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Via Electronic Filing

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

Re: Notice of written ex parte communications, Joint Application by BellSouth Corporation, et al., for Provision of In-Region, InterLATA Services in Georgia and Louisiana, CC Docket No. 01-277

Dear Ms. Salas:

AT&T submits this letter in response to the *ex partes* filed yesterday by BellSouth. In particular, BellSouth submitted a letter from a KPMG representative, Michael W. Weeks, relating to the testing conducted by KPMG Consulting of BellSouth's OSS in Georgia. *BellSouth Dec. 18 Ex Parte*, Att. at 1 ("*Weeks Letter*"). BellSouth contends that the *Weeks Letter* supports its claim that CLECs can, to the same extent as BellSouth, parse the data contained in the customer service requests ("CSRs") from BellSouth's pre-ordering OSS and "auto-populate" the local service requests ("LSRs") used by BellSouth's ordering OSS. The Weeks letter, and BellSouth's own December 18 submissions, however, only confirm that such integration is not possible today.

Numerous CLECs have demonstrated that even if *some* fields on *some* LSRs can be autopopulated, BellSouth's systems do not, in fact, allow full integration. See, e.g., *AT&T Dec. 17 Ex Parte*, App. A (summarizing CLECs statements). Because critical parsing functionality remains unavailable, CLECs must today manually re-enter information onto LSRs. BellSouth alone is immune from the delays, errors and additional costs that are inherent in such manual processing. Although the Georgia Commission has ordered BellSouth to provide this critical parsing functionality, BellSouth has not yet done so. BellSouth, not surprisingly, has been unable to demonstrate with evidence of actual commercial operations that CLECs can fully integrate.

The critical issue for CSR parsing is whether the CLEC can mechanically parse the stream of actual CSR data sent by BellSouth through its interfaces and whether that parsed data can be mapped electronically to corresponding LSR fields for successful

order processing. KPMG did not test this. KPMG received a data dump of artificially created CSRs, parsed it to some unknown degree in its own proprietary databases, and used data from its own database to populate an LSR. During its so-called “integration” testing, KPMG simply eye-balled the pre-ordering data to see if it could fit into the LSR ordering fields, and found that it could not in some unquantified number of instances. KPMG’s functional testing Master Test Plan (page V-2) states that: “For a defined set of integrated transactions, information returned on the pre-order response will be used to populate fields in subsequent orders. This activity is undertaken to simulate the system-related activities of a CLEC wishing to integrate the pre-order and order functions.” Nothing in the Master Test Plan, Final Test Report, or *Weeks Letter* indicates that any of the “defined set of integrated transactions” involved the relevant functionality at issue here: the use of CSR data obtained through the BellSouth TAG (or LENS) interface to automatically and directly populate an LSR.

Moreover, the *Weeks Letter* concedes that KPMG’s parser “was not . . . designed to parse all possible fields from all possible types of CSRs.” *Weeks Letter* at 2. Rather, KPMG’s “CSR parser extracted only that information required to populate the LSRs *which were submitted*” in KPMG’s tests. *Id.* (emphasis added). And even limiting the test to only this unspecified subset of order types, KPMG’s parser still did not obtain sufficient information to autopopulate the LSRs in KPMG’s test; rather, KPMG had to combine the limited amount of parsed CSR data with data from its own “proprietary database” to *fully* populate the LSRs. *Id.* As such, the KPMG testing plainly provides no support for BellSouth’s claim that full integration is possible. Mr. Weeks likewise concedes that the only other testing carried out by KPMG “moved data *manually* directly from Pre-Order Queries to Orders (LSRs).” *Id.* at 1. Manual processing is not the issue; it is the problem.

Mr. Weeks states, without the slightest explanation, that the KPMG parser “did not need to be” able to parse all of the fields that CLECs must parse to integrate in the real world. It is true that the KPMG parser did not need that functionality to serve its very limited purpose, but without that capability it could not possibly support a finding that CLECs can, in fact, fully integrate. And Mr. Weeks suggestion that “mov[ing] data manually” “simulated the logic a computer program” would use to perform the parsing and autopopulation functionalities is simply irresponsible. *Id.* at 1. By that “logic,” one could conclude that any untested OSS proffered by a BOC is adequate – it is always possible move data from one form to another, and it is always theoretically possible to write code that will mechanize that manual operation. But if OSS proceedings before the states and the Commission have taught anything, it is that the devil is in the details. There is no question that it is *possible* that OSS could be designed to provide CLECs with sufficient integration functionality, but the fact remains that BellSouth has *not* yet done that. Programmers presumably always believe that the code they write will accomplish its stated purpose; practice, however, often differs considerably from theory or expectations, as BellSouth’s own OSS history of broken promises vividly confirms. As explained in the *Texas 271 Order* (¶ 152), the Commission “does not simply inquire whether it is possible to transfer information from pre-ordering to ordering interfaces . . . [rather it] assesses whether the BOC enables *successful* integration.”

