

Date	Connect Time	To Number	Duration (minutes)	From	BellSouth Response	SED	Usage Reference	Updated BellSouth Response with our understanding of what should have happened to usage:
Nov 18	11:50	770 933-8523	1	770 933-8526	Org # Not UNE until 11/26/99. KPMG should not have expected a DUF record for this call.	11/26	3	D order for UNE account eff 11/18 posted 11/18, N order for UEP eff 11/26 posted 11/26. This call was most likely processed during the timeframe when the account was not UNE. Usage should have errored as a 6M (message dated after disconnect) error code. The usage sent in reference 3 could have been processed on another date, and sent to the BellSouth's Retail Usage system where it was re-guided, and sent to the BIBS (UNE) system where it was then sent to ODUF.

Directory Assistance

Fifteen directory assistance (“411” and “NPA 555-1212”) calls were found to have no corresponding DUF record.

Missing Directory Assistance DUF Records (Representative List)

Date	Connect Time	From Number	Local / Long Distance	Call Completion	BellSouth Response	SED	Usage Reference	Updated BellSouth Response with our understanding of what should have happened to usage:
Nov 18	15:00	706 236-9492	Local	Yes	Usage erred as a 6M (message dated after disconnect) error code. Disconnect order effective on 11/17. Usage was not processed or billed because the volume of messages erring on this account was less than the threshold needed for investigation.	11/17	7	D order for TNP account eff 11/17 posted 11/19, N order for UNE eff 11/17 posted 11/22. Usage should have erred as a 6M (message dated after disconnect) error code. Usage Reference 7 call was probably not processed until 11/22 (weekend data), and order was posted by that time, and the message was delivered to KPMG
Nov 18	15:10	706 236-9492	Local	Yes	Usage erred as a 6M (message dated after disconnect) error code. Disconnect order effective on 11/17. Usage was not processed or billed because the volume of messages erring on this account was less than the threshold needed for investigation.	11/17	7	D order for TNP account eff 11/17 posted 11/19, N order for UNE eff 11/17 posted 11/22. Usage should have erred as a 6M (message dated after disconnect) error code. Usage Reference 7 call was probably not processed until 11/22 (weekend data), and order was posted by that time, and the message was delivered to KPMG
Nov 18	15:25	706 236-9492	LD	Yes	Usage erred as a 6M (message dated after disconnect) error code. Disconnect order effective on 11/17. Usage was not processed or billed because the volume of messages erring on this account was less than the threshold needed for investigation.	11/17	7	D order for TNP account eff 11/17 posted 11/19, N order for UNE eff 11/17 posted 11/22. Usage should have erred as a 6M (message dated after disconnect) error code. Usage Reference 7 call was probably not processed until 11/22 (weekend data), and order was posted by that time, and the message was delivered to KPMG
Nov 18	14:53	706 236-9677	Local	Yes	See Record # 4 sent 11/23/99 below			D order for UNE account eff 11/17 posted 11/17, N order for UNE eff 11/17 posted 11/19. See Record # 4 sent 11/23/99 below.

