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RECEIVED

APR - 7 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

April 7, 2000

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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 two documents that KPMG filed recently with the Georgia Public Service in connection with KPMG's execution of the Georgia Third-Party Testing Plan for BellSouth's Operation Support Systems, or OSS and a third document filed by BellSouth in that same proceeding.

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 7, 2000

WRITTEN EX PARTE

Ms. Claudia Fox  
Policy and Program Planning Division  
Common Carrier Bureau  
Room 5-C235  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> 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 two documents that KPMG filed 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. The first document contains KPMG's Exceptions 31, 32, and 33 and BellSouth's Response to each. The second document sets forth BellSouth's Amended Response to KPMG's Exception 28. KPMG filed both these documents with the Georgia Commission on March 30, 2000. The third document is a copy of BellSouth Telecommunications, Inc.'s Comments in Support of the Proposed Standards and Benchmarks for Use in the Georgia OSS Evaluation, which BellSouth filed with the Georgia Commission on April 5, 2000. 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 docketed 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 docketed.

Sincerely,



 Kathleen B. Levitz

Attachments

cc: William Agee  
Jake Jennings





## EXCEPTION 31

BellSouth Georgia OSS Testing Evaluation

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Date: March 19, 2000

### EXCEPTION REPORT

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

**Exception:**

**BellSouth's electronic ordering systems (TAG and EDI) do not adequately support CLEC requests for Directory Listings associated with UNE loop customers.**

**Background:** BellSouth's ordering documentation indicates that all data elements associated with the Directory Listing (DL) form on Loop Service (LS) requests (REQ TYPE A) are "Not Applicable".<sup>1</sup> While DL requests associated with other service delivery types (e.g., UNE Port, UNE Loop-Port Combination) can be accommodated on the original service request, DL requests in association with UNE Loop orders are not accepted on the actual Loop transaction.

KPMG's BellSouth Customer Support Manager (CSM) informed the ordering team that two separate service requests are required for related LS and DL orders. These two service requests are:

1. Loop Service Request - REQ TYPE A
2. Directory Listing Request - REQ TYPE J

KPMG's CSM further indicated that in order to coordinate the service establishment dates, these two transactions should be linked utilizing the Related Purchase Order Number (RPON) data element on the service request. According to KPMG's CSM, all transactions submitted using the RPON functionality automatically fall out for manual handling.

**Directory Listing for UNE Loop Customers:** The existing BellSouth requirements for ordering LS and DL present a number of deficiencies:

- The LS with DL ordering process is not documented.
- Two separate transactions are required.
- The related transactions result in a more complicated error resolution process. When one transaction within the RPON'd order set (the LS or DL request) is clarified back to the CLEC, the related transaction is subsequently sent back as well, requiring the CLEC to submit 2 supplements.

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<sup>1</sup> BellSouth's *Local Exchange Ordering (LEO) Guide, Volume 1, Issue 7N, January 2000, Section 7.*



**EXCEPTION 31**  
BellSouth Georgia OSS Testing Evaluation

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- Use of the RPON field means the LS request will not flow through<sup>2</sup>.

**Impact**

BellSouth's ordering process for Loop Service with Directory Listing service requests may impact a CLEC in the following ways:

**Increase in operating costs.** The amount of CLEC coordination required to generate multiple transactions for one customer, monitor responses on both transactions, and send supplements on both transactions adds a significant amount of time and cost to the CLEC ordering process.

**Decrease in customer satisfaction.** Delays associated with handling multiple purchase orders for one customer, coupled with potential delays caused by the orders' non-flow through status, will result in overall slower service delivery for a CLEC's end users. Slow service will decrease CLEC customer satisfaction.

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<sup>2</sup> BellSouth represented to KPMG that UNE Loops with DL are flow-through transactions. However, during testing, KPMG discovered that UNE Loop with DL orders are not flow-through.



