

**OBSERVATION 80**  
BellSouth Florida OSS Testing Evaluation

May 23, 2001

**OBSERVATION REPORT**

An observation has been identified as a result of test activities associated with the Functional Carrier Bill Evaluation Test (TVV11).

**Observation**

**The application of recurring and non-recurring charges associated with UNE ports denoted by the Universal Service Order Code (USOC) UEPLX, appear to be inconsistent. (TVV11)**

**Background**

The network element represented by the USOC UEPLX is listed in Attachment 2, Exhibit C of the Interconnection Agreement between BellSouth and the KPMG CLEC with the following rates:

- \$41.50 Non Recurring Charge (NRC) for first network element
- \$41.50 NRC for additional network element
- \$14.90 Recurring Charge (RC) per month

**Issue**

KPMG Consulting has examined several order types including new and change order activities. On new orders the NRC is applied, however the RC is not applied. On change orders, the RC is applied however the NRC is not applied. The rate tables do not provide adequate description on the application of the respective rates. Following, please find examples where the charges were applied inconsistently:

[REDACTED]			
904 Q59-0568-568	352-490-7959	07/29/00	New
904 Q59-0568-568	352-490-7959	04/29/00	Change
561 Q59-0568-568	561-832-1972	04/29/00	Change

**Question:**

Can BellSouth provide a full description on how the rates are applied, indicating where the variations in the application of rates?

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Date: June 7, 2001

**OBSERVATION REPORT**

KPMG Consulting has identified an observation as a result of the POP Functional Evaluation (TVV-1).

**Observation:**

**KPMG Consulting has not received manual Firm Order Confirmations (FOC) on orders that have been assigned a Completed Status (CP) in Bellsouth's Customer Service Order Tracking System (CSOTS). (TVV1)**

**Background:**

An FOC should be returned to CLECs either via facsimile or electronically, depending on how the order was transmitted, after BellSouth processes an error free local service request.<sup>1</sup> A Completion Notice (CN) is generated by BellSouth's systems after the service order is completed. For orders submitted manually, CLECs are expected to check CSOTS, or the PON Status Report online, for the current status of the order.

**Issue:**

The following PONs were submitted manually, and have been assigned a status of Completion (CP) in CSOTS, but KPMG has yet to receive a FOC:

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<sup>1</sup> *BellSouth Business Rules for Local Ordering – OSS99, Issue 9M April 30, 2001.* This document can be found at the following URL: [www.interconnection.bellsouth.com/guides/html/leo.html](http://www.interconnection.bellsouth.com/guides/html/leo.html). See Sec.2.8.3.

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044071FPMC000002	01	9993	4/10/01 2:32PM	ISDN PRI
057021FPMC000013	01	9990	4/19/01 4:06PM	SYNCHRONET
099051FPMC000002	01	9990	4/11/01 9:20 AM	EEL
099051FPMC000003	01	9990	4/11/01 9:53 AM	EEL
099051FPMC000004	01	9990	4/11/01 1:09 PM	EEL
099061FPMC000003	01	9990	4/11/01 2:04 PM	EEL
044022FPMC000005	00	9993	4/04/01 11:52AM	ISDN BRI
025011FPMC000001	01	9990	4/17/01 5:35 PM	CENTREX
035071FPMC000007	00	9990	4/5/01 5:09 PM	ISDN PRI
035071FPMC000002	00	9990	3/30/01 1:08 PM	ISDN PRI

**Impact:**

CLECs may commit time and resources to investigating orders that are error free, but are in the process of completion. Additionally, without FOCs, CLECs are unable to communicate scheduling of service activity work to their customers or schedule CLEC provisioning activity needed to complete the order.



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Date: June 13, 2001

**OBSERVATION REPORT**

KPMG Consulting has identified an observation as a result of the test activities associated with the Provisioning Verification and Validation Evaluation test (TVV-4).

**Observation:**

**BellSouth's systems or representatives did not update Customer Service Records (CSRs) consistently following a change in the status of a customer's account. (TVV4)**

**Background:**

Upon the completion of the local service requests (LSRs) to change service providers, BellSouth's systems or representatives should update the CSRs to reflect all appropriate changes made. KPMG Consulting observed that the directory section of CSRs was not consistently updated. The following two sets of identical orders demonstrate the inconsistent update of the directory section of CSRs.

Following is an example of orders yielding different results:

001061FPEJ100003	00	9990
001061FPEJ102005	00	9990

Both purchase order numbers (PONs) were submitted to migrate a 1-line residential retail customer to CLEC UNE Platform (Port/Loop Combination). The LSR for these orders consists of LSR form, End User (EU) form, and Port Service (PS) form. No directory listing (DL) form was attached to these orders.

PON 001061FPEJ100003 was for the account telephone number of 305 374-0785. The order was submitted on March 15, 2001 and received a completion notice on March 21, 2001. The post-activity CSR was retrieved via LENS on April 10, 2001. The directory section in the post-activity CSR was not updated; therefore, it contained the same information as the directory section in the pre-activity CSR shown below:

--- DIR  
DEL           A0, B0, C0

PON 001061FPEJ102005 was for the account telephone number of 305 681-2209. The order was submitted on April 3, 2001 and received a completion notice on April 5, 2001.

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The post-activity CSR was retrieved via LENS on April 10, 2001. The directory section in the post-activity CSR was updated.

The directory section of the pre-activity CSR is shown below:

--- DIR  
DEL           A0, B0, C0

The directory section of the post-activity CSR is shown below:

--- DIR  
DDA           FLO SOUTH  
              2660 E SUPERIOR ST  
              OP-LKA FL 33054  
DEL           A1, B1, C1

Following is a second example of identical orders yielding different results:

002121FPEJ100003	00	9990
002121FPEJ100006	00	9990

Both PONs were submitted to migrate a 1-line residential retail customer to CLEC UNE Platform. The LSR for these orders consists of LSR form, EU form, and PS form. No DL form was attached to these orders.

PON 002121FPEJ100003 was for the account telephone number of 305 358-4029. The order was submitted on April 3, 2001 and received a completion notice on April 4, 2001. The post-activity CSR was retrieved via LENS on May 9, 2001. The directory section in the post-activity CSR was updated.

