Exhibit 1

Date: November 3, 2000

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the process verification review for Interface Development (PPR 5).

Exception:

BellSouth lacks an appropriate process, methodology and robust test environment for testing of the electronic data interchange (EDI) interface.

Background:

The first step for a CLEC planning to execute transactions on BellSouth's EDI production systems is for the CLEC to develop an EDI software interface. To accomplish this, the CLEC follows BellSouth's EDI interface development process which includes acquiring specifications and following a test plan that will lead to certified connectivity with BellSouth's EDI production systems. Once certified, the CLEC can execute customer transactions with BellSouth.

To facilitate market entry by a CLEC, BellSouth should make available a robust test environment for the EDI interface.

Issue:

CLECs that seek to test the EDI machine to machine interface during the establishment of system connectivity do not have an adequate test environment available.

BellSouth's current EDI test environment does not offer the functionality to enable a CLEC to thoroughly test its EDI interface prior to connecting to BellSouth's production systems. Some of the elements KPMG Consulting would expect BellSouth's EDI test environment and test processes to include are:

- Ability for a CLEC to create valid electronic test transactions that will process completely through BellSouth's ordering, billing and provisioning systems. In BellSouth's existing process, when a CLEC sends test transactions to BellSouth's test environment the transactions are not processed by either billing or provisioning systems. The only system generated confirmation is a Firm Order Confirmation (FOC), which indicates simply that an order was received and processed through the ordering system. The CLEC is not notified of the test transaction's success or failure by BellSouth's EDI systems directly. In a production environment, a Billing Completion Notice [BCN] and Provisioning Completion Notice [PCN] are system generated upon successful processing.

Current BellSouth testing methodology does not allow a CLEC to ensure that the test transactions generated by a CLECs EDI system can be processed end-to-end by BellSouth systems successfully upon reaching the production environment.

- BellSouth test cases with expected input and output data that will facilitate the CLEC's ability to validate a developed EDI interface before and after connecting to BellSouth's test or production environment. All BellSouth test cases should be of sufficient breadth and depth to allow a CLEC to robustly and thoroughly test all facets of its EDI interface to ensure it has met BellSouth specifications.

- Consistent and documented process for creation of CLEC specific test cases. A CLEC should have the ability to develop an overall test approach or plan that is consistent with its intended business model.

- Documented test processes and expected timelines. A CLEC should have access to information outlining the entire process prior to commencing development for business planning purposes.

- CLECs that have already entered the market require consistent and documented processes, timelines, and a test environment that will permit them to test new changes or releases prior to their introduction into the production environment. As changes are made to BellSouth's EDI systems (e.g., software, specifications, business rules, etc.) that require a CLEC to upgrade its own EDI interface to continue to be able to conduct transactions, the test environment should be updated in a controlled fashion that will permit a CLEC to test these system changes before they are used with live data or on production systems. The CLEC should be provided with reasonable notification.

Amendment—In response to the BellSouth request for more detail regarding the proposed EDI test environment, KPMG Consulting agreed to develop a more detailed description of the types of elements typically found in the test environment. KPMG Consulting would expect, at a minimum, the following elements to be included in a comprehensive EDI test environment:

1. Detailed description of the complete functionality and operation of the proposed EDI test environment (down to the computer system level).
2. Capacity and availability of the proposed EDI test environment.
3. Computing and network architecture of the proposed EDI test environment.
4. Types and version of software to be used in the proposed EDI test environment.
5. Standard template or process for developing a CLEC Test Agreement.
6. Documented process for developing a CLEC EDI interface test plan.
7. CLEC requirements for connecting to the proposed EDI test environment.

8. Documented process for the creation, use, and modification of BellSouth and CLEC test data. Complete test cases would include expected outputs.
9. Detailed flow of events for submitted test transactions, including the types of messaging (automated and manual) that will be exchanged between the CLEC EDI interface and the proposed BellSouth EDI test environment.
10. Documented process that guides a new CLEC EDI trading partner (i.e., new entrant) through the steps necessary—from initiating the EDI interface development process through to the cutover into a production environment. I.e. an end-to-end view of the EDI interface development/connectivity process.
11. Documented process that guides an existing CLEC EDI trading partner through the necessary steps for a new EDI system release—from connecting to the proposed EDI test environment to developing and testing against the new system release through to the cutover into a production environment. I.e. an end-to-end view of the EDI interface development/connectivity process for a new software release that includes:
    - Intervals.
    - Milestones.
    - Software version control and availability.
    - Testing.
    - Software migration.
12. Quality assurance processes BellSouth would employ to ensure the software in the proposed EDI test environment is equally functional and stable to that in the production environment.
13. Documented process for notifying the CLEC community on events regarding the proposed EDI test environment.
14. Process for providing support to a CLEC operating in the proposed EDI test environment, including the ability to report, track, and escalate issues.

Impact

Due to deficiencies in the current EDI test environment, CLECs have difficulty in developing defect free interfaces . This has an impact on a CLECs ability to develop and deliver uninterrupted service to its customers.

KPMG Consulting

2nd AMENDED EXCEPTION 10

BellSouth Florida OSS Testing Evaluation

Date: September 26, 2001

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5).

Exception:

KPMG Consulting has found that BellSouth's implemented metrics calculations for the "Ordering: Local Number Portability (LNP) – Reject Interval" Service Quality Measurement report (May 2000) are inconsistent with the documented metrics calculations. (PMR5)

Background:

Service Quality Measurements (SQMs) are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida. BellSouth also publishes the monthly processed data[1] (PMAP raw data[2]) used to create these reports.[3]

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting is attempting to replicate these reports using BellSouth's published PMAP Raw Data User Manual, where applicable, the corresponding raw data, supported by technical assistance from BellSouth.

When KPMG Consulting was unable to replicate the BellSouth reported values for the "Ordering: LNP – Reject Interval" SQM, KPMG Consulting discovered during the investigation of Observation 12, that BellSouth's implemented metrics calculations are inconsistent with the documented metrics calculations.

[1] The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data".
[2] *The PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the May 15, 2000 version of the Manual.
[3] These reports and PMAP raw data may be delivered in hard copy or via the PMAP Web site.

