

**Massachusetts Bell Atlantic OSS Test Observations
Status Summary by Observation Number as of 08/25/00**

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
108	A KPMG LSOG 4, resale, stand-alone directory listing service order was routed by Bell Atlantic to the wholesale department.	Closed	Discussion Complete	<p>06/29/00: Issued.</p> <p>07/07/00: BA agreed. In its response, BA referred to the Business Rules and clarified that the 'REQTYP' field on the LSR form should be populated with "DB" and the 'Activity' field with "J". The Observation remains deferred for further consideration of this response.</p> <p>07/13/00: BA explained that LSR form should be populated with "EB" for 'REQTYP' and not "DB" as stated on 07/07/00. KPMG has retested this Issue and was able to confirm that BA's statement is correct. This Observation can be closed.</p>	MA Observation report 108.doc
109	Call records were missing from the Daily Usage Feed (DUF) files received from Bell Atlantic.	Closed	Discussion Complete	<p>06/30/00: Issued.</p> <p>07/07/00: BA agreed. This Observation remains deferred.</p> <p>07/14/00: BA explained the reason for the missing call records being the following: Eleven call records could not be found (ref # 2,3,6,9-13,18,21&22). For five call records, according to BA, no call event for date and time has been specified. The Call duration time was "0" (ref # 1,16,17,19,20). These calls would not be billable and, therefore, no records have been sent. For six call records, the Order activity was on the account (ref # 4,5,7,8,15,23). These accounts were switched from retail to resale/UNE. Calls were placed on due date of order, and before the toll guide was updated. Finally, one Valuflex call (ref # 14) that is owned by BA had no record sent. KPMG accepts BA's explanation regarding all Items. This Observation can be closed.</p>	MA Observation report 109.doc

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ID	Brief Description	Status	Status Reason	Notes	Additional Documents
110	KPMG observed that the process for ordering xDSL migrations in the BA-North Order Business Rules v 4.3.1 is incorrect.	Closed	Discussion Complete	<p>07/07/00: Issued.</p> <p>07/14/00: BA stated that when the first character of the REQTYP is 'A', the ACT field cannot be populated with 'V'.</p> <p>07/17/00: KPMG agreed to BA's response. However, in the instance referenced in the Observation report, the ACT field was populated with "C". And when using an LNA of "C" on the LS form according to Business Rules, KPMG received an error message. It appears that the Business Rules are incorrect for loop orders when the first character of the REQTYP = "A" in an upgrade from POTS to xDSL service. Currently, a character of "C" is not prohibited on the LNA field of the LS form when upgrading a POTS line to xDSL. KPMG stated that there was a typographical error in the listed PON. The corrected Observation report has been issued. This Observation remains deferred for further discussion.</p> <p>07/18/00: BA explained that an upgrade of this nature is not supported by BA today. A CLEC would have to request a 'disconnect' first, and then a new. There is no specific documentation that states this process.</p> <p>07/21/00: BA announced that a CLEC notification will go out regarding this Observation.</p> <p>07/25/00: BA released an Informational Message via Change Control to the CLEC community titled "Loop Regrade Ordering Policy". KPMG is assessing the information. The status of this Observation remains deferred.</p> <p>07/26/00: KPMG agrees that the "Loop Regrade Ordering Policy" as presented in the Informational Message via Change Control to the CLEC community delivers a satisfactory solution to this Observation. The Observation can be closed.</p>	MA Observation report 110.doc