The directory section of the pre-activity CSR is shown below:

--- DIR  
DEL           A0, B0, C0

The directory section of the post-activity CSR is shown below:

--- DIR  
DDA           FLO SOUTH  
              45 NW 5TH ST  
              MIA FL 33128  
DEL           A1, B1, C1

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PON 002121FPEJ100006 was written for the account telephone number of 561 835-4938. The order was submitted on April 3, 2001 and received a completion notice on April 4, 2001. The post-activity CSR was retrieved via LENS on May 9, 2001. The directory section in the post-activity CSR was not updated; therefore, it contained the same information as the directory section in the pre-activity CSR shown below:

--- DIR  
DEL           A0, B0

**Questions:**

1. Should the directory section of a CSR be updated when a DL has not been submitted with the order? If it should be updated, which forms and/or fields in the order are the sources of information used for this update?
2. Why are post-completion CSRs for identical types of orders not updated in a consistent manner?
3. Per BellSouth's document CG-CSRJ-001 Issue 1, February 2001 (CSR Job Aid), the directory section specifies the directories that the customer has requested and the directory information if it is different from the account's listed address. In these two examples, the addresses in the directory section do not differ from the account's listed address. Why is this directory section populated and updated?



**OBSERVATION 86**  
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Date: June 29, 2001

**OBSERVATION REPORT**

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

**Observation:**

**The BellSouth Release Management Team does not provide all prioritized Change Requests to the BellSouth IT Team for development and implementation (PPR1).**

**Background:**

The BellSouth Internal Change Management Process is the process used by BellSouth to implement changes to its OSS. These changes are proposed by both BellSouth Internal Groups and the CLEC Community. Proposed changes are routed through a series of prioritization steps and combined into a Master Prioritization list. The thirty (30) highest-ranking change requests on the Master Prioritization list are then submitted to the BellSouth IT Team for possible implementation.<sup>1</sup>

**Issue:**

During the review of the BellSouth Internal Change Management Process, KPMG Consulting found that the BellSouth Release Management Team has a policy of providing only the thirty (30) highest ranking Change Requests to the BellSouth IT Team for development. Specifically:

1. The IT Team is not provided with an opportunity to review all proposed change requests that have been approved for development and implementation.
2. The thirty (30) highest-ranking Change Requests from the Master Prioritization list do not include all of the Change Requests that have been prioritized for implementation by BellSouth and the CLEC Community during the Change Control Process.<sup>2</sup>

**Impact:**

The BellSouth Release Management End-to-End Process Flow does not provide rationale for the policy of providing only the thirty (30) highest-ranking change requests during prioritization. This policy appears to limit the number of CLEC Change Requests that can be implemented.

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<sup>1</sup> End-to-End Process Flow, Version 1, Table on Page 37, Step 1.

<sup>2</sup> Documented in the BellSouth Master Prioritization List

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Date: June 29, 2001

**OBSERVATION REPORT**

KPMG Consulting has identified an observation as a result of the POP Functional Evaluation (TVV-1).

**Observation:**

**The Local Exchange Navigation System (LENS) interface does not support orders requesting to move a CLEC account outside of the end user's location (ACT T). (TVV1)**

**Background:**

LENS is an on-line, interactive, menu-driven system used to submit Local Service Requests (LSRs) to BellSouth. LENS automatically tests orders for compliance with BellSouth's current business rules.

According to the *BellSouth Business Rules for Local Ordering, OSS99<sup>1</sup>* an ACT of T is valid for UNE Loop, UNE Combinations, and Resale request types.

When populating the Activity Type (ACT) field in LENS, a drop down menu is provided in which the user must choose from options provided. LENS, however, does not provide the user with ACT T as an option.

**Impact:**

The unavailability of ACT T in LENS could impact CLECs in the following ways:

- **Decrease in Customer Satisfaction.** CLECs might be exposed to delays if they are unable to successfully submit ACT T service requests due to a conflict between the LENS application and business rules. A delay in delivering a service to a customer could negatively impact a customer's view of a CLEC's reliability.
- **Increase in Operating Costs.** Ordering problems might require additional CLEC resources before completion. Delays in problem resolution increase the time CLECs expend to successfully process a customer's order.

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<sup>1</sup> BellSouth Business Rules for Local Ordering – OSS99, *Issue 9N May 31, 2001*. This document can be found at the following URL: <http://www.interconnection.bellsouth.com/guides/html/leo.html>

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Date: July 5, 2001

**OBSERVATION REPORT**

KPMG Consulting has identified an observation as a result of the POP Functional Evaluation (TVV-1).

**Observation:**

**BellSouth's *Pre-Order Business Rules*<sup>1</sup> for Loop Makeup Data on Working Loops Query (LMU\_WL) conflicts with the *Telecommunications Access Gateway (TAG) API Reference Guide*<sup>2</sup> on Circuit ID (CKT-ID) and Telephone number (TN) field formats. (TVV1)**

**Background:**

BellSouth's *Pre-Order Business Rules*<sup>3</sup> defines CKT-ID as 36 alpha/numeric characters in length and defines the valid format - described in Appendix T - as "12.PLNT.123456.66.SB" with the following characteristics:

WHERE 12 = PREFIX (OPTIONAL) (1-2 ALPHANUMERICS)

WHERE PL = SERVICE CODE (2 ALPHABETICS PRECEDED BY A PERIOD) WHERE NT = MODIFIER (2 ALPHABETICS OR 1 ALPHABETIC AND 1 ALPHANUMERIC)

WHERE 123456 = SERIAL NUMBER (1-6 NUMERICS OF 1-999999 PRECEDED BY A PERIOD)

WHERE 66 = SUFFIX (OPTIONAL) (1-3 NUMERICS OF 1-999 PRECEDED BY A PERIOD)

WHERE SB = ASSIGNING COMPANY IDENTIFICATION (2 OR 4 ALPHABETICS PRECEDED BY A PERIOD)

NOTE 1: THE ABSENCE OF THE SUFFIX DATA IS INDICATED BY 2 PERIODS BETWEEN THE SERIAL NUMBER AND THE ASSIGNING COMPANY IDENTIFICATION.

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<sup>1</sup> *BellSouth Pre-Order Business Rules, Issue 11.0, April 2001*. This document can be found at the following URL: <http://www.interconnection.bellsouth.com/guides/html/bpobr.html>

<sup>2</sup> Release 7.5.0.10 February, 2001

<sup>3</sup> Section 51.1

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The TN field is defined as 24 alpha/numeric characters in length with the following comment for both the TN and the CKT-ID fields: "Only one of circuit ID or Telephone Number is required<sup>4</sup>."

The *TAG API Reference Guide*<sup>5</sup> differs showing the following sample input:

cktId="38.SBGS.404.477.3999.T22.123"

The above sample input implies that the telephone number must be in the circuit ID field, after the modifier, instead of the serial number as described in the pre-order business rules.

**Questions:**

1. What is the correct format to populate these fields?
2. Are both fields required to complete an LMU\_WL pre-order?

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<sup>4</sup> *BellSouth Pre-Order Business Rules, Issue 11.0, April 2001, page 270.*

<sup>5</sup> Part B, page 203

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Date: July 9, 2001

**OBSERVATION REPORT**

KPMG Consulting has identified an observation as a result of the POP Functional Evaluation (TVV-1).