In the BellSouth Response to Observation 12, BellSouth informed KPMG Consulting that the reported interval distributions do not reflect necessarily the intervals (levels of disaggregation) identified in *BellSouth Service Quality Measurements (SQM Manual)*.

> *The primary difference in calculation lies within the methods of calculation used, i.e., Informix-4GL utilized by BellSouth vs. Microsoft Excel utilized by KPMG. Interval calculations within PMAP using Informix-4GL are carried only to the nearest minute, while interval calculations using Microsoft Excel are carried to the millisecond by default (this setting depends on the user's choices). This difference in precision results in various intervals being categorized into the wrong "buckets".*[4]

Using BellSouth's interval example, BellSouth would report inaccurately intervals of 4 minutes and 33 seconds in the "0 to 4 min" category, instead of the "4-8 min" as prescribed by rules documented in the SQM definition.

The discrepancies, originally identified in Observation 12, are listed in the following table.

1	Total Mech; UNE Loop w/LNP	0-4 min	28	830	3.37%	3.49%
2	Total Mech; UNE Loop w/LNP	4-8 min	3	830	0.36%	0.24%
3	Total Mech; UNE Loop w/LNP	1-8 hrs	62	830	7.47%	8.07%
4	Total Mech; UNE Loop w/LNP	8-24 hrs	30	830	3.61%	3.01%
5	Total Mech; LNP	0-4 min	0	155	0.00%	0.64%
6	Total Mech; LNP	4-8 min	1	155	0.65%	0.64%
7	Total Mech; LNP	12-60 min	4	155	2.58%	2.56%

[4] Florida OSS BellSouth's Response to Observation 12, November 15, 2000. Page 3.

8	Total Mech; LNP	0-1 hrs	5	155	3.23%	3.85%
9	Total Mech; LNP	1-8 hrs	17	155	10.97%	13.46%
10	Total Mech; LNP	8-24 hrs	11	155	7.10%	4.49%
11	Total Mech; LNP	24 hrs+	122	155	78.71%	78.21%
12	Total Mech; LNP	Avg Int Hour	456394.3	155	49.07[5]	48.76
13	Partial Mech; UNE Loop w/LNP	0-4 min	5	806	0.62%	0.74%
14	Partial Mech; UNE Loop w/LNP	4-8 min	2	806	0.25%	0.12%
15	Partial Mech; UNE Loop w/LNP	1-8 hrs	62	806	7.69%	8.31%
16	Partial Mech; UNE Loop w/LNP	8-24 hrs	30	806	3.72%	3.10%
17	Partial Mech; LNP	0-4 min	0	155	0.00%	0.64%

Amendment – In accordance with BellSouth's response to Exception 10, KPMG Consulting re-tested using December 2000 data. However, KPMG Consulting continues to be unable to replicate the BellSouth reported values for the "Ordering: LNP – Reject Interval" SQM. The discrepancies found during the re-test are listed in the following table.

[5] The KPMG Consulting calculated value is derived as follows: (numerator/denominator)/60

1	Total Mech	UNE Loop w/LNP; 1-<8 hrs	13	122	10.66%	20.49%
2	Total Mech	UNE Loop w/LNP; 8-<24 hrs	64	122	52.46%	42.62%
3	Total Mech	LNP; 0-<4 min	97	862	11.25%	11.37%
4	Total Mech	LNP; 4-<8 min	42	862	4.87%	4.76%
5	Total Mech	LNP; 1-<8 hrs	213	862	24.71%	46.87%
6	Total Mech	LNP; 8-<24 hrs	258	862	29.93%	7.77%
7	Total Mech	LNP; Avg Int Hour	442700.22	862	8.56[5]	8.55
8	Fully Mech	UNE Loop w/LNP; Avg Int Hour	2.45	1	0.04[5]	0.03
9	Fully Mech	LNP; Avg Int Hour	151.53	36	0.07[5]	0.06
10	Partial Mech	UNE Loop w/LNP; 1-<8 hrs	13	121	10.74%	20.66%

11	Partial Mech	UNE Loop w/LNP; 8-<24 hrs	64	121	52.89%	42.98%
12	Partial Mech	UNE Loop w/LNP; Avg Int Hour	218674.75	121	30.12[6]	30.11
13	Partial Mech	LNP; 0-<4 min	74	826	8.96%	9.08%
14	Partial Mech	LNP; 4-<8 min	39	826	4.72%	4.60%
15	Partial Mech	LNP; 1-<8 hrs	213	826	25.79%	48.91%
16	Partial Mech	LNP; 8-<24 hrs	258	826	31.23%	8.11%
17	Partial Mech	LNP; Avg Int Hour	442548.68	826	8.93[6]	8.92

2nd Amendment – In accordance with BellSouth's Amended Response to Exception 10,[7] which stated that coding changes would be made to the time buckets, KPMG Consulting attempted to replicate May 2001 data. However, KPMG Consulting discovered that the data file appeared to contain only Non-Mechanized transactions (where mechztn_id = 2). BellSouth reported at the Fully, Partially, Total and Non-Mechanized levels for May 2001 data. When KPMG Consulting requested clarification, BellSouth stated that the data had been inadvertently hard-coded and that the issue had been resolved effective for June 2001 data.[8] When KPMG Consulting re-tested using July 2001 data, KPMG Consulting discovered that the data set still appeared to contain only Non-Mechanized transactions.

Without the proper data set, KPMG Consulting is unable to re-test the "Ordering: LNP-Reject Interval" SQM.

[6] The KPMG Consulting calculated value is derived as follows: (numerator/denominator)/60
[7] Florida OSS BellSouth's Amended Response to Exception 10, 5/7/01.
[8] KPMG Consulting received BellSouth's response to its clarification question on 8/2/01.

Amended Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculation for the "Ordering: LNP – Reject Interval" SQM may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

AMENDED EXCEPTION 12

BellSouth Florida OSS Testing Evaluation

Date: May 23, 2001

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the Documentation Review of the Change Management Process (PPR1).

Exception:

BellSouth does not adhere to the procedures for System Outages (Type 1) established in the BellSouth Change Control Process, version 2.0 (PPR1).