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ID	Brief Description	Status	Status Reason	Notes	Additional Documents
111	KPMG observed that flow through orders have been processed inconsistently.	Closed	Discussion Complete	<p>07/10/00: Issued.</p> <p>07/14/00: BA stated that the PON's noted on this Observation received an internal system error message due to an unavailable backend system. BA further explained that the in the Observation listed LSR's went Level 4, as all service orders associated with those were mechanically generated. TISOC intervention was only required to allow the system to send the LSC. BA concluded that instances of this nature are captured in BA's Achieved Flow Through Metric. This Observation remains deferred for consideration of BA's response.</p> <p>07/18/00: KPMG agrees to BA's response. This Observation can be closed.</p>	MA Observation report 111.doc
112	The BA Pre-Order Business Rules version 2.8.1 states that the Service Address State/Province (SAST) Field is conditional on a Address Validate Inquiry/ Direct TN Selection Inquiry (ADR). KPMG observed, however, that this field is required.	Closed	Discussion Complete	<p>07/12/00: Issued.</p> <p>07/14/00: BA agreed. The Business Rules are not in line with the actual practice. Flash CR# 1516 addresses this Observation. This Observation remains deferred for further analysis of the Flash.</p> <p>07/21/00: KPMG has received Flash CR# 1516 and acknowledged the announced change of the SAST Field from 'conditional' to 'required' with the next release of the Pre-Order Business Rules. This Observation can be closed. The change could not be verified.</p>	MA Observation report 112.doc
113	Two DS1 circuits were found to be out of service due to Bell Atlantic wiring transpositions between the MUX and the RJ48 jack (Demarcation Point).	Closed	Discussion Complete	<p>07/12/00: Issued.</p> <p>07/14/00: BA stated that further clarification of this Observation is needed. The status of this Observation remains deferred.</p> <p>07/17/00: This problem is a result of human error in wiring transposition. Therefore, this Observation can be closed.</p>	MA Observation report 113.doc

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ID	Brief Description	Status	Status Reason	Notes	Additional Documents
114	KPMG observed four DS1 circuits installed with an incorrect Demarcation Labeling based on BA's Methods & Procedures.	Closed	Discussion Complete	<p>07/12/00: Issued.</p> <p>07/14/00: BA suspects that the Demarcation of the listed DS1 circuits has been mislabeled. This Observation remains deferred for further investigation.</p> <p>07/17/00: BA's assessment could be confirmed by KPMG. This Observation can be closed.</p>	MA Observation report 114.doc
115	KPMG has received misleading error messages when submitting orders as described by the Bell Atlantic North Order Business Rules, Version 4.3.1.	Closed	Discussion Completed	<p>07/19/00: Issued.</p> <p>07/20/00: Addendum for clarification of both Issues released. As a result, the original Observation has been closed.</p> <p>07/24/00: BA asked KPMG to supply the inbound EDI request and the EDI response from BA for the PON's referenced in Issues 1 and 2.</p> <p>07/25/00: KPMG provided BA with two PON numbers and the related version of the LSR's. BA is still analyzing this Observation. This Observation remains deferred.</p> <p>7/28/00: BA disagreed and explained that in both cases (Issue 115.1 and 115.2), the BA generated error messages were due to KPMG incorrectly constructing EDI inputs. These inputs, when read by BA, generated the messages based on what the order actually contained, which was not what KPMG intended or states above.</p> <p>Issue 115.1 BA explained that KPMG submitted an order with incorrect EDI structure. The fifth PO1 Loop did not properly identify the loop as a Level 1 indent. (The level is missing from the SLN 5 data- see BA Order EDI LSOG Specification Document Example 3.5, DSCR depiction). BA then correctly mapped the SI TI C3 data to the Header Telephone Number. This generates the error message above correctly.</p> <p>Issue 115.2 BA explained that KPMG incorrectly identified POC 1 as a Port Service Form ("SS") instead of identifying it as a Hunting segment (HNT). This caused BA to map the data to a Port Service Form, and since no Telephone Number (for a Port Service form) is present in this segment, the correct error message was generated. BA error messages were correct for the transactions as</p>	MA Observation report 115.doc