March 27, 2000

## EXCEPTION REPORT

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

Exception:

**BellSouth's electronic ordering systems (TAG and EDI) do not adequately support CLEC requests for Directory Listings associated with UNE loop customers.**

**Background:** BellSouth's ordering documentation indicates that all data elements associated with the Directory Listing (DL) form on Loop Service (LS) requests (REQ TYPE A) are "Not Applicable".<sup>1</sup> While DL requests associated with other service delivery types (e.g., UNE Port, UNE Loop-Port Combination) can be accommodated on the original service request, DL requests in association with UNE Loop orders are not accepted on the actual Loop transaction.

KPMG's BellSouth Customer Support Manager (CSM) informed the ordering team that two separate service requests are required for related LS and DL orders. These two service requests are:

1. Loop Service Request - REQ TYPE A
2. Directory Listing Request - REQ TYPE J

KPMG's CSM further indicated that in order to coordinate the service establishment dates, these two transactions should be linked utilizing the Related Purchase Order Number (RPON) data element on the service request. According to KPMG's CSM, all transactions submitted using the RPON functionality automatically fall out for manual handling.

**Directory Listing for UNE Loop Customers:** The existing BellSouth requirements for ordering LS and DL present a number of deficiencies:

- The LS with DL ordering process is not documented.
- Two separate transactions are required.
- The related transactions result in a more complicated error resolution process. When one transaction within the RPON'd order set (the LS or DL request) is clarified back to the CLEC, the related transaction is subsequently sent back as well, requiring the CLEC to submit 2 supplements.

---

<sup>1</sup> BellSouth's *Local Exchange Ordering (LEO) Guide, Volume 1, Issue 7N, January 2000, Section 7.*

- Use of the RPON field means the LS request will not flow through<sup>2</sup>.

### **Impact**

BellSouth's ordering process for Loop Service with Directory Listing service requests may impact a CLEC in the following ways:

**Increase in operating costs.** The amount of CLEC coordination required to generate multiple transactions for one customer, monitor responses on both transactions, and send supplements on both transactions adds a significant amount of time and cost to the CLEC ordering process.

**Decrease in customer satisfaction.** Delays associated with handling multiple purchase orders for one customer, coupled with potential delays caused by the orders' non-flow through status, will result in overall slower service delivery for a CLEC's end users. Slow service will decrease CLEC customer satisfaction.

### **BellSouth Response**

Loop service is identified by a circuit number not a telephone number. Therefore, circuit numbers are used to provision and identify customer service records (CSRs) for Loop service. UNE Port (REQTYP F) and UNE Port-Loop Combination (REQTYP M) services are telephone number identified. BellSouth lists only dialable telephone numbers in the directory, not circuit numbers.

Section 2.6 of the LEO-IG, Volume 1, Issue 70, which was posted March 20, 2000, provides a table that illustrates the ordering requirements for provisioning different types of service requests. The table clearly indicates only fields associated with LSR, EU and Loop forms are applicable for REQTYP A – Loop Service Requests.

If CLECs want to associate the loop and directory listing LSRs, they can do so by populating the RPON field. CLECs are not required to use the RPON field or request BellSouth to coordinate Loop and Directory Listing requests. CLECs may simply request the same due date on the Loop and Directory Listing LSRs submitted to BellSouth.

If this functionality is desired, it would need to be submitted through the normal change control process where it would be evaluated and considered for development.

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<sup>2</sup> BellSouth represented to KPMG that UNE Loops with DL are flow-through transactions. However, during testing, KPMG discovered that UNE Loop with DL orders are not flow-through.



**EXCEPTION 32**  
BellSouth Georgia OSS Testing Evaluation

Date: February 16, 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 delivered Firm Order Confirmations (FOCs) on transactions after issuing Clarifications (CLR).**

According to BellSouth ordering documentation, a CLR is delivered to a CLEC when BellSouth receives a service order containing an error<sup>1</sup>.