**Observation:**

**BellSouth provides inaccurate and inconstant date and time stamps on their responses to Local Service Requests (LSRs) submitted via RoboTAG<sup>1</sup>. (TVV1)**

**Background:**

BellSouth developed RoboTAG as an electronic interface software that combines Telecommunication Access Gateway (TAG) with a front-end Graphical User Interface (GUI). CLECs can use RoboTAG for all ordering and pre-ordering functions that are currently electronically available.

Per BellSouth's instructions<sup>2</sup>, KPMG Consulting has been referencing the URMain response tables in the RoboTAG SQL Database for the purpose of measuring and evaluating the timeliness of BellSouth responses to LSRs submitted through RoboTAG.

**Issue:**

KPMG Consulting has discovered the following discrepancies in date and time stamps reported by BellSouth through both the RoboTAG interface and the SQL Database:

1. **Response dates changed in RoboTAG, version 7.1.2.1.** PON 005091FPRJ100013 (Version 00, CC 9990) was submitted on 5/08/2001 10:37 AM, and received a clarification response 'Date of Receipt' of 5/8/2001. The clarification response 'Date of Receipt' later changed to 5/9/2001.
2. **RoboTAG SQL Database, associated with version 7.1.2.1, provides inaccurate time and date stamps.** PON 005091FPRJ100013 (Version 00, CC 9990) has 'Date of Receipt' of 5/9/01 3:25 PM. Version 1 of the same PON has a 'Date of Receipt' of 5/9/01 10:30 AM.
3. **RoboTAG's SQL Database, associated with version 7.1.2.1, has changed after being recorded the first time.** PON 011121FPRN100009 (Version 00, CC 9993) was downloaded from the SQL database on 5/17/01, and again on

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<sup>1</sup> Versions 7.1.2.1 and 7.5.0.15

<sup>2</sup> See Florida OSS BellSouth Response to Observation 52. This document can be found at the following URL: <http://www.psc.state.fl.us/industry/telecomm/oss/exceptions.html>

5/22/01. On 5/17 the 'Date of Receipt' was 5/17/01 3:47 PM, and on 5/22 the 'Date of Receipt' was 5/20/01 4:56 PM.

4. **RoboTAG's SQL Database, associated with version 7.5.0.15, provides different dates of receipt for the same PONs.** The following PONs have been recorded with multiple dates on RoboTAG's SQL Database:

077011FPRH000010	0	9993	Confirmed	06/21/2001 6:29:20 AM/ 06/20/2001 1:23:25 PM
011071FPRJ000020	1	9993	Rejected	06/21/2001 6:28:14 AM/ 06/20/2001 12:23:58 PM
016031FPRN000005	1	9993	Rejected	06/21/2001 6:27:08 AM/ 06/21/2001 6:26:02 AM/ 06/20/2001 11:53:35 AM/ 06/20/2001 11:25:24 AM

**Impact:**

BellSouth's failure to provide accurate and constant time stamps could impact CLECs in the following ways:

- **Decrease in Customer Satisfaction.** Changes in response dates of receipt might expose CLECs to uncertainties relating to the accuracy of response information. Such uncertainties might affect a CLECs ability to maintain an accurate record of responses, which might prevent CLECs from confirming customers' service dates. CLECs inability to provide reliable service dates might negatively impact a customer's view of a CLEC's reliability.
- **Increase in Operating Costs.** Constant record revisions might require additional CLEC resources to investigate and follow up on such changes.

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Date: July 9, 2001

**OBSERVATION REPORT**

KPMG Consulting has identified an observation as a result of the POP Functional Evaluation (TVV-1).

**Observation:**

**KPMG Consulting has not received Firm Order Confirmations (FOCs) from the Local Carrier Service Center (LCSC) after faxing supplemental Local Service Requests (LSRs) to cancel existing orders. (TVV1)**

**Background:**

According to the *BellSouth Business Rules for Local Ordering- OSS99*<sup>1</sup>, a “FOC will be returned to the CLEC either via facsimile or electronically after the LCSC processes the CLECs service request(s) and determines that corrections or error resolutions are not required”<sup>2</sup>.

Furthermore, BellSouth business rules state, “The Firm Order Confirmation (FOC) provides the customer with the information required for control and tracking of the request(s) for the provisioning of local service”<sup>3</sup>.

When faxing service requests, expected FOCs are received from the LCSC via facsimile.

**Issue:**

KPMG Consulting has not received FOCs for supplement orders requesting cancellation of the following PONs:

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<sup>1</sup> BellSouth Business Rules for Local Ordering – OSS99, *Issue 9N May 31, 2001*. This document can be found at the following URL: <http://www.interconnection.bellsouth.com/guides/html/leo.html>

<sup>2</sup> *BellSouth Business Rules for Local Ordering, OSS99, issue 9N May 31, 2001, page 220.*

<sup>3</sup> *BellSouth Business Rules for Local Ordering, OSS99, Issue 9N May 31, 2001, page 220.*

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100022FPMC000002	01	5/16/2001 3:52 PM	9990	Fax
100022FPMC000003	01	5/16/2001 4:39 PM	9990	Fax
100022FPMC000004	01	5/16/2001 4:49 PM	9990	Fax
100022FPMC000005	01	5/16/2001 4:55 PM	9990	Fax
100022FPMC000006	01	5/16/2001 5:06 PM	9990	Fax
100022FPMC000007	01	5/16/2001 5:15 PM	9990	Fax
100022FPMC000008	01	5/16/2001 5:44 PM	9990	Fax
100022FPMC000009	01	5/16/2001 5:50 PM	9990	Fax
100022FPMC000010	01	5/16/2001 6:00 PM	9990	Fax
100022FPMC000011	01	5/17/2001 11:15AM	9990	Fax

None of these service requests received errors, and they were all cancelled successfully.

**Impact:**

BellSouth's failure to return Firm Order Confirmations on service requests could impact CLECs in the following ways:

- **Decrease in Customer Satisfaction.** CLECs might be exposed to delays if they are unable to confirm the success or failure of their service requests. A delay in delivering a service to a customer could negatively impact a customer's view of a CLEC's reliability.
- **Increase in Operating Costs.** Ordering problems might require additional CLEC resources before completion. Delays in problem resolution increase the time CLECs expend to successfully process a customer's order.

**OBSERVATION 94**  
BellSouth Florida OSS Testing Evaluation

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Date: July 16, 2001

**OBSERVATION REPORT**

KPMG Consulting has identified an observation as a result of the Order "Flow Through" Evaluation (TVV-3).

