

ATTACHMENT 59

DECLARATION OF JAY M. BRADBURY

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of: :

Investigation into Development of :
Electronic Interfaces for BellSouth's: Docket No. 8354-U
OPERATIONAL SUPPORT SYSTEMS :

Hearing Room 110
244 Washington Street
Atlanta, Georgia

Tuesday, May 8, 2001

The above-entitled matter came on for hearing
pursuant to Notice at 10:00 a.m.

BEFORE:

LAUREN MCDONALD, JR., Chairman
STAN WISE, Vice Chairman
ROBERT BAKER, Commissioner
ROBERT DURDEN, Commissioner
DAVID BURGESS, Commissioner

* * *

1 use, the ones they would have to rely on from BellSouth,
2 BellSouth set up an entirely separate system called RSIMMS,
3 isn't that right?

4 A (Witness Weeks) Well RSIMMS existed prior to the
5 notion of a volume test. It was actually used by BellSouth,
6 as I understand it, to do certain other testing of their
7 own, and the decision was made to execute the normal and
8 peak tests in the RSIMMS environment as opposed to the
9 Encore environment.

10 Q So when you say that, the normal and peak volume
11 tests were run in RSIMMS and not in the regular production
12 system, Encore?

13 A (Witness Weeks) That's a correct statement.

14 Q Can we agree that this will be called a test
15 system as opposed to a production system?

16 A (Witness Weeks) That's fine.

17 Q Who designed RSIMMS?

18 A (Witness Weeks) BellSouth -- I assume. BellSouth
19 or their contractors.

20 Q Do you know why BellSouth wanted the volume test
21 runs in RSIMMS instead of in Encore?

22 A (Witness Weeks) It was the representation
23 BellSouth made to us that they did not have the computing
24 capacity in the production environment to sustain the
25 workloads 18 months to two years hence.

1 Q Well, in fact, BellSouth knew its actual system,
2 Encore, couldn't pass the volume test, correct?

3 A (Witness Weeks) I wouldn't be able to say yes or
4 no to that.

5 Q You would agree that BellSouth indicated to you
6 that it's production system could not handle the volume
7 anticipated in these volume tests?

8 A (Witness Weeks) They represented to us that they
9 did not believe that their production system would be able
10 to support those volumes, but I don't know that that was
11 based on empirical evidence. I don't know. You would have
12 to ask BellSouth.

13 Q Do you know any reason why BellSouth couldn't
14 simply have improved their production system to handle the
15 volume tests?

16 A (Witness Weeks) They could have done so. The
17 reasons they gave for doing that were mostly based upon
18 cost.

19 Q They did not want to spend the money it would take
20 to bring their system up to level it would need to be to
21 pass the volume test?

22 A (Witness Weeks) That was the representation that
23 was made to us.

24 Q Now in setting up RSIMMS, BellSouth didn't simply
25 duplicate the Encore system, did it?

ATTACHMENT 60

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1.0 Document Objective

In this document, KPMG Consulting provides a Monthly Status Report on developments related to the BellSouth-FL OSS Testing Project. A brief overview of key developments is provided in section 2.0. Key upcoming activities are summarized in section 3.0. A more detailed report on specific test items from the Master Test Plan is provided in the table in section 4.0. Each item presented in the tables in section 4.0 includes a reference number that identifies the item from a previous status report, where applicable.

2.0 Key Developments

- **Order Management (OM):**
 - Interface testing for EDI, TAG, LENs are nearing completion continued through the month of September. Test progress as of September 30th is as follows:
 - TAG – 89 % received Completion Notices
 - EDI – 89% received Completion Notices
 - LENs – 91% received Completion Notices
 - RoboTAG – 51% received Completion Notices
 - Manual – 60% are in Completed Status
 - Transaction testing for orders sent via BellSouth's RoboTAG interface resumed in order to monitor date and time stamp issue associated with Observation 91.
 - KPMG Consulting continues to monitor all BellSouth systems and representative responses to Local Service Requests (LSRs) as it relates to accuracy and completeness evaluation criteria.
 - *TVV1-POP Functional Evaluation.* Preparation activities are underway for a re-test of functionality and timeliness. Exceptions 16, 42, 45, 49, 51, 54, 64, 68, 69, 70, 71, 74, 75, 77, 80, 85, 87, 89, 90, 98, 100, 102, and 105 are open. Observations 49, 64, 77, 81, 87, 89, 90, 91, 92, 93, 95, 99, 100, 104, and 122 also remain open.
 - *TVV2-POP Volume Performance Test:* ~~Testing is on hold pending the resolution of open exceptions.~~ Exceptions 99, 104, and 107 are open and are related to ~~electronic volume testing.~~ Exception 72 is open and is related to manual volume testing. Exception 108 has been recommended for closure. KPMG Consulting is refreshing the volume forecast to reflect a September 2002 target date. ~~Exceptions 72, 99, 104, and 107 are open.~~
 - *TVV3-Flow-Through Evaluation.* KPMG Consulting is awaiting BellSouth responses to clarification questions on Exception 86 and Observation 94 KPMG

Consulting is preparing to monitor flow-through performance against documentation and benchmarks during the *TVV1-POP Functional Evaluation* re-test. Exception 86 and Observation 94 remain open.