Background:

The BellSouth Change Control Process, version 2.0 includes the following process flow for Type 1 Changes (System Outages):[1]

- If a System Outage is not resolved within 20 minutes, a notification will be sent to CLECs via email and posted to the BellSouth Interconnection Website within one hour.
- If a System Outage is not resolved, a status update will be posted on the BellSouth Interconnection Website every two to four hours until resolution.
- The final resolution notice is posted to the BellSouth Interconnection Website upon resolution of the System Outage.

Issue:

During the review of the BellSouth Change Management Activities, KPMG Consulting has found that BellSouth is not adhering to the System Outage procedures as established in the BellSouth Change Control Process, version 2.0. Specifically, BellSouth does not adhere to the following procedures:

1. Email notifications were not sent to CLECs involved in the Change Control Process when System Outages last longer than 20 minutes.[2]
2. Email notifications were not sent to CLECs involved in the Change Control Process within one hour of the outage.[3]

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[1] BellSouth Change Control Process, v. 2.0, http://www.interconnection.bellsouth.com/markets/lec/ccp_live/docs/bccp/CCP8_23.pdf, August 23, 2000. Section 4.0, Pages 16-18.

[2] See Appendix A, Outages without email notice.

[3] See Appendix B, Outages with email notice.

3. Accurate updates were not posted to the website of the current status and final resolution of each outage.[4]

Amendment:

KPMG Consulting conducted a retest of the BellSouth System Outage Notification Procedures. The retest consisted of a review of BellSouth System Outages beginning March 12, 2001 and ending April 27, 2001. The results are as follows:

1. BellSouth did not provide notification of all system outages that occurred during the retest period. KPMG Consulting received retest information from BellSouth in the form of an outage log that indicated that the following two outages occurred on the date specified. However, KPMG Consulting did not receive any email notification regarding these outages.

LENS	1704	03/26/2001
TAG	1706	03/26/2001

2. BellSouth did not meet the notification standard as published in the Change Control Process, Version 2.2, March 26, 2001. Specifically, BellSouth met the system outage notification standard for 42% of the outages reviewed during the retest period.

TAG	1672	03/13/2001	11:15	*BellSouth could not provide data for this system outage*	11:32	:0:17	NO
EDI	5106	03/15/2001	11:34	03/16/2001 17:10	03/16/2001 17:28	0:18	NO
LENS	1680	03/17/2001	5:00	9:00	9:22	0:22	NO
LENS	1681	03/19/2001	9:20	9:20	9:34	0:14	YES
LENS	1682	03/19/2001	12:20	12:20	12:44	0:24	NO
LENS	1683	03/19/2001	15:15	15:13	16:24	1:11	NO
TAG	1686	03/20/2001	17:55	03/21/2001	03/21/2001	0:09	YES

[4] See Appendix 1, Outages without accurate status.
[5] All times based on the 24 Hour Clock

				9:30	9:39		
LENS	1692	03/22/2001	15:00	15:00	15:37	0:37	NO
TAG	1693	03/22/2001	15:00	15:00	15:41	0:41	NO
TAG	1694	03/22/2001	17:41	17:41	18:02	0:21	NO
LENS	1695	03/23/2001	9:54	9:54	10:17	0:23	NO
TAG	1696	03/23/2001	9:54	10:25	10:34	0:09	YES
TAG	1699	03/23/2001	15:15	15:15	15:36	0:21	NO
EDI	5172	03/22/2001	13:45	03/23/2001 15:35	03/23/2001 15:52	0:17	NO
LENS	1701	03/23/2001	17:52	17:52	18:22	0:30	NO
EDI	5190	03/23/2001	13:30	16:29	18:45	2:16	NO
LENS	1703	03/25/2001	7:35	7:35	8:08	0:33	NO
TAG	1710	03/27/2001	12:55	12:55	13:18	0:23	NO
TAG	1711	03/27/2001	17:19	17:19	17:35	0:16	NO
LENS	1713	03/28/2001	10:09	10:09	10:27	0:18	NO
LENS	1717	03/29/2001	11:02	11:02	11:22	0:20	NO
TAG	1719	03/29/2001	11:35	11:32	11:48	0:16	NO
TAG	1721	03/29/2001	15:20	15:20	15:35	0:15	YES
TAG	1720	03/29/2001	13:00	13:00	13:18	0:18	NO
LENS	1729	04/02/2001	7:05	8:04	8:20	0:16	NO
LENS	1728	04/01/2001	10:34	10:34	04/02/2001 8:34	22:00	NO
TAG	1730	04/02/2001	8:20	9:55	10:20	0:25	NO
TAG	1732	04/02/2001	14:03	14:25	14:36	0:11	YES
LENS	1737	04/03/2001	10:25	10:45	10:54	0:09	YES
TAG	1743	04/04/2001	16:35	17:00	17:07	0:07	YES
TAG	1745	04/04/2001	17:30	04/05/2001 13:57	04/05/2001 14:15	0:18	NO
LENS	1747	04/05/2001	18:54	18:54	19:14	0:20	NO
LENS	1749	04/06/2001	13:11	13:31	13:30	*Notification provided before outage was verified*	YES
EDI	1751	04/07/2001	14:30	15:05	16:20	1:15	NO
LENS	1752	04/08/2001	9:30	12:23	12:39	0:16	NO
LENS	1753	04/09/2001	10:23	10:43	10:46	0:03	YES
TAG	1765	04/13/2001	9:20	9:40	9:45	0:05	YES
LENS / TAG	1767	04/13/2001	14:30	14:50	14:56	0:06	YES
LENS	1768	04/13/2001	17:45	19:35	19:40	0:05	YES
TAG	1769	04/16/2001	11:02	11:22	11:26	0:04	YES

TAG	1777	04/18/2001	10:07	11:27	11:35	0:08	YES
TAG	1778	04/18/2001	11:31	11:51	11:51	0:00	YES
TAG	1792	04/23/2001	18:25	18:45	18:45	0:00	YES
LENS	1796	04/24/2001	11:50	12:10	12:20	0:10	YES
EDI	5572	04/24/2001	BellSouth's notification provided no data for this field	15:30	15:41	0:11	YES
TAG	1802	04/25/2001	12:13	12:33	12:39	0:06	YES
EDI	5581	04/25/2001	15:06	15:30	15:36	0:06	YES
TAG	1804	04/25/2001	17:23	17:43	17:43	0:00	YES
EDI	BellSouth's notification provided no data for this field	04/26/2001	7:15	17:42	18:04	0:22	NO
EDI	5506	04/27/2001	5:08	5:19	8:03	2:44	NO

BellSouth did not meet the system outage notification standard for at least 95% of the outages reviewed during the retest. Based on observed retest performance levels, KPMG Consulting will conduct a second retest.

