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March 21, 2000

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

RECEIVED

MAR 21 2000

EXECUTIVE SECRETARY
G.P.S.C.

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

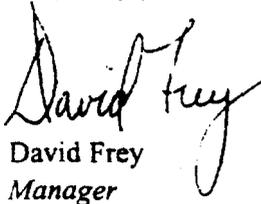
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of BellSouth's Amended Responses to KPMG Consulting LLC's Exceptions 13, 16, 19, 25 and 27 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





March 6, 2000

EXCEPTION REPORT

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

Exception:

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

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

1. A CPNI warning message stating, "CPNI data unavailable do not use this customer as a sales opportunity."
2. A message stating, "System may contain fragmented CPNI data, to be used only consistent with your CPNI training. Not to be used for sales and marketing purposes."
3. A message instructing the TAFI user to, "Take trouble in GA WFA/C¹".
4. A message instructing the TAFI user to get their customer's email address and provide BellSouth's small business web site address.
5. A message stating, "Pending Backtalk."²

Impact

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

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

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

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

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

BST Response

The proper handling of CPNI data is a FCC requirement. Since BST cannot control how the CLEC's user uses this data, TAFI provides a warning message every time the user accesses a customer's record. The CPNI message on the initial TAFI window – *"System may contain fragmented CPNI data, to be used only consistent with your CPNI training. Not to be used for sales and marketing purposes"* – appears for all users (BST and CLEC). In release 2000.1, the CPNI error message has been modified to just state *"CPNI data is not available"* as opposed to what was observed by the tester.

The message *"Take trouble in GA WFA/C"* was appropriate since the tester entered a trouble report for a UNE Port. UNE Ports are designed services supported in WFA. TAFI allowed the user to continue processing a trouble report for the UNE Port in error. TAFI will be modified to provide this error message (should a user enter a UNE Port telephone number) and then automatically return the user to the initial trouble entry window.

References to obtaining the customer's E-mail address and directing the user to the BST website will be removed for CLEC transactions. This is an internal requirement for the BRCs.

The 'Pending BackTalk' message should never be displayed since CLEC reports are not routed to the BackTalk system. The BackTalk reference was found in a TAFI recommendation line. This is the incorrect message for the CLECs TRANSQ routed trouble and will be corrected.

The BackTalk message will be corrected in the next CLEC TAFI release tentatively scheduled for April 15, 2000. The prevention of taking a trouble report for a UNE Port (which is avoided with training) and removing the E-mail reference require significant code modification and will be implemented in release 2000.3 which is tentatively scheduled for implementation September 1, 2000.



March 13, 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 applicable tariffs in cases where specific rates are not provided in the contracts. For Virtual Collocation, the tariff is the F.C.C. Tariff No. 1. However, no service comparable to a DS0 cross-connect is described in the F.C.C Tariff No 1. 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 established for use when this service was ordered by and provisioned for a customer. The USOC, VE1R2, was added into the applicable rating tables in advance of an approved tariff and was incorrectly set to apply the resale discount. This setting was removed on 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. Rates for USOCs for individual services were updated to the appropriate billing tables only for

those services expected to be ordered during the test. A mistake was made which caused a mismatch between CRIS and CABS for the USOC SOMEK. It was decided not to include the SOMEK on the CRIS rate sheets because that USOC was already loaded with statewide rates from the Standard Interconnection Agreement (non-recurring charge of \$3.50). Since a specific rate was required in CABS, a specific rate was included on the rate sheets. Absent any specific agreement, a rate of \$5.00 was used. If a standard interconnection agreement been used as the authorization for the services ordered by the test manager, the contract implementation processes would have caused the appropriate rate to be loaded for this USOC in both CRIS and CABS.

Undocumented Charges – USOC UEAC2

An Interconnection Agreement was not signed with the initial Test Manager. Rates for USOCs for individual services were updated to the appropriate billing tables only for those expected to be ordered during the test. For USOC UEAC2 a mistake was made in that USOCs for cross connects were not included in the rate tables. As such, the rate defaulted to zero. This USOC is listed in the Standard Interconnection Agreement. If a standard interconnection agreement been used as the authorization for the services ordered by the test manager, the contract implementation processes would have caused the appropriate rate to be loaded for this USOC.

Incorrect Rates – USOC UEAL2

Due to an error in loading the rate tables 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 was added to the CRIS rate file for business classes of service on 3/1/00. This will correct the rates on a going forward basis. BellSouth plans to have all occurrences of the USOC on CLEC accounts revised to reflect this charge by 3/17/00.

Mislabeled Information

The requested adjustments 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, BellSouth is providing parity of service to its retail and resale customers.