Date	Connect Time	From Number	Local / Long Distance	Call Completion	BellSouth Response	SED	Usage Reference	Updated BellSouth Response with our understanding of what should have happened to usage:
Nov 18	15:01	706 236-9677	LD	Yes	See Record # 5 sent 11/23/99 below			D order for UNE account eff 11/17 posted 11/17, N order for UNE eff 11/17 posted 11/19. See Record # 5 sent 11/23/99 below.
Nov 19	08:54	706 236-9677	Local	Yes	See Record # 10 sent 11/23/99 below			D order for UNE account eff 11/17 posted 11/17, N order for UNE eff 11/17 posted 11/19. See Record # 10 sent 11/23/99 below.
Nov 18	13:55	912 741-5953	LD	Yes	Could not find any record of call, and switch recording records were not available due to the age of the calls.	NA		N effective 11/17 posted 11/18. We feel that the timing of the message and the order posting so close together caused this call not being delivered. This usage was probably erred as a 6M (message dated after disconnect) error code and unbilled.
Nov 18	14:13	912 741-5953	Local	Yes	See Record # 7 sent 11/23/99 below			N effective 11/17 posted 11/18. See Record # 7 sent 11/23/99 below.
Nov 18	17:13	912 741-7059	Local	No	Usage erred as a 6M (message dated after disconnect) error code. Disconnect order Effective on 11/17. Usage was not processed or billed because the volume of messages erring on this account was less than the threshold needed for investigation.	8/28	8	D order for 1FB eff 09/17 posted 9/17, N order for UNE eff 11/7 posted 11/19. Usage erred as a 6M (message dated after disconnect) error code. Disconnect order Effective on 11/17. Usage was not processed or billed because the volume of messages erring on this account was less than the threshold needed for investigation. The message in usage reference 8 was dated 11/19 (the day the order posted), and should have been delivered to KPMG
Nov 18	17:27	912 741-7059	LD	Yes	Usage erred as a 6M (message dated after disconnect) error code. Usage was not processed or billed because the volume of messages erring on this account was less than the threshold needed for investigation. The record that we based this reply on has a connect:time of 17:21 not 17:27	8/28	8	D order for 1FB eff 09/17 posted 9/17, N order for UNE eff 11/7 posted 11/19. Usage erred as a 6M (message dated after disconnect) error code. Disconnect order Effective on 11/17. Usage was not processed or billed because the volume of messages erring on this account was less than the threshold needed for investigation. The message in usage reference 8 was dated 11/19 (the day the order posted), and should have been delivered to KPMG

KPMG Missing DA Records

Number 4 DA Sent 11/23/99

NOTE: NO DACC, only a DA record

10013299111810706236967700006706411000000000000000000014555900003550200063000041000070001000057000000010993030007062369677ROMEG
ADA 35 00000000010000000000000000

Number 5 DACC Sent 11/23/99

10013299111810706236967700006706411000000000000000000014595600003590200063000041000070001000057000000010991420007062369677ROMEG
ADA 35 00000000010000000000000000

100118991118107062369677000107062327000000000000000001501000000720200063000041000070001000057000000010990000007062369677ROMEG
ALOCAL CALL 35 00000000010300000000000000

100101991118107062369677000107062327000000000000000001501000000720200063000041000070001000057000000010990000007062369677ROMEG
ALOCAL CALL 35 00000000010000000000000000

Number 7 DACC Sent on 11/23/99

NOTE: Call dated 11/19 not 11/18. Could this be a KPMG logging error?

10013299111910912741595300006912411000000000000000000014115900004530200316000041000070001000057000000011330320009127415953MACON

10011899111910912741595300010912477111000000000000000001412530002350020031600004100007000100005700000001133000009127415953MACON

10010199111910912741595300010912477111000000000000000001412530002350020031600004100007000100005700000001133000009127415953MACON

Number 10 Toll Call Sent on 11/23/99

Note: Since toll call below lasted for over 2 mins. and there were no other calls around this time, could this be a logging error at KPMG (type of call)?

10010199111910706236967700010404222313100000000000000000853440021476020006300004100007000100005700000001301300007062369677ROME

WATS Calls

Thirty-one completed WATS ("800", "877", "888") calls were found to have no corresponding DUF record.

Missing WATS DUF Records (Representative List)

Date	Connect Time	To Number	Duration (minutes)	From Number	BellSouth Response	SED	Usage Reference	Updated BellSouth Response with our understanding of what should have happened to usage:
Nov 19	11:30	800 207-4512	1	404 633-3674	Orig # not UNE until 11/26/99. KPMG should not have expected a record for this call.	Not in File	4	D order for UNE account eff 11/26 posted 11/26, N order for UNE eff 11/26 posted 12/09... Without the detail history in the Billing System, we cannot determine why this was not delivered, and the call in usage reference 4 was delivered to KPMG
Nov 20	10:42	603 382-9705	56	404 633-5251	Could not find any record of call, and switch recording records were not available due to the age of the calls.	NA		D order for UNE account eff 11/17 posted 11/19, N order for UNE eff 11/17 posted 11/19. KPMG needs to examine this call record and log since 603 is not a Wats number.
Nov 18	12:07	888 699-2364	1	404 633-5981	Could not find any record of call, and switch recording records were not available due to the age of the calls.	NA		D order for UNE account eff 11/17 posted 11/19, N order for UNE eff 11/17 posted 11/19... Usage would have been sent to CABS Billing system since there was no UNE guide on date of call. BellSouth would have billed the access.
Nov 19	11:40	800 888-4848	2	706 236-9042	Could not find any record of call, and switch recording records were not available due to the age of the calls.	NA		D order for UNE account eff 11/17 posted 11/19, N order for UNE eff 11/17 posted 11/22... Usage would have been sent to CABS Billing system since there was no UNE guide on date of call. BellSouth would have billed the access.
Nov 20	10:36	800 888-8000	1	706 236-9492	Could not find any record of call, and switch recording records were not available due to the age of the calls.	NA		D order for TNP account eff 11/17 posted 11/19, N order for UNE eff 11/17 posted 11/22. Usage would have been sent to CABS Billing system since there was no UNE guide on date of call. BellSouth would have billed the access.
Nov 18	15:16	888 255-7669	1	706 236-9677	Could not find any record of call, and switch recording records were not available due to the age of the calls.	NA		D order for TNP account eff 11/17 posted 11/17, N order for UNE eff 11/17 posted 11/19. Usage would have been sent to CABS Billing system since there was no UNE guide on date of call. BellSouth would have billed the access.