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ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				<p>submitted. 7/28/00: KPMG has considered BA's explanation regarding both Issues and agrees. This Observation can be closed.</p>	
116	<p>KPMG noticed that in several cases Local Service Billing Completion (LSBCM) responses received from BA-MA did not contain the required fields 'Service Order Identifier' (SOID) and 'Service Order Billing Telephone Number' (SOBTN).</p>	Closed	Discussion Completed	<p>07/28/00: Issued. 08/03/00: Further analysis showed that the SOID and SOBTN fields are not in the Business Rules version 4.1.1 and, therefore, should not have been included in the analysis of the orders referenced in this Observation that were sent prior to the 4.3.1 release (June 17th). Orders sent after June 17th have the SOID and SOBTN fields. This Observation can be closed.</p>	MA Observation report 116.doc
117	<p>KPMG observed that in several cases, the Due Date (DD) on the Local Response received from BA-MA contained a date that did not match the Desired Due Date (DDD) sent to BA-MA on the Local Service Request.</p>	Closed	Discussion Completed	<p>07/31/00: Issued. 08/01/00: BA explained that it understands the importance of being consistent with the Desired Due Date requested by the CLEC and the Due Date assigned by BA-MA. Further, BA stated that in two of the three the cases mentioned in this Observation, BA methods were followed as described in document 2000-0015. The document states that "if the CLEC requests a short interval BA may assign the correct interval and then confirm the new Due Date back to the CLEC on the LSC". This occurred for PON #037011ZM0X000001 and #058012ZM0X010001 (on this PON the rep over calculated the date by 1 day, therefore, a 13 day interval was assigned instead of the proper 12 day interval). On the third PON #025012ZM0X000004, the Due Date was changed due to rep error. BA concluded that the 6/27/00 requested Due Date should have been used. The Observation remains deferred for further consideration of BA's response. 8/18/00: BA has provided KPMG with a second response</p>	MA Observation report 117.doc

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ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				addressing each of the 29 PONs in question. KPMG has assessed BA's response and raised this Observation to MA Exception #16. Therefore, this Observation can be closed.	
118	KPMG observed that BA-MA is unable to perform CLEC to CLEC loop migrations in both LSOG 2 and LSOG 4.	Closed	Discussion Completed	<p>08/01/00: Issued.</p> <p>08/07/00: BA disagreed. BA explained that complex migrations of unbundled elements and resale and platform services are an industry wide set of issues that still requires industry definition, consensus, and validation before BA can reasonably produce all the "rules" for all these transactions. Further, BA stated that it currently provides rules for transaction such as Platform to Platform migrations, migrations from Resale to Platform and Resale to Loop/Loop w/LNP. BA believes industry agreement permits such transactions. According to BA's response activities such as Loop to Loop migrations contain unresolved industry issues, such as: "Does an order from a New Service provider give the Network Service Provider (BA) the authority to remove the loop from the old Local Service Provider's inventory without separate express permission from the that Provider?" BA pointed out that these issues are being discussed with the Wholesale Community in several forums, including BA Change Control hosted Workshops, the current OBF working committee, and under a NY PSC proceeding. Finally, BA argued that until the industry resolves and concurs on these issues, BA could only handle such requests on a case by case basis with full cooperation of both the new and old Local Service Provider. This Observation remains deferred for consideration of BA's response.</p> <p>8/18/00: KPMG has considered BA's response and has come to the conclusion that this Observation can be closed.</p>	MA Observation report 118.doc

Massachusetts Bell Atlantic OSS Test Observations
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November 2, 1999

OBSERVATION REPORT #1

Issue

A problem has been identified as a result of the initial review of Maintenance and Repair (M&R) metrics reports. In July, the metric “Percent out of Service > 24 hours – Total” was reported as 61.27%. In fact, that figure is the percent out of service < 24 hours. In this case, the calculations performed by the M&R technical programmer were correct, but the information was incorrectly reported. In addition, for the metric “Percent No Access”, the M&R technical programmer computed 8.31%, but 12.26% was reported by mistake, a result of a transcription error.

In addition, several minor differences existed between KPMG’s initial calculations and the reported metrics for July. KPMG believes that these will be resolved, with the assistance of BA technical programmers.