**Observation:**

**KPMG Consulting did not receive flow through Firm Order Confirmations (FOC) on Local Service Requests (LSR) submitted electronically via the mechanized ordering process. (TVV3)**

**Background:**

According to Ordering O-3 of the Service Quality Measurement Plan<sup>1</sup>, BellSouth should issue a flow through FOC on 85% of Unbundled Network Element (UNE) LSRs submitted through mechanized ordering processes. During production testing of the TAG, EDI and LENS interfaces, a number of LSRs submitted by KPMG Consulting fell out for manual intervention.

**Issue:**

The following are the results that KPMG Consulting received as of June 29, 2001 on UNE LSRs. The number of transactions specifically excludes fatal rejects, auto clarifications, CLEC system fallout and planned manual fallouts for complex orders.

<b>Number of Transactions</b>	<b>380</b>
<b>Number of Flow Through FOCs</b>	<b>323</b>
<b>Percent Actual Flow Through</b>	<b>85%</b>

Please refer to Attachment One for PONs that fell out for manual intervention.

**Impact:**

Flow through LSRs are a critical factor in the CLEC's delivery of service to customers in a timely manner. Unexpected manual intervention may cause significant delays in the return of FOCs and may have a negative impact on the timeliness of the completion of CLEC orders, lowering overall CLEC customer satisfaction.

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<sup>1</sup> BellSouth OSS Testing Florida Interim Performance Metrics Ver. 3.0, Approved by Florida PSC June 12, 2001

**OBSERVATION 94 – Attachment One**  
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**Attachment One**

Attachment One					
1	9993	074052FPEH000001	00	UNE	Do Not Agree. LSR was a flow through but was classified as non-flow through. Did not fallout for manual handling. File:KPMGLSR_0611_0617_2001.xls.
2	9993	074052FPEH000001	02	UNE	Agree.
3	9993	074052FPEH001002	00	UNE	Do Not Agree. LSR was a flow through but was classified as non-flow through. Did not fallout for manual handling. File:KPMGLSR_0611_0617_2001.xls.
4	9993	076011FPEH105003	00	UNE	Do Not Agree. LSR was a flow through but was classified as non-flow through. Did not fallout for manual handling. File:KPMGLSR_0514_0520_2001.xls
5	9993	076012FPTH100008	00	UNE	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File:KPMGLSR_0401_0430_2001.xls
6	9993	076012FPTH101007	00	UNE	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0301_0331_2001.xls.
7	9993	081051FPEH100002	00	UNE	Do Not Agree. Planned fallout per BellSouth Business Rules for Local Ordering.
8	9993	081051FPEH100004	00	UNE	Do Not Agree. Planned fallout per BellSouth Business Rules for Local Ordering.
9	9993	081051FPEH101003	00	UNE	Do Not Agree. Fell out for address validation because Cable ID and address provided by KPMG is not compatible in the test bed.
10	9993	081051FPEH101005	00	UNE	Do Not Agree. Planned fallout per BellSouth Business Rules for Local Ordering.
11	9993	081051FPEH102001	00	UNE	Do Not Agree. Planned fallout per BellSouth Business Rules for Local Ordering.
12	9993	081051FPEH102003	00	UNE	Do Not Agree. Planned fallout per BellSouth Business Rules for Local Ordering.

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13	9993	081051FPTH100007	00	UNE	Do Not Agree. Planned fallout per BellSouth Business Rules for Local Ordering.
14	9993	081051FPTH100008	00	UNE	Do Not Agree. Planned fallout per BellSouth Business Rules for Local Ordering.
15	9993	081051FPTH100009	00	UNE	Do Not Agree. Planned fallout per BellSouth Business Rules for Local Ordering.
16	9993	081051FPTH100010	00	UNE	Do Not Agree. Planned fallout per BellSouth Business Rules for Local Ordering.
17	9993	081051FPTH101006	02	UNE	Do Not Agree. Planned fallout per BellSouth Business Rules for Local Ordering.
18	9993	081051FPTH103006	03	UNE	Do Not Agree. Planned fallout per BellSouth Business Rules for Local Ordering.
19	9993	070062FPEH000002	03	UNE	Do Not Agree. Planned fallout for pending order review.
20	9993	080012FPEH001003	04	UNE	Do Not Agree. Planned fallout for pending order review.
21	9993	080012FPTH001010	00	UNE	Do Not Agree. LSR was a flow through but was originally classified as non-flow through. Did not fallout for manual handling. Re-run File classified as flow through: KPMGLSR_0430_0506_2001.xls.
22	9993	080012FPTH002006	01	UNE	Do Not Agree. Planned fallout for pending order review.
23	9993	080012FPTH002007	00	UNE	Do Not Agree. LSR was a flow through but was originally classified as non-flow through. Did not fallout for manual handling. Re-run File classified as flow through: KPMGLSR_0430_0506_2001.xls.

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24	9993	080012FPTH003009	00	UNE	Do Not Agree. LSR was a flow through but was originally classified as non-flow through. Did not fallout for manual handling. Re-run File classified as flow through: KPMGLSR_0430_0506_2001.xls.
25	9990	074021FPTF000017	00	UNE	Agree.
26	9990	093022FPTF000005	00	UNE	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File:KPMGLSR_0618_0624_2001.xls.
27	9993	076021FPEH102003	00	UNE	Agree.
28	9993	076021FPTH101006	00	UNE	Agree.
29	9993	076021FPTH103007	00	UNE	Agree.
30	9993	076022FPTH101006	00	UNE	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0301_0331_2001.xls.
31	9993	076032FPEH100001	00	UNE	Agree.
32	9993	076032FPTH100002	00	UNE	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0301_0331_2001.xls.
33	9993	094011FPTH000008	00	UNE	Do Not Agree. LSR was a flow through and did not fall out for manual handling. File: KPMGLSR_0301_0331_2001.xls.
34	9993	072062FPTH100008	01	UNE	Do Not Agree. Fell out unable to retrieve pending service order due to incorrect End User address and cable pr provided by KPMG
35	9990	072073FPEH100001	00	UNE	Agree.
36	9990	072073FPEH100002	00	UNE	Agree.
37	9990	072073FPEH100003	00	UNE	Agree.
38	9990	072073FPEH100004	00	UNE	Agree.
39	9990	072073FPEH100005	00	UNE	Agree.

