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Joan Marsh
Director
Federal Government Affairs

Suite 1000
1120 20th Street NW
Washington DC 20036
202 457 3120
FAX 202 457 3110

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March 13, 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW, Room TWB-204
Washington, DC 20554

RECEIVED

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Notice of Oral Ex Parte
Second Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and
BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana,
CC Docket No. 98-121

Dear Ms. Salas:

On March 13, 2000, David Eppsteiner, Sharon Norris, Jay Bradbury and the undersigned, all representing AT&T, met with Jessica Rosenworcel, Ben Childers, Bill Dever and Daniel Shiman of the Commission's Common Carrier Bureau. The purpose of the meeting was to provide an update and status on a number of Section 271-related issues and proceedings in the State of Georgia. AT&T's comments at the meeting were largely focused on issues related to: (1) the Georgia Third Party Test; (2) data integrity; (3) the change management process being used by BellSouth in the State of Georgia; and (4) operational problems with BellSouth's OSS. The substance of AT&T's comments was consistent with the attached documents and analyses, which were distributed at the meeting.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to be "JM".

No. of Copies rec'd 012
DATE

cc: Jessica Rosenworcel
Ben Childers
Bill Dever
Daniel Shiman

1. **THIRD PARTY TEST**

Structural Issues

Implementation Issues

2. **CHANGE MANAGEMENT**

Appropriate Intervals

Defect correction

Implementation of CLEC-prioritized requests

BellSouth's lack of adherence to the process

Need for regulatory oversight

3. **PRE-ORDERING AND ORDERING PROCESSES**

Status notice issues

Customer Service Record Issues

BellSouth errors

Lack of system stability

Deficient ordering capabilities

4. **PROVISIONING PROCESS**

Hot Cut Timeliness

Hot Cut Procedures

Handling missed appointments

Number porting issues

Access to multi-tenant buildings

Erroneous disconnects of end-user's service

5. **POST PROVISIONING ISSUES**

Reassignment of CLEC Assigned Numbers

Caller ID Issues

Dropped Directory Listings

Need for appropriate order completion

6. **PERFORMANCE MEASURES ISSUES**

Data integrity

Performance measurement deficiencies

Remedy plan deficiencies

7. **OTHER INTERCONNECTION ISSUES**

Point of interconnection

8. **CUSTOMIZED ROUTING OF OS/DA CALLS**

Line Class Code (LCC) solution Issues

Originating Line Number Service (OLNS) solution Issues

9. **DSL**

Line-splitting

Key Open Dockets Listing – Georgia

| Docket | Issue | Status | Key Parties |
|---------|--|---|--|
| 6863-U | <p>271: BellSouth Telecommunications, Inc., Entry Into InterLATA Services Pursuant to Section 271 of the Telecommunications Act of 1996</p> | <p>In response to BellSouth's Notice of Intent and Motion to file a 271 application filed May 27, 1998, the staff (on October 15, 1998) issued a Report and Opinion regarding an expected filing for interLATA authority by BellSouth. That report found that BellSouth had not met several of the 14 points of the 271 competitive checklist. Shortly thereafter, the FCC issued its Decision on BellSouth's Second Section 271 application for Louisiana. November 13, 1998, BellSouth filed its comments as requested from the Staff's Report and Opinion. This was later supplemented on November 23, 1998. BellSouth filed further supplements on December 21, 1998 to address concerns raised by the Commission Staff's Report and Opinion, with respect to the FCC decision in the Second Louisiana Decision. The last PSC activity in this docket was 2/18/99 when the PSC requested comments addressing the impact of the Supreme Court's decision in <u>AT&T Corporation v. Iowa Utilities Board</u> on the Section 271 Proceeding in Georgia and BellSouth's compliance with the FCC's Second Louisiana Decision. There has been no substantive activity in this docket since that time.</p> | <p>AT&T espire Intermedia LCI Sprint WorldCom</p> |
| 7061-U | <p>UNE Cost Dockets: Review of Cost Studies, Methodologies, and Cost-Based Rates for Interconnection and Unbundling of BellSouth Telecommunications Services</p> | <p>On December 6, 1996, the GPSC issued a Procedural and Scheduling Order to consider cost-based rates in Docket 7061-U stemming from the AT&T/BellSouth Arbitration in Docket No. 6801. The GPSC issued its final order in that case on December 16, 1997 setting permanent rates for stand-alone UNEs.</p> | <p>AT&T Cable TV Assn Payphone Assn Sprint WorldCom US Army</p> |
| 10692-U | <p>Generic Proceeding to Establish Long-Term Pricing Policies For Unbundled Network Elements</p> | <p>The GPSC initiated this docket to establish long-term pricing policies for combinations of Unbundled Network Elements (UNEs) and to establish recurring and nonrecurring rates for particular combinations of UNEs. Direct Testimony was filed 6/30/99; rebuttal testimony 7/9/99; Hearing held 7/13 –</p> | <p>AT&T Intermedia Sprint WorldCom</p> |