Date	Connect Time	To Number	Duration (minutes)	From Number	BellSouth Response	SED	Usage Reference	Updated BellSouth Response with our understanding of what should have happened to usage:
Nov 19	10:47	888 820-2265	3	706 722-4181	Orig # not UNE until 11/26/99. KPMG should not have expected a record for this call.	11/26	9	D order for TNP account eff 11/18 posted 11/18, N order for UNE eff 11/26 posted 11/26. Usage would have been sent to CABS Billing system since there was no UNE guide on date of call. BellSouth would have billed the access. Without the detail history in the Billing System, we cannot determine why the call in usage reference 9 was delivered to KPMG
Nov 19	12:06	888 624-6633	1	706 722-4955	Could not find any record of call, and switch recording records were not available due to the age of the calls.	NA		D order for UNE account eff 11/17 posted 11/17, N order for UNE eff 11/17 posted 11/17. Without the detail history in the Billing System, we cannot determine why this call was delivered to KPMG
Nov 19	14:36	877 762-2667	1	770 933-8170	Orig # not UNE until 11/26/99. KPMG should not have expected a record for this call.	11/26	10	D order for UNE account eff 11/18 posted 11/18, N order for UEP eff 11/26 posted 11/26. This call was most likely processed during the timeframe when the account was not UNE. The usage would have been sent to CABS Billing system. Without the detail history in the Billing System, we cannot determine why the reference 10 record was sent.
Nov 18	14:56	800 284-4886	2	770 933-8526	Orig # not UNE until 11/26/99. KPMG should not have expected a record for this call.	11/26	3	D order for UNE account eff 11/18 posted 11/18, N order for UEP eff 11/26 posted 11/26. This call was most likely processed during the timeframe when the account was not UNE. The usage would have been sent to CABS Billing system, BellSouth would have billed the access. Currently there is no Re-guiding process between CABS and the UNE billing system. The usage sent in reference 3 would have been sent to BellSouth's Retail Usage system where it was re-guided, and sent to the BIBS (UNE) system where it was then sent to ODUF..
Nov 18	18:29	800 207-4512	1	912 741-6758	Could not find any record of call, and switch recording records were not available due to the age of the calls.	NA		N order for UNE eff 11/17 posted 11/18. This call was most likely processed during the timeframe when the account was not UNE. The usage would have been sent to CABS Billing system, BellSouth would have billed the access. Currently there is no Re-guiding process between CABS and the UNE billing system.

Date	Connect Time	To Number	Duration (minutes)	From Number	BellSouth Response	SED	Usage Reference	Updated BellSouth Response with our understanding of what should have happened to usage:
Nov 18	13:06	800 888-8000	1	912 746-7876	Could not find any record of call, and switch recording records were not available due to the age of the calls.	NA		Originating number is Resale. Term Number is BST customer. No ODUF or ADUF records would be passed to KPMG on this call.

Long Distance Calls

One hundred eighty-five completed long distance calls were found to have no corresponding DUF record.