The three adjustments requested by KPMG were entered as a combined adjustment; i.e. the LCSC representative added the three amounts together and entered one adjustment “voucher”. The adjustment can be disaggregated upon request from either CLEC or retail customers.



March 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.

BellSouth Response

Effective March 13, 2000, BellSouth posted an unmarked version of the SQM report to the web. Additionally, a link has been provided that allows the user to view a change log that details every change made to the document.



March 8, 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 March. 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.
- E. Overall, BellSouth's current capacity management process obtains inputs from the following sources:
 - CLEC transaction forecasts, if provided
 - Analysis of Business Unit Driver, BUD, reports
 - Joint discussions with the Project Management groups that support our core business products and electronic interfaces and Interconnection Marketing to

ensure all systems, whether pre-ordering, ordering, billing or maintenance and repair can accommodate forecasted transactional volumes.

- Analysis from the appropriate IT organizations that support the affected applications to review if additional hardware/software is required to meet forecast levels.



March 13, 2000

EXCEPTION REPORT

The following exception has been identified as a result of the ADUF/ODUF Functional Usage Evaluation (BLG-2)

Exception:

BellSouth provided incorrect DUF records to KPMG.

During the period of November 18-20, 1999 KPMG completed 846 test calls (for which DUF files were expected) for the ADUF/ODUF Functional Usage Evaluation¹. As part of the evaluation, BellSouth provided DUF records for these calls. Through evaluation of these DUF records, KPMG has determined that BellSouth provided incorrect DUF records for certain test calls. Incorrect DUF records are categorized here as: 1) Misidentified DUF records; 2) Improper DUF records.

Misidentified DUF Records

KPMG received numerous ODUF records inappropriately identifying toll calls as local calls. EMI industry standards dictate that the Record Identifier 100101 is to be used to identify toll call detail transmitted from the recording entity to the rating entity. BellSouth failed to adhere to the EMI standard. Representative occurrences of errors are detailed below.

Misidentified Toll Calls

Date	Cat.	From Number	To Number	Connect Time
Nov 20	100131	770-933-8170	706-236-9787	09:44
Nov 20	100131	770-933-8526	706-236-9677	10:02
Nov 20	100131	770-933-8170	706-236-9787	13:56
Nov 20	100131	770-933-8526	706-236-9677	08:59
Nov 20	100131	706-236-9677	770-933-8170	09:42
Nov 20	100131	706-236-9787	770-933-8170	13:58
Nov 20	100131	706-236-9677	770-933-8876	10:24
Nov 20	100131	706-236-9677	770-933-8876	14:07
Nov 19	100131	706-236-9677	770-933-8170	11:47
Nov 19	100131	706-236-9677	770-933-8523	15:29

¹ Access Daily Usage Files (ADUF) provide competitive local exchange carriers with records of intraLATA/interLATA calls originated from or terminated to CLEC end user lines. Optional Daily Usage Files (ODUF) provide competitive local exchange carriers with records of billable measured intraLATA local and toll calls, per use/per activation services, directory assistance messages and WATS & 800 service calls.

Improper DUF Records

BLS submitted DUFs for zero-minus² calls placed by testers requesting operator assistance in placing inter-LATA calls. DUF records indicate that local BellSouth operators attempted to place these inter-LATA calls. Inter-LATA calls cannot be completed by local operators therefore no attempt should have been made to place the calls and no DUF record should have been created.

The EMI standard contains no provisions for inappropriately attempted calls. BellSouth previously stated its DUF production process conforms to the EMI standard, noting no exceptions. Details of improper DUFs are shown below.

Improper DUF Records

Date	Cat.	From Number	To Number	Connect Time
Nov 19	100101	706-722-2879	912-741-7059	15:18
Nov 19	100101	706-236-9492	706-722-2879	11:31

Impact

Incorrect DUF records impact CLECs in the following ways:

- **Decrease in revenue.** A CLEC receiving incorrect ODUF information will not be able to bill end-user customers correctly for local and toll calls. Likewise, the absence of correct ADUF information will prevent CLEC from billing an inter-exchange carrier correctly. As a result, the CLEC will lose revenue.
- **Decrease in customer satisfaction.** Providing a CLEC with incorrect DUF records will cause the CLEC to incorrectly bill a customer for usage. This will likely result in a decrease in end-user satisfaction.
- **Increase in operating costs.** Inappropriate charges for operator services may be billed to a CLEC as a result of the creation of inappropriate DUF records. A CLEC receiving improper DUF records will be forced to engage in a protracted reconciliation of billing information. This will result in an increase in labor costs. In addition,

BellSouth Response

Misidentified Toll Calls

BellSouth agrees with KPMG regarding 10-01-01 records are used for toll calls, and

² Zero-minus calls are those placed by dialing zero for operator assistance.