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

As of February 16, KPMG identified eight transactions that received an FOC after receiving a CLR for the same transaction

**Firm Order Confirmations delivered after receipt of Clarifications**

FOC	VER	EC	CLR	FOC
329A212PTI100003	00	9992	12/17/99	12/20/99
415A213PTM000001	00	9991	12/09/99	12/09/99
625A214PTJ100001	05	9991	12/10/99	12/22/99
403A223PTM100003	00	9994	02/10/00	02/10/00
626A224PTJ100002	04	9991	12/13/99	12/13/99
402E223PTM000002	03	9994	01/18/00	01/18/00
441C214PEM000001	00	9991	01/14/00	01/18/00
417X223PTM000002	01	9991	01/14/00	01/14/00

**Impact**

By generating a second response on a transaction, BellSouth could cause significant disruption to the CLEC ordering process. For example, a CLEC is likely to submit a Supplement following receipt of a CLR on an initial transaction. Receipt of an FOC on the initial transaction subsequent to submission of a Supplement would introduce

<sup>1</sup> Local Exchange Ordering (LEO) Guide Volume 1, Issue 7N, January 2000, Section 2.4.

<sup>2</sup> According to the LEO Guide, Section 2.4: "Requests for service cannot be processed until a complete and accurate LSR has been received."



**EXCEPTION 32**  
BellSouth Georgia OSS Testing Evaluation

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confusion into the order management process. The effort required to investigate the reason for the FOC on a transaction that already received a prior response would add additional time and cost to the CLEC's ordering process.



March 16, 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 delivered Firm Order Confirmations (FOCs) on transactions after issuing Clarifications (CLR).**

According to BellSouth ordering documentation, a CLR is delivered to a CLEC when BellSouth receives a service order containing an error<sup>1</sup>.

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

As of February 16, KPMG identified eight transactions that received an FOC after receiving a CLR for the same transaction

#### Firm Order Confirmations delivered after receipt of Clarifications

Transaction ID	Order Type	Order Number	CLR Date	FOC Date	Description
329A212PTI100003	00	9992	12/17/99	12/20/99	Agree, PON clarified for invalid ACTL. The individual Service Rep was covered when the incident occurred.
415A213PTM000001	00	9991	12/09/99	12/09/99	Agree, PON clarified in error. LCSC service reps covered on 2/01/00 on proper procedures for processing suspend/restore requests.
625A214PTJ100001	05	9991	12/10/99	12/22/99	Agree, PON clarified in error. LCSC service reps covered 1/3/00 on proper procedures on hunting sequences.
403A223PTM100003	00	9994	02/10/00	02/10/00	Disagree, PON clarified for Bill Information being different from Q account. Through conversations, the correct process for changing billing info was furnished. The LCSC agreed not to continue to clarify if this was the only error on the LSR and agreed to process the clarified PON.

<sup>1</sup> Local Exchange Ordering (LEO) Guide Volume 1, Issue 7N, January 2000, Section 2.4.

<sup>2</sup> According to the LEO Guide, Section 2.4: "Requests for service cannot be processed until a complete and accurate LSR has been received."

626A224PTJ100002	04	9991	12/13/99	12/13/99	Disagree, PON clarified 12/13/99 for incorrect USOCs and on 12/29/99 automatically cancelled by the system. An FOC was never sent by BellSouth.
402E223PTM000002	03	9994	01/18/00	01/18/00	Agree, PON clarified in error and was subsequently cancelled by the system. An FOC was never sent by BellSouth.
441C214PEM000001	00	9991	01/14/00	01/18/00	Agree, PON clarified in error. LCSC service rep: covered on 2/01/00 on proper procedures for processing suspend/restore requests.
417X223PTM000002	01	9991	01/14/00	01/14/00	Disagree, PON clarified for incorrect cable and pair.