Missing Long Distance DUF Records (Representative List)

Date	Connect	To	Duration	From	BellSouth Response	SED	Usage Reference	Updated BellSouth Response with our understanding of what should have happened to usage:
Nov 18	09:33	912 471-9199	1	404 633-5981	Could not find any record of call, and switch recording records were not available due to the age of the calls.	NA		D order for UNE account eff 11/17 posted 11/19, N order for UNE eff 11/17 posted 11/19. . Usage would have been sent to CABS Billing system since there was no UNE guide on date of call. BellSouth would have billed the access.
Nov 19	09:22	603 382-9705	1	706 236-9677	Could not find any record of call, and switch recording records were not available due to the age of the calls.	NA		D order for TNP account eff 11/17 posted 11/17, N order for UNE eff 11/17 posted 11/19. Usage would have been sent to CABS Billing system since there was no UNE guide on date of call. BellSouth would have billed the access.
Nov 19	09:21	603 382-9705	7	706 722-2879	Could not find any record of call, and switch recording records were not available due to the age of the calls.	NA		D order for UNE account eff 11/17 posted 11/19, N order for UNE eff 11/17 posted 11/19. This usage could have been processed during a timeframe when the first UNE account was disconnected, and the 2 nd UNE was not established. We feel the usage was not delivered due to timing. This usage would have been passed to CABS billing system. Currently there is no process to re-guide messages from the CABS system to the UNE system (BIBS).
Nov 19	15:07	415 863-8500	1	706 722-4087	Orig # not UNE until 11/26/99. KPMG should not have expected a record for this call.	11/26	5	D order for UNE account eff 11/18 posted 11/18, N order for UNE eff 11/26 posted 11/26. This usage could have been processed during a timeframe when the first UNE account was disconnected, and the 2 nd UNE was not established. We feel the usage was not delivered due to timing. This usage would have been passed to CABS billing system, and the access billed by BellSouth

Date	Connect	To	Duration	From	BellSouth Response	SED	Usage Reference	Updated BellSouth Response with our understanding of what should have happened to usage:
Nov 18	17:00	912 741-7059	3	706 722-4181	Orig # not UNE until 11/26/99. KPMG should not have expected a record for this call.	11/26	1	From number: D order for UNE account eff 11/18 posted 11/18, N order for UNE eff 11/26 posted 11/26. This usage could have been processed during a timeframe when the first UNE account was disconnected, and the 2 nd UNE was not established. This usage would have been passed to CABS billing system, and the access billed by BellSouth TO number: D order for UNE account eff 11/17 posted 11/19, N order for UNE eff 11/17 posted 11/19. This usage could have been processed during the timeframe when the account was not UNE. The usage would have been sent to CABS Billing system, and billed to a carrier. The usage sent in reference 1 could have been sent to BellSouth's Retail Usage system where it would have been sent out the ODUF process where the new N account was setup.
Nov 20	10:03	603 382-9705	1	706 722-4953	Could not find any record of call, and switch recording records were not available due to the age of the calls.	NA		D order for UNE account eff 11/17 posted 11/17, N order for UNE eff 11/17 posted 11/17... Without the detail history in the Billing System, we cannot determine why the call was not delivered to KPMG
Nov 18	15:45	770 933-8170	4	706 722-4955	Could not find any record of call, and switch recording records were not available due to the age of the calls.	NA		From Number: D order for UNE account eff 11/17 posted 11/17, N order for UNE eff 11/17 posted 11/17. Without the detail history in the Billing system, we cannot determine why the originating access record was not delivered to KPMG To Number: D order for UNE account eff 11/18, N order for UNE eff 11/26 posted 11/26. The Terminating Access record was most likely processed during the timeframe when the account was not UNE. This usage would have been sent to CABS billing system where BellSouth would have billed the carrier