Key Open Dockets Listing – Georgia

| | | | |
|--------|---|--|---|
| | | 7/16/99; Briefs filed 8/4/99; Comments on the UNE Remand Order filed 12/21/99; Final Order issued 2/1/00. Recently, in the AT&T/BellSouth arbitration in Docket No. 11853-U, the staff has recommended that rates for all new combinations be addressed in a further generic proceeding. No procedural and scheduling order has been issued at this time. | |
| 7253-U | SGAT: BellSouth Telecommunications, Inc.'s Revised Statement of Generally Available Terms and Conditions under Section 252(f) of the Telecommunications Act of 1996 | Original SGAT Filed: 1/22/97 Original Decision: 3/21/97 Revised SGAT Filed by BST: 6/6/97 Decision Revised SGAT: 10/29/97 2nd Revised SGAT Filed: 3/27/98 Collocation Handbook Filed: 5/1/98 BST SQM Filed: 5/8/98 In its Decision on Second Revised SGAT on 7/8/98, the GPSC voted to approve BellSouth's SGAT with modifications. As in Docket 6863-U, the PSC solicited comments from parties in an Order dated 2/18/99 regarding the impact of the Supreme Court decision and the LA II decision on the SGAT. There has been no substantive activity in this docket since that time, although the Southeastern Competitive Carriers Association filed a letter in March 2000 urging the GPSC to reject amendments to the SGAT made by BellSouth in February and March 2000. | AT&T espire Intermedia LCI Sprint WorldCom |
| 7892-U | Performance Measures: Performance Measurements Standards for Telecommunications Interconnection, Unbundling and Resale | The GPSC initiated this phase of this on June 8, 2000 to establish performance measurements, and to establish appropriate enforcement mechanisms for those performance measurements, for telecommunications interconnection, unbundling and resale. The GPSC initiated this new phase following a June 1998 order to refine and upgrade the set of performance measures so that it will more clearly reveal whether BellSouth is adequately opening its market to competition on a nondiscriminatory basis and to adopt a complete remedies plan that will provide adequate consequences should BellSouth | AT&T ITC DeltaCom MediaOne Mpower Sprint WorldCom Z-Tel |

Key Open Dockets Listing – Georgia

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| | | fail to meet the standards. Direct testimony filed 7/20/99; Rebuttal testimony 7/27/99; Hearing 7/5-7/7 & 8/10; Briefs filed 8/21/00. The PSC issued its decision in this docket on 1/12/01. Motions for Clarification and Reconsideration were filed by BellSouth and the CLEC coalition on 1/29/01. The GPSC voted on those motions on 3/6/01. | |
| 8354-U | OSS: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems | The Third Party Test of BellSouth's OSS by KPMG was ordered in May 1999. Since that time, KPMG has tested BellSouth's systems pursuant to a Master Test Plan and a Supplemental Test Plan, the latter of which was developed following the September 27, 1999 letter from Larry Strickling to US West. KPMG has filed 130 Exceptions during the course of the testing and has filed 14 Status Reports. A final report is expected on March 20 with a supplemental report covering performance measures evaluations to be filed by April 30, 2001. A public hearing is to be held subsequently (no date set at this time). | AT&T espire Intermedia Sprint Z-tel |
| 11853-U | Arbitration: In The Matter of the Interconnection Agreement Negotiations Between AT&T Communications of the Southern States, Inc., Teleport Communications Atlanta, Inc. and Pursuant to 47 U.S.C § 252 | AT&T filed its petition for arbitration on 2/4/00. Testimony was filed on 7/14, 8/18, and 9/22 with a hearing held October 30-31, 2000. Briefs were filed on 11/27 and the Staff Recommendation was presented to the PSC on March 1. The GPSC voted on this docket on March 6. A written order is expected in the following three weeks. Key issues addressed include: reciprocal compensation, new UNE rates, access to Multiple Dwelling Units, network architecture, availability of OS/DA, and OSS issues including change management. | AT&T BellSouth |
| 11900-U | XDSL: Investigation of BellSouth Telecommunications, Inc., Provision of Unbundled Network Elements for xDSL Service Providers | Proceeding stemmed from a complaint filed by Rhythms in February 2000 in which the GPSC was asked to initiate a generic proceeding to consider BellSouth's provision of unbundled network elements (UNEs) to CLECs that provide DSL services and other advanced services. Hearing was held 1/29/01 through 2/1/01. | AT&T Bluestar Broadslate Covad Mpower NorthPoint Rhythms |

Key Open Dockets Listing – Georgia

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| | | Briefs were filed on 3/1/01. Estimated timeframe for GPSC decision: end of April. | |
| 13542-U | Network Architecture: Generic Proceeding on Point of Interconnection and Virtual FX Issues | Proceeding ordered as a result of several arbitrations between various parties and BellSouth. The docket addresses 2 issues: 1. Does [a CLEC], as the requesting carrier, have the right pursuant to the Act, the FCC's Local Competition Order, and FCC regulations, to designate the network point (or points) of interconnection at any technically feasible point? 2. Should [an ILEC] be permitted to impose restrictions on [a CLEC's] ability to assign NPA/NXX codes to [its] end-users? Tentative procedural schedule includes testimony April 3 and April 20; hearing on May 1-4. Briefs May 25. | AT&T BellSouth Level 3 Sprint WorldCom |
| Other Dockets | Issue | Status | Key Parties |
| 7892-U | Hot Cuts | As part of Docket 7892-U, the GPSC staff sent a letter to parties on 8/15/00 in which it established a process to gather hot cut data from three (3) CLECs: AT&T, Allegiance, and Mpower. The letter established a two month period for a formal reconciliation of BellSouth's hot cut data in order to verify BST's performance in the provisioning of Unbundled Loops. The process was further designed to allow additional review of BST's performance with regard to the provisioning of Unbundled Loops utilizing the hot cut process for completion of the order. BST filed reports with the PSC on 9/8/00, 12/5/00, and a final report on 12/18/00. AT&T filed responses to the BST reports on 11/6/00 and 12/5/00. At GPSC staff direction BellSouth is to meet with CLECs to resolve issues related to the hot cut process. | Allegiance AT&T BellSouth Mpower |
| 10418-U | Access to MDU's: Interconnection Agreement between MediaOne Telecommunications of Georgia, LLC and BellSouth Telecommunications, Inc. | On 10/30/00, MediaOne filed a Motion for Declaratory Interpretation of the Remaining Arbitration Issues in this docket requesting that the PSC decide two issues: 1. Whether the GPSC's Order requires BST to install compliant NTW equipment in | BellSouth MediaOne |