### Impact

By generating a second response on a transaction, BellSouth could cause significant disruption to the CLEC ordering process. For example, a CLEC is likely to submit a Supplement following receipt of a CLR on an initial transaction. Receipt of an FOC on the initial transaction subsequent to submission of a Supplement would introduce confusion into the order management process. The effort required to investigate the reason for the FOC on a transaction that already received a prior response would add additional time and cost to the CLEC's.

### Additional BellSouth Response

See above table for responses to specific PONs. BellSouth agrees that 5 of the 8 transactions were clarified in error which resulted in FOCs being sent after clarifications. BellSouth Service reps were retrained on the specific issues on the indicated dates. BellSouth disagrees with 3 of the identified instances.



## EXCEPTION 33

BellSouth Georgia OSS Testing Evaluation

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Date: March 14, 2000

### EXCEPTION REPORT

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

#### Exception:

**BellSouth's *Local Exchange Ordering Guide - Volume 1, Version N (LEO Guide)* does not define data element requirements and valid entries for loop service requests.**

KPMG has identified a documentation defect associated with BellSouth's *LEO Guide*. The documentation does not adequately define rules for correctly populating the Billing Account Number (BI1, BAN1, BI2, BAN2) fields for SL1 and SL2 loop orders. Additionally, the stated requirements for the LOCBAN data element for loop migrations are incorrect.

Specific issues include the following:

1. **The *LEO Guide* does not discuss circumstances under which more than one BAN is required for an order type.** Bills for a particular account cannot be accurately generated if all applicable BANs are not included in cases where more than one is required. In some cases, service orders may even fail if all applicable BANs are not included. BAN requirements vary by order requisition and activity type. The *LEO Guide* does not mention any circumstances requiring more than one BAN for a particular order type.
2. **The *LEO Guide* does not state the BAN sequence when more than one BAN is to be used.** BellSouth's order validation process depends on the BAN sequence in cases where more than one BAN is required. If the sequence is not correct, in some cases a service order may receive an error.
3. **The *LEO Guide* does not state that a Carrier Access Billing System (CABS) account number should be used with an SL2 loop order, or that a Miscellaneous Account Number (MAN) should be used with an SL1 loop order.** BellSouth LCSC informed KPMG that an SL2 loop order should include a CABS account number, and that an SL1 loop order should include a MAN. If SL1 and SL2 loop orders are not submitted with the correct account numbers, a service order will receive an error. However, the *LEO Guide* does not state this fact.



### EXCEPTION 33

#### BellSouth Georgia OSS Testing Evaluation

4. The *LEO Guide* does not clearly define requirements for all Activity Types for the **LOCBAN data element**. The existing **LOCBAN** rules apply for new loop installations, but appear to create errors on loop migration orders<sup>1</sup>.

The following table details new loop installation requests for which KPMG received Firm Order Completions (FOCs) on orders populated according to the business rules documented in the *LEO Guide*.

PON	VERSION	CC	Order Type	Loop Type	LOCBAN	Result
301A212PEH100006	03	9994	AB/A	SL1	404M382906906	FOC
303A222PEH101001	03	9994	AB/A	SL2	706N250047047	FOC

The following table details loop migration requests for which KPMG received errors on orders populated according to the business rules in the *LEO Guide*.

PON	Version	CC	Order Type	Loop Type	LOCBAN	Result
305A122PTH103001	00	9994	AB/V	SL1	912U305160160	ERROR
307A222PTH100014	02	9994	AB/V	SL2	706N250047047	ERROR

KPMG referred these errors to BellSouth. BellSouth advised KPMG that for loop migrations, the **LOCBAN** must be populated with a dialable TN (customer's original account number). This information conflicts with the information in the *LEO Guide*.

Following BellSouth's advice, KPMG submitted loop migration orders with dialable TNs. The following table details loop migrations (ACT TYPE V) for which KPMG received FOCs by populating the **LOCBAN** data field with a dialable TN.