Date	Connect	To	Duration	From	BellSouth Response	SED	Usage Reference	Updated BellSouth Response with our understanding of what should have happened to usage:
Nov 18	15:57	706 722-4181	3	770 933-8523	Orig # not UNE, Term # not UNE until 11/26/99. KPMG should not have expected a record for this call.	Not in File	6	<p>From Number: D order for UNE account eff 11/11 posted 11/16, N order for UNE eff 11/17 posted 03/03. The originating access record would have been sent to the CABS billing system, and the access billed to the carrier.</p> <p>To Number: D order for UNE account eff 11/18, posted 11/18, N order for UNE eff 11/26 posted 11/26. The Terminating Access record was most likely processed during the timeframe when the account was not UNE. This usage would have been sent to CABS billing system where BellSouth would have billed the carrier.</p> <p>The message in Usage Reference 6 was most likely sent to the Retail Billing system where it was re-guided and sent to the ODUF process. Currently there is no process to reguide message from the CABS system to the UNE system.</p>
Nov 20	10:26	912 741-6758	1	770 933-8526	Orig # not UNE until 11/26/99. KPMG should not have expected a record for this call.	11/26	12	<p>From Number: D order for UNE account eff 11/18 posted 11/18, N order for UNE eff 11/26 posted 11/26. The originating access record would have been sent to the CABS billing system, and the access billed to the carrier.</p> <p>To Number: N order for UNE eff 11/17 posted 11/18. The Terminating Access record was most likely processed during the timeframe when the account was not UNE. This usage would have been sent to CABS billing system where BellSouth would have billed the carrier.</p> <p>The message in Usage Reference 12 was most likely sent to the Retail Billing system where it was re-guided and sent to the ODUF process. Currently there is no process to reguide message from the CABS system to the UNE system.</p>

Date	Connect	To	Duration	From	BellSouth Response	SED	Usage Reference	Updated BellSouth Response with our understanding of what should have happened to usage:
Nov 20	10:02	404 633-5740	1	912 741-4774	Could not find any record of call, and switch recording records were not available due to the age of the calls.	NA		From Number: N order for UNE eff 11/17 posted 11/18. The originating access record would have been sent to the CARS billing system, and the access billed to the carrier. To Number: N order for UNE eff 10/15 posted 10/18. Without the detail history in the Billing System, we cannot determine why the Terminating Access record was not passed to KPMG.
Nov 20	09:46	404 633-5740	1	912 741-5953	Could not find any record of call, and switch recording records were not available due to the age of the calls.	NA		From Number: N order for UNE eff 11/17 posted 11/18. Without the detail history in the Billing System, we cannot determine why the originating access record may have not been sent to KPMG. To Number: N order for UNE eff 10/05 posted 10/18. Without the detail history in the Billing System, we cannot determine why the Terminating Access record was not passed to KPMG.

Additional BellSouth Response

BellSouth's responses to the individual occurrences have been incorporated into the tables.



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 30th day of March 2000.



David Frey

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April 5, 2000

RECEIVED

APR 05 2000

EXECUTIVE SECRETARY
G.P.S.C.

DELIVERED BY HAND

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

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

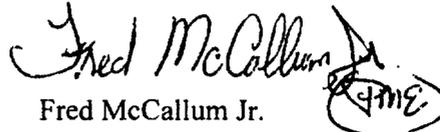
Dear Ms. O'Leary:

Enclosed please find an original and twenty-eight (28) copies, as well as an electronic copy, of BellSouth Telecommunications, Inc.'s Comments in Support of the Proposed Standards and Benchmarks for use in the Georgia OSS Evaluation filed by BellSouth Telecommunications, Inc. in the above-referenced docket.

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

Thank you for your assistance in this regard.

Very truly yours,


Fred McCallum Jr.

FJM:nvd
Enclosures

cc: Parties of Record

204335

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

RECEIVED

APR 05 2000

In re:)
)
Investigation Into Development of)
Electronic Interfaces for BellSouth's)
Operation Support Systems)

Docket No. 8354-U

EXECUTIVE SECRETARY
G.P.S.C.

BELLSOUTH TELECOMMUNICATIONS, INC.'S COMMENTS
IN SUPPORT OF PROPOSED STANDARDS AND BENCHMARKS
FOR USE IN THE GEORGIA OSS EVALUATION

INTRODUCTION

Pursuant to the March 22, 2000, KPMG Letter and the March 28, 2000, Letter from Leon Bowles to KPMG, BellSouth Telecommunications, Inc. ("BellSouth") hereby files its Comments in support of the proposed standards and benchmarks for use in the Georgia OSS Evaluation (hereinafter the "Proposed Standards"). While the following discussion is by no means comprehensive, BellSouth wanted to take this opportunity to highlight a limited number of the proposed standards and/or benchmarks and to demonstrate to the Commission why such proposed standards and/or benchmarks are appropriate for purposes of the third-party testing of BellSouth's OSS. BellSouth respectfully requests a further opportunity to comment in support of the proposed standards and/or benchmarks after the CLECs file their comments.