Assessment

This issue may be a concern for the following reason:

- In the Maintenance and Repair domain, Bell Atlantic manually transcribes figures from an internal report onto their metrics reports. This resulted in the July error, related to percent out of service, described above. KPMG does not know whether the same manual transcription occurs in other domains, with respect to reporting metrics. This manual transcription could lead to future errors of unpredictable magnitude.

November 15, 1999

OBSERVATION REPORT #2

The mapping for PIC and LPIC is confusing and appears to be incorrect.

Issue #2.1

In the BA North Pre-Order Documentation v 2.5.1 (LSOG 3 & Issue 9) on page 223, Feature/Service Availability (Response), the mapping for PIC is confusing and appears to be incorrect. The qualifying data element of N101=P9 is correct for PIC according to the ANSI X12 standards, but the EDI sample states "N1*8V**41*PIC". This is repeated in the Pre-Order EDI Guide v 2.5 on page 5-9.

Assessment

Incorrect PIC mapping in Bell Atlantic specifications would result in processing errors for CLECs using EDI for pre-order.

Issue #2.2

The mapping for LPIC appears to be incorrect in the Bell Atlantic North Pre-Order Documentation v 2.5.1 (p. 225). Specifically, KPMG believes that the qualifying data element of N901=82 appears to be incorrect. It should state 'N101=8V' for LPIC according to the ANSI X12 standards. The EDI sample appears to correctly state "N1*8V**41*LPIC".

Assessment

Incorrect LPIC mapping in Bell Atlantic specifications would result in processing errors for CLECs using EDI for pre-order.

November 15, 1999

OBSERVATION REPORT #3

KPMG observed misleading and missing references, misplaced documentation and unclear commands in the BA North Order Business Rules v 1.7.

Issue #3.1

- In the BA North Order Business Rules v 1.7 on page 2-144 there is documentation for a SEM. In the notes and conditions for ERR, it says to refer to the Pre-Order error messages. The document found on the TIS website is called "Pre-Order, Order and Trouble Administration Error Messages".
- There is no mapping for any of these data elements and no reference to the SEM transaction in the Bell Atlantic North Order v 1.7 EDI Guide.

Assessment

- The reference to the "Pre-Order error messages" might be misleading.
- More importantly, without an EDI map for the SEM transaction, CLECs will not be able to read the SEM.

Issue #3.2

There is documentation about a Multi line text for an Address Validation Direct TN Selection Response (ADA) transaction in the BA North Order Business Rules v 1.7 on page 2-92. This documentation appears to be a misplaced page from BA Pre-Order Business Rules v 2.5.1.

Assessment

Although included in the BA North Order Business Rules, this documentation appears to be a BA Pre-Order response form segment.

Issue #3.3

On the LSNP form, the conditions for the SVGTYP and the CFA fields are dependent on each other. The SVGTYP field (p. 2-66) is required when the CFA field is populated and the LNA field equals "V." The CFA field is required when the LNA field is "C" or "V" and the SVGTYP field is "M." The SVGTYP field may not be populated unless the CFA field (p. 2-67) is populated. Similarly, the CFA field may not be populated unless the SVGTYP field is populated (specifically with "M").

Assessment

The interdependency of SVGTYP and CFA makes it confusing to write an order.

11/17/99

OBSERVATION REPORT #4

KPMG observed a discrepancy between the North Order EDI Guide v 1.7 and the North Order Business Rules v 1.7 specifications.

Issue #4

The North Order EDI Guide v 1.7 contains mapping for an N1 loop (N1*78*CCNA*41*CIC) in the LSR form on page 116. According to this N1 loop, the CCNA field must be populated in order for an N1 loop to be created.

In contrast, the CCNA field is not a required field in the North Order Business Rules v 1.7 (p. 2-74). Consequently, it is not populated for all orders.

The North Order Business Rules, however, also state that the INITNO field cannot be populated unless an N1 loop has been created.

Assessment

If the CCNA field is not populated, an order will fail in translation, because the required initiator telephone number field is missing.