Key Open Dockets Listing – Georgia

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|--|--|--|--|
| | | <p>newly constructed MDUs; and 2. Whether the GPSC's order requires BST to provide MediaOne with access to NTW in all MDUs including high-rise MDUs, at no additional cost other than the NTW. BellSouth filed its response on 11/13/00 and MediaOne a further response on 12/28/00. The GPSC voted on these issues at its March 6, 2001 Administrative Session. The PSC's decision requires BST to install compliant NTW in newly constructed MDUs and requires BST to provide MediaOne with access to NTW in all MDUs at no additional cost. The GPSC's written order is expected in the next 3 weeks.</p> | |
|--|--|--|--|

**KEY PROBLEMS AFFECTING AT&T'S ABILITY
PROVIDE SERVICE TO CUSTOMERS IN GEORGIA**

1. THIRD PARTY TEST

Structural Problems

Implementation Problems

2. PERFORMANCE MEASURES PROBLEMS

Lack of data integrity

Performance measurement deficiencies

Remedy plan deficiencies

3. CHANGE MANAGEMENT PROBLEMS

BellSouth Control

Lack of regulatory oversight

Inadequate plan, poor implementation

4. OPERATIONAL PROBLEMS

Pre-Ordering and Ordering Problems

Provisioning Problems

Post-Provisioning Problems

5. OTHER KEY PROBLEMS

Third Party Testing

Issues with Test Structure

Georgia Test Design

Comparison of Georgia and Florida Tests

Issues with Test Implementation

Materiality of test for a CLEC's business operations

Experience as a "CLEC Participant"

KPMG as "finders of fact"

Level of audit

Level of blindness

Status of Exceptions and Observations

Next Steps

Georgia Third Party Test

| Test Area | Issues |
|--|--|
| FCC Letter to US West | |
| Performance Measures | <ul style="list-style-type: none"> --No review of processes for development of SQM. --Inadequate evaluation of data accuracy (end to end tracking, completeness evaluations, etc) --No evaluation of accuracy of retail metrics. --No review of assertions of parity by design --Inadequate change management review. --No review of adequacy of measures |
| Change Management | <ul style="list-style-type: none"> --No adequacy review. --Exceptions are peripheral to core problems. --No evaluation of implementation of OSS99 through testing systems. --No review of BST's changes to its own OSS |
| xDSL Testing | <ul style="list-style-type: none"> --No volume testing of xDSL. --No test of electronic ordering/pre-ordering. --No disaggregation in performance metrics. --No DSL specific metrics or disaggregation. |
| Normal, High, and Stress Volume Testing | <ul style="list-style-type: none"> --Peak volume testing conducted in test environment, not production environment. --No volume testing of DSL. --No stress testing. --No volume testing of complex resale. --No volume testing of TAFI. --Volume levels unclear |
| Pseudo-CLEC | <ul style="list-style-type: none"> --EDI and TAG interfaces built, but no there are no test activities, objectives or required reporting associated with the evaluation of the documentation used to build the interfaces. There is no equivalent objective to Test RMI2 in New York and PPR5 in Florida (Interface Development). --No maintenance interfaces are being built. --No live CLEC orders. |
| CLEC involvement/ Dissemination of Information | <ul style="list-style-type: none"> --Test activities began in July, 1999. First CLEC meeting was held in February, 2000, with the test scheduled to complete by end of April. --Many CLEC requests for information and involvement are not granted. --The process is not sufficiently open. --Exception information is not timely. |

| Test Area | Issues |
|---|--|
| <p>Functionality</p> <p>Interfaces</p> <p>Types of services tested.</p> | <p>--Manual ordering is tested only for DSL services. --Latest version of EDI and TAG (OSS99) is not being tested.</p> <p>--Does not test GUI interfaces.</p> <p>--The ECTA maintenance interface used by CLECs is not being tested.</p> <p>--Testing is not end-to-end (maintenance and billing are not the same accounts as pre-ordering, ordering, and provisioning)</p> <p>Ordering—Only 4 of the 21 complex resale services are tested, and they are tested for limited ordering scenarios.</p> <p>Only the following UNEs are being tested: 2 wire-analog loops, 2 wire analog ports, 2 wire analog loop/port combinations, INP, LNP, and xDSL. (LNP for simple scenarios only).</p> <p>Includes no complex orders for UNEs.</p> <p>--CLECs not involved in scenario development. Comments ignored, e.g. CSRs, canceled orders, EELs, complex services.</p> <p>--Line sharing is not tested.</p> |
| <p>Role of Third Party</p> | <p>--Testers are not sufficiently independent.</p> <p>--Core document written by BellSouth, changes must be approved by BellSouth</p> <p>--KPMG works for BellSouth.</p> |
| <p>Omissions from scope of test.</p> | <p>--No review of Ordering Center or other help desks.</p> <p>--No review of account team.</p> <p>--No testing of process to establish CLEC and account and business relationship.</p> <p>--No testing of interconnection, collocation, or network planning.</p> <p>--No testing of training.</p> <p>--OS/DA routing not tested</p> <p>--Only systems included capacity management, except for xDSL.</p> |
| <p>Exception Process</p> | <p>Process still too closed, and not timely.</p> <p>Many exceptions narrowly focused.</p> <p>BST's inadequate fixes.</p> <p>CLEC input for exception areas largely ignored.</p> |
| <p>Tests for parity</p> | <p>Test only includes two instances of parity examinations, one for a process review of repair, and the other for xDSL process parity.</p> |
| <p>Blind testing</p> | <p>All testing activities are highly coordinated.</p> <p>Minimal testing is done via CLEC. (LNP orders)</p> |
| <p>Flow-Through</p> | <p>Does not compare to retail.</p> |
| <p>Billing Issues</p> | <p>No billing testing of digital UNEs.</p> <p>No testing of billing claims and adjustments.</p> <p>No testing to ensure that retail billing is properly discontinued.</p> <p>No review of CLEC billing.</p> |