- *PPR7-POP Manual Order Processing Evaluation*: KPMG Consulting continues to monitor and analyze TVV1-POP Functional Evaluation testing activities. Observations and interviews relating to this review were conducted at the Local Carrier Service Centers (LCSC) in Atlanta, Birmingham, and Jacksonville. Additional interviews and observations were conducted at BellSouth's retail centers including the Business Sales Account Center (BSAC), Major Account Center (MAC), Mid-Market Account Center, and the Retail Business Office.
 - *PPR8-POP Work Center Help Desk Support*: KPMG Consulting requested and received, in September 2001, updated internal Methods and Procedure guides from BellSouth's Corporate Directory Information Access (CDIA) system. These documents are currently being reviewed and analyzed to refresh test results and address Observation and Exception issues. Exceptions 57, 94, 103, and 110 as well as Observations 109, 111, and 114 are open.
 - Analysis also continues on the parity study for *PPR7-POP Manual Order Processing Evaluation* and *PPR8 Work Center Support Evaluation*. Additional interviews and observations may be conducted as the test progresses to address Observation and Exception issues as they arise until closure of the test.
- **Repair, Provisioning and Maintenance (RPM):**
 - *TVV4-Provisioning Verification and Validation*: KPMG Consulting continues with validation testing of Switch Translations, CSR's, Completion Notices, and Directory Listings. Planning continued this month for the Intercept Messaging re-test. Loop Qualification, Line Splitting, and Dark Fiber testing continued through the month of September. Observations 45, 82, 106, 117 and Exceptions 76, 82, 84, and 112 are open.
 - *TVV5-M&R TAFI Functional Evaluation*: KPMG Consulting has completed this test. The final report is complete and in internal review.
 - *TVV6-M&R ECTA Functional Evaluation*: KPMG Consulting continued planning for a re-test of MLT observations for the month of September. Observations 83 and 102 are open.
 - *TVV7-M&R TAFI Performance Evaluation*: KPMG Consulting has completed this test. The final report is complete and in internal review.

- *TVV8-M&R ECTA Performance Evaluation:* KPMG Consulting will continue volume testing with new BellSouth forecasting data. Planning for the volume test continued during the month of September. Observation 107 and Exceptions 38 and 63 are open.
 - *TVV9-M&R End-to-End Trouble Report Processing:* KPMG Consulting has completed this test. The final report is complete and in internal review.
 - *PPR6-Collocation and Network Design Verification and Validation:* KPMG Consulting continues to monitor the Collocation Process. KPMG Consulting is preparing work papers and the final report.
 - *PPR9-Provisioning Process Evaluation:* KPMG Consulting has completed this test. The final report is complete and in internal review.
 - *PPR14-End to End M&R Process:* KPMG Consulting continued preparing for a re-test to satisfy Exception 35. Exception 35 remains open.
 - *PPR15-M&R Work Center Support:* KPMG Consulting has completed this test. The final report is complete and in internal review.
 - *PPR16-Network Surveillance Support:* KPMG Consulting has completed this test. The final report is complete and in internal review.
- **Billing**
 - *TVV10-Billing Functional Usage Evaluation:* KPMG Consulting has completed the DUF retest field work and DUF analysis for Exceptions and Observations. KPMG Consulting is preparing for an additional billing retest, scheduled for late 2001, in conjunction with BellSouth billing infrastructure changes. Exception 13 (Amended), 79, and 83 are open.
 - *TVV11-Functional Carrier Bill Evaluation:* KPMG Consulting has completed the process of analyzing usage records generated from *TVV10-Billing Functional Usage Evaluation* and analyzed under *TVV11-Functional Carrier Bill Evaluation*. KPMG Consulting has validated 95% of all test cases for Bill Period 2. a retest of TVV10 and TVV11 will be conducted in conjunction with BellSouth billing infrastructure changes. Exceptions 43 (Amended), 62, 96 (Amended), and 111 are open.
 - *PPR13-Bill Production and Distribution Process Evaluation:* KPMG Consulting has completed the Parity Evaluation Report.

- **Performance Results Comparison (Metrics):**
 - *PMR1-Data Collection and Storage:* KPMG Consulting continued an assessment of systems to be reviewed for the new SQMs and continued to review documentation to validate that current data collection and storage procedures applied to the new SQMs. No open Observations or Exceptions.
 - *PMR2-Metrics Definitions and Standards:* KPMG Consulting continued evaluating SQMs defined in the Florida Revised Interim Metrics (SQM document, adopted by the Florida Public Service Commission in November, 2000) and continued evaluating the new proposed SQMs. Observations 69, 112, and Exception 81 are open.
 - *PMR3-Change Management:* KPMG Consulting continued to review the Change Management Process and continued to monitor change management adherence. Observation 73 and 118 are open. Exception 78 was closed.
 - *PMR 4-Data Integrity:* KPMG Consulting continued the completeness and accuracy phases for all domains and continued the Data Integrity testing for the Test CLEC. Exception 36 is open as part of PMR 4.
 - *PMR5-Metrics Calculation:* KPMG Consulting continued to validate SQM calculations for CLEC Aggregate and BellSouth Retail reports as part of test activities, and continued replication of regional metrics and new metrics (added since October 2000) to be tested. Observations 68, 105, 113, 119 and Exceptions 10, 22, 27, 101 and 109 are open for PMR5. Observation 110 was closed and the issue escalated to an Exception (109).

- **Relationship Management Infrastructure (RMI):**
 - *PPR1-Change Management Process Verification and Validation Review:* KPMG Consulting attended the BellSouth Change Control Process Status Meeting (9/26/01) for September. KPMG Consulting will continue to observe change management interaction between BellSouth and the CLEC community. In addition, KPMG Consulting continues to await closure of Exception 81 before beginning a second retest for Exception 12. KPMG Consulting has also reviewed BellSouth responses to Observation 116 and Exception 106. KPMG Consulting is in the process of scheduling refresh interviews.
 - *PPR2-Account Establishment and Management Review:* KPMG Consulting continues to monitor Account Establishment and Management processes and documentation. This included review of documentation for Exception 65 and 67

and KPMG Consulting has recommended closure of both. KPMG Consulting reviewed the BellSouth response to Observation 115 and is conducting a retest. KPMG Consulting is in the process of scheduling refresh interviews.