11/19/99

OBSERVATION REPORT #5

KPMG observed inconsistencies between EDI specifications and EDI examples in the North Order EDI Guide v 1.7

Issue #5.1

The detailed explanation of the EDI specifications for the TCMULT field on page 192 example in North Order EDI Guide v 1.7 differs from the example of the TCMULT field on page 184. On page 192, an ORI tag is placed immediately before the TCMULT value (N9*H5*ORI*TCMULT) for the TCMULT data field. In contrast, there is there is no ORI tag (N9*H5*TCMULT) in the example on page 184.

Issue #5.2

The detailed explanation of the EDI specifications for the OA data field on page 185 in the North Order EDI Guide v 1.7 and the example of the OA data field on page 184 differ. On page 184, the OA data field mapping specification is N9*H5*OROA*PS. In the detailed specification, however, there is no reference to an N903 mapping of 'PS' for the OA data field.

Assessment

Due to the inconsistency between EDI specifications and EDI examples in the North Order EDI Guide v 1.7, orders might be created incorrectly and, as a result, not flow through.

OBSERVATION REPORT #9

KPMG observed a discrepancy between the BA North Order EDI Guide v 1.7 and the BA North Order Business Rules v 1.7

Issue 9.1

In the PS form on page 2-104 of the BA North Order Business Rules v 1.7, the LNA field is “prohibited when the ACT field on the LSR form = “W” or “X”.

The BA North Order EDI Guide v 1.7 states on pages 144 and 145, that if the LNA field is not populated, the second SI segment (elements 01, 02, 03, 04 and 05) cannot be created.

However, according to the Business Rules, the element 05 (TNTER) is a required field.

This is an issue because if the LNA field is blank, TNTER cannot be created in the EDI. When creating an order where the LNA needs to be blank, a required field (TNTER) is not created because in EDI if the LNA is left blank the SITI line is not created. Since the SITI 05 is not created a required field, the error message reads “required field not populated.”

Assessment

The discrepancy between the BA North Order EDI Guide v 1.7 and the BA North Order Business Rules v 1.7 results in the creation of an incorrect order that will fail.

January 4, 2000

OBSERVATION REPORT #11

KPMG observed an inconsistency between the BA North Order Business Rules v 1.7 and operating procedures.

Issue

The field "site contact for access" on the Resale Service End-User Information form is optional according to the North Order Business Rules v 1.7. KPMG has not been able to place new ISDN resale orders without providing an entry in this field.

Assessment

It appears that new ISDN resale orders cannot be completed without providing a field stated as being optional in the North Order Business Rules v 1.7.

January 11, 2000

OBSERVATION REPORT #13

KPMG observed that the process regarding xDSL migration scenarios in the BA-North Order Business Rules v 1.7 is insufficient.

Issue

The LS form in the BA North Order Business Rules v 1.7 does not prohibit xDSL migration orders. However, KPMG has been unable to place migrate “as is,” migrate “as is, with changes,” or migrate “as specified” orders for xDSL.

Bell Atlantic’s current process for the migration of an xDSL line is to disconnect the existing line and have the CLEC qualify and create a new line.

Assessment

As a result of the method that Bell Atlantic uses to migrate xDSL lines, i.e. BA disconnects a line and the CLEC establishes a new line, customers could temporarily lose service. Additionally, order processing time increases substantially.

January 24, 2000

OBSERVATION REPORT #15

KPMG experienced a discrepancy regarding the timeliness of Bell Atlantic's bill delivery.

Issue 15.1

KPMG's understanding of Bell Atlantic's delivery process for paper bills is that the CLEC should receive a bill within 10 business days of the bill date. This was communicated to KPMG by BA personnel in an interview in November 1999. Also refer to *BA's Compliance Filing – NY State Carrier to Carrier Guidelines for Performance Standards and Reports* (Metric #BI-2, dated November 15, 1999) for documentation of this metric.