PON	Version	CC	Order Type	Loop Type	LOCBAN	Result
305A112PTH100001	18	9994	AB/V	SL1	9127501013831	FOC
311F212PEH100002	00	9994	AB/V	SL2	7068285950025	FOC

#### Impact:

The absence of clearly defined data element requirements and valid entries for loop service requests will impact CLECs in the following ways:

<sup>1</sup> BellSouth *Local Exchange Ordering Guide, Volume 1, Issue 7N, Section 5.5.3.1 (LOCBAN data element)*. Note 1: (REQ TYPE = A) - For Designed Loops the **LOCBAN** must be the ACCESS miscellaneous account. Note 2: (REQ TYPE = A) - For Designed Loops the **BANI** must be the same as the ACCESS miscellaneous account **LOCBAN**. Note 3: (REQ TYPE = A) - For non-designed loops the **LOCBAN** must be a CRIS miscellaneous number.



## EXCEPTION 33

### BellSouth Georgia OSS Testing Evaluation

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**Increased operating costs.** A lack of clear business rules may result in errors on CLEC loop migration orders. As a result, CLECs will be required to utilize additional resources to investigate these errors and to re-submit these service requests.

**Decreased customer satisfaction.** Errors on loop migration service requests may result in a CLEC experiencing delays in providing service to their customers. Additionally, if service is provided with incorrect billing information, CLECs will receive incorrect bills that will be passed along to end-users. Service delays and incorrect bills will lower CLEC customer satisfaction.



March 23, 2000

## EXCEPTION REPORT

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

### Exception:

**BellSouth's *Local Exchange Ordering Guide - Volume 1, Version N (LEO Guide)* does not define data element requirements and valid entries for loop service requests.**

KPMG has identified a documentation defect associated with BellSouth's *LEO Guide*. The documentation does not adequately define rules for correctly populating the Billing Account Number (BI1, BAN1, BI2, BAN2) fields for SL1 and SL2 loop orders. Additionally, the stated requirements for the LOCBAN data element for loop migrations are incorrect.

Specific issues include the following:

1. **The *LEO Guide* does not discuss circumstances under which more than one BAN is required for an order type.** Bills for a particular account cannot be accurately generated if all applicable BANs are not included in cases where more than one is required. In some cases, service orders may even fail if all applicable BANs are not included. BAN requirements vary by order requisition and activity type. The *LEO Guide* does not mention any circumstances requiring more than one BAN for a particular order type.
2. **The *LEO Guide* does not state the BAN sequence when more than one BAN is to be used.** BellSouth's order validation process depends on the BAN sequence in cases where more than one BAN is required. If the sequence is not correct, in some cases a service order may receive an error.
3. **The *LEO Guide* does not state that a Carrier Access Billing System (CABS) account number should be used with an SL2 loop order, or that a Miscellaneous Account Number (MAN) should be used with an SL1 loop order.** BellSouth LCSC informed KPMG that an SL2 loop order should include a CABS account number, and that an SL1 loop order should include a MAN. If SL1 and SL2 loop orders are not submitted with the correct account numbers, a service order will receive an error. However, the *LEO Guide* does not state this fact.

4. The *LEO Guide* does not clearly define requirements for all Activity Types for the LOCBAN data element. The existing LOCBAN rules apply for new loop installations, but appear to create errors on loop migration orders<sup>1</sup>.

The following table details new loop installation requests for which KPMG received Firm Order Completions (FOCs) on orders populated according to the business rules documented in the *LEO Guide*.

PON	VERSION	CC	Order Type	Loop Type	LOCBAN	Result
301A212PEH100006	03	9994	AB/A	SL1	404M382906906	FOC
303A222PEH101001	03	9994	AB/A	SL2	706N250047047	FOC

The following table details loop migration requests for which KPMG received errors on orders populated according to the business rules in the *LEO Guide*.