- *PPR3-Interface Help Desk Functional Review:* KPMG Consulting continues the review of the FC Support Help Desk Log. KPMG Consulting has issued a data request for the FC Support Help Desk data.
- *PPR4-CLEC Training Verification and Validation Review:* KPMG Consulting has drafted the Final Report for CLEC Training (PPR4). KPMG Consulting is currently in the process of scheduling refresh interviews.
- *PPR5-Interface Development:* KPMG Consulting is monitoring the development of the CLEC Applications Verification Environment (CAVE) for. KPMG Consulting will be testing CAVE with volunteer vendors, service bureaus, and CLECs. BellSouth announced the CAVE would not be available from September 25 until December 10. KPMG Consulting conducted interviews with two CLECs regarding their CAVE testing efforts. KPMG Consulting is reviewing the documentation and process for CLEC CAVE support. Monitoring of the BellSouth Release Management Process continues. Upcoming activities include a review of the BellSouth upgrade procedures related to the Test CLEC TAG upgrade to 7.6.2.1. KPMG Consulting is reviewing the BellSouth third amended response for Exception 6.

• **External Relations:**

- KPMG Consulting issued 3 Observations (119 total to date) and 2 Exceptions (110 total to date). There are currently 41 open Observations and 64 open Exceptions.
- The chart below details Observations and Exceptions by domain.

Domain	Exceptions issued this month	Observations Issued this month	Total Exceptions Issued	Total Observations Issued	Open Exceptions	Open Observations
OM	0	2	54	39	33	22
RPM	1	0	9	24	6	7
Billing	0	0	13	8	10	2
RMI	0	0	19	10	7	3
Metrics	1	1	15	37	8	7
Total	2	3	110	119	64	41

- The next Florida Face to Face is scheduled to take place in Tallahassee, Florida on October 10th. The Face to Face will be held at the FPSC offices at 2540 Shumard Oak Blvd, Tallahassee, Florida in Room 152 of the Fasley Building.

3.0 Key Upcoming Activities

- **TVV1 functional and timeliness re-test.**
- **TVV2 Volume Testing**
- **TVV8 Volume Testing (ECTA)**
- **Second DUF Retest**
- **Refresh of PPR12 (DUF) Process Interviews**
- **Process test refresh (all domains)**

4.0 Master Test Plan Specific Item Status

Domain	Ref	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
Order Management	VI-1	<i>TVV1: POP Functional Evaluation</i>	<ul style="list-style-type: none"> Complete functional testing for all interfaces, TAG, EDI, LENS, and RoboTAG. Percent instances in Completion Notice (CN) status as of 9/30 is as follows: EDI 89%, TAG 89%, LENS 91%, RoboTAG 51%. Testing of Complex and Non-Complex orders via facsimile and e-mails has progressed to 60% of planned instances in Completed Status (CP). Preparatory activates continue for TVV-1 re-test. 	<ul style="list-style-type: none"> Notification and Test CLEC Listener problems associated with the TAG interface. 	<ul style="list-style-type: none"> Observations 49, 64, 65, 74, 77, 81, 87, 89, 90, 91, 92, 93, 95, 99, 100, 104, 108 Exceptions 16, 41, 42, 45, 49, 51, 54, 64, 68, 69, 70, 71, 74, 75, 77, 80, 85, 89, 90, 98, 100, 102, 105, 107 	
	VI-2	<i>TVV2: POP Volume Performance</i>	<ul style="list-style-type: none"> The volume forecast is being refreshed to a September 2002 target date. Electronic volume testing is on hold pending resolution of Exceptions 99, 104, 107, and 108. Manual volume testing is on hold pending the resolution of Exception 72. 		<ul style="list-style-type: none"> Exceptions 72, 99, 104, 107, 108 (closing) 	<ul style="list-style-type: none"> Electronic and manual volume testing on hold pending resolution of Exceptions.

**BellSouth-FL OSS Testing Evaluation
Monthly Status Report
September 30, 2001**

Domain	Ref	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
	VII-1	<i>TVV3: Flow Through Evaluation</i>	<ul style="list-style-type: none"> Received monthly raw data reports from BellSouth. Validation of monthly reports against test CLEC data continues. Preparing to monitor flow-through performance during TVV1 re-test. 		<ul style="list-style-type: none"> Exception 86 Observation 94 	
	XIII-1	<i>PPR7: Manual Order Process</i>	<ul style="list-style-type: none"> Parity analysis for PPR7 continues. Received updated Method and procedure documentation, which are currently under review. Final report and work paper preparation continues. Final report will remain in draft until completion of TVV1 test. 		<ul style="list-style-type: none"> Observation 114 Exception: 94 (closure recommendation issued) 	<ul style="list-style-type: none"> KPMG Consulting will continue to monitor and observe TVV manual order process interactions throughout production testing. Request interviews at ordering center to refresh findings.
	XIII-2	<i>PPR8: Work Center Support Evaluation</i>	<ul style="list-style-type: none"> Received updated Method and procedure documentation, which are currently under review. Final report and work paper preparation continues. Final report will remain in draft until completion of TVV1 test. 		<ul style="list-style-type: none"> Observation 109, 111 Exception 57, 94, 103 	<ul style="list-style-type: none"> KPMG Consulting will continue to monitor BellSouth's work center support processes throughout production testing. Request interviews at ordering center to refresh findings.