Impact:

Without proper notification of System Outages, CLECs may not be aware of the potential problems that may arise from the outage. CLECs may be unable to assess and resolve the situation resulting in potentially increased costs, decreased revenue and/or reduced customer service.

Appendix A

Outages without email notice

The following outages were reported by the BellSouth Interconnection website and KPMG Consulting, in their role as a pseudo CLEC, did not receive email notification of the outage as described in the Change Control Process, Table 4-2, Step 2, page 16. These 81 cases represent 61 % of the outages that occurred between 05/15/2000 and 01/18/2001.

AMENDED EXCEPTION 12

BellSouth Florida OSS Testing Evaluation

1	CSOTS	01/03/2000	1493
2	CSOTS	06/15/2000	NA
3	EDI	10/10/2000	3233
4	EDI	06/11/2000	NA
5	LENS	01/08/2001	1499
6	LENS	12/26/2000	1476
7	LENS	12/22/2000	1474
8	LENS	12/22/2000	1473
9	LENS	12/19/2000	1465
10	LENS	12/18/2000	1460
11	LENS	12/18/2000	1457
12	LENS	12/15/2000	1454
13	LENS	12/14/2000	1446
14	LENS	12/13/2000	1443
15	LENS	12/12/2000	1440
16	LENS	12/11/2000	1439
17	LENS	12/08/2000	1422
18	LENS	12/07/2000	1417
19	LENS	12/07/2000	1415
20	LENS	12/07/2000	1412
21	LENS	12/04/2000	1400
22	LENS	11/28/2000	1389
23	LENS	11/15/2000	1375
24	LENS	11/14/2000	1372
25	LENS	11/13/2000	1369
26	LENS	11/12/2000	1367
27	LENS	11/11/2000	1366
28	LENS	11/09/2000	162
29	LENS	11/08/2000	1359
30	LENS	11/06/2000	1355
31	LENS	11/04/2000	1351
32	LENS	11/03/2000	1350
33	LENS	11/02/2000	1346
34	LENS	11/01/2000	1342
35	LENS	10/29/2000	1331
36	LENS	10/27/2000	1326
37	LENS	10/25/2000	1320
38	LENS	10/24/2000	1315
39	LENS	10/23/2000	1311
40	LENS	10/22/2000	1310

42	LENS	10/14/2000	1298
43	LENS	10/13/2000	1297
44	LENS	10/12/2000	1295
45	LENS	10/04/2000	1284
46	LENS	09/12/2000	1257
47	LENS	09/07/2000	1250
48	LENS	08/24/2000	1232
49	LENS	08/22/2000	1227
50	LENS	08/14/2000	1220
51	LENS	07/27/2000	1196
52	LENS	07/19/2000	1193
53	LENS	07/19/2000	1192
54	LENS	07/10/2000	1184
55	LENS	06/16/2000	1155
56	LENS	06/07/2000	1133
57	LENS	06/06/2000	1130
58	LENS	05/23/2000	1114
59	LENS	05/19/2000	1106
60	LENS	05/17/2000	1100
61	LENS	05/17/2000	1098
62	LENS	05/15/2000	1094
63	TAG	01/05/2001	1498
64	TAG	01/03/2001	1495
65	TAG	12/07/2000	1414
66	TAG	12/01/2000	1397
67	TAG	11/17/2000	1380
68	TAG	11/05/2000	1352
69	TAG	10/25/2000	1318
70	TAG	10/22/2000	1313
71	TAG	10/19/2000	1304
72	TAG	10/18/2000	1301
73	TAG	10/11/2000	1293
74	TAG	08/25/2000	1235
75	TAG	08/22/2000	1228
76	TAG	07/28/2000	1201
77	TAG	05/31/2000	1122
78	TAG	05/25/2000	1118
79	TAG	05/25/2000	1117
80	TAG	05/19/2000	1105
81	TAG	05/15/2000	1094

41	LENS	10/18/2000	1302				

Appendix B

Outages with email notice

The following outages were reported by the BellSouth Interconnection website and KPMG Consulting, in their role as a pseudo CLEC, received an email notification of the Outage. These 15 cases represent 11 % of the outages that occurred between 05/15/2000 and 01/18/2001. In each case the 1 hour notification interval was not met as described in the Change Control Process, Table 4-2, Step 2, page 16.

1	CSOTS	09/21/2000	1273	14:00	15:11	1:11
2	LENS	12/05/2000	1406	9:36	11:35	1:59
3	LENS	11/02/2000	1344	9:45	11:44	1:59
4	LENS	11/02/2000	1345	11:42	13:43	2:01
5	LENS	10/23/2000	1311	8:00	9:38	1:38
6	LENS	10/10/2000	1306	12:17	14:21	2:04
7	LENS	10/02/2000	1282	14:15	16:20	2:05
8	LENS	07/28/2000	1202	13:35	17:15	3:40
9	LENS	07/28/2000	1204	14:50	17:15	2:25
10	LENS	07/10/2000	1184	8:45	9:57	1:15
11	TAG	11/07/2000	1358	13:50	14:51	1:01
12	TAG	08/29/2000	1237	9:05	10:06	1:01
13	TAG	08/23/2000	1229	9:00	11:57	2:57
14	TAG	08/23/2000	1230	11:10	12:31	1:21
15	TAG	08/01/2000	1208	21:00	8/2/00 at 10:33	13:33

Appendix C

Outages posted without accurate status

The following outages were reported by the BellSouth Interconnection Website but were not accurately updated. These 11 cases represent 8% of the outages that occurred between 05/15/2000 and 01/18/2001. In each case, the outage did not have a Final Resolution Notification posted on the Website as described in the Change Control Process, Table 4-2, Step 5, page 17-18.