DISCUSSION

The Proposed Standards are based on direct retail analogs (where applicable); on surrogates for retail analogs where direct retail analogs do not exist; on existing practices and procedures; and on the manner in which BellSouth's Service Quality Measurements ("SQMs") are reported in Georgia pursuant to the Commission's Order in Docket No. 7892-U. Because of the sound basis upon which each of the Proposed Measures was

derived, each of the Proposed Standards will allow the Test Manager to fairly and objectively evaluate BellSouth's performance with respect to the CLEC community. It should be irrelevant whether the Proposed Standards are identical to those used by Bell Atlantic or Southwestern Bell; the Proposed Standards reflect conditions in BellSouth's region and BellSouth's systems and thus are appropriate to assess BellSouth's performance. In summary, the Commission should adopt the Proposed Standards because they will serve as an accurate and fair indicator of the performance BellSouth provides to its CLEC customers.

A. Pre-Ordering: OSS Response Interval

The proposed standard for the various measures dealing with OSS response intervals is parity with retail, with an adjustment where applicable. The adjustment, characterized as Parity plus X seconds, is necessary to quantitatively recognize the differences in architecture and security requirements between the systems used by BellSouth's retail units and the OSS systems used by the CLECs.

For example, the CLEC representative accesses one interface, either LENS or TAG, for pre-ordering information for both residence and business customers. The CLEC representative can request address information, reserve a telephone number, determine appointment availability, and access customer record information, among other things, through this one interface. The OSS then determine the information that is being requested by the CLEC and the legacy system from which that information can be obtained, and routes the CLEC's request to that system. If the CLEC requests customer information, the OSS will conduct a security evaluation to insure that the customer whose

information is being sought is a customer of BellSouth or another CLEC so as to prevent one CLEC from viewing information pertaining to the customer of another CLEC.

In the BellSouth retail situation, BellSouth's representatives also are subject to CPNI restrictions. In the case of BellSouth retail units, however, the BellSouth representative is signed on to a secure network where per-transaction security is not required as it is for the CLEC whose connection to BellSouth's systems is shared by all CLECs using that interface and whose identity must be confirmed at each transaction.

The result of these different security measures is a difference in OSS response times for BellSouth retail and the CLEC. The analog for OSS response times must reflect these differences to accurately assess BellSouth's performance. In the recent Bell Atlantic decision, the FCC and the New York Public Service Commission recognized these differences. Specifically, the FCC stated that "[g]iven the additional security measures and computer translations needed to process pre-order transactions from competing carriers, we find that the 'parity plus four seconds' standard is reasonable and appropriate measure of whether Bell Atlantic processes pre-order transactions for competing carriers in substantially the same time that it processes its own pre-order transactions." (Bell Atlantic Order, ¶ 146).

BellSouth proposes that KPMG conduct testing to determine the situations in which response pre-ordering response times require an adjustment to account for differences in the systems used by BellSouth's retail representatives and the OSS accessed by the CLECs. In the absence of such testing, BellSouth proposes that the standard for OSS response interval be Parity plus 4 seconds.

B. Ordering: Percent Rejected Service Request

In the Proposed Standards, Percent Rejected Service Request is identified appropriately as a “diagnostic” measure and thus no analogues or benchmarks are identified. The Percent Rejected Service Request measures the percentage of LSRs that are submitted by the CLEC with errors. In essence, it is a barometer of the CLEC’s ability to submit an error-free LSR. Consequently, the outcome of this measurement is beyond BellSouth’s control and should only be viewed as a diagnostic measure. Classifying this measure as a diagnostic makes even more sense in the context of the Third Party Test in that the test is expected to involve the submittal of a number of LSRs known to have errors.

C. Ordering: Firm Order Confirmation and Reject Interval

With respect to the Firm Order Confirmation Timeliness (Mechanized), the benchmark is 95% in less than 4 hours. For non-mechanized and partially mechanized orders, the FOC benchmark is 85% in less than 48 hours. These benchmarks are appropriate and should be adopted by the Commission. BellSouth should not be obligated to adopt a 24-hour FOC for manual orders.