Given this standard, KPMG received three bills significantly beyond this timeliness metric:

Bill Type	Bill Number	Bill Date	Postmark	KPMG Receipt Date
Abbreviated	508 Q05-1035 135	11/30/99	1/5/00	1/10/00
Administrative	508 Q10-0068 068	12/4/99	1/5/00	1/10/00
Abbreviated	508 Q05-0136 136	12/18/99	1/15/00	1/24/00

It appears that BA had incorrect billing addresses for these bills, despite several requests by KPMG since 10/29/99 asking BA to correct the addresses. The table above outlines when KPMG received those bills.

Issue 15.2

KPMG's understanding of Bell Atlantic's delivery process for bills via NDM or CD ROM is that the CLEC should receive a bill within 10 business days of the bill date. Please refer to *BA's Compliance Filing – NY State Carrier to Carrier Guidelines for Performance Standards and Reports* (Metric #BI-2, dated November 15, 1999) for documentation of this metric.

The following table outlines bills KPMG expected to receive via NDM but has not yet received:

Bill Type	Bill Number	Bill Date	Bill Media
Resale Sub-Account	508 Q05-0136 136	12/15/99	NDM
Y40	617 Y40-0013 156	12/6/99	NDM

The following table outlines bills KPMG received via NDM, but were sent later than as prescribed in the timeliness standard:

Bill Type	Bill Number	Bill Date	Date Sent by BA
Y40	413 Y40-0014 104	12/6/99	1/14/00
M40	617 M40-0021 673	12/4/99	1/14/00

With regard to bills sent on CD ROM, KPMG has not yet received the following expected resale bill:

Bill Type	Bill Number	Bill Date	Expected Arrival Date
Resale Sub-Account	508 Q05-0135 135	12/31/99	1/19/00

Assessment

If CLECs do not receive their bills in a timely manner, they will be unable to bill end user accounts in a timely manner.

February 8, 2000

OBSERVATION REPORT #19

The information provided in the CLEC Handbook regarding publishing the Standard Quality Baseline Validation Test Deck on the web-site is incorrect.

Issue

In section 4.5.1 [3rd paragraph] of the CLEC Handbook – Volume II (September 1999 release), it is stated that Bell Atlantic North has posted a standard Quality Baseline Validation Test Deck of preorder and order transactions on its web site, under “miscellaneous.” Following these directions only leads to the Bell Atlantic-New York Quality Baseline Validation Test Deck. The Bell Atlantic-Massachusetts Quality Baseline Validation Test Deck information does not appear under the “miscellaneous” section (http://www.bellatlantic.com/wholesale/html/cd_supp_document.htm#misc).

The Bell Atlantic-Massachusetts Quality Baseline Validation Test Deck was distributed to the CLECs via the Bell Atlantic Change Control electronic mail distribution (01/10/2000, 10:53 PM) and was not published on the website under “miscellaneous” per procedure as described in the CLEC Handbook.

Assessment

This information and procedures that have been stated in the CLEC Handbook are inconsistent with actual practice and can mislead a CLEC or delay a CLEC’s ability to conduct business.

February 15, 2000

OBSERVATION REPORT #21

KPMG has identified the hours of operation for the Bell Atlantic System Support Help Desk as published in the CLEC/Resale Handbook to be incorrect.

Issue

The hours of operation for the Bell Atlantic System Support Help Desk as identified to KPMG by Bell Atlantic through interviews are:

Monday to Friday 6:00 AM to 9:00 PM
Saturday and Sunday 7:00 AM to 5:00 PM

However, in the CLEC/Resale Handbook, September 1999 Release, Volume II, Section 5.3 - Help Desk and Assistance Information, under the heading "Bell Atlantic System Support Help Desk Supporting Bell Atlantic North and Bell Atlantic South" the stated hours of operation are:

"Please contact the Bell Atlantic System Support Help Desk supporting Bell Atlantic North and Bell Atlantic South at 888-433-4357, Monday through Friday, 6:00 a.m. to 8:00 p.m. and Saturday through Sunday 7:00 a.m. to 5:00 p.m."¹

Assessment

The hours of operation for Monday to Friday are incorrectly published. This discrepancy provides erroneous information and may delay a CLEC's ability to contact the Bell Atlantic System Support Help Desk for timely assistance.