1	CSOTS	09/21/2000	1273	Final Resolution Notification not posted on Website
2	CSOTS	06/15/2000	NA	Final Resolution Notification not posted on Website
3	LENS	12/18/2000	1460	Final Resolution Notification not posted on Website
4	LENS	12/15/2000	1454	Final Resolution Notification not posted on Website
5	LENS	12/12/2000	1440	Final Resolution Notification not posted on Website
6	LENS	09/07/2000	1250	Final Resolution Notification not posted on Website
7	LENS	08/24/2000	1232	Final Resolution Notification not posted on Website
8	LENS	08/22/2000	1227	Final Resolution Notification not posted on Website
9	LENS	07/19/2000	1193	Final Resolution Notification not posted on Website
10	LENS	06/22/2000	1162	Final Resolution Notification not posted on Website
11	TAG	11/28/2000	1389	Final Resolution Notification not posted on Website

KPMG Consulting

AMENDED EXCEPTION 13

BellSouth Florida OSS Testing Evaluation

Date: July 10, 2001

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Billing Functional Usage Evaluation (TVV10).

Exception:

BellSouth failed to deliver at least 95% of Daily Usage File (DUF) records within six calendar days following the date the calls were placed. (TVV10)

Background:

During execution of the Functional Usage Test, KPMG Consulting placed a variety of types of scripted test calls. BellSouth produces DUF records for calls, as appropriate, according to Exchange Message Interface (EMI) guidelines.[1] The records are then distributed to the appropriate CLEC.

Issue:

During the period between December 11-14, 2000, KPMG Consulting generated usage from six different locations served by a variety of switch types. A total of 2,675 DUF (ADUF, ODUF or EODUF) records were received as a result of these calls. BellSouth's SQM Performance Reports establishes a six day time frame for distribution of DUF records.[2] The standard established by KPMG Consulting for the purpose of the OSS test is that 95% of the records must be delivered within that timeframe. Upon review of the DUF records received, KPMG Consulting found that only 94%[3] were received within six calendar days. The number of records received by day is shown in the table below.

[1] Exchange Message Interface (EMI); Industry Support Interface; Issue 17, Rev. 1; April 2000

[2] B-5. Usage Data Delivery Timeliness BellSouth Service Quality Measurements Performance Reports, Version 02/29/00, page 55.

[3] Timeliness is measured as the difference between the record date and the record pack creation date. The package creation date is remain the same in the case of a resent DUF.

AMENDED EXCEPTION 13

BellSouth Florida OSS Testing Evaluation

1 Day	349	349	13%
2 Days	1,249	1,598	60%
3 Days	213	1,811	68%
4 Days	369	2,180	81%
5 Days	244	2,424	91%
6 Days	94	2,518	94%
7 Days	43	2,561	96%
8 Days	48	2,609	98%
9 Days	19	2,628	98%
10 Days	25	2,653	99%
>10 Days	22	2,675	100%

All of the untimely DUF records were received in the following BellSouth datasets:

- MD03.PFB02.OCN9990.D121800
- MD03.PFB02.DJM9990
- MD03.PFA02.OCN9990.D122100
- MD03.PFA02.OCN9990.D122200
- MD03.PFA02.OCN9990.D122700
- MD03.PFA02.OCN9990.D011001
- MD03.PFA02.OCN9990.D012301
- MD03.PFA02.OCN9991.D121900
- MD03.PFA02.OCN9991.D122200
- MD03.PFB02.OCN9992.D121800
- MD03.PFB02.DJM9992
- MD03.PFA02.OCN9992.D122100
- MD03.PFA02.OCN9992.D010401

Amendment:

BellSouth's response to Exception 13 stated the following two reasons for not achieving the 95% timeliness standard:

1. Originating UNE calls with a terminating number of 0000000000 were sent from the ALPHA billing system to BIBS with the terminating number populated as 'FFFFFFFFFF'. This condition caused usage to be held, resulting in delayed DUF delivery. (A mechanized process was implemented on February 23, 2001 to populate the terminating number with zeros.)

2. KPMG migrated accounts from different CLEC provider types (i.e. Resale to UNE, Retail to UNE, etc.). This type of migration causes usage to be held until service orders post in the billing system, resulting in delayed DUF delivery.

KPMG Consulting conducted a DUF retest between the dates of May 29th and June 1st, 2001. Following the DUF retest, KPMG Consulting received 3,598 DUF records for calls placed during the retest period. Of the 3,598 records received, 82% (2,953) of these DUF records were received within the six calendar day period following the record creation date. For the DUF retest, the number of records received by day is shown in the table below.

1 Day	140	140	4%
2 Days	591	731	20%
3 Days	240	971	27%
4 Days	250	1,221	34%
5 Days	446	1,667	46%
6 Days	1,286	2,953	82%
7 Days	391	3,344	93%
8 Days	115	3,459	96%
9 Days	4	3,463	96%
10 Days	38	3,501	97%
>10 Days	97	3,598	100%

All of the untimely DUF records (retest) were received in the following BellSouth datasets:

- MD03.PFB02.OCN9990.D060701
- MD03.PFB02.OCN9990.D060801
- MD03.PFA02.OCN9990.D060601
- MD03.PFA02.OCN9990.D060701
- MD03.PFA02.OCN9990.D060801
- MD03.PFA02.OCN9990.D061101
- MD03.PFA02.OCN9990.D061201
- MD03.PFA02.OCN9990.D061301
- MD03.PFA02.OCN9990.D061401
- MD03.PFA02.OCN9990.D061501
- MD03.PFA02.OCN9990.D061801
- MD03.PFA02.OCN9991.D060701
- MD03.PFA02.OCN9991.D060801

- MD03.PFA02.OCN9991.D061101
- MD03.PFA02.OCN9991.D061201
- MD03.PFA02.OCN9991.D061301
- MD03.PFA02.OCN9991.D061401
- MD03.PFA02.OCN9991.D061501
- MD03.PFA02.OCN9991.D061801
- MD03.PFB02.OCN9992.D061101
- MD03.PFA02.OCN9992.D060501
- MD03.PFA02.OCN9992.D060601
- MD03.PFA02.OCN9992.D060701
- MD03.PFA02.OCN9992.D060801
- MD03.PFA02.OCN9992.D061101
- MD03.PFA02.OCN9992.D061201
- MD03.PFA02.OCN9992.D061301
- MD03.PFA02.OCN9992.D061401
- MD03.PFA02.OCN9992.D061501
- MD03.PFA02.OCN9992.D061801

Impact:

Failure to timely deliver DUF records can cause delays for CLECs in billing their customers as well as delaying the billing of Interexchange Carriers for access minutes of use.