These benchmarks are reasonable because BellSouth is able to return FOCs within 4 hours only for complete and correct, electronically-submitted LSRs for services designed to flow through the systems, i.e. totally mechanized services, unless otherwise stated in BellSouth’s Interval Guide. For complete and correct electronically-submitted LSRs *not* designed to flow through, BellSouth attempts to return FOCs within 48 hours (unless otherwise stated in the interval guide), not within 4 hours. A 24-hour FOC for manual orders is unreasonable because more time is required to handle manual LSRs. Under the 24-hour proposal, BellSouth would be required to return FOCs on manually

submitted LSRs in the same interval as it takes to return FOCs for certain electronically-submitted LSRs. For complete and manually submitted LSRs, the 48-hour interval for FOCs reasonably recognizes the work effort involved in manual processing.

Like the FOC benchmarks, the Reject Interval benchmarks recognize the differences between mechanized and non-mechanized and partially mechanized orders. For a mechanized order, the benchmark appropriately is set at 95% in less than 1 hour. For non-mechanized and partially mechanized orders, however, which require more time to process, the reject interval benchmark is 85% in less than 48 hours.

D. Provisioning and/or Maintenance: Product Disaggregation

1. Level of Product Disaggregation

With respect to the level of product disaggregation, the Proposed Standards include an analogue for each product for which BellSouth produces monthly results for the Commission. These products include Resale Residence, Resale Business, Resale Design, UNE Non-Design, UNE-Design and Local Interconnection Trunks. In compliance with the Commission's Order, BellSouth has been reporting its SQMs at this level of disaggregation since late 1998. This level of product disaggregation is consistent with the level of disaggregation ordered by the Commission in Docket No. 7892-U and thus is sufficient and appropriate for purposes of Third Party Testing. In the future, BellSouth plans to report results for the UNE Loop and Port Combination in addition to the products currently being reported.

Recently, the Florida Commission ordered BellSouth to disaggregate at a different level than ordered by the Georgia Commission for purposes of the Florida OSS testing. The Florida Commission's order, however, is not relevant to Georgia's Third Party Test.

Georgia's OSS test should be based on the Commission's decision in Docket 7892-U and the monthly reports filed with the Commission. To alter the level of disaggregation utilized in Georgia over the past two years at this point would be nonsensical. The current level of product disaggregation is more than sufficient to assess whether BellSouth is providing non-discriminatory access to CLECs.

2, Analogues and Benchmarks

With respect to analogues and benchmarks, the Proposed Standards set forth, for each of the measures listed above, a standard that is either a direct analogue or a surrogate analogue. A direct analogue is used in situations in which the provisioning and maintenance processes for CLEC and BellSouth retail are nearly identical. For example, the proposed analogue for Resale Residence Dispatch is Retail Residence Dispatch. Similarly, for Resale Residence Non-Dispatch, the proposed analogue is Retail Residence Non-Dispatch. For Resale Business Dispatch, the proposed analogue is Retail Residence Dispatch, and for Resale Business Non-Dispatch, the proposed analogue is Retail Business Non-Dispatch. Finally, the proposed analogue for Resale Design, Dispatch and Non-Dispatch, is Retail Design, Dispatch and Non-Dispatch. These direct analogues should be non-controversial.

The surrogate analogue applies in situations in which there are differences in the provisioning and/or maintenance processes between BellSouth retail and the CLEC that make a direct comparison difficult. For example, the Proposed Standards provide that the surrogate analogue for UNE Non-Design be an average of Retail Residence and Retail Business – Dispatch only. The reason for this is simple – in nearly all situations, physical work is required to provision a UNE Non-Design circuit. By contrast, when a BellSouth

residential or business customer requests service from BellSouth, generally the provisioning required is software based and can be accomplished without physical work. For example, in a typical month, 77% of BellSouth's retail orders require no physical work while only 23% require physical work.

While it is true that some UNE provisioning is classified as "non-dispatched," this classification does not mean that no physical work is required to provision the order. In those non-dispatch situations, the central office technician still must locate wiring points and complete the necessary central office wiring. Thus, while the technician is not actually "dispatched" to the actual work site, there is still physical work involved in provisioning the order which differentiates the order from the majority of BellSouth retail orders.