**BellSouth-FL OSS Testing Evaluation
Monthly Status Report
September 30, 2001**

Domain	Ref	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
Repair, Provisioning, and Maintenance	III-3	<i>Data Requests</i>	<ul style="list-style-type: none"> Interviews and Documentation request will continue related to PPR6, Collocation and OLNS testing as well as for TVV4, Dark Fiber, Line Splitting and Switch Translation testing. Re-Testing to resolve Observations and Exceptions continues. 		<p>TVV4 Observations: 45, 82, 106, 117 Exceptions: 76, 82, 84, 112</p> <p>TVV6 Observation: 83, 102</p> <p>TVV8 Observation: 107 Exception: 38, 63</p> <p>PPR14 Exception: 35</p>	<ul style="list-style-type: none"> Interviews, Documentation, and Data requests continue to be scheduled with BellSouth.
	V-5	<i>CLEC Participation</i>	<ul style="list-style-type: none"> KPMG Consulting is continuing to conduct CLEC discussions for all tests as required. MLT observations and collocation process monitoring as well as OLNS process monitoring continued with CLEC's. 			<ul style="list-style-type: none"> KPMG Consulting will utilize information gained in these discussions to facilitate completion of all tests.
	V-5	<i>CLEC Participation</i>	<ul style="list-style-type: none"> KPMG Consulting is continuing to conduct CLEC discussions for all tests as required. MLT observations and collocation process monitoring as well as OLNS process monitoring continued with CLEC's. 			<ul style="list-style-type: none"> KPMG Consulting will utilize information gained in these discussions to facilitate completion of all tests.

BellSouth-FL OSS Testing Evaluation
 Monthly Status Report
 September 30, 2001

Domain	Ref	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
Billing	X-1	<i>TVV10: Billing Functional Usage Evaluation</i>	<ul style="list-style-type: none"> KPMG Consulting has completed DUF retest analysis. 		<ul style="list-style-type: none"> Exceptions (Amended) 13, 79 & 83 	<ul style="list-style-type: none"> Prepare for second DUF retest.
	XII-2	<i>TVV11: Functional Carrier Bill Evaluation</i>	<ul style="list-style-type: none"> KPMG Consulting has completed all resale usage analysis related to the DUF retest. 		<ul style="list-style-type: none"> Exceptions 43 (Amended), 44 (Amended), 96 (Amended) & 111 	<ul style="list-style-type: none"> Continue Exception 44 UNE validation work with BellSouth.
		<i>PPR10: Billing Work Center/Help Desk</i>	<ul style="list-style-type: none"> KPMG Consulting received the workforce management interview summary report draft with BellSouth's comments. KPMG Consulting continues to work on the initial draft of the PPR10 Final Report. 		<ul style="list-style-type: none"> Exception 37 	<ul style="list-style-type: none"> KPMG Consulting will submit the workforce management interview summary report for BellSouth's comments and approval.
		<i>PPR12: Daily Usage Production & Distribution - Process Evaluation</i>	<ul style="list-style-type: none"> KPMG Consulting has completed initial work on the 1st draft of the draft final report. 			<ul style="list-style-type: none"> Refresh Interviews with BellSouth SMEs.

BellSouth-FL OSS Testing Evaluation
Monthly Status Report
September 30, 2001

Domain	Ref ¹	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
		<i>PPR13: Bill Production and Distribution Process Evaluation</i>	<ul style="list-style-type: none"> KPMG Consulting continues to work on the initial draft of the final report. 			<ul style="list-style-type: none"> KPMG Consulting will complete the initial draft of the final report and submit the draft for PM team review.
Metrics	IV-4	Data Requests	<ul style="list-style-type: none"> KPMG Consulting and BellSouth have continued to discuss data requests for the PMR tests, with FPSC participation. 			
	VII-2	<i>PMR1: Data Collection and Storage</i>	<ul style="list-style-type: none"> KPMG Consulting is continuing to review systems related to new metrics. 			
	VII-3	<i>PMR2: Metrics Definitions and Standards</i>	<ul style="list-style-type: none"> KPMG Consulting continues to evaluate SQMs defined in the <i>Florida Revised Interim Metrics</i> (SQM document, adopted by FPSC 06/01) for PMR2. KPMG Consulting continued to analyze data received as part of the Parity By Design Interviews conducted during August. 		<ul style="list-style-type: none"> Observations 69, 112 Exception 81 	<ul style="list-style-type: none"> KPMG Consulting will conduct follow-up interviews as necessary for PMR2.
	VII-4	<i>PMR3: Metrics Change Management</i>	<ul style="list-style-type: none"> KPMG Consulting Continued to monitor adherence to the Change Management Process. 		<ul style="list-style-type: none"> Observations 73, 118 	<ul style="list-style-type: none"> KPMG Consulting will conduct follow-up interviews as necessary for PMR3.

BellSouth-FL OSS Testing Evaluation
 Monthly Status Report
 September 30, 2001

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	VII-5	<i>PMR4 Metrics Data Integrity</i>	<ul style="list-style-type: none"> • KPMG Consulting continued the completeness phase analysis for all Domains. • KPMG Consulting continued the accuracy phase analysis for all Domains. • KPMG Consulting continued the Metric Specific analysis for the all Domains. • KPMG Consulting continued the Test CLEC data integrity analysis between KPMG systems and BellSouth's Legacy Systems. 	<ul style="list-style-type: none"> • Issues related to Product IDs continue to impact project schedule. 	<ul style="list-style-type: none"> • Exception 36 	<ul style="list-style-type: none"> • KPMG Consulting will continue to extract data in support of the data integrity comparisons.
	VII-6	<i>PMR5: Metrics Calculations</i>	<ul style="list-style-type: none"> • KPMG Consulting continued to validate SQM calculations for CLEC Aggregate and BellSouth Retail reports as part of <i>PMR5: Metrics Calculation</i> test activities, and continued replication of regional metrics and new metrics (added since October 2000) to be tested. • KPMG Consulting continued to validate the SQM calculations for the new metrics and the new levels of disaggregations included in the new Interim Metrics. 		<ul style="list-style-type: none"> • Observations 68, 105, 113, 119 • Exceptions 10, 22, 27, 101, 109 	<ul style="list-style-type: none"> • KPMG Consulting will continue to analyze variances in support of the data replication effort.