KPMG Consulting

EXCEPTION 16

BellSouth Florida OSS Testing Evaluation

Date: March 5, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the TVV1 POP Functional Evaluation.

Exception:

The BellSouth Business Rules for Local Ordering –OSS '99, Issue 9K[1], does not offer CLECs the ability to submit an order for the partial migration of a customer's unbundled (UNE) loops. (TVV1)

Background:

Current allowable activity types for UNE loop orders include New (N), Change (C), Disconnection (D), Outside move of end user location (T), and Full Conversion of service as specified to new Local Service Provider (V). A partial migration of a customer's account would allow for a CLEC to migrate one or more lines of a multi-line account, while leaving some lines with the ILEC or with another CLEC.

Issue:

The BellSouth Business Rules for Local Ordering –OSS '99, Issue 9K, does not provide specific business rules on how to issue an order for the partial migration of an end user's account. Without the functionality to order a partial migration of an end user's UNE loops, end user customers and CLECs are required to go through a multi-step process simply to allow customers to change their service provider. First, the customer (end user) must call BellSouth to disconnect a partial list of the phone numbers in the account. The disconnect must then be performed by BellSouth and will take at least one work day before completion. Once the disconnect is complete, the CLEC sends an order to establish new service with new phone numbers for the end user. The absence of partial migration in effect could operate in such a manner that it is a barrier to competition for CLECs.

[1] BellSouth Business Rules for Local Ordering – OSS99, *Issue 9k December 22,* 2000. This document can be found at the following URL: http://www.interconnection.bellsouth.com/guides/leo/pdf/gleoo009.pdf

Impact:

BellSouth's current ordering process for partial Loop Service requests may impact a CLEC in the following ways:

- **Decrease in customer satisfaction.** The inconvenience and the uncertain service delivery times associated with the current process may decrease CLEC customer satisfaction.
- **Deterrent to competition.** The current process may increases a CLEC's costs and time to win customers from another service provider as well as impose an undue hardship on customers who may want to change service providers.

KPMG Consulting

3rd AMENDED EXCEPTION 22

BellSouth Florida OSS Testing Evaluation

Date: August 29, 2001

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5). This exception was originally issued as Observation 15.

Exception:

KPMG Consulting cannot replicate the values in the "Provisioning: Local Number Portability (LNP) – Disconnect Timeliness Interval & Average Disconnect Timeliness Interval" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2000). KPMG Consulting found that BellSouth's instructions are insufficient for calculating the metrics values for this SQM. (PMR5)

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida. BellSouth also publishes the monthly processed data[1] (PMAP raw data[2]) used to create these reports.[3]

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting attempted to replicate these reports using BellSouth's published PMAP Raw Data User Manual, where applicable, the corresponding raw data, supported by technical assistance from BellSouth.

BellSouth provided KPMG Consulting with a file described to contain English-language instructions to calculate the metrics values for "Provisioning: LNP – Disconnect Timeliness Interval Distribution & Average Disconnect Timeliness Interval." The BellSouth instruction file for calculating the SQM values is described in the following table:

[1] The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data".

[2] *The PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the May 15, 2000 version of the Manual.

[3] These reports and PMAP raw data may be delivered in hard copy or via the PMAP Web site.

DisconnectTimelinessInteval.doc	Computation instructions for the LNP-Disconnect Timeliness Interval Distribution & Average Disconnect Timeliness Interval

KPMG Consulting discovered, however, that the computation instructions for "Provisioning: LNP- Disconnect Timeliness Interval Distribution & Average Disconnect Timeliness Interval" are insufficient for calculating metrics values for this SQM.

BellSouth's computation instructions for the calculation of the "Disconnect Timeliness Interval" refer to two variables. However, in the data file provided to KPMG Consulting, "LNPDisconnect.xls,"[4] these variables are not readily apparent. Furthermore, based on BellSouth's computation instructions, KPMG Consulting is unable to identify FL-specific records in the data file.

Without adequate instructions, KPMG Consulting is unable to replicate metrics values for this SQM.

BellSouth's response to Observation 15[5] indicates how to locate the appropriate variables and provided a table to identify Florida-specific records. Subsequently, KPMG Consulting asked BellSouth a clarification question regarding negative intervals. BellSouth stated in its response to the clarification question that a system change was required and that the change would be effective for February 2001 data.[6]

Amendment- In BellSouth's Amended Response to Exception 22, BellSouth informed KPMG Consulting how negative intervals are treated in its computation process:

> *Due to the calculation requirements for LNP Disconnect, the method described by BellSouth of treating all negative intervals as errors and, therefore, omitting them from the calculation, could not be properly instituted in the LNP Disconnect measure. As a result, BellSouth has made the decision to convert all negative LNP Disconnect intervals to zero and allow them to remain a part of the calculation.*

[4] BellSouth provided KPMG Consulting with this data file on July 7, 2000.
[5] Florida OSS BellSouth's Response to Observation 15, 11/21/00.
[6] KPMG Consulting received BellSouth's response to the clarification e-mail on 1/8/01.

KPMG Consulting has reviewed BellSouth's computation methodology[7] and the *Revised Interim SQM* and does not understand under what circumstances negative intervals would occur.

The *Revised Interim SQM* defines the LNP-Disconnect Timeliness interval formula in the "Calculation" section as follows:

(Disconnect Service Order Completion Date & Time) – ('Number Ported' Message Received Date & Time)

The "Business Rules" section states that:

The Disconnect Timeliness interval is the elapsed time from when BST receives the 'Number Ported' message for an LSR's disconnect order from NPAC (signifies the CLEC 'Activate') until the Disconnect service order is completed in SOCS.