10-01-31 EMI records are used for local. The above calls that BellSouth sent to KPMG were sent as local calls due to the From and To points falling within the LOCAL measured calling area set in the Tariff. These calls were correctly sent as local records (10-01-31 EMI records) since all Unbundled Switch Ports in BellSouth are treated as a measured class of service. Therefore all calls originating from UNE Switch Ports that fall within the local measured calling area are recorded and sent to the CLECs as local calls using the 10-01-31 EMI record.

Improper DUF Records

The above two calls originated from a UNE Switch Port, and terminated to a BellSouth Operator because they both were Zero-Minus (0-) dialed. Both of the calls were not completed or answered calls, and the EMI records were marked with as an Attempt Message by setting Indicator 18 to equal 2 in the 10-01-01 records. BellSouth furnishes all Attempt/incomplete calls that are handled by an operator for any incomplete BellSouth Operator messages using a Category 10 EMI record, and not the 11-01-01 EMI record. The purpose of these records is to notify the CLEC that their customer of record used BellSouth Operator Services, and they will be billed an Operator surcharge on their UNE bill. BellSouth believes that it correctly utilized the provisions of the EMI guidelines with respect to operator calls and the use of Indicator 18 for the two messages to KPMG as attempt messages using the 10-01-01 EMI record. This treatment of these types of calls is covered in the training that is provided to CLECs on the ODUF feed (See page from CLEC training documents sent under separate cover as Attachment A). In an attempt to clarify this treatment further, a notation will be added to the BellSouth Optional Daily Usage File (ODUF) document Attachment B ODUF EMI Call Detail Records (See document sent under separate cover as Attachment C Page from the ODUF documents).

Local calls originating or terminating between Smyrna and Rome are considered by Operator Services as toll calls. Please refer to G.S.S.T. A3.6.1 page 8.3.4, dated 6/26/98 and page 8.4.5, dated 5/30/98. These pages identify the exchanges that fall within the local calling area and the expanded service area. Section A3.7.1.C.1 references Georgia Community Calling, GCC, where based on availability, customers may choose to subscribe to an expanded service area plan. If the end user subscribes to GCC, the calls placed between Smyrna and Rome would be rated as local calls.

When a BellSouth Operator enters the NPA NXXs of the originating and terminating telephone numbers, e.g., 770 933 and 706 236 they are flagged as toll calls since they are not within the local calling area. The BellSouth directory also supports the calls as toll based on the local calling area which should answer the question why the BellSouth directory and BellSouth Operators reflect calls placed between Smyrna and Rome as tolls calls. Directories do not contain maps of area calling plans, only the standard local calling area.

In addition, the Interconnection Contracts signed by CLECs describe the charges that will be billed for Operator Handled calls. It is BellSouth's position that the contract language

along with the rate sheets for these services provide the authorization for BellSouth to bill operator surcharges for incomplete calls, whatever the reason that the call did not complete.

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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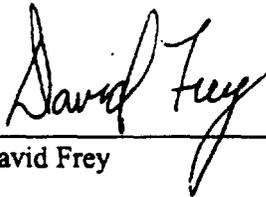
James A. Schendt
Regulatory Affairs Manager
Interpath Communications, Inc.
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William R. Atkinson
Sprint Communications Co. L.P.
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This 21st day of March 2000.



David Frey

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MAR 21 2000

**EXECUTIVE SECRETARY
G.P.S.C.**

March 21, 2000

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**

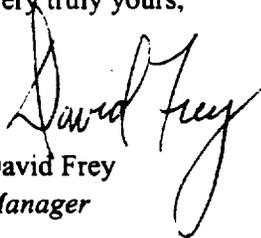
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG Consulting LLC's Exception 7 Closure Report 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 7

BellSouth Georgia OSS Testing Evaluation

Date: February 15, 2000

EXCEPTION CLOSURE REPORT

Exception:

The BellSouth ECTA Gateway does not allow CLECs to process trouble reports for SL1 circuits.

Summary of Exception:

BellSouth's ECTA Gateway is designed to allow CLECs to process trouble reports for all designed and non-designed circuits, including SL1 UNEs¹. The ECTA Gateway routes all trouble tickets to one of two maintenance and repair (M&R) management systems, WFA (for designed circuits) and LMOS (for non-designed circuits). KPMG functional transaction testing identified a defect with ECTA: Entering a trouble report into ECTA for an SL1 circuit generates an error response from the ECTA Gateway, and no trouble ticket is created in either the LMOS or the WFA systems.