Comparison of Georgia and Florida Tests

| | Included in Florida Test | Georgia Test? |
|---|---|--|
| Performance Measures | <ol style="list-style-type: none"> 1. Review BLS processes for developing SQM definitions and standards. 2. Assess the adequacy of the SQMs for performance measurement purposes. 3. Compare actual CLEC data to BLS data and test CLEC data. Identify and investigate discrepancies. 4. Trace CLEC & retail transactions end-to-end through the data filtering process to assess data integrity. 5. Validate accuracy of calculation & reporting of metrics for BLS retail. Replicate the calculation of metrics values using KPMG programs, as with wholesale metrics. . 6. Compare CLEC results to BLS retail analogs or numerical standards, depending on the metric. Use statistical tests for comparison purposes. 7. Use additional metrics beyond SQM to evaluate BST performance. 8. Use collaborative process to establish test performance measures. | <ol style="list-style-type: none"> 1. No 2. No. 3. No. 4. No. 5. No. 6. No. 7. No. 8. One comment cycle. |
| xDSL Testing | <ol style="list-style-type: none"> 1. Volume testing of xDSL. 2. Full xDSL testing | <ol style="list-style-type: none"> 1. No. 2. Limited. |
| Normal, High, and Stress Volume Testing | <ol style="list-style-type: none"> 1. Peak volume testing conducted in production environment. 2. Includes all ordering product types 3. Includes stress testing. 4. Includes manual and GUI interfaces 5. Includes TAFI repair interface. 6. Volume levels described in test 7. Includes partially mechanized, manual, and non-flow through orders. | <ol style="list-style-type: none"> 1. No 2. No 3. No 4. No 5. No 6. No 7. No. |
| Pseudo-CLEC | <ol style="list-style-type: none"> 1. Includes a test that evaluates BST's methods and procedures for developing, providing, and maintaining OSS interfaces. (PPR5) 2. Includes analysis of live CLEC transactions. | <ol style="list-style-type: none"> 1. No. 2. No. |
| CLEC | <ol style="list-style-type: none"> 1. Workshops to provide input into test plan. | <ol style="list-style-type: none"> 1. No. |

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| involvement | <ol style="list-style-type: none"> 2. Substantive and frequent interaction with PSC Staff and KPMG 3. Weekly calls 4. Observe exception and observation calls 5. Supply test scenarios 6. Provide CLEC transactions 7. Participation routinely and systematically solicited. 8. Forecast solicited. <p>Note: A brief section on CLEC involvement first appeared in the supplemental plan filed January 24, 2000.</p> | <ol style="list-style-type: none"> 2. No. 3. Yes 4. No. 5. No. 6. Limited. 7. No. 8. Yes, after NY. |
| <p>Functionality</p> <p>Interfaces</p> <p>Types of services tested.</p> | <ol style="list-style-type: none"> 1. Manual ordering is tested for all services 2. Latest version of EDI and TAG (OSS99) is being tested. 3. Testing GUI interfaces. 4. Testing is end-to-end <ol style="list-style-type: none"> 1. All offered services being tested, according to MTP. | <ol style="list-style-type: none"> 1. DSL only 2. No 3. No 4. No <ol style="list-style-type: none"> 1. Limited sub-sets of UNEs and resale. |
| Role of Third Party | <ol style="list-style-type: none"> 1. Testers work solely at the direction of the Commission 2. Testers under contract to Commission, Contract publicly available 3. Test plan prepared by tester, with oversight and involvement of Commission. | <ol style="list-style-type: none"> 1. No 2. No 3. No |
| <p>Omissions from scope of test.</p> <p>(Additional omissions appear in other categories)</p> | <ol style="list-style-type: none"> 1. Account Establishment and Management Review. (PPR2) 2. OSS Interface Help Desk (PPR3) 3. Training review. (PPR4) 4. Collocation, Network Design Review (PPR6) 5. Ordering and Provisioning Work Center Support (PPR 8) 6. Provisioning Process Evaluation (PPR9) 7. Billing Work Center/Help Desk (PPR 10) 8. M&R Work Center Evaluation (PPR15) | <ol style="list-style-type: none"> 1. No, 2. No. 3. No. 4. No. 5. No. 6. No. 7. No 8. No. |

| | | |
|-------------------|---|---|
| | 9. Network Surveillance Support Evaluation (PPR16) | 9. No. |
| Exception Process | 1. Observations will be provided as well as exceptions. Observations are indications of negative findings. 2. CLECs can observe calls between KPMG, PSC, and BellSouth regarding observations and exceptions. | 1. No. 2. No. |
| Tests for parity | 1. Flow-Through testing 2. Account Management 3. Training 4. Provisioning Process 5. Billing Work Center 6. Billing Daily Usage Processes 7. Bill Production 8. Functional review of pre-order, ordering, and provisioning 9. Manual processing of orders. 10. Capacity management | 1. No. 2. No. 3. No. 4. Only DSL. 5. No. 6. No. 7. No 8. No 9. No 10. No |
| Blind testing | 1. Test called for active CLEC participation and involvement to increase blindness of test. 2. Robust test bed. | 1. No. 2. No. |
| Flow-Through | 1. Compared to retail flow-through | 1. No |
| Billing | 1. Include multiple bill cycles. 2. Test billing claims and adjustments 3. Includes evaluation for digital UNE services | 1. Only for re-test. 2. No. 3. No. |