The two date/time stamps listed in the formula above are dependent events. Until BellSouth receives the 'Number Ported' message from NPAC, it cannot process the Disconnect service order. In our opinion, any negative intervals should be treated as errors.

Furthermore, by converting the negative intervals to zeros and placing them in the 0-4 hour time bucket, BellSouth is including invalid disconnect transactions (e.g. negative intervals) with valid disconnect transactions. Also, by adding negative intervals to the data set in the 0-4 hour time bucket, BellSouth is potentially overstating its performance.

2nd Amendment – KPMG Consulting reviewed BellSouth's response to Amended Exception 22[8] and the updated instructions.[9] However, KPMG Consulting continues to be unable to replicate the BellSouth reported values for the "Provisioning: LNP-Disconnect Timeliness Interval Distribution & Average Disconnect Timeliness Interval" SQM. The discrepancy found is listed in the table below.

1	LNP Disconnect Timeliness	Average Interval (hh:mm)	39219.5	1820	21:33	20:41

[7] FLA BellSouth Supporting Docs Exception 22.doc, 3/28/01.
[8] Florida OSS BellSouth Response to Amended Exception 22, 5/21/01.
[9] Exc22aerSupDoc 5_21_01.doc, 5/18/01.

3rd Amendment – KPMG Consulting reviewed BellSouth's response to 2nd Amended Exception 22[10] and attempted to replicate using May 2001 data.[11] However, KPMG Consulting continues to be unable to replicate the BellSouth reported values for the "Provisioning: LNP-Disconnect Timeliness Interval Distribution & Average Interval Distribution" SQM. The discrepancies are listed in the table below.

1	LNP Disconnect Timeliness	<=15 Minutes	134	5939	2.26%	1.45%
2	LNP Disconnect Timeliness	> 15 Minutes	5805	5939	97.74%	98.55%
3	LNP Disconnect Timeliness	Average Interval (hh:mm)	7119010.917	5939	19:58[12]	15:13

Impact:

CLECs utilize BellSouth's performance measurements as an input for assessing the quality of service provided by BellSouth and for planning future business activities. KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the "Provisioning: LNP-Disconnect Timeliness Interval Distribution & Average Interval Distribution" SQM may be in question. Without accurate SQMs, CLECs might not be able to assess the quality of service received or plan for future business activities reliably.

[10] FLA OSS BellSouth's Response to 2nd Amended Exception 22, 5/29/01.
[11] BellSouth provided KPMG Consulting with this data file on July 17, 2001.
[12] The KPMG Consulting-calculated value is derived as follows: (numerator/denominator)/60

KPMG Consulting

EXCEPTION 27

BellSouth Florida OSS Testing Evaluation

Date: March 12, 2001

EXCEPTION REPORT

An Exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5). This exception was originally issued as Observation 32.

Exception:

KPMG Consulting cannot replicate the values in the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2000). (PMR-5)

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida. BellSouth also publishes the monthly processed data[1] (PMAP raw data[2]) used to create these reports.[3]

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting attempted to replicate these reports using BellSouth's published PMAP Raw Data User Manual, where applicable, and the corresponding raw data, supported by technical assistance from BellSouth.

[1] The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data".
[2] *The PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the May 15, 2000 version of the Manual.
[3] These reports and PMAP raw data may be delivered in hard copy or via the PMAP Web site.

EXCEPTION 27

BellSouth Florida OSS Testing Evaluation

KPMG Consulting was unable to replicate the BellSouth reported values for the "Provisioning: Troubles Within 30 Days of Provisioning" SQM. The discrepancies are listed in the following table.

1	BST; Residence	<10 Circuits; Dispatch	4236	55577	7.62%	7.72%
2	BST; Residence	<10 Circuits; Non-Dispatch	19999	816701	2.45%	3.06%
3	BST; Residence	<10 Circuits	24235	872278	2.78%	10.79%
4	BST; Residence	>=10 Circuits; Dispatch	11	101	10.89%	9.80%
5	BST; Residence	>=10 Circuits; Non-Dispatch	4834	0	DIV/0	N/A
6	BST; Residence	>=10 Circuits	4845	101	4797.03%	9.80%
7	BST; Business	<10 Circuits; Dispatch	1089	16483	6.61%	6.86%
8	BST; Business	<10 Circuits; Non-Dispatch	2166	56070	3.86%	4.36%
9	BST; Business	<10 Circuits	3255	72553	4.49%	11.21%
10	BST; Business	>=10 Circuits; Dispatch	50	453	11.04%	7.25%
11	BST; Business	>=10 Circuits; Non-Dispatch	279	487	57.29%	0.41%
12	BST; Business	>=10 Circuits	329	940	35.00%	7.66%
13	BST; Design	<10 Circuits; Dispatch	81	6289	1.29%	2.35%
14	BST; Design	<10 Circuits	82	6794	1.21%	2.55%

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15	CLEC; Residence	<10 Circuits; Dispatch	84	1035	8.12%	7.92%
16	CLEC; Residence	<10 Circuits; Non-Dispatch	594	14248	4.17%	4.41%
17	CLEC; Residence	<10 Circuits	678	15283	4.44%	12.33%
18	CLEC; Residence	>=10 Circuits; Non-Dispatch	25	0	DIV/0	N/A
19	CLEC; Residence	>=10 Circuits	25	3	833.33%	N/A
20	CLEC; Business	<10 Circuits; Dispatch	27	431	6.26%	7.19%
21	CLEC; Business	<10 Circuits; Non-Dispatch	112	2387	4.69%	5.01%
22	CLEC; Business	<10 Circuits	139	2818	4.93%	12.21%
23	CLEC; Business	>=10 Circuits; Dispatch	5	6	83.33%	16.67%
24	CLEC; Business	>=10 Circuits; Non-Dispatch	4	13	30.77%	7.69%
25	CLEC; Business	>=10 Circuits	9	19	47.37%	24.36%
26	CLEC; Design	<10 Circuits	1	83	1.20%	1.89%
27	CLEC; UNE Design	<10 Circuits; Dispatch	31	1245	2.49%	13.64%
28	CLEC; UNE Design	<10 Circuits	31	1245	2.49%	13.64%
29	CLEC; UNE Non-Design	<10 Circuits; Non-Dispatch	14	1048	1.34%	1.43%
30	CLEC; UNE Non-Design	<10 Circuits	14	1582	0.88%	1.43%

31	CLEC; UNE Non-Design	>=10 Circuits; Non-Dispatch	1	26	3.85%	N/A
32	CLEC; UNE Non-Design	>=10 Circuits	1	49	2.04%	N/A

BellSouth's Response to Observation 32[4] indicated that a change request was submitted for the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" measure and has been implemented.