PON	Version	CC	Order Type	Loop Type	LOCBAN	Result
305A122PTH103001	00	9994	AB/V	SL1	912U305160160	ERROR
307A222PTH100014	02	9994	AB/V	SL2	706N250047047	ERROR

KPMG referred these errors to BellSouth. BellSouth advised KPMG that for loop migrations, the LOCBAN must be populated with a dialable TN (customer's original account number). This information conflicts with the information in the *LEO Guide*.

Following BellSouth's advice, KPMG submitted loop migration orders with dialable TNs. The following table details loop migrations (ACT TYPE V) for which KPMG received FOCs by populating the LOCBAN data field with a dialable TN.

PON	Version	CC	Order Type	Loop Type	LOCBAN	Result
305A112PTH100001	18	9994	AB/V	SL1	9127501013831	FOC
311F212PEH100002	00	9994	AB/V	SL2	7068285950025	FOC

**Impact:**

The absence of clearly defined data element requirements and valid entries for loop service requests will impact CLECs in the following ways:

<sup>1</sup> BellSouth *Local Exchange Ordering Guide, Volume 1, Issue 7N, Section 5.5.3.1 (LOCBAN data element)*.  
 Note 1: (REQ TYPE = A) - For Designed Loops the LOCBAN must be the ACCESS miscellaneous account. Note 2: (REQ TYPE = A) - For Designed Loops the BAN1 must be the same as the ACCESS miscellaneous account LOCBAN. Note 3: (REQ TYPE = A) - For non-designed loops the LOCBAN must be a CRIS miscellaneous number.

**Increased operating costs.** A lack of clear business rules may result in errors on CLEC loop migration orders. As a result, CLECs will be required to utilize additional resources to investigate these errors and to re-submit these service requests.

**Decreased customer satisfaction.** Errors on loop migration service requests may result in a CLEC experiencing delays in providing service to their customers. Additionally, if service is provided with incorrect billing information, CLECs will receive incorrect bills that will be passed along to end-users. Service delays and incorrect bills will lower CLEC.

### **BellSouth Response**

The LEO IG does not discuss circumstances under which more than one BAN is required for an order type.

BST will elaborate on the usage of the multiple BANs when requesting service. This expansion of the existing usage notes will be captured in an update of the LEO-IG, Volume 1 on April 7, 2000.

The LEO Guide does not state the BAN sequence when more than one BAN is to be used.

BST will elaborate on the sequence of the multiple BANs when requesting service. This expansion of the existing usage notes will be captured in an update of the LEO-IG, Volume 1 on April 7, 2000.

The LEO Guide does not state that a Carrier Access Billing System (CABS) account number should be used with an SL2 loop order; or that a Miscellaneous Account Number (MAN) should be used with an SL1 loop order.

Usage notes in the LOCBAN field were enhanced to communicate that the CABS account number must be populated in the LOCBAN field for SL2 loops and a CRIS miscellaneous account number must be populated in the LOCBAN field for SL1 loops. These enhancements were made in the LEO-IG, Volume 1, Issue 70 that was posted 3/20/00.

The LEO Guide does not clearly define requirements for all Activity Types for the LOCBAN data element.

Pre-existing notes on the LOCBAN field were enhanced to specify ACT types relevant to "new install". Additionally, a note was added to reflect: REQ TYP A, ACT V, the LOCBAN must be the 10 digit dialable telephone number being converted. These enhancements were made in the LEO-IG, Volume 1, Issue 70 that was posted 3/20/00.

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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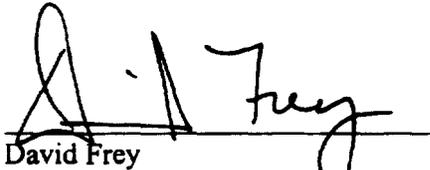
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This 30<sup>th</sup> day of March 2000.