**Georgia Third Party Test
Exception Summary as of March 11, 2001**

| Exception Area | Total |
|------------------------------|--------------|
| Performance Measures | 38 |
| Pre-Order | 8 |
| Ordering/Provisioning | 48 |
| Billing | 12 |
| Flow-Through | 3 |
| Change Management | 3 |
| Capacity Management | 2 |
| Repair | 15 |
| Unknown (drafts) | 6 |
| Total | 133 |

Florida Third Party Test

Observation Summary as of March 11, 2001

| Observation Area | Total |
|--|--------------|
| Metrics | 25 |
| Relationship Mgmt. Infrastructure | 6 |
| Order Management | 7 |
| Provisioning and Repair | 6 |
| Billing | 4 |
| Total | 48 |

Exception Summary as of March 11, 2001

| Exception Area | Total |
|--|--------------|
| Metrics | 4 |
| Relationship Mgmt. Infrastructure | 10 |
| Order Management | 2 |
| Provisioning and Repair | |
| Billing | 1 |
| Total | 17 |

Florida Observations and Exceptions Summary

| Observation | Date Issued | Description |
|-------------|-------------|---|
| | 7/18/00 | BST does not appear to have public documentation available for CLECs to establish connectivity for TAG. |
| 2 | 7/25/00 | KPMG cannot replicate the values in the % rejected service requests (May) |
| 3 | 8/3/00 | KPMG cannot replicate the values in the reject interval for non-trunks (May) |
| 4 | 8/3/00 | KPMG cannot replicate the values in the Ordering FOC timeliness for non-trunks (May) |
| 5 | 8/29/00 | KPMG cannot replicate the values in the Average Completion Interval /Distribution (May) |
| 6 | 8/30/00 | BST does not properly construct the processed data used to validate certain ordering service quality measurements--systematically excludes the entire weekend. |
| 7 | 9/20/00 | KPMG cannot replicate the values in Average Completion Notice Interval (May) |
| 8 | 9/19/00 | KPMG cannot replicate the values in E911 |
| 9 | 9/21/00 | KPMG does not properly construct the processed data used to validate the total service order cycle time (May) |
| 10 | 10/18/00 | BST does not follow its documented process of providing proper notifications when software interfaces are being retired. |
| 11 | 10/20/00 | KPMG cannot replicate LNP - % rejected service requests metric (5/00) |
| 12 | 10/25/00 | KPMG cannot replicate LNP - reject interval metric (5/00) |
| 13 | 11/3/00 | BST does not notify CLECs when they make changes to historical performance reports a/d or raw data. |
| 14 | 11/3/00 | KPMG cannot replicate LNP - missed appointments metric (5/00) |
| 15 | 11/14/00 | KPMG cannot replicate LNP-Disconnect Timeliness metric (5/00) |
| 16 | 11/14/00 | KPMG cannot replicate LNP FOC Timeliness (5/00) |
| 17 | 11/30/00 | KPMG cannot replicate % missed appointments (5/00) |
| 18 | 11/30/00 | KPMG cannot replicate M&R customer trouble report rate (5/00) |
| 19 | 11/30/00 | KPMG cannot replicate Average Jeopardy Notice metric(5/00) |
| 20 | 11/30/00 | KPMG cannot replicate Mean Held Order Interval metric (5/00) |
| 21 | 12/13/00 | The distribution of carrier notification info associated with change control process is not adequate. Also significant information is not included in the notice. |
| 22 | 12/15/00 | KPMG cannot replicate Coordinated Cutovers metric (9/00) |
| 23 | 12/15/00 | KPMG cannot replicate Reject Interval - Trunks metric (10/00) |
| 24 | 12/15/00 | KPMG cannot replicate Provisioning Troubles (Trunks) within 30 days metrics (5/00) |
| 25 | 12/15/01 | KPMG cannot replicate LNP Total Service Order Cycle Time (5/00) |
| 26 | 1/17/01 | No documentation for CLECS to correlate the available versions of TAG to business rules |
| 27 | | BST does not have a clearly defined process for addressing documentation defects. |
| 28 | | KPMG cannot replicate OS/DA speed to answer metric (5/00) |
| 29 | 0/18/01 | BST failed to meet the frame due time on commercial CLEC loop migrations. |
| 30 | 01/22/00 | BST UNE center does not make hot cut related calls |
| 31 | 01/22/00 | KPMG cannot replicate 3 collocation measures (5/00) |