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the SQM may be in question. Without accurate SQMs, CLECs might not be able to assess the quality of service received or plan for future business activities reliably.

[4] BellSouth's Response to Observation 32, 01/31/01.

KPMG Consulting

2nd AMENDED EXCEPTION 35

BellSouth Florida OSS Testing Evaluation

Date: September 21, 2001

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the End-to-End Maintenance and Repair Process Evaluation. (PPR14)

Exception:

BellSouth processes for responding to customer requests for earlier appointments in the CWINS Center differ from those in the Small Business Telecommunications Center resulting in a disparity in service between wholesale and retail. (PPR14)

Background:

KPMG Consulting found that all call receipt centers attempt to provide customers with the system provided appointment. However, when a customer requests an earlier appointment, the process used in the Customer Wholesale Interconnect Network Service (CWINS) Center differs from that used in the Small Business Telecommunications Center (SBTC).

Customer Wholesale Interconnect Network Service (CWINS) Center—In the CWINS (CLEC) Center, if a request is made for an earlier appointment, the Maintenance Administrator (MA) must contact the manager for approval. The manager will, for emergency or very unique situations, allow the MA to alter the commitment and offer something sooner. The CWINS Center then normally notifies the (Work Management Center) WMC to make the center aware of the earlier appointment.

Small Business Telecommunications Center—When a retail customer requests an earlier appointment while reporting a trouble to the SBTC (business accounts with five or less lines), the Specialist taking the report has the ability to schedule an appointment within four hours as long as it does not take the appointment beyond 6:00PM. If offering a four hour appointment would take the appointment beyond 6:00 PM, the Specialist provides the best appointment time possible, then contacts the WMC to see if something better can be provided. The SBTC does not appear to restrict this to emergencies or unique situations. If the caller does not accept the appointment, Specialists have the authority to work with the caller to meet their needs. The SBTC stated that customers reporting troubles by 3:00 PM normally get a same day appointment. This is not the experience observed in the CWINS Center.

2nd AMENDED EXCEPTION 35

BellSouth Florida OSS Testing Evaluation

Issue:

CLECs are dependent on BellSouth to fairly prioritize repair reports for CLEC end users that are experiencing trouble. When a CLEC end user has a reason to request a faster repair than that offered, CLECs deserve the same considerations and responses as those experienced by retail customers. CLECs are at a disadvantage when BellSouth retail business customers normally get same day service, and/or the agents taking troubles are capable of reducing the appointment intervals immediately online, for BellSouth retail customers.

Amendment:

A retest of Exception 35 was completed to re-evaluate the business practices associated with earlier appointments for wholesale troubles as compared to those for BellSouth small business retail accounts.

KPMG Consulting testers observed trouble receipt activities in the CWINS Center in Duluth, GA. on 08-08-01 where they observed as employees handled 26 troubles. Additionally, on 08-09-01 the testers observed maintenance activity in the Jacksonville, FL small business repair call receipt center were they observed agents as they processed 73 troubles. After each work observation, the testers interviewed center management employees to discuss process steps.

The following areas reflected differences between the wholesale and retail small business practices:

1. Wholesale backed up 2 or 8% of their appointments while retail backed up 19 or 26% of their appointments.
2. The CWINS center called the WMC for approval on 100% of their backed up appointments while the retail employees made the decisions and made no calls to the WMC for approval. The retail employees did state that if they were to offer an appointment with less than four hours, they would need to obtain WMC approval.
3. As troubles were processed by the CWINS center no changes were made to appointments unless the CLEC made a direct request. Agents in the retail small business center would ask the caller for office hours and if the appointment was for a time period later than office hours, the agent would shorten the appointment to match the customer's business hours. This change was not made apparent to the caller and no call to the WMC was required.
4. CWINS agents described the process they use which confirmed to the written process supplied by BellSouth on the earlier response to Exception 35. The retail small business agents indicated that the call to the WMC (which is documented on the process previously supplied in response to Exception 35) was not required unless they were attempting to make an appointment shorter than the four hours required by the

WMC.

5. An interview with management employees in the CWINS center was conducted and in the interview, management stated the policy as documented and as demonstrated by the employees. When asked if they could provide a copy of the process they were able to supply a copy and it matched activity observed. In the interview with the retail small business management, when asked to describe the process used, management described a process that was different from the actual work performed by the agents. When asked for a copy of their process, management stated that they could not provide a copy to KMPG Consulting. Without a copy of the process, KPMG Consulting could not verify which was correct, that expressed by management or the work observed as agents processed trouble reports.

As a result of the retest, KPMG Consulting requests that BellSouth revisit the process for modifying appointments and the execution within work centers and suggests that another retest would be required before Exception 35 could be recommended for closure.

2nd Amendment:
Due to a misunderstanding between the KPMG Consulting test team and the BellSouth interface team, the retest scheduled and conducted on August 9, 2001 was performed in the incorrect work center. The retest was to be conducted in the Small Business Repair Center and was actually conducted in the standard Business Repair Center (BRC) located in the same building as the Small Business Repair Center.

Because the observed process associated with changing appointments for BRC retail business customers is similar to the process originally found in the Small Business Repair Center which was the basis of Exception 35, KPMG Consulting amends this Exception by including the BRC process in Exception 35. Both the Business Repair Center and the Small Business Repair Center use a process associated with the scheduling of appointments that would disadvantage wholesale customers performing trouble administration activity though the CWINS Center. KPMG Consulting requests that BellSouth consider the process used by both retail centers in comparison to that used in the CWINS Center.

Impact:

A different set of rules for exceptions on repair commitments for BellSouth wholesale and retail customers creates a disparity in the level of service that CLECs can provide to their customers. This disparity may affect CLEC reputation, customer satisfaction, and impair the ability of the CLEC to obtain and maintain customers.