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40	9990	072073FPEH100006	00	UNE	Agree.
41	9990	072073FPEH100007	00	UNE	Agree.
42	9990	072073FPTH100010	00	UNE	Do Not Agree. LSR was a flow through but was classified as non-flow through. Did not fallout for manual handling. File: KPMGLSR_0611_0617_2001.xls.
43	9990	070011FPTH000012	01	UNE	Agree.
44	9993	070022FPEH000006	01	UNE	Agree.
45	9993	070022FPEH000007	00	UNE	Agree.
46	9993	070022FPTH000012	01	UNE	Agree.
47	9993	070022FPTH000013	00	UNE	Agree.
48	9993	070032FPEH000002	00	UNE	Agree.
49	9993	070032FPEH000002	01	UNE	Agree.
50	9993	079022FPEH001002	00	UNE	Agree.
51	9993	079022FPTH000006	00	UNE	Do Not Agree. LSR was a flow through but was classified as non-flow through. Did not fallout for manual handling. File: KPMGLSR_0401_0430_2001.xls.
52	9993	088011FPEH001002	00	UNE	Do Not Agree. Planned fall out for complex service converting to UNE
53	9993	088011FPEH001003	00	UNE	Do Not Agree. Planned fall out for complex service converting to UNE
54	9993	088011FPEH001004	00	UNE	Do Not Agree. Planned fall out for complex service converting to UNE
55	9993	088011FPEH006001	00	UNE	Do Not Agree. Planned fall out for complex service converting to UNE
56	9993	088011FPTH001006	00	UNE	Do Not Agree. Planned fall out for complex service converting to UNE
57	9993	088011FPTH001007	00	UNE	Do Not Agree. Planned fall out for complex service converting to UNE

**OBSERVATION 94 – Attachment One**  
BellSouth Florida OSS Testing Evaluation

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**OBSERVATION 95**  
BellSouth Florida OSS Testing Evaluation

Date: July 27, 2001

**OBSERVATION REPORT**

KPMG Consulting has identified an observation as a result of the POP Functional Evaluation (TVV-1).

**Observation:**

**KPMG Consulting has not received timely mechanized Unbundled Network Element Switched Combinations Firm Order Confirmations (FOCs) from BellSouth's Telecommunications Access Gateway (TAG) interface. (TVV1)**

**Issue:**

According to Ordering Measure O-9 of the Service Quality Measurement Plan<sup>1</sup>, BellSouth should return  $\geq 95\%$  of mechanized UNE-Switched Combination FOCs to Competitive Local Exchange Carriers (CLECs) within three (3) hours of receiving the Local Service Request (LSR). During the production test, KPMG Consulting received mechanized UNE-Switched Combination FOCs in greater than the three-hour interval.

The following are the FOC timeliness results as of July 11, 2001 on mechanized UNE-Platform FOC using the TAG interface.

192	8	6	0	0	0	206
93%	4%	3%	0	0	0	100%

Following is a list of PONs, which did not receive a mechanized UNE-Switched Combination FOC from BellSouth within three hours.

002141FPTJ002015	00	9990	04/10/01 11:16 AM	04/11/01 10:50 AM
010151FPTJ100021	00	9993	04/09/01 11:41 AM	04/10/01 03:16 PM

<sup>1</sup> BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved June 1, 2001

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BellSouth Florida OSS Testing Evaluation

018051FPTJ000013	00	9993	04/09/01 03:01 PM	04/10/01 03:23 PM
010151FPTJ100019	00	9993	04/09/01 10:26 AM	04/10/01 03:16 PM
018051FPTJ000016	00	9993	04/09/01 03:25 PM	04/10/01 03:23 PM
018051FPTJ000019	00	9993	04/09/01 03:44 PM	04/10/01 03:23 PM
018051FPTJ000015	00	9993	04/09/01 03:15 PM	04/10/01 03:23 PM
018051FPTJ000017	00	9993	04/09/01 03:31 PM	04/10/01 03:23 PM
018051FPTJ000020	00	9993	04/09/01 03:52 PM	04/10/01 03:23 PM
018051FPTJ000014	00	9993	04/09/01 03:09 PM	04/10/01 03:23 PM
001051FPTJ100032	00	9990	06/04/01 05:32 PM	06/05/01 06:46 AM
005091FPTJ101011	01	9990	06/04/01 02:39 PM	06/05/01 06:46 AM
012051FPTJ001007	00	9993	04/09/01 05:35 PM	04/10/01 08:15 PM
010051FPTJ100011	00	9993	03/29/01 03:41 PM	03/30/01 11:32 AM

**Impact:**

Receipt of timely UNE-Switched Combination FOCs is a critical factor in the CLEC's ability to process service requests, and meet its customer's needs. Delays in the return of FOCs could have a negative impact on the timeliness of the ordering process, possibly lowering overall customer satisfaction.

**OBSERVATION 99**  
BellSouth Florida OSS Testing Evaluation

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Date: August 2, 2001

**OBSERVATION REPORT**

KPMG Consulting has identified an observation as a result of the POP Functional Evaluation (TVV-1).

**Observation:**

**BellSouth's RoboTAG<sup>1</sup> requirement for Conversion As Is - UNE Switched Combination service requests is inconsistent with the *BellSouth Business Rules for Local Ordering, OSS99*.<sup>2</sup> (TVV1)**

**Background:**

BellSouth developed RoboTAG as an electronic interface software that combines Telecommunication Access Gateway (TAG) with a front-end Graphical User Interface (GUI). Accordingly, CLECs use RoboTAG for the purposes of issuing pre-orders and orders to BellSouth.

**Issue:**

According to the BellSouth business rules, the Port Type (PORTTYP) field is not a required field for requesting 'Conversion As Is' UNE Switched Combination (REQTYP M/ACT W) service.<sup>3</sup> However, contrary to BellSouth business rules, RoboTAG requires that the PORTTYP field for REQTYP M/ACT W service requests be populated prior to the submission of an order. In addition, this field is located on a form entitled "UNE OPTIONS", which is not available to users when processing this REQTYP/ACT combination.

**Impact:**

The lack of consistency between the BellSouth RoboTAG application and applicable business rules could impact CLECs in the following ways:

- **Decrease in Customer Satisfaction.** CLECs might be exposed to delays if they are unable to submit orders due to programming inconsistencies with business rules. A delay in delivering a service to a customer could negatively impact a customer's view of a CLEC's reliability.

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<sup>1</sup> Version 7.5.0.15.r2.p1

<sup>2</sup> *BellSouth Business Rules for Local Ordering – OSS99, Issue 9N, May 31, 2001*. This document can be found at the following URL: <http://www.interconnection.bellsouth.com/guides/html/leo.html>

<sup>3</sup> See *BellSouth Business Rules for Local Ordering – OSS99, Issue 9N, May 31, 2001*, page 580.

**OBSERVATION 99**  
BellSouth Florida OSS Testing Evaluation

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- **Increase in Operating Costs.** Ordering problems might require additional CLEC resources before completion. Delays in problem resolution increase the time CLECs expend to successfully process a customer's order.