| | | |
|----|----------|---|
| 32 | 02/24/01 | KPMG cannot replicate Provisioning Troubles (non-Trunks) within 30 days metrics (5/00) |
| 33 | 01/30/01 | BST business rules (9K) provides ambiguous informatione |
| 34 | 02/6/01 | BST improperly populates "ToNumber" Field in DUF files—611 calls |
| 35 | 2/6/01 | BST improperly populates "ToNumber" Field in ADUF files—LD calls |
| 36 | | BST failed to deliver daily usage files (DUF) records for toll-free calls |
| 37 | 2/9/01 | BST business rules for ordering provides information inconsistent with system responses. |
| 38 | 2/14/01 | BST issued a FOC on a XDSL/line sharing order when the loop could not support DSL service. |
| 39 | 02/15/01 | BST did not provision the CO splitter equipment assigned to a line sare order on the FOC date. |
| 40 | 02/15/01 | Inconsistencies in BST's process and technical documents with regard to allowable foreign voltage parameter established for xDSL loops. |
| 41 | 02/15/01 | BST flow-through documentation is incomplete and inconsistent. |
| 42 | | BST failed to deliver Daily Usage File (DUF) records for a variety of completed calls. |
| 43 | 3/2/01 | KPMG is unable to complete several orders using EDI interface. |
| 44 | 3/6/01 | Bst does not meet the stated intervals and target objectives for maintenance for UNE Non-Designed (SL1) loops. |
| 45 | 3/6/01 | BST returned FOC frame due times that do not match the regular hours for provisioning. |
| 46 | | |
| 47 | | |
| 48 | | |

| Exception | Date Issued | Description |
|-----------|-------------------------|--|
| 1 | 7/26/00 CI.-11/09/00 | BST's electronic EDI test environment is inadequate for testing of a CLEC's EDI interface (LNP). |
| 2 | 7/27/00 CI.-1/30/01 | Inconsistencies and omissions in the EDI Specs and OSS 99 business rules prevent the development of an EDI interface between BST and a CLEC. |
| 3 | 8/04/00 CI.-11/09/00 | The test cases BST provides a CLEC for EDI end-to-end testing are either incomplete or incorrect. |
| 4 | 8/8/00 | BST does not have documented procedures for interaction with CLECs during the account establishment and management process. |
| 5 | 8/17/00 CI.-01/18/01 | BST does not follow their documented process of providing proper time intervals when posting documentation changes. |
| 6 | 9/21/00 | BST lacks an appropriate process, methodology and a robust test environment for testing of the EDI interface. |
| 7 | 10/3/00 | BST does not have sufficient publicly available information that provides information to a CLEC—physical connectivity ECTA. |
| 8 | 10/10/00 | BST lacks a consistent and documented process to enable a CLEC to independently develop an ECTA interface. |
| 9 | 11/14/00 | BST does not have documented procedures for CLEC training management practices and program administration. |
| 10 | 12/4/00 | KPMG has found that BST's metrics calculations for LNP reject intervals are inconsistent with the documented metrics calculations. (former observation)e |
| 11 | 12/4/00 | KPMG has found that BST's metrics calculations for LNP FOC intervals are inconsistent with the documented metrics calculations. (former observation) |
| 12 | 2/14/01 | BST does not adhere to the procedures for System Outage established in the BST change control process. |
| 13 | 2/27/01 | BST failed to deliver at least 95% of DUF records within 6 calendar days. |
| 14 | 2/27/01 | BST has inconsistent retention periods of the unprocessed data that is required to calculate the LNP measurements. |
| 15 | 3/5/01 | KPMG cannot determine whether BST is producing complete SQM reports. (conflicting metrics ordered vs SQM) |
| 16 | 3/5/01 | BST business rules for ordering (9K) do not offer the ability to submit an order for the partial migration of customer's UNE loops. |
| 17 | 3/6/01 | BST does not offer CLECs the ability to migrate a retail customer to a CLEC using an EEL. |

Notes:

Gray shading indicates that observation is closed.

Observations 1, 26, 33, 37, 38, and 39, and 43 are outside the scope of the Georgia test. AT&T is still trying to obtain clarity on metrics replication for LNP measures for the Georgia test. Those measures are the source of multiple observations in Florida.

Exceptions 1, 2, 3, 4, 6, 7, 8, 9, 16, and 17 are outside the scope of the Georgia test.

Customized Routing of OS/DA Calls

- No arrangement routing to a third party OS/DA platform exists in any BellSouth state.
- Ordering procedures for implementing central office translations, trunking and database updates for such arrangements using LCC or AIN have never been published.
- BellSouth's OLNS does not provide routing to third party platforms.
- BellSouth does not have an electronic ordering process for assigning individual customers to CLEC customized OS/DA routing arrangements.