¹ CLEC/Resale Handbook Series, September 1999 Release, Volume II,
http://www.bellatlantic.com/wholesale/html/handbooks/clec_resale/volume_2/cr2s5_3.htm.

February 15, 2000

OBSERVATION REPORT #25

The information provided in the CLEC Handbook regarding publishing the 'specific test scenarios' on the website is incorrect.

Issue

In section 4.5.1 [4th paragraph] of the CLEC Handbook – Volume II (September 1999 release), it is stated that Bell Atlantic North will develop “specific test scenarios” for the functionality of the new release, other than the scenarios published in the standard Quality Baseline Validation Test Deck. These additional specific test scenarios were supposed to be posted on the Bell Atlantic web site two weeks prior to the CLEC testing and they were supposed to be run in the CLEC Test Environment (CTE) along with the standard Quality Baseline Validation Test Deck. It has also been stated that the results of these specific test scenarios would be published along with those of the Quality Baseline Validation Test Deck.

For the current Bell Atlantic-Massachusetts LSOG 4 release testing, KPMG has observed that Bell Atlantic-Massachusetts has not posted these specific test scenarios on the web site, which is contrary to the documented procedures. The CLECs have not been informed of the existence of any of these specific test scenarios that were supposed to be run in the CTE along with the standard Quality Baseline Validation Test Deck. Furthermore, assuming the existence of specific test transactions, the test results for those have not been made available to the CLECs.

Assessment

This information and procedures that have been stated in the CLEC Handbook are inconsistent with actual practice. This inconsistency may lead the CLEC to perform incomplete testing of the release and may delay the CLEC's ability to conduct business.

February 22, 2000

OBSERVATION REPORT #26

KPMG is receiving duplicate usage records.

Issue

Since KPMG CLEC is being charged on a per-record-transmitted basis, the receipt of duplicate usage records, via NDM, causes KPMG to incur extra charges.

The table below lists sample duplicate data received by KPMG.

#	BADUFMA.U5114C.19991222.94754141100002a000
1	<p>1001019912161041356483050001041373351310000000000000000100557000000022000 01000031000070003000007000010004132410094135648305 MA N9 00000000010000000051140000</p> <p>1001019912161041356483050001041373351310000000000000000100557000000022000 01000031000070003000007000010004132410094135648305 MA N9 00000000010000000051140000</p>
2	<p>1001019912161041356483050001041373351310000000000000000113103000000022000 01000031000070003000007000010004132410094135648305 MA N9 00000000010000000051140000</p> <p>1001019912161041356483050001041373351310000000000000000113103000000022000 01000031000070003000007000010004132410094135648305 MA N9 00000000010000000051140000</p>
3	<p>100101991217107812637003000107812351610000000000000000100815000000022000 01000031000070003000007000010005080050017812637003 MA NN 00000000010000000051140000</p> <p>100101991217107812637003000107812351610000000000000000100815000000022000 01000031000070003000007000010005080050017812637003 MA NN 00000000010000000051140000</p>

Assessment

The receipt of duplicate usage records causes a CLEC to incur extra charges for records it cannot process. A CLEC would be required to have a duplicate check process in place to avoid passing on invalid charges to the CLEC's customers.

February 29, 2000

OBSERVATION REPORT #33

KPMG observed that certain resale bill data records for “Other Charges and Credits” are not in line with the CABS Billing Output Specifications.

Issue

The CABS Billing Output Specifications (BOS-BDT), Vol. 3A – 10-30-XX- Page 34, SR 1873, Issue 6, April 1999 state that “where current charges exist, Total Other Charges and Credits” on 10-05-13 and 10-30-90 data records should be equal. A 10-30-90 record illustrates information about the “Other Charges and Credits Total.” A 10-05-13 record illustrates “Details of Current Charges” appearing on the bill.

As shown in the table below, the charges for “Other Charges and Credits” on the 10-30-90 resale bill data record on bill number 508 Q05-0136 136 from 1/15/00 do not match the charges on the 10-05-13 record. The information on “Other Charges and Credits” on the 10-30-90 data record is missing.

