist with the analysis of normal, trended growth patterns that are input into the functions performed by the capacity planning organization. This is another check in the process to ensure these systems are not "out of capacity".
- C. IT personnel are also responsible for developing the capacity plan for all the mainframe assets. They provide a quarterly asset plan for review by BellSouth planners to ensure that overall capacity needs are met. Specific application growth for all mainframe applications are captured monthly and the top growth applications are identified and managed such that capacity will not become a problem.
- D. Through the implementation of new corporate-wide IT engagement processes, the requirement for adequate forecast data is assigned to the prime project manager. This data can be gathered according to defined templates based on the level of project detail known at the time. Training for implementation of this process is currently underway, with full operation planned prior to March 31, 2000.



EXCEPTION 26
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 Tests (O&P-1 and O&P-2).

Exception:

BellSouth does not deliver timely Completion Notices (CNs).

According to BellSouth ordering documentation, a CN is delivered to a CLEC when the service order is completed and error free¹. KPMG's Customer Service Manager (CSM) indicated that for electronically-submitted Local Service Requests (LSRs), CNs will be delivered within one business day of the completion of actual service provisioning.

Through February 5, KPMG had received CNs on 44 service orders. Sixteen percent (16%) of these CNs were received later than one business day after the completion of provisioning².

Date of CN Receipt (CN) versus CN Due Date (DD)

CN = DD	CN = DD+1	CN = DD+2	CN = DD+3-5	CN = DD+ >5	TOTAL
33	4	2	0	5	44
75%	10%	5%	0%	11%	100%
Total Late Responses = 16%					

The following table provides a detailed breakdown of timeliness data for CNs that took longer than one business day.

Order ID	DD	9994	Receipt Date/Time	1/7/00	01/05/00	Count
405A312PEM001002	05	9994	12/27/99 03:54 PM	1/7/00	01/05/00	2
419A223PTM100003	00	9991	01/12/00 08:57 AM	1/20/00	01/18/00	2
305A112PTH100001	18	9994	12/16/99 05:35 PM	1/7/00	12/27/99	9
428A124PTJ100006	01	9994	12/20/99 09:08 AM	1/18/00	01/05/00	9
603A224PTJ100002	00	9991	11/16/99 11:25 AM	12/3/99	11/20/99	10
307A122PEK100001	04	9994	12/08/99 05:23 PM	1/8/00	12/21/99	12
373A215PEG100002	02	9992	12/20/99 02:39 PM	1/18/00	12/27/99	16

¹ Local Exchange Ordering Guide, Volume 1, Issue 7N, January 2000, Section 13.1.

² Service provisioning date is identified as the Due Date (DD) value within the CN.



EXCEPTION 26
BellSouth Georgia OSS Testing Evaluation

Impact

Receipt of a timely Completion Notice is essential for CLECs to: (1) confirm that service has been established; and (2) initiate billing activities. Delayed CN responses could impact a CLEC's ability to fully inform customers of service provisioning status, thereby decreasing CLEC customer satisfaction, and to maintain accurate billing records, potentially reducing CLEC revenue.



February 18, 2000

EXCEPTION REPORT

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

Exception:

BellSouth does not deliver timely Completion Notices (CNs).

According to BellSouth ordering documentation, a CN is delivered to a CLEC when the service order is completed and error free¹. KPMG's Customer Service Manager (CSM) indicated that for electronically-submitted Local Service Requests (LSRs), CNs will be delivered within one business day of the completion of actual service provisioning.

Through February 5, KPMG had received CNs on 44 service orders. Sixteen percent (16%) of these CNs were received later than one business day after the completion of provisioning².

Date of CN Receipt (CN) versus CN Due Date (DD)

CN = DD	CN = DD+1	CN = DD+2	CN = DD+3-5	CN = DD+ >5	TOTAL
33	4	2	0	5	44
75%	10%	5%	0%	11%	100%
Total Late Responses = 16%					

The following table provides a detailed breakdown of timeliness data for CNs that took longer than one business day.

Order ID	DD	Order No	Order Date	Order Time	Order Date	Order Time	Count
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419A223PTM100003	00	9991	01/12/00	08:57 AM	1/20/00	01/18/00	2
305A112PTH100001	18	9994	12/16/99	05:35 PM	1/7/00	12/27/99	9
428A124PTJ100006	01	9994	12/20/99	09:08 AM	1/18/00	01/05/00	9
603A224PTJ100002	00	9991	11/16/99	11:25 AM	12/3/99	11/20/99	10
307A122PEK100001	04	9994	12/08/99	05:23 PM	1/6/00	12/21/99	12
373A215PEG100002	02	9992	12/20/99	02:39 PM	1/18/00	12/27/99	16

¹ Local Exchange Ordering Guide, Volume 1, Issue 7N, January 2000, Section 13.1.

² Service provisioning date is identified as the Due Date (DD) value within the CN.

Impact

Receipt of a timely Completion Notice is essential for CLECs to: (1) confirm that service has been established; and (2) initiate billing activities. Delayed CN responses could impact a CLEC's ability to fully inform customers of service provisioning status, thereby decreasing CLEC customer satisfaction, and to maintain accurate billing records, potentially reducing CLEC revenue.

BellSouth Response:

For electronically submitted Local Service Requests LSRs, Completion Notices are transmitted when the service order is completed, error free and obtains a status of CPX or PCX. There are error conditions which occur after the service is provisioned which will delay receipt of a CN until resolved. For example, if a listing error is encountered after service is provisioned, the CN would be delayed until the error is cleared by a service representative in the Local Carrier Service Center. Since the requests above are completed and have been purged, BellSouth cannot provide any further details on why the CNs were delayed. BellSouth will modify the LEO IG, Vol. 1 by March 20, 2000 to clarify when a CN should be expected.

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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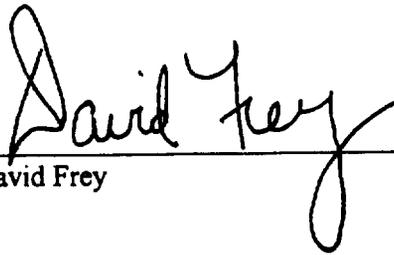
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