| ER | Dated | Title/Description |
|----|-------|---|
| | | Performance Measures |
| 1 | 3 | 12/15/99 Competitive Local Exchange Carriers(CLEC's) are not notified when BellSouth initiates changes to published historical performance measurement reports and/or the raw data files associated with these reports after this information has been removed from the Performance Measurement & Analysis Platform (PMAP) web site 3/29/00 KPMG Reopened Exception Report #3. |
| 2 | 19 | 2/14/00 BellSouth does not adequately document changes in versions of the BellSouth Service Quality Measurements Performance Reports. |
| 3 | 23 | 2/11/00 KPMG cannot replicate five of BellSouth's reported Service Quality Measurements. |
| 4 | 42 | 3/23/00 BellSouth published incomplete KPMG Test CLEC Service Quality Measurement (SQM) reports for the months of November 1999, December 1999, and January 2000 for the billing metric <i>Mean Time to Deliver Invoices</i> . |
| 5 | 43 | 3/29/00 BellSouth has not provided KPMG with the raw data necessary to calculate values for the Service Quality Measurement ("SQM"), <i>Mean Time To Deliver Invoices (Billing)</i> , for the KPMG Test CLEC. |
| 6 | 45 | 3/21/00 KPMG cannot replicate four of BellSouth's reported Service Quality Measurements (SQMs). |
| 7 | 46 | 4/6/00 KPMG cannot replicate seven of BellSouth's reported Service Quality Measurements (SQMs). |
| 8 | 52 | 4/12/00 KPMG cannot replicate twelve of Bellsouth's reported Service Quality Measurements (SQMs) |
| 9 | 56 | 4/26/00 BellSouth published incomplete PMAP Raw Data for December 1999 for the Service Quality Measurement (SQM) <i>Maintenance Average Duration</i> . |
| 10 | 61 | 4/12/00 For certain Service Quality Measurements ("SQMs"), BellSouth does not report values at all levels of disaggregation specified in the <i>Service Quality Measurements Georgia Performance Report 10/22/99 (SQM Reports)</i> . |
| 11 | 62 | 4/26/00 KPMG cannot replicate four of BellSouth's Service Quality Measurements (SQMs) in the February 2000 Report. |
| 12 | 64 | 3/29/00 KPMG cannot replicate BellSouth's reported values for the "Provisioning - Service Order Accuracy" Service Quality Measurement (SQM). |
| 13 | 70 | 4/12/00 BellSouth does not have an adequate change management process for the generation of Service Quality Measurement (SQM) data from its legacy/source systems. |
| 14 | 74 | 3/29/00 BellSouth does not report certain Georgia Service Quality Measurements ("SQMs") at the levels of disaggregation specified in the <i>Service Quality Measurements Georgia Performance Reports</i> . |
| 15 | 79 | 5/9/00 BellSouth does not adequately retain certain source data used in the calculation of several Service Quality Measurement (SQM) reports that are not generated wholly or primarily by the Performance Measurement and Analysis Platform (PMAP). |
| 16 | 83 | 5/16/00 Exclusions listed in the "Exclusions" section of the <i>Service Quality Measurements Georgia Performance Reports (SQM Reports)</i> are not correctly applied when creating raw data or calculating SQMs. |
| 17 | 84 | 5/16/00 The information in the <i>Service Quality Measurements Georgia Performance Reports (SQM Reports)</i> is inconsistent with the computational instructions provided by BellSouth for five Service Quality Measurements (SQMs). |
| 18 | 86 | 5/8/00 KPMG cannot replicate six of BellSouth's reported Service Quality Measurements (SQMs). |
| 19 | 87 | 5/23/00 Computation instructions provided by BellSouth for thirteen PMAP Service Quality Measurements (SQMs) are inconsistent with the information provided |

| | | | |
|----|-----|----------|---|
| | | | Quality Measurements (SQMs) are inconsistent with the information provided in the <i>Service Quality Measurements Georgia Performance Reports (SQM Reports)</i> 1. |
| 20 | 88 | 5/23/00 | BellSouth does not have a clearly defined change management process for the <i>PMap Raw Data User Manual</i> . |
| 21 | 89 | 5/23/00 | Raw data1 used in the calculation of BellSouth Service Quality Measurement (SQM) reports are not accurately derived from or supported by their component early-stage data2. |
| 22 | 90 | 5/30/00 | KPMG cannot replicate three of BellSouth's reported Service Quality Measurements (SQMs) in the March 2000 performance measurement reports. |
| 23 | 92 | 6/12/00 | BellSouth's raw data1 used in the calculation of the BellSouth Service Quality Measurement (SQM) reports are not accurately derived from or supported by their component early-stage data2. |
| 24 | 93 | 6/1/00 | KPMG encountered ten Service Quality Measurements ("SQMs") for which there are inconsistencies among the statements of the definition, calculation and business rules sections in the <i>Service Quality Measurements Georgia Performance Reports (SQM Reports)</i> . |
| 25 | 100 | 7/5/00 | KPMG was unable to replicate two of BellSouth's Service Quality Measurements (SQMs) in the May 200 Report |
| 26 | 101 | 7/7/00 | BellSouth-reported raw data values in usage data delivered to the KPMG Test CLEC, used in the calculation of three SQMs do not match the KPMG-collected values for April 2000. |
| 27 | 104 | 7/25/00 | BellSouth-reported raw data values for the KPMG Test CLEC do not match the KPMG-collected values for certain billing accounts involved in the calculation of Mean Time To Deliver Invoices, for both CRIS and CABS. |
| 28 | 105 | 7/27/00 | Computation instructions provided by BellSouth for Provisioning - Mean Held Order Interval and Distribution Intervals are inconsistent with the information provided in the <i>Service Quality Measurements Georgia Performance Reports (SQM Reports)</i> 1. |
| 29 | 110 | 8/8/00 | Cannot replicate four of BST's SQMs |
| 30 | 111 | 9/11/00 | Cannot replicate one July SQM |
| 31 | 113 | 9/22/00 | BST reported raw data values for commitment Date for the KPMG test CLEC do not match KCL collected values for certain service order numbers and PONS for six provisioning metrics. |
| 32 | 119 | 12/4/00 | BST reported raw data values for completion date for the KPMG test clec do not match the KPMG collected values for certain PONS and SO numbers for one provisioning metric. |
| 33 | 120 | 12/13/00 | BST reported raw data files used in the calculation of three ordering metrics of the KPMG test CLEC incorrectly report certain PON numbers and version numbers as non-mechanized in August and September 2000. |
| 34 | 122 | 01/05/01 | Definitions and business rules in the SQM reports are incomplete or inaccurate for the FOC timeliness and Reject Interval Ordering Guide Measurements. |
| 35 | 123 | 12/18/00 | KPMG discovered that BellSouth's raw data is insufficient for calculating the October 2000 % Provisioning Troubles in 30 days for the test CLEC. |
| 36 | 127 | 11/16/00 | BST reported raw data values for commitment date for the KMG test CLEC do not match the KPMG collected values for certain PONS and service order numbers for two provisioning metrics. |
| 37 | 128 | 1/05/01 | BST reported raw data values for the completion date for the KPMG test CLEC do not match the KPMG collected values for certain PONs and service order numbers for one provisioning metric. |
| 38 | 129 | 1/13/01 | A number of BST graphical charts depicting the Georgia PSC approved performance measurements reviewed by KPMG contain errors or identified issues. |