BellSouth-FL OSS Testing Evaluation
Monthly Status Report
September 30, 2001

Domain	Ref	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
Relationship Management Infrastructure	III-1	Data Requests	<ul style="list-style-type: none"> • KPMG Consulting has issued a data request related to PPR2 Exc. 95. This document request is to further understand how the Account Team resolves metrics issues. • KPMG Consulting has issued a data request for the PPR3 test. This request is for data from the EC Support log of troubles. 			<ul style="list-style-type: none"> • KPMG Consulting expects to receive the Exc. 95 documentation on 10/3/01. • KPMG Consulting expects to receive the PPR3 data on 10/3/01.
	IV-2	<i>PPR1: Change Management Practices Verification and Validation Review</i>	<ul style="list-style-type: none"> • KPMG Consulting attended the BellSouth Change Control Process Status Meeting 9/26/01. • KPMG Consulting Continues to monitor the Change Management Process. • KPMG Consulting reviewed responses to Observation 116 and Exception 106. • KPMG Consulting has begun scheduling refresh interviews. 	<ul style="list-style-type: none"> • KPMG Consulting has reviewed the BellSouth response to Amended Exception 12 and is awaiting closure of Exception 81 before the second retest begins. 	<ul style="list-style-type: none"> • Exceptions 12, 88, and 106 • Observations 86, and 116 	<ul style="list-style-type: none"> • KPMG Consulting will continue to observe change management interaction between BellSouth and the CLEC community. • KPMG Consulting will prepare for the Exception 12 Second retest. • KPMG Consulting will attend the Change Control Process Monthly Status Meeting as well as the process improvement meeting for October.

BellSouth-FL OSS Testing Evaluation
Monthly Status Report
September 30, 2001

Domain	Ref	Item	Status	Issues	Observations/Exceptions	Next Step/Resolution
	XI-1	<i>PPR2: Account Management</i>	<ul style="list-style-type: none"> • KPMG Consulting continued to review BellSouth Responses to Exception 65 and 67 and has recommended disposition for both. • KPMG Consulting is retesting Observation 115. • KPMG Consulting has begun scheduling refresh interviews. 		<ul style="list-style-type: none"> • Exceptions 65, 67, 95 • Observation 115 	<ul style="list-style-type: none"> • KPMG Consulting will continue to review documentation associated with Account Management and Establishment.
	XI-2	<i>PPR3: OSS Interface Help Desk</i>	<ul style="list-style-type: none"> • KPMG Consulting continued to review the EC Support Help Desk Log. 	<ul style="list-style-type: none"> • KPMG Consulting has reviewed the BellSouth response to Amended Exception 12 and is awaiting BellSouth's implementation of a new email system as well as the closure of Exception 81 before the second retest begins. 		<ul style="list-style-type: none"> • KPMG Consulting will continue to review the EC Support Help Desk Log. • KPMG Consulting will review the ECS Help Desk data received.
	XII-1	<i>PPR4: CLEC Training</i>	<ul style="list-style-type: none"> • KPMG Consulting has begun scheduling refresh interviews. 			<ul style="list-style-type: none"> • No scheduled activity.

BellSouth-FL OSS Testing Evaluation
Monthly Status Report
September 30, 2001

Domain	Ref	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
		<i>PPRS-OSS Interface Development</i>	<ul style="list-style-type: none"> Continue review of Interface development process documentation. Additional Documentation was received. Continued to Monitor development of BellSouth CLEC test environment (CAVE). Continued to Monitor the BellSouth Release management process. Exceptions and 20 closed. Observation 53 closed. 		<ul style="list-style-type: none"> Exceptions 6 	<ul style="list-style-type: none"> Observe CAVE testing process. Observed CAVE Connectivity, syntax and application testing for one Vendor/CLEC. Held interviews regarding CAVE with three vendors/CLECs.
External Relations (CLEC Contact, Exceptions/Observations, Status Reporting)	I-18	<i>Exception/Observation Process</i>	<ul style="list-style-type: none"> KPMG Consulting issued 3 Observations (119 total to date) and 2 Exceptions (110 total to date). There are currently 41 open Observations and 64 open Exceptions. 	<ul style="list-style-type: none"> Observation calls are held following the Wednesday 10AM status calls at approximately 11:00 AM. Exception calls are held on Thursdays at 1:30PM with the same conference bridge and pass code. 		
	IV-I-19	<i>CLEC Face to Face</i>	<ul style="list-style-type: none"> Next Meeting to be held in Tallahassee, Florida on October 10, 2001. 			

¹ Referencing Methodology: An item referenced as I-n indicates that this item first appeared in the March 7, 2000 report. An item referenced as II-n indicates that this item first appeared in the April 7, 2000 report. An item referenced as III-n indicates that this item first appeared in the May 5, 2000 report. An item referenced as IV-n indicates that this item first appeared in the June 7, 2000 report. An item referenced as V-n indicates that this item first appeared in the July 10, 2000 report. An item referenced as VI-n indicates that this item first appeared in the August 7, 2000 report. An item referenced as VII-n indicates that this item first appeared in the September 7, 2000 report. An item referenced as VIII-n indicates that this item first appeared in the October 6, 2000 report. An item referenced as IX-n indicates that this item first appeared in the November 7, 2000 report. An item referenced as X-n indicates that this item first appeared in the December 7, 2000 report. An item referenced as XI-n indicates that this item first appeared in the January 8, 2001 report. An item referenced as XII-n indicates that this item first appeared in the February 7, 2001 report. An item referenced as XIII-n indicates that this item is new for this report.

