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March 24, 2000

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

RECEIVED

MAR 24 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 Response to KPMG Consulting LLC's Exception 18 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



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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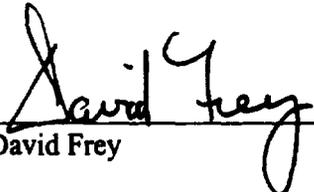
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This 24th day of March 2000.



David Frey

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March 14, 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 were correctly populated.

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)		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	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.

BellSouth Response

In the next scheduled update of the LEO IG scheduled for March 17, 2000, 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. As mentioned in this exception there was inconsistency in how the LSRs were processed. Investigation revealed that in some instances, if the LCOS was the only error, some service reps in the LCSC processed the request and did not clarify back to KPMG. In an effort to minimize impacts to customer due dates, the LCSC personnel can use their judgement and not clarify for minor errors, as long as they are not placed in the position of making a decision for the CLEC. For example, if the LCOS was populated with UEPRX instead of UEPRC and a feature for Caller ID was present, the service rep could decide not to clarify for the Line Class of Service. The line class of service edit 8240 should help to minimize service rep inconsistencies.



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March 27, 2000

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MAR 27 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 Exception 20 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 20

BellSouth Georgia OSS Testing Evaluation

Date: March 7, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth technicians cannot initiate a Verify Repair Completion request.

Summary of Exception:

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 present. 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.

Summary of BLS Response:

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

Summary of KPMG Re-test Activities:

KPMG's retest activities consisted of re-executing scenarios involving the Verify Repair Completion function.

KPMG Re-test Results:

The Verify Repair Completion function was successfully executed four times in KPMG's re-testing activities. Based on the functionality demonstrated during KPMG's retest, BellSouth appears to have adequately addressed the issue identified in Exception 20.

Based on re-testing activities, KPMG, with the concurrence of the Georgia Public Service Commission, declares Exception 20 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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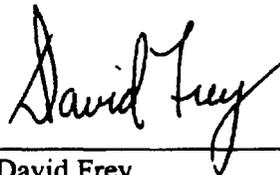
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This 27th day of March 2000.

A handwritten signature in cursive script that reads "David Frey". The signature is written in black ink and is positioned above a horizontal line.

David Frey

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MAR 31 2000

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

Dear Mr. Frey:

On March 22, 2000, KPMG submitted BellSouth's proposed set of standards and benchmarks to be used in the above-named matter. KPMG stated in its cover letter that it would receive comments on the proposal through March 29, 2000. On March 23, 2000, AT&T, MediaOne and Sprint responded to KPMG that, at a minimum, the deadline for comments should be extended until April 12, 2000. This is to inform you that the Staff of the Georgia Public Service Commission extends the deadline for comments to be filed with KPMG and the Commission until April 05, 2000. The comments must be filed with the Executive Secretary of the Commission by 4:00 PM on April 5.

The letter filed by AT&T, MediaOne and Sprint also states that "it is unclear if the standards will be considered temporary or permanent by the Commission, or if they will be applied only as part of the BellSouth-Georgia OSS Evaluation." This is to inform you that in the opinion of the Commission Staff, these standards will be applied only as part of the BellSouth-Georgia OSS Evaluation. It would require formal Commission approval to adopt permanent standards of general applicability.

Sincerely,

Leon Bowles
Director, Telecommunications Section

cc: Helen O'Leary, Executive Secretary
All Parties of Record