Bill Number	Data Record	Other Charges and Credits
508 Q05-0136 136	10-30-90	-
	10-05-13	\$171.36

Assessment

If resale bill data records are not equal or missing, CLECs cannot validate that they are charged the correct amount for “Other Charges and Credits” on a bill.

February 29, 2000

OBSERVATION REPORT #34

The CSR information for one of KPMG's resale bills is incomplete.

Issue

KPMG's resale bill for the 1/15/00 bill period (Bill No. 508 Q05-0136 136) is missing several Customer Service Records, specifically with respect to sub-account information that should appear on this bill. The missing records include, but are not be limited to:

- A. **40-15-05-00**
Contains the telephone number associated with a sub-account.
- B. **40-15-10-00**
Contains USOC names that indicate the monthly recurring charges associated with a sub-account.
- C. **40-15-20-01**
Contains information on the rates/charges related to a particular USOC.

Several sub-accounts should appear on this bill; consequently, KPMG would expect to see numerous 40-15-05-00, 40-15-10-00, and 40-15-20-01 records with the bill.

In contrast, the 01/15/00 resale bill contains only one 40-15-05-00 record, two 40-15-10-00 records¹ and no 40-15-20-01 records. In addition, KPMG was charged \$260.86 in monthly charges, validating that KPMG is being charged for sub-accounts on the bill.

Assessment

Incomplete Customer Service Records inhibit the ability of CLECs to validate that the correct sub-accounts appear on their bills. Secondly, CLECs cannot validate that they are charged the correct monthly recurring rates for those accounts.

¹ The 40-15-05-00 record that does appear illustrates the summary bill number and not a sub-account telephone number. The 40-15-10-00 records that appear show the USOC of "MBR".

February 29, 2000

OBSERVATION REPORT #36

KPMG is receiving rated records (010101) for calls made from KPMG-owned Resale lines.

Issue

The table below lists 010101 records received by KPMG. The 'From Numbers' in these calls are a part of the KPMG test bed. The 'Bill To Numbers' are either Resale or UNE-P telephone numbers. These records should be un-rated records (100101).

ID	Create Date	Category	From Number	To Number	Initiation	Bill To Number	Filename
1672	12/16/99	010131	4135648302	4135648305	100105	4135648305	BADUFMA.R51 15C.19991221.7 3006141100002a 000
1676	12/16/99	010131	7812929672	7814557559	114929	7812929643	BADUFMA.R51 15C.19991221.7 3006141100002a 000
1697	12/14/99	010131	4135648302	4135648314	102523	4135648314	BADUFMA.R51 15C.19991217.4 4854122219991a 000
1701	12/15/99	010131	7812929642	7812929643	094817	7812929643	BADUFMA.R51 15C.19991217.4 4854122219991a 000

The tables below lists the raw DUF records that correspond to the entries listed above.

ID	BADUFMA.R5115C.19991221.73006141100002a000
1672	010131991216104135648302000104135648305000152200000000100105000012822000 09000734000060004000007104010004132410094135648305WESTFIELD MAWESTFIELD MAN9600000000010000000051150000
1676	010131991216107812929672000107814557559000170000000000114929000204622000 01000132000060104000007104010005080050017812929643NEEDHAM MANEEDHAM MANN6000000000010000000051150000

ID	BADUFMA.R5115C.19991221.73006141100002a000
1697	010131991214104135648302000104135648314000152600000000102523000017022000 09000734000060004000007104010004132410094135648314WESTFIELD MAWESTFIELD MAN9600000000010000000051150000
1701	010131991215107812929642000107812929643000164000000000094817000119622000 01000134000060104000007104010005080050017812929643NEEDHAM MANEEDHAM MANN6000000000010000000051150000

Assessment

A CLEC should not receive rated records for telephone calls made from its own telephone lines. A CLEC would be required to re-rate these records to accurately bill its end-users.