Attachment 3

DATE: September 12, 2001
TO: William D. Talbott, Executive Director
FROM: Division of Regulatory Oversight (Hoppe, Harvey)
Division of Competitive Services (D'Haeseleer, Simmons)
Division of Legal Services (B. Keating)
RE: Florida Third-Party Testing of BellSouth's Operational Support Systems (OSS)

CRITICAL INFORMATION: Please place on the September 18, 2001 Internal Affairs

During the September 18, 2001 Internal Affairs, staff and KPMG would like to provide a short briefing on the status of BellSouth OSS third-party testing. Attached is a handout detailing the status of evaluation criteria, observations and exceptions.

LSH/bjm

Attachment

cc: Dan Hoppe
Walter D'Haeseleer
Bill Lowe
Beth Salak
Beth Keating
Sally Simmons

**Florida OSS Testing of BellSouth
Status of Evaluation Criteria
as of September 12, 2001**

Domain/Test	Total Evaluation Criteria	Total Eval Criteria Currently Passing	Total Eval Criteria Currently Failing/Retesting	Total Eval Criteria Under Evaluation	Percent Currently Passing	Percent Currently Fail/Retesting	Percent Currently Under Evaluation
PMR1 Data Collection	48	24	0	24	50%	0%	50%
PMR2 Metric Definitions	574	562	12	0	98%	2%	0%
PMR3 Metric Change Mgt	7	0	4	3	0%	57%	43%
PMR4 Data Integrity	140	40	0	100	29%	0%	71%
PMR5 Metric Calculations	328	303	9	16	92%	3%	5%
TVV4 Provisioning Verification	23	0	0	23	0%	0%	100%
TVV5 TAFI Functional	16	16	0	0	100%	0%	0%
TVV6 ECTA Functional	14	11	0	3	79%	0%	21%
TVV7 TAFI Performance	9	9	0	0	100%	0%	0%
TVV8 ECTA Performance	20	10	10	0	50%	50%	0%
TVV9 End-to-End Trouble Rpt	35	35	0	0	100%	0%	0%
PPR6 Collocation	17	17	0	0	100%	0%	0%
PPR9 Provisioning Process	82	66	0	16	80%	0%	20%
PPR14 End-to-End M&R	16	15	1	0	93.75%	6.25%	0%
PPR15 M&R Work Centers	19	19	0	0	100%	0%	0%
PPR16 Network Surveillance	6	6	0	0	100%	0%	0%
PPR1 Change Management	8	2	5	1	25%	62.5%	12.5%
PPR2 Account Establishment	17	8	1	8	47%	6%	47%
PPR3 Interface Help Desk	13	2	5	6	15%	39%	46%
PPR4 CLBC Training	14	14	0	0	100%	0	0
PPR5 Interface Development	23	5	1	17	22%	4%	74%
TVV1 POP Functional	100	0	30	70	0%	30%	70%
TVV2 POP Volume	37	0	13	24	0%	35%	65%
TVV3 Flow Through	20	0	4	16	0%	20%	80%
PPR7 POP Manual Ordering	14	12	1	1	86%	7%	7%
PPR8 POP Work Center	21	13	2	6	62%	9.5%	28.5%
TVV10 Billing Functional	6	4	2	0	66.6%	33.4%	0%
TVV11 Carrier Bill Evaluation	20	13	3	4	65%	15%	20%
PPR10 Billing Work Center	19	18	1	0	95%	5%	0%
PPR12 Daily Usage Production	16	16	0	0	100%	0%	0%
PPR13 Bill Production	44	43	1	0	98%	0	2%

**Florida OSS Testing of BellSouth
Status of Observations and Exceptions
as of September 12, 2001**

OSS Observations			
	Total	Open	Closed
Performance Metrics	36	6	30
Repair, Provisioning and Maintenance	24	7	17
Relationship Management Infrastructure	10	3	7
Order Management	38	20	18
Billing	8	2	6
Total	116	38	78

Observations are potential deficiencies in BellSouth's OSS or a defect that hinders test execution.

OSS Exceptions			
	Total	Open	Closed
Performance Metrics	14	8	6
Repair, Provisioning & Maintenance	8	6	2
Relationship Management Infrastructure	19	7	12
Order Management	54	33	21
Billing	13	10	3
Total	108	64	44

Exceptions identify a deficiency that may result in a "not satisfied" condition in the final report if not remedied.