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March 16, 2000

## **EXCEPTION REPORT**

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

### **Exception:**

**BellSouth failed to deliver 46% of expected DUF records to KPMG.**

KPMG completed 1,017<sup>1</sup> test calls during the ODUF/ADUF Functional Usage Evaluation. BellSouth failed to deliver DUF records for forty-six percent of the test calls for which records were expected. Representative occurrences of calls with no corresponding DUF record are detailed in the tables shown below. The list include numerous call types including Calling Card Calls, Information Provider (900) Calls, Local Calls, Directory Assistance Calls, WATS Calls, Long Distance Calls, and Operator Services Calls.

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<sup>1</sup> 1017 test calls were made resulting in an expectation that 846 calls would have corresponding DUF records. 171 of the test calls made were not billable.

**Calling Card Calls**

Thirteen completed Calling Card calls were found to have no corresponding DUF record.

***Missing Completed Calling Card DUF Records (Representative List)***

<b>Date</b>	<b>Connect Time</b>	<b>To Number</b>	<b>Duration (minutes)</b>	<b>From Number</b>	<b>BellSouth Response</b>	<b>SED</b>	<b>Usage Reference<sup>2</sup></b>	<b>Updated BellSouth Response with our understanding of what should have happened to usage:</b>
Nov 20	10:35	734 214-0024	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. This call would have been on ADUF.	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	16:28	912 927-1626	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. This call would have been on ADUF.	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	16:29	914 763-3670	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. This call would have been on ADUF.	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 18	16:25	914 763-3670	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. This call would have been on ADUF.	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. Currently there is no process to re-guide messages from the CABS system to the UNE system (BIBS).

<sup>2</sup> Refer to the DUF records in the Usage Found Table (end of document) for usage examples on these TNs.

Date	Connect Time	To Number	Duration (minutes)	From Number	BellSouth Response	SED	Usage Reference <sup>2</sup>	Updated BellSouth Response with our understanding of what should have happened to usage:
Nov 18	16:31	770 419-4300	2	706 722-2879	Could not find any record of call, and switch recording records were not available due to the age of the calls. This call would have been on ADUF.	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 <sup>nd</sup> 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 18	16:27	423 755-4880	18	706 722-6207	Not UNE until 11/19/99. No UNE record should have been expected by KPMG. This call would have been on ADUF.	11/19	1	D order for UNE account eff 11/18 posted 11/18, N order for UNE eff 11/19 posted 11/22. 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 and billed by BellSouth. 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 when the new N account was setup (reguide).
Nov 20	13:53	603 382-9705	1	770 933-8170	Org # Not UNE until 11/26/99. No UNE record should have been expected by KPMG. This call would have been on ADUF.	11/26	2	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. The usage sent in reference 2 would have been sent to BellSouth's Retail Usage system. Without the detail history in the Billing System, we cannot determine why the reference 2 record was sent.
Nov 18	14:26	703 525-3367	1	770 933-8526 Not UNE until 11/26/99	Could not find any record of call, and switch recording records were not available due to the age of the calls. This call would have been on ADUF.	NA		D order for UNE 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.

Date	Connect Time	To Number	Duration (minutes)	From Number	BellSouth Response	SED	Usage Reference <sup>2</sup>	Updated BellSouth Response with our understanding of what should have happened to usage:
Nov 20	10:26	941 454-0643	15	912 741-6728	Could not find any record of call, and switch recording records were not available due to the age of the calls. This call would have been on ADUF.	NA		D order for UNE account eff 11/16 posted 11/17, N order for UNE eff 11/16 posted 11/17. Without the detail history in the Billing System, we cannot determine why the call was not delivered to KPMG
Nov 18	18:16	770 719-3611	3	912 741-7059	Could not find any record of call, and switch recording records were not available due to the age of the calls. This call would have been on ADUF.	NA		D order for UNE 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 18	13:23	770 413-9398	1	912 746-7876 Org or Term Not UNE (Org is Resale	Could not find any record of call, and switch recording records were not available due to the age of the calls. This call would have been on ADUF.	NA		Originating number is Resale. Term Number is BST customer. No ODUF or ADUF records would be passed to KPMG on this call.