**OBSERVATION 100**  
BellSouth Florida OSS Testing Evaluation

Date: August 6, 2001

**OBSERVATION REPORT**

KPMG Consulting has identified an observation as a result of the POP Functional Evaluation (TVV1).

**Observation:**

**KPMG Consulting has not received timely Completion Notices (CNs) submitted via the Electronic Data Interchange (EDI) and Telecommunications Access Gateway (TAG). (TVV1)**

**Background:**

CNs provide Competitive Local Exchange Carriers (CLECs) with verification that all provisioning activity on the CLECs end user account has been completed and the date which the activity occurred. KPMG Consulting applied a standard that 95% of Completion Notices should be returned to CLECs within 1 business day after the Completion Notice Due Date (CN DD)<sup>1</sup>. During the production test, KPMG Consulting received a number of CNs after the one business day interval.

**Issue:**

As of July 11, 2001, KPMG Consulting has received the following results for CN responses

	315	251	159	725
	5	1	14	20
	1		1	2
	1	10	7	18
	5	2	2	9
	327	264	183	774
	96.33%	95.08%	86.89%	93.67%

	197	136	103	436
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<sup>1</sup> KPMG Consulting applied standards based on its professional judgment in the absence of 1) FPSC-approved standards or 2) documented BellSouth guidelines.

<sup>2</sup> Defined as a completion notice received on or before 12:00pm of the next business day following the CN DD. Any notice received after that time is considered late.

**OBSERVATION 100**  
BellSouth Florida OSS Testing Evaluation

	16	9	9	34
	16	8	2	26
	43	46	14	103
	4		3	7
	276	199	131	606
	71.38%	68.34%	78.63%	71.95%

**Impact:**

**Decreased Customer Satisfaction:** Delays in receiving timely Completion Notice responses could prevent a CLEC from effectively processing a customer's service request or responding to customer inquires. As a result, customer satisfaction with the CLEC could decrease.

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<sup>3</sup> Defined as a completion notice received on or before 12:00pm of the next business day following the CN DD. Any notice received after that time is considered late.

**OBSERVATION 100 – Attachment 1**  
BellSouth Florida OSS Testing Evaluation

1	002141FPEJ000012	00	9990	06/19/01 12:00 AM	07/11/01 03:47 PM	
2	002141FPEJ001011	00	9990	06/19/01 12:00 AM	07/11/01 03:47 PM	
3	001121FPEN100005	00	9994	03/30/01 12:00 AM	04/18/01 01:23 PM	CN sent 03/31/01 at 14:48
4	002121FPEJ100009	00	9990	04/04/01 12:00 AM	04/17/01 05:22 PM	
5	020061FPEJ001001	02	9990	04/03/01 12:00 AM	04/12/01 07:34 AM	
6	002151FPEJ100008	00	9990	04/04/01 12:00 AM	04/11/01 10:42 AM	
7	076011FPEH101004	00	9993	05/31/01 12:00 AM	06/06/01 10:20 AM	
8	076021FPEH101004	00	9993	05/31/01 12:00 AM	06/06/01 10:20 AM	
9	051041FPEN000003	00	9990	04/19/01 12:00 AM	04/25/01 08:52 AM	
10	035021FPEN000001	00	9993	05/30/01 12:00 AM	06/04/01 12:47 PM	
11	035021FPEN000003	00	9993	05/30/01 12:00 AM	06/04/01 12:47 PM	
12	036011FPEN004001	00	9993	07/05/01 12:00 AM	07/10/01 03:51 AM	
13	054031FPEN001004	01	9993	07/05/01 12:00 AM	07/10/01 03:51 AM	
14	010061FPEJ101001	00	9993	04/06/01 12:00 AM	04/10/01 03:34 PM	
15	054031FPEN000007	01	9993	07/06/01 12:00 AM	07/10/01 10:08 AM	
16	054031FPEN001005	01	9993	07/06/01 12:00 AM	07/10/01 03:51 AM	
17	076012FPEH100002	00	9993	05/18/01 12:00 AM	05/21/01 01:35 PM	
18	076012FPEH101001	00	9993	05/18/01 12:00 AM	05/21/01 01:31 PM	

**OBSERVATION 100 – Attachment 1**  
BellSouth Florida OSS Testing Evaluation

19	076022FPEH100004	00	9993	05/18/01 12:00 AM	05/21/01 01:31 PM	
20	036071FPEN001002	00	9993	06/01/01 12:00 AM	06/04/01 12:47 PM	
21	036071FPEN002001	00	9993	06/01/01 12:00 AM	06/04/01 12:47 PM	
22	076012FPEH100005	00	9993	05/18/01 12:00 AM	05/21/01 11:13 AM	
23	076012FPEH100006	00	9993	05/18/01 12:00 AM	05/21/01 11:13 AM	
24	054031FPEN002001	01	9993	06/15/01 12:00 AM	06/18/01 10:27 AM	
25	076011FPEH101005	00	9993	06/01/01 12:00 AM	06/04/01 09:57 AM	
26	051041FPEN000007	00	9994	03/30/01 12:00 AM	04/02/01 09:37 AM	
27	076022FPEH102003	00	9993	04/17/01 12:00 AM	04/20/01 07:51 AM	
28	002201FPEJ100001	02	9990	03/17/01 12:00 AM	03/19/01 05:22 PM	
29	076012FPEH100004	00	9993	05/23/01 12:00 AM	05/25/01 06:31 AM	
30	076032FPEH100001	00	9993	06/13/01 12:00 AM	06/14/01 06:31 PM	
31	002081FPEJ100001	00	9990	03/22/01 12:00 AM	03/23/01 02:56 PM	CN sent 03/23/01 at 10:43
32	010151FPEJ100003	01	9993	03/22/01 12:00 AM	03/23/01 02:56 PM	CN sent 03/22/01 at 16:50
33	016011FPEN100003	00	9993	03/22/01 12:00 AM	03/23/01 02:56 PM	CN sent 03/22/01 at 16:22
34	022021FPEJ101002	00	9993	03/22/01 12:00 AM	03/23/01 02:56 PM	CN sent 03/22/01 at 16:06
35	022021FPEJ101003	00	9993	03/22/01 12:00 AM	03/23/01 02:56 PM	CN sent 03/22/01 at 16:02
36	076021FPEH102003	00	9993	06/20/01 12:00 AM	06/21/01 02:46 PM	
37	077011FPEH000004	00	9993	06/20/01 12:00 AM	06/21/01 02:46 PM	