			Section Fields			
Added Rule 2: For REQ TYP A, TOS = R; Line Share this field <i>must</i> be populated with "XXXX" (if using <u>existing</u> facilities or FRN from Loop Make Up Query if using <u>reserved</u> facilities.)						
Added Rule 3: For REQ TYP A-TOS = P; Line Splitting this field <i>must</i> be populated with "XXXX" (if using <u>existing</u> facilities or FRN from Loop Make Up Query if using <u>reserved</u> facilities.)						
2754 CCP- 0441	N/A	Data Element Dictionary	LSR - Administra tive Section Fields	REMARKS	-	Added CONDITIONAL USAGE NOTES:
Note 1: On REQ TYP A where TOS 2 nd character =R and the splitter resides inside the DLEC cage (Splitter LOC I), populate this field with CTI=B.						
Note 2: On REQ TYP A where TOS 2 nd character =R and the splitter resides inside the DLEC cage (Splitter LOC I), populate this field with CABLE ID2. (DLEC Collocated Cable ID- indicates CA for voice only cross connect).						
Note 3: On REQ TYP A where TOS 2 nd character =R and the splitter resides inside the DLEC cage (Splitter LOC I), populate with CHAN/PR2 (DLEC Collocated Cable ID-indicates CA for voice only cross connect).						
Note 4: On REQ TYP A where TOS 2 nd character =R and the splitter resides inside the DLEC cage (Splitter LOC I), populate this field with RESID=FRN.						
2754 CCP- 0441	N/A	Data Element Dictionary	LSR - Administra tive Section Fields	REMARKS	-	Added BUSINESS RULES:
Rule 5: On REQ TYP A where TOS 2 nd character =P and the splitter resides inside the DLEC cage (Splitter LOC I), populate this field with CTI=B.						
Rule 6: On REQ TYP A where TOS 2 nd character =P and the splitter resides inside the DLEC cage (Splitter LOC I), populate this field with CABLE ID2. (DLEC Collocated Cable ID- indicates CA for voice only cross connect).						
Rule 7: On REQ TYP A where TOS 2 nd character =P and the splitter resides inside the DLEC cage (Splitter LOC I), populate with CHAN/PR2 (DLEC Collocated Cable ID-indicates CA for voice only cross connect).						
Rule 8: On REQ TYP A where TOS 2 nd character =P and the splitter resides inside the DLEC cage (Splitter LOC I), populate this field with RESID=FRN.						
Rule 9: For REQ TYP A, TOS = R; Line Share this field <i>must</i> be populated with "XXXX" (if using <u>existing</u> facilities or FRN from Loop Make Up Query if using <u>reserved</u> facilities.)						
Rule 10: For REQ TYP A-TOS = P; Line Splitting this field <i>must</i> be populated with "XXXX" (if using <u>existing</u> facilities or FRN from Loop Make Up Query if using <u>reserved</u> facilities.)						
Rule 11: For REQ TYP A, TOS = R; HFS Unbundled (CO Based) Line Share DLEC Owned this field <i>must</i> be populated with CTI=B cable ID2 XXXX1 and CHAN/PAIR2-XXXX.						
Rule 12: For REQ TYP A-TOS = P; Line Splitting this field <i>must</i> be populated with CTI=B cable ID2 XXXX1 and CHAN/PAIR2-XXXX.						
2857 CCP- 0474	N/A	Data Element Dictionary	LSR - Administra tive Section Fields	REQ TYP	Valid Entries	Added (BellSouth®) to Centrex® and added ESSX® AND MultiServ® for REQ TYP P (row).
2873	N/A	Data	LSR -	TOS	-	Added BUSINESS

**Attachment
SN91082639**

		Element Dictionary	Administrative Section Fields			RULE: Rule 12: When both PBX and DID Trunks are on the same request, the second character of the TOS should be "J".
2882	N/A	Data Element Dictionary	LSR - Administrative Section Fields	TOS	-	Added (SynchroNet®) valid 2 nd character TOS for ACT N, C, D, T, V and W
2885	N/A	Data Element Dictionary	LSR - Administrative Section Fields	REMARKS	-	Added BUSINESS RULES 'Rule 4: When ordering RS HFS Unbundled Line Share DLEC Owned this field must be populated as follows: REMARKS Remote Site DLEC Owned Requested.'
2889	N/A	Data Element Dictionary	Introduction	-	-	Added verbiage regarding fields that are not supported by BellSouth. "Not Supported is defined as this field is not used by BellSouth and when populated will be ignored by BellSouth. The Not Supported fields will not be shown in the R/C/O tables, but will be reflected in the Data Elements Dictionary."
2894	N/A	Data Element Dictionary	LSR - Administrative Section Fields	-	-	Update to change Centrex to BellSouth Centrex, and to add ESSX, and MultiServ to the table for REQTY P
2899	N/A	Data Element Dictionary	RS - Administrative Section Fields	LNUM	-	Update 5 digit EXAMPLE.
2899	N/A	Data Element Dictionary	RS - Administrative Section Fields	RSQTY	-	Update Valid Entry to show 000-999

ATTACHMENT 61

DECLARATION OF JAY M. BRADBURY

EXCEPTION 99
BellSouth Florida OSS Testing Evaluation

Date: August 23, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Volume Performance Test (TVV-2).

Exception:

KPMG Consulting has not received fully mechanized responses to multiple Local Service Requests (LSRs) submitted to BellSouth's Electronic Data Interchange (EDI) interface. (TVV2)

Background:

BellSouth's Business Rules for Local Ordering specifies: "A FOC will be returned to the Competitive Local Exchange Carrier (CLEC) via facsimile or electronically after the Local Carrier Service Center (LCSC) processes the CLEC's service request(s) and determines that corrections or error resolutions are not required."¹

BellSouth is expected to provide fully mechanized Firm Order Confirmations (FOCs), Clarification, or Error responses for a minimum of 99% of acknowledged PONs.² Planned flow-through drop-out errors are excluded from the calculation.

Issue:

As part of the POP Volume Performance Test KPMG Consulting submitted orders to BellSouth via EDI on August 18,2001.

The following are the response results on mechanized orders using the EDI interface, excluding planned flow-through drop-out orders.

ACK	FOC, ERR, or CLR	No Response	Response Percentage
8743	7989	754	91.4%

KPMG Consulting has not received a fully mechanized FOC, rejection, or clarification from BellSouth for the following orders³:

¹ BellSouth Business Rules for Local Ordering, Issue 90, section 2.9.3.

² KPMG Consulting applied standards based on its professional judgment in the absence of 1) FPSC-approved standards or 2) documented BLS guidelines.

³ A representative sample of the 754 PONs has been provided.