### Information Provider Calls

Eight completed Information Provider calls were found to have no corresponding ADUF record.

#### *Missing Information Provider DUF Records (All Included)*

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 20	10:40	900 786-6600	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	15:36	900 860-0030	21	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	15:26	900 656-5000	23	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 20	09:15	900 484-7000	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

<b>Date</b>	<b>Connect Time</b>	<b>To Number</b>	<b>Duration (minutes)</b>	<b>From Number</b>	<b>BellSouth Response</b>	<b>SED</b>	<b>Usage Reference</b>	<b>Updated BellSouth Response with our understanding of what should have happened to usage:</b>
Nov 20	13:19	900 680-4400	8	770 933-8170	Org # Not UNE until 11/26/99 KPMG should not have expected a record for this call.	11/26	2	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, and BellSouth would have billed the access. The usage sent in reference 2 would have been sent to BellSouth's Retail Usage system. Without the detail history in the Billing System, we cannot determine why the reference 2 record was sent.
Nov 20	13:18	900 407-1600	2	770 933-8170	Org # Not UNE until 11/26/99. KPMG should not have expected a record for this call	11/26	2	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. The usage sent in reference 2 would have been sent to BellSouth's Retail Usage system. Without the detail history in the Billing System, we cannot determine why the reference 2 record was sent.
Nov 18	15:25	900 407-1600	1	770 933-8526	Org # 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.

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	18:25	900 656-5000	21	912 741-7059	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 posted 11/17, N order for UNE eff 11/18 posted 11/19. 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, and BellSouth would have billed the access.

### Local Calls

Sixty-eight completed Local calls were found to have no corresponding DUF record.

#### **Missing Local Call DUF Records (Representative List)**

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 19	15:14	404 633-5251	2	404 633-3674	Orig # Not UNE until 11/26/99. KPMG should not have expected a DUF 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 call was not delivered to KPMG
Nov 20	10:44	404 633-5740	1	404 633-5809	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 not delivered to KPMG
Nov 20	09:38	706 236-9492	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 UNE account eff 11/17 posted 11/17, N order for UNE eff 11/17 posted 11/19. Without the detail history in the Billing System, we cannot determine why this call was not delivered to KPMG

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	10:30	706 722-4955	2	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 11/17, N order for UNE eff 11/17 posted 11/19. Usage should have 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.
Nov 19	10:34	706 722-2879	4	706 722-4087	Orig # not UNE until 11/26/99. KPMG should not have expected a DUF 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. Usage should have erred as a 6M (message dated after disconnect) error code. Without the detail history in the Billing System, we cannot determine why Usage Reference 5 call was delivered to KPMG
Nov 18	10:25	706 722-4181	1	706 722-6207	Orig # not UNE until 11/19/99. KPMG should not have expected a DUF record for this call.	11/19	1	D order for UNE account eff 11/18 posted 11/18, N order for UNE eff 11/19 posted 11/22. This call was most likely processed during the timeframe when the account was not UNE (after the D order). Usage should have erred as a 6M (message dated after disconnect) error code. 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 when the new N account was setup (reguide).
Nov 20	10:08	770 933-8526	1	770 933-8523	SO NDN65 in PCX Status, not posted as of 2/21/00. This call is treated as a non-UNE call since the service order is not posted.	Not in File	6	D order for UNE account eff 11/11 posted 11/17, N order for UNE eff 11/17 posted 03/03. This call was most likely processed during the timeframe when the account was not UNE (after the D order). Usage should have erred as a 6M (message dated after disconnect) error code. The usage sent in reference 6 should not have been sent based on the above dates. Without the detail history in the Billing System, we cannot determine why Usage Reference 6 call was delivered to KPMG