Integrated Digital Loop Carrier (IDLC) presents another complicating factor for UNEs that does not exist for BellSouth retail services. IDLC is a technology that integrates the BellSouth loop with the central office switching equipment in a BellSouth digital switch. When the retail customer is acquired by the CLEC and the CLEC chooses to serve the customer via a BellSouth UNE loop, IDLC cannot be used because the service is to be terminated in the CLEC's switch. The customer's line facility must be changed to either copper wire or to a Universal Digital Loop Carrier (UDLC). Unlike IDLC, the UDLC system is not integrated with the switching equipment. At a minimum, this change requires work at the field and at the central office end of the circuit. However, many instances, cable or carrier construction is required since idle copper wire or UDLC facilities are typically not available at locations served by IDLC. This is an

important issue because a significant amount of BellSouth retail customers are served by IDLC.

For these reasons, it is not an accurate to compare a UNE LSR with a mixture of BellSouth retail orders (dispatch and non-dispatch) when the majority require no physical work.

E. Provisioning: Average Jeopardy Notice Interval (Mechanized)

In the case of the Average Jeopardy Notice Interval (Mechanized), BellSouth has proposed a benchmark of 95% in less than or equal to 24 hours. BellSouth has, however, limited this benchmark to mechanized orders. Again, the reason for this limitation is simple and appropriate. What the Average Jeopardy Notice Interval measures is how far in advance of the due date BellSouth tells the CLEC that BellSouth might not meet the order due date. This notification is a proactive notification provided to BellSouth to aid the CLEC in dealing with its end user. The key point with respect to this notification is that BellSouth does *not* provide such proactive notification to its retail units. Thus, while both BellSouth retail and the CLECs can access order status notification information to check on the status of an end user's order, only the CLEC receives proactive notification that a due date might not be met. Thus, the CLEC is receiving superior service. This superior service is too costly to provide for non-mechanized orders. Thus, BellSouth limits the notification, and consequently the measurement, to mechanized orders.

With respect to the 24 hour benchmark, experience has shown that 24 hours is a fair and reasonable time frame for mechanized orders for BellSouth to provide the CLECs with a notification that BellSouth does not provide to its own retail units.

For non-mechanized orders, the provision of jeopardy notices is not a benchmark issue. BellSouth does not provide these notices to its retail units and such notices, therefore, are appropriately not part of the Third Party Test. Simply, BellSouth does not provide these notices and does not collect data for these notices, and thus there is no applicable benchmark.

F. Provisioning: Average Completion Notice Interval (Mechanized)

As is the case with Average Jeopardy Interval (Mechanized), BellSouth limits its measurement of Average Completion Notice Interval to mechanized orders as well. Like the jeopardy notification, BellSouth does not provide its retail units with an order completion notice. Thus, the notification provided to the CLEC constitutes superior service to that CLEC that is too costly to provide for non-mechanized orders. Because the completion notice is something above and beyond what BellSouth provides for its own retail units, it should not be obligated to provide it in situations in which it is excessively costly such as non-mechanized orders.

With respect to the analogue, because BellSouth does not provide completion notices to its retail units, it does not have a direct retail analogue for this measurement. However, BellSouth was able to derive such an analogue by recording the interval between the time the order is completed until the SOCS history file is updated. This interval is the closest and most relevant measure of comparison and should be adopted by the Commission.

For non-mechanized orders, like with jeopardy notices, there is no benchmark because no completion notices are provided and no data is collected. BellSouth does not provide these notices to its retail units and such notices, therefore, are appropriately not

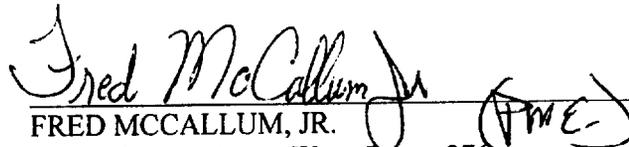
part of the Third Party Test. Simply, BellSouth does not provide these notices and does not collect data for these notices for non-mechanized orders, and thus there is no applicable benchmark.

G. Maintenance and Repair: OSS Interface Availability

The KPMG Proposed Standards currently provide an analogue of Parity with Retail for OSS Interface Availability for Maintenance and Repair. This interval is the result of a typographical error on the part of BellSouth. The Proposed Standard for OSS Interface Availability for Maintenance and Repair should be a Benchmark of 99.5%.

This 5th day of April, 2000.

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CERTIFICATE OF SERVICE

Docket No. 8354-U

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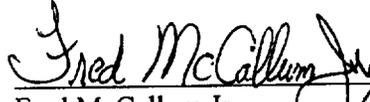
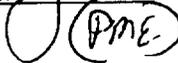
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