Summary of BLS Response:

An internal problem with properly processing SL1 reports was corrected on January 6, 2000. SL1 UNE reports have been successfully submitted since the problem was corrected.

Summary of KPMG Re-test Activities:

KPMG re-submitted several requests to create an SL1 UNE trouble report via the ECTA interface.

KPMG Re-test Results:

In response to KPMG submitted requests, BellSouth's ECTA Gateway created trouble tickets. Examination of the ECTA Gateway agent log and the back-end systems revealed that the correct information was present in the tickets. As a result, KPMG has concluded that the ECTA Gateway now allows CLECs to create trouble tickets for SL1 circuits.

¹ According to BellSouth's Interconnection Services Web site, an SL1 (Unbundled Voice Loop - Service Level 1) circuit is "a dedicated analog transmission facility from BellSouth's main distribution frame (MDF) to an end user's facility."



CLOSURE REPORT FOR EXCEPTION 7
BellSouth Georgia OSS Testing Evaluation

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, declares Exception 7 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:

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This 21st day of March 2000.



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March 22, 2000

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

RECEIVED

MAR 22 2000

EXECUTIVE SECRETARY
G.P.S.C.

Dear Ms. O'Leary:

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

At BellSouth's request, KPMG hereby submits BellSouth's proposed set of standards and benchmarks to be used in the BellSouth - Georgia OSS Evaluation, Docket No. 8354-U. Enclosed please find twenty-eight (28) copies of the referenced document, as well as an electronic copy, for filing.

KPMG will receive comments on this proposal on behalf of the Georgia Public Service Commission (GAPSC) through Wednesday, March 29, 2000. Comments should be sent via U.S. mail to Christopher Casey, KPMG Consulting, Suite 1050, 270 Peachtree Street, Atlanta, GA 30303, or via email to christophercasey@kpmg.com.

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

Thank you for your assistance in this matter.

Very truly yours,


David Frey
Manager

Enclosures

cc: Parties of Record



**BellSouth Telecommunications Inc. Georgia OSS Evaluation
Analogues and Benchmarks**

BST SQM Category	MEASURES AND SUB-METRICS	Retail Analogue	Benchmark
Pre-Ordering	Percent Response Received within "X" seconds Average Response Time – Customer Service Record Average Response Time – Due Date Avail Average Response Time – Address Validation Average Response Time – Product and Service Availability Average Response Time – Tel. No Availability and Reservation	Parity w/ retail where applicable.	
	OSS Interface Availability		99.5%
Ordering	Percent Flow-Through Service Request <ul style="list-style-type: none"> • Residence • Business • UNE • Specials 		90% 80% 80% 0%
	Percent Rejected Service Request	Diagnostic	Diagnostic.
	Reject Interval (Mechanized)		95% in 1 hr
	<ul style="list-style-type: none"> • Reject Interval (Non-Mechanized and Partially Mechanized) 		85% < 48 hrs
	Firm Order Confirmation Timeliness (Mechanized) (Non-Mechanized and Partially Mechanized)		95% < 4 hrs 85% < 48 hrs
	Speed of Answer in Ordering Center	Parity with retail	
Provisioning	Mean Held Order Interval		
	<ul style="list-style-type: none"> • Resale Residence 	Parity with retail	
	<ul style="list-style-type: none"> • Resale Business 	Parity with retail	
	<ul style="list-style-type: none"> • Resale Design 	Parity with retail	
	<ul style="list-style-type: none"> • UNE Loop and Port Combos 	Retail Residence and Business*	
	<ul style="list-style-type: none"> • UNE Non-Design 	Retail Residence and Business*	
	<ul style="list-style-type: none"> • UNE Design 	Retail Design*	
	<ul style="list-style-type: none"> • Local Interconnection Trunks 	Parity with retail	
	Average Jeopardy Notice Interval (Mechanized)		
	<ul style="list-style-type: none"> • Resale Residence 		95% >=24 hrs
	<ul style="list-style-type: none"> • Resale Business 		95% >=24 hrs
	<ul style="list-style-type: none"> • Resale Design 		95% >=24 hrs
	<ul style="list-style-type: none"> • UNE Loop and Port Combos 		95% >=24 hrs
	<ul style="list-style-type: none"> • UNE Non-Design 		95% >=24 hrs
	<ul style="list-style-type: none"> • UNE Design 		95% >=24 hrs
	<ul style="list-style-type: none"> • Local Interconnection Trunks 		95% >=24 hrs
	% of Orders given jeopardy notice (Mechanized)		