In fact, even in KPMG's limited analysis, it identified one serious problem that would make writing a program to fully automate the pre-ordering/ordering processes extremely difficult. As explained by Mr. Weeks, KPMG "discovered that differences in definitions existed between [BellSouth's pre-ordering and ordering] interfaces." *BellSouth Dec. 10 Ex Parte*, Att. 1 at 1. In response to this problem, BellSouth "created certain [but unidentified] Pre-Order to Order 'mapping' documents." *Id.* But Mr. Weeks frankly admits that KPMG cannot vouch for those "mapping" documents because they "have not been reviewed by KPMG Consulting." *Id.*¹

For its part, BellSouth struggles to draw a favorable comparison between KPMG's limited testing that concededly did not even purport to test actual integration capabilities with Telcordia's Texas testing that did purport to do so. *BellSouth December 18 Ex Parte*, Att. 2, at 3. BellSouth's own words confirm that no such comparison is possible. As BellSouth explains, integration testing must show that a BOC's OSS permit "information [to be] autopopulated into the LSR." *Id.* Unlike the Telcordia integration testing which purported to test that functionality, BellSouth concedes that KPMG testing did not. *Compare id.* ("[i]n the Georgia test, the LSR was auto-populated *except for the specific pre-order field being tested*") (emphasis added) with *Texas 271 Order* ¶ 158 ("Telcordia reports that it used documentation and other information including address information, obtained through the pre-ordering process directly onto an LSR."). Indeed, BellSouth's admission that the particular pre-order query field being tested was exempt from any electronic processing underscores the limited value of the testing.

In the end, BellSouth's eleventh hour barrage of empty promises, untested quick fixes and record mischaracterizations only confirms that the pervasive problems with BellSouth's OSS cannot possibly be resolved in the final days of the statutory review period. The form letters hastily filed over the past few days at BellSouth's request by a handful of CLECs offering heavily qualified support for its OSS cannot overcome the problems experienced by all CLECs, including the incomplete integration of pre-ordering and ordering systems, the excessive manual processing of orders submitted electronically, the errors in service order provisioning, the repeated failures to provide prompt access to due dates, and the utterly dysfunctional change control process. These problems have persisted for years and will continue unless the Commission requires BellSouth to shoulder its statutory responsibility to resolve them.

Even the Georgia and Louisiana commissions who approved BellSouth's state applications have identified significant problems that remain to be resolved. The ongoing Georgia and Florida tests that this Joint Application attempts to render moot, confirm that these problems are real, not imaginary. And the Justice Department has

¹ BellSouth's assertion that CLECs have not brought change control or parsing issue complaints to the GPSC or other state commissions is simply false. AT&T, for one, has raised the deficiencies in the change control process before the GPSC in arbitration, as well as before state commissions in several other BellSouth states. *See, e.g., GPSC Order, Petition of AT&T Communications of the Southern States, Inc., et al. for Arbitration of Certain Terms and Conditions of Proposed Agreement with BellSouth Telecommunications, Inc. Under the Telecommunications Act of 1996*, Docket 11853-U, at 14 (April 14 2001) (issue 42(a) is "Parsed CSR Records for Pre-Ordering).

weighed in with a strong and indisputably negative evaluation of BellSouth's OSS and this Joint Application in general. And, contrary to BellSouth's claims, the Commission's prior § 271 orders – whether given their plain meaning or wrenched entirely out of context – do not permit, much less mandate, acceptance of such an abysmal performance across the board.

Consistent with Commission rules, I am filing one electronic copy of this notice and request that you place it in the record of this proceeding.

Sincerely,

A handwritten signature in black ink, appearing to be 'JM', with a long horizontal line extending to the right.

Joan Marsh

cc: Kyle Dixon Matthew Brill Monica Desai
Jordan Goldstein Dorothy Attwood Kathy Farroba
Jessica Rosenworcel Aaron Goldberger