EXCEPTION 99
BellSouth Florida OSS Testing Evaluation

PON	Ver	CC
0021211CEJYY0256	00	9991
0021211CEJYY0482	00	9991
0200211CENYY0001	00	9991
0200211CENYY0002	00	9991
0200511CEJYY0015	00	9991
0200511CEJYY0026	00	9991
0200511CEJYY0049	00	9991
0200511CEJYY0074	00	9991
0200511CEJYY0140	00	9991
0200511CEJYY0194	00	9991
0200511CEJYY0214	00	9991
0200511CEJYY0240	00	9991
0200511CEJYY0280	00	9991
0200511CEJYY0370	00	9991
0200511CEJYY0502	00	9991
0700221CEHYY0021	00	9991
0700221CEHYY0097	00	9991
0700221CEHYY0215	00	9991
0720621CEHYY0018	00	9991
0720621CEHYY0033	00	9991
0720621CEHYY0061	00	9991

EXCEPTION 99
BellSouth Florida OSS Testing Evaluation

PON	Ver	CC
0720621CEHYY0081	00	9991
0720621CEHYY0141	00	9991
0720621CEHYY0153	00	9991
0720621CEHYY0168	00	9991
0720621CEHYY0188	00	9991
0720621CEHYY0204	00	9991
0760121CEHYY0057	00	9991
0760121CEHYY0148	00	9991
0760121CEHYY0188	00	9991

Impact:

The absence of fully mechanized BellSouth confirmations and errors can create extra work for a CLEC to follow up on missing responses, have a negative impact on the timeliness of order completion, and may lower overall CLEC customer satisfaction.

EXCEPTION 107
BellSouth Florida OSS Testing Evaluation

Date: August 29, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the Volume Performance Test (TVV-2).

Exception:

KPMG Consulting has not received fully mechanized responses to multiple Local Service Requests (LSRs) submitted to BellSouth's Telecommunications Access Gateway (TAG) interface. (TVV2)

Background:

BellSouth's Business Rules for Local Ordering specifies: "A FOC will be returned to the CLEC either via facsimile or electronically after the Local Carrier Service Center (LCSC) processes the CLEC's service request(s) and determines that corrections or error resolutions are not required."¹

BellSouth is expected to provide fully mechanized FOC, Clarification, or Error responses for at least 99% of acknowledged PONs.² Planned flow-through drop-out errors are excluded from the calculation.

Issue:

As part of the Volume Performance Test KPMG Consulting submitted orders to BellSouth via the TAG interface on August 18, 2001.

Response results on mechanized orders excluding planned flow-through drop-out orders are as follows:

ACK	FOC, ERR, or CLR	No Response	Response Percentage
91	88	3	96.7%

KPMG Consulting has not received a fully mechanized FOC, rejection, or clarification from BellSouth for the following orders:

¹ BellSouth Business Rules for Local Ordering, Issue 90, section 2.9.3.

² KPMG Consulting applied a benchmark of "99% Returned" to Ordering Measure O-11 of the BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved June 1, 2001. The benchmark was applied based on KPMG Consulting's professional judgment.

EXCEPTION 107
BellSouth Florida OSS Testing Evaluation

PON	Ver	CC
0026011CTJYY0001	00	9991
0720621CTHY0001	00	9991
0720621CTHY0002	00	9991

Impact:

The absence of fully mechanized BellSouth confirmations and errors can create extra work for a CLEC to follow up on missing responses, have a negative impact on the timeliness of order completion, and may lower overall CLEC customer satisfaction.

EXCEPTION 104
BellSouth Florida OSS Testing Evaluation

Date: August 28, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Volume Performance Test (TVV-2).

Exception:

KPMG Consulting has not received timely responses for the pre-order queries, Appointment Availability (AAQ), Address Validation (AVQ), Address Validation by Telephone Number (AVQ_TN), Customer Service Record (CSRQ), Service Availability (SAQ) and Telephone Number Assignment (TNAQ) submitted via the Robust Telecommunications Access Gateway (RoboTAG) Web interface. (TVV2)

Background:

According to Operations Support Systems OSS-1 of the Service Quality Measurement Plan¹, BellSouth should return pre-order responses within an average interval that is at parity +2 seconds with retail performance provided monthly by BellSouth. KPMG Consulting used BellSouth parity metrics for the report period of June 1, 2001 through June 30, 2001².

Issue:

During volume testing conducted on August 16, KPMG Consulting received the following results for AAQ, AVQ, AVQ_TN, CSRQ, SAQ and TNAQ pre-orders, submitted using RoboTAG:

	<2.3 Seconds	>6 Seconds	<=6.3 Seconds	Average Response Time
AAQ - KPMG Consulting Performance	44.71%	54.68%	45.32%	21.1 Seconds
BellSouth Parity	98.24%	0.64%	99.39%	0.69 Seconds
AVQ - KPMG Consulting Performance	0%	96.97%	3.03%	54.7 Seconds
BellSouth Parity	96.16%	0.71%	99.33%	1.04 Seconds
AVQ_TN - KPMG Consulting	0%	100%	0%	53.4 Seconds

¹ BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved by Florida PSC June 12, 2001

² Pre-Ordering and Ordering OSS

EXCEPTION 104
BellSouth Florida OSS Testing Evaluation

Performance				
BellSouth Parity	97.37%	0.48%	99.55%	0.92 Seconds
CSRQ - KPMG Consulting Performance	0%	99.58%	0.42%	66.5 Seconds
BellSouth Parity	93.36%	1.60%	98.46%	1.66 Seconds
SAQ - KPMG Consulting Performance	0%	100%	0%	196.1 Seconds
BellSouth Parity	77.21%	4.92%	95.47%	2.09 Seconds
TNAQ - KPMG Consulting Performance	12.30%	79.67%	20.33%	26.9 Seconds
BellSouth Parity	95.50%	2.22%	97.85%	3.12 Seconds

Impact:

Delays in receiving pre-order responses could prevent a CLEC from obtaining information necessary to efficiently process a customer's service request. As a result, customer satisfaction with the CLEC could decrease.