**OBSERVATION 100 – Attachment 1**  
BellSouth Florida OSS Testing Evaluation

38	002081FPEJ100003	00	9990	03/22/01 12:00 AM	03/23/01 02:24 PM	
39	081051FPEH102003	00	9993	06/07/01 12:00 AM	06/08/01 02:08 PM	
40	094011FPEH001001	00	9993	05/21/01 12:00 AM	05/22/01 02:08 PM	
41	076022FPEH100002	00	9993	05/21/01 12:00 AM	05/22/01 02:03 PM	
42	076011FPEH105003	00	9993	05/29/01 12:00 AM	05/30/01 01:28 PM	
43	077011FPEH000001	00	9993	06/05/01 12:00 AM	06/06/01 01:22 PM	
44	094011FPEH000002	00	9993	05/30/01 12:00 AM	05/31/01 12:29 PM	CN sent 05/31/01 at 10:01
45	077012FPEH000003	00	9993	06/19/01 12:00 AM	06/20/01 12:17 PM	
46	077012FPEH000004	00	9993	06/19/01 12:00 AM	06/20/01 12:17 PM	
47	094011FPEH000003	00	9993	05/22/01 12:00 AM	05/23/01 12:12 PM	
48	094011FPEH001004	00	9993	05/22/01 12:00 AM	05/23/01 12:12 PM	
49	074052FPEH000004	00	9993	06/18/01 12:00 AM	06/19/01 12:12 PM	
50	077011FPTH000006	00	9993	04/10/01 12:00 AM	05/02/01 10:49 AM	
51	072131FPTH002012	03	9993	05/23/01 12:00 AM	06/06/01 12:32 PM	
52	002131FPTJ100014	00	9990	06/07/01 12:00 AM	06/20/01 08:10 AM	
53	002201FPTJ100016	03	9990	05/25/01 12:00 AM	06/05/01 03:43 PM	
54	020041FPTJ100018	02	9990	06/11/01 12:00 AM	06/21/01 06:51 PM	

**OBSERVATION 100 – Attachment 1**  
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55	077012FPTH003005	00	9993	05/03/01 12:00 AM	05/09/01 03:18 PM	
56	011131FPTJ101013	03	9993	05/16/01 12:00 AM	05/22/01 07:03 AM	
57	077012FPTH000006	00	9993	05/03/01 12:00 AM	05/08/01 11:32 AM	
58	094011FPTH002007	00	9993	05/25/01 12:00 AM	05/29/01 03:46 PM	CN sent 05/29 14:46 TAG T6 start 05/29 14:46 Ack rec'd 05/29 14:47 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
59	077012FPTH000007	00	9993	05/03/01 12:00 AM	05/07/01 10:47 AM	CN sent 05/04 14:35, TAG T6 start 05/04 14:35 Resent 05/04-05/07 Ack received 05/07 09:47 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
60	077012FPTH000008	00	9993	05/03/01 12:00 AM	05/07/01 10:46 AM	CN sent 05/04 14:33 TAG T6 start 05/04 14:33 Resent 05/04-05/07 Ack received 05/07 09:46 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
61	002201FPTJ100013	01	9990	05/25/01 12:00 AM	05/29/01 10:46 AM	CN sent 05/25 17:19, TAG T6 start 05/25 17:19 Resent 05/25-05/29 Ack received 05/29 09:47 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
62	002201FPTJ100018	00	9990	05/25/01 12:00 AM	05/29/01 10:46 AM	CN sent 05/25 17:15 TAG T6 start 05/25 17:16 Resent 05/25-05/29 Ack received 05/29 09:47 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>

**OBSERVATION 100 – Attachment 1**  
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63	005091FPTJ101007	01	9990	05/25/01 12:00 AM	05/29/01 10:46 AM	CN sent 05/25 17:14 TAG T6 start 05/25 17:14 Resent 05/25-05/29 Ack received 05/29 09:47 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
64	002201FPTJ100014	01	9990	05/25/01 12:00 AM	05/29/01 10:46 AM	CN sent 05/25 17:07 TAG T6 start 05/25 17:07 Resent 05/25-05/29 Ack received 05/29 09:46 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
65	002201FPTJ100017	01	9990	05/25/01 12:00 AM	05/29/01 10:46 AM	CN sent 05/25 17:13 TAG T6 start 05/25 17:13 Resent 05/25-05/29 Ack received 05/29 09:47 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
66	002211FPTJ101012	01	9990	05/25/01 12:00 AM	05/29/01 10:46 AM	CN sent 05/25 17:13 TAG T6 start 05/25 17:13 Resent 05/25-05/29 Ack received 05/29 09:46 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
67	002201FPTJ101015	00	9990	05/25/01 12:00 AM	05/29/01 10:46 AM	CN sent 05/25 17:11 TAG T6 start 05/25 17:11 Resent 05/25-05/29 Ack received 05/29 09:46 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
68	005091FPTJ101009	00	9990	05/25/01 12:00 AM	05/29/01 10:46 AM	CN sent 05/25 17:07 TAG T6 start 05/25 17:07 Resent 05/25-05/29 Ack received 05/29 09:46 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>

**OBSERVATION 100 – Attachment 1**  
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69	005091FPTJ100010	00	9990	05/25/01 12:00 AM	05/29/01 10:46 AM	CN sent 05/25 16:54 TAG T6 start 05/25 16:54 Resent 05/25-05/29 Ack received 05/29 09:46 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
70	002211FPTJ100016	01	9990	05/25/01 12:00 AM	05/29/01 10:46 AM	CN sent 05/25 17:15 TAG T6 start 05/25 17:16 Resent 05/25-05/29 Ack received 05/29 09:46 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
71	019011FPTN101015	00	8772	05/25/01 12:00 AM	05/29/01 10:46 AM	CN sent 05/25 16:57 TAG T6 start 05/25 16:57 Resent 05/25-05/29 Ack received 05/29 09:46 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
72	011021FPTN003002	00	9993	05/25/01 12:00 AM	05/29/01 10:46 AM	CN sent 05/25 17:02 TAG T6 start 05/25 17:02 Resent 05/25-05/29 Ack received 05/29 09:46 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
73	002201FPTJ100012	01	9990	05/25/01 12:00 AM	05/29/01 10:46 AM	CN sent 05/25 17:15 TAG T6 start 05/25 17:15 Resent 05/25-05/29 Ack received 05/29 09:46 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
74	019011FPTN100016	00	8772	05/25/01 12:00 AM	05/29/01 10:46 AM	CN sent 05/25 16:57 TAG T6 start 05/25 16:57 Resent 05/25-05/29 Ack received 05/29 09:46 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>