| Pre-Ordering | | | |
|---------------------|-----|----------|--|
| 1 | 1 | 11/12/99 | BellSouth does not provide comprehensive and usable business rule documentation for submitting electronic pre-order transactions via the TAG interface. |
| 2 | 24 | 2/12/00 | BellSouth's TAG interface does not deliver timely responses to pre-order transactions. |
| 3 | 63 | 3/22/00 | KPMG discovered numerous inconsistencies between BellSouth's <i>TAG API Guide, Version 2.2.0.5</i> and <i>Pre-Order Business Rules, Version 3.0</i> document. |
| 4 | 65 | 4/14/00 | BellSouth's Calculate Due Date (CDD) pre-order query does not support all order requisition (REQ) and activity (ACT) types. |
| 5 | 66 | 4/26/00 | BellSouth does not provide complete pre-order responses via the Telecommunications Access Gateway (TAG) interface. |
| 6 | 71 | 4/21/00 | The service establishment intervals returned on Calculate Due Date (CDD) pre-order responses are not consistent with intervals defined in the <i>BellSouth Product and Services Interval Guide</i> . |
| 7 | 107 | 8/7/00 | KPMG observes that parity does not appear to exist between the processes through which BST retail and wholesale customers may determine the availability of ADSL capable loops. |
| 8 | 116 | 10/19/00 | TAG does not perform calculate due date function for loop/port combo orders. |

| | | | Ordering, and Provisioning |
|----|----|----------|--|
| 1 | 4 | 12/15/99 | BellSouth's electronic ordering systems do not provide the functionality required for submitting partial migration service requests for loop port combinations. |
| 2 | 5 | 12/29/00 | BellSouth's rules for submitting supplements to existing service orders are not accurately defined. |
| 3 | 8 | 1/12/00 | Firm Order Confirmations (FOC's) are issued by BellSouth on CLEC service orders before facility status has been determined. |
| 4 | 9 | 1/20/00 | Bell South failed to deliver electronic Firm Order Confirmations (FOC's) and Completion Notices(CN's) in response to electronic service order requests. |
| 5 | 18 | 2/15/00 | BellSouth (BLS) requirements for values entered in the Line Class of Service data element for EDI and TAG orders are not consistent, and the documentation is incomplete. |
| 6 | 22 | 2/15/00 | BellSouth disconnected retail accounts on loop migration orders without reconnecting the UNE loop component. |
| 7 | 26 | 2/15/00 | BellSouth does not deliver timely Completion Notices (CN's). |
| 8 | 31 | 3/19/00 | BellSouth's electronic ordering system (TAG and EDI) do not adequately support CLEC requests for Directory Listings associated with UNE loop customers. |
| 9 | 32 | 2/16/00 | BellSouth delivered Firm Order Confirmations (FOC's) on transactions after issuing Clarifications (CLR). |
| 10 | 33 | 3/14/00 | BellSouth's <i>Local Exchange Ordering Guide - Volume 1, Version N (LEO Guide)</i> does not define data element requirements and valid entries for loop service requests. |
| 11 | 38 | 3/7/00 | BellSouth does not consistently provide CLEC's with a service Due Date (DD) matching their Desired Due Date (DDD). |
| 12 | 39 | 3/7/00 | BellSouth's electronic ordering systems do not provide the functionality required for submitting partial migrations to UNE Loops. |
| 13 | 40 | 3/8/00 | BellSouth's TAG interface does not process service requests for coordinated hot cuts on non-designed loops as described in the Local Exchange Ordering Implementation Guide, Volume 1, Version 7N (LEO Guide). |
| 14 | 44 | 4/11/00 | KPMG was unable to change the telephone number (TN) of a resale auxiliary line in certain instances. |
| 15 | 47 | 3/23/00 | BellSouth delivers inconsistent and inaccurate responses to Local Service Requests (LSRs). |
| 16 | 49 | 4/12/00 | BellSouth did not provide an accurate and timely update to CLECs when implementing a Universal Service Order Code (USOC) change. |
| 17 | 51 | 4/14/00 | BellSouth's electronic ordering systems (EDI and TAG) do not support the partial migration of a customer's Billing Telephone Number (BTN) on UNE Loop-Port Combination service requests. |
| 18 | 53 | 3/28/00 | BellSouth's <i>Local Exchange Ordering Guide, Volume 1, Versions J-N (LEO Guide)</i> contains numerous revision-related errors. |
| 19 | 54 | 4/19/00 | BellSouth's electronic ordering systems do not support UNE-to-UNE migration service requests. |
| 20 | 55 | 4/12/00 | BellSouth's pre-ordering and ordering documentation contains numerous errors and omissions in structure and format. |
| 21 | 57 | 5/2/00 | BellSouth guidelines for submitting xDSL pre-order Service Inquiry (SIs) for Loop Make-Up (LMU) information do not exist. |
| 22 | 58 | 3/30/00 | BellSouth's UNE Center does not consistently adhere to the methods and |