**OBSERVATION 100 – Attachment 1**  
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75	005091FPTJ101012	00	9990	05/25/01 12:00 AM	05/29/01 10:46 AM	CN sent 05/25 17:12 TAG T6 start 05/25 17:12 Resent 05/25-05/29 Ack received 05/29 09:46 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
76	005091FPTJ100008	00	9990	05/25/01 12:00 AM	05/29/01 10:46 AM	CN sent 05/25 16:50 TAG T6 start 05/25 16:50 Resent 05/25-05/29 Ack received 05/29 09:46 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
77	002211FPTJ101013	02	9990	05/25/01 12:00 AM	05/29/01 10:46 AM	CN sent 05/25 17:14 TAG T6 start 05/25 17:14 Resent 05/25-05/29 Ack received 05/29 09:46 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
78	076012FPTH102012	00	9993	04/19/01 12:00 AM	04/23/01 10:45 AM	CN sent 04/20 18:38 TAG T7 start 04/20 18:38 Resent 04/20-04/23 Ack received 04/23 09:45 <b><u>Client CNS Problem</u></b> <b>(KPMG)</b>
79	016041FPTN102010	00	9993	04/19/01 12:00 AM	04/23/01 10:45 AM	CN sent 04/19 16:54 TAG T7 start 04/19 16:54 Resent 04/19-04/23 Ack received 04/23 09:45 <b><u>Client CNS Problem</u></b> <b>(KPMG)</b>
80	035021FPTN000004	01	9993	04/19/01 12:00 AM	04/23/01 10:45 AM	CN sent 04/20 02:48 TAG T7 start 04/20 02:48 Resent 04/20-04/23 Ack received 04/23 09:45 <b><u>Client CNS Problem</u></b> <b>(KPMG)</b>
81	084021FPTH000010	00	9993	05/25/01 12:00 AM	05/29/01 10:22 AM	

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82	006031FPTJ000014	00	9990	06/01/01 12:00 AM	06/05/01 08:37 AM	
83	002081FPTJ100018	00	9990	05/15/01 12:00 AM	05/19/01 07:26 AM	
84	002081FPTJ100029	01	9990	05/18/01 12:00 AM	05/22/01 07:06 AM	
85	002081FPTJ100022	02	9990	05/18/01 12:00 AM	05/22/01 07:05 AM	
86	001081FPTJ101004	00	9990	06/01/01 12:00 AM	06/05/01 06:17 AM	CN sent 06/01 17:09 TAG T6 start 06/01 17:09 Resent 06/01-06/05 Ack received 06/05 05:17 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
87	010072FPTJ001009	00	9993	06/01/01 12:00 AM	06/05/01 06:17 AM	CN sent 06/02 02:48 TAG T6 start 06/02 02:48 Resent 06/02-06/05 Ack received 06/05 05:16 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
88	018031FPTJ000012	00	9993	06/01/01 12:00 AM	06/05/01 06:17 AM	CN sent 06/01 16:56 TAG T6 start 06/01 16:56 Resent 06/01-06/05 Ack received 06/05 05:16 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
89	018031FPTJ000008	00	9993	06/01/01 12:00 AM	06/05/01 06:17 AM	CN sent 06/01 16:53 TAG T6 start 06/01 16:53 Resent 06/01-06/05 Ack received 06/05 05:16 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
90	018031FPTJ000011	00	9993	06/01/01 12:00 AM	06/05/01 06:17 AM	CN sent 06/01 16:52 TAG T6 start 06/01 16:52 Resent 06/01-06/05 Ack received 06/05 05:16 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>

**OBSERVATION 100 – Attachment 1**  
BellSouth Florida OSS Testing Evaluation

91	006031FPTJ002012	00	9990	06/01/01 12:00 AM	06/05/01 06:17 AM	CN sent 06/01 17:04 TAG T6 start 06/01 17:04 Resent 06/01-06/05 Ack received 06/05 05:16 <b><u>CLEC Listener Problem</u></b> <b>(KPMG)</b>
92	006031FPTJ002013	00	9990	06/01/01 12:00 AM	06/05/01 06:16 AM	CN sent 06/01 16:51 TAG T6 start 06/01 16:51 Resent 06/01-06/05 Ack received 06/05 05:16 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
93	018031FPTJ000010	00	9993	06/01/01 12:00 AM	06/05/01 06:16 AM	CN sent 06/01 16:27 TAG T6 start 06/01 16:27 Resent 06/01-06/05 Ack received 06/05 05:16 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
94	018031FPTJ002007	00	9993	06/01/01 12:00 AM	06/05/01 06:16 AM	CN sent 06/01 16:22 TAG T6 start 06/01 16:22 Resent 06/01-06/05 Ack received 06/05 05:16 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
95	016093FPTJ100011	00	9993	06/01/01 12:00 AM	06/05/01 06:16 AM	CN sent 06/01 16:22 TAG T6 start 06/01 16:22 Resent 06/01-06/05 Ack received 06/05 05:16 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
96	001081FPTJ100005	02	9990	06/01/01 12:00 AM	06/05/01 06:16 AM	CN sent 06/01 17:09 TAG T6 start 06/01 17:09 Resent 06/01-06/05 Ack received 06/05 05:17 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>

**OBSERVATION 100 – Attachment 1**  
BellSouth Florida OSS Testing Evaluation

97	018031FPTJ001009	00	9993	06/01/01 12:00 AM	06/05/01 06:16 AM	CN sent 06/01 16:44 TAG T6 start 06/01 16:44 Resent 06/01-06/05 Ack received 06/05 05:17 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
98	017041FPTJ102010	00	9993	06/01/01 12:00 AM	06/05/01 06:16 AM	CN sent 06/01 16:02 TAG T6 start 06/01 16:02 Resent 06/01-06/05 Ack received 06/05 05:16 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
99	016093FPTJ100010	00	9993	06/01/01 12:00 AM	06/05/01 06:16 AM	CN sent 06/01 16:20 TAG T6 start 06/01 16:20 Resent 06/01-06/05 Ack received 06/05 05:16 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
100	051041FPTN002014	00	9990	05/04/01 12:00 AM	05/07/01 08:15 PM	CN sent 05/05 03:55 TAG T6 start 05/05 03:55 Resent 05/05-05/07 Ack received 05/07 19:15 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
101	002211FPTJ103011	00	9990	05/04/01 12:00 AM	05/07/01 08:15 PM	CN sent 05/04 17:10 TAG T6 start 05/04 17:10 Resent 05/04-05/07 Ack received 05/07 19:15 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>
102	006061FPTN002013	01	9990	05/04/01 12:00 AM	05/07/01 08:15 PM	CN sent 05/04 17:23 TAG T6 start 05/04 17:23 Resent 05/04-05/07 Ack received 05/07 19:15 <b><u>Client Listener Problem</u></b> <b>(KPMG)</b>