ATTACHMENT 1

From: Sherwood, Suzy [Suzy.Sherwood@BellSouth.COM]
Sent: Wednesday, February 06, 2002 5:03 PM
To: Timmons, King C (K.C.), NCAM
Subject: Reposted Flow Through Report to PMAP Website

The Flow Through Report for December 2001 data has been reposted to the PMAP Website. Our records indicate that you downloaded this report prior to its reposting. To receive a current copy of this report, you will need to download a new copy from the PMAP Website.

Listed below is the Flow Through Key that should be used to analyze AT&T's data on this report.

ATTACHMENT 2

From: Timmons, King C (K.C.), NCAM [ktimmons@att.com]
Sent: Thursday, February 28, 2002 2:25 PM
To: Phillip Porter - BellSouth
Subject: December LNP Flow Through Report

LNP_Flow_Through_122001.xls

Phil,

I am attaching a copy of the December 2001 LNP Flow Through Report. I received an e-mail from Suzy Sherwood on February 6 letting me know that the Flow Through reports were reposted, but it appears that this report in still reporting incorrect data. I believe there is an error in BellSouth's calculations in rows 35, 36, and 37 of the Flow Through Aggregate tab. For example, in Column C, BellSouth is reporting the TAG subtotal to be 229 and the EDI subtotal to be 5,130. I believe the cells should report zero EDI LSRs and 5,359 TAG LSRs. The EDI Subtotal in Column B also appears to be incorrect.

<<LNP_Flow_Through_122001.xls>>

Are these cells calculated incorrectly, or am I misunderstanding the spreadsheet?

Thanks in advance for your response.

KC Timmons
Manager Supplier Performance Measurements
AT&T Local Services - Southern Region
Phone: 404-810-3914
Pager: 1-888-858-7243 Pin: 115394
Fax: 281-664-3671
e-mail: ktimmons@att.com

ATTACHMENT 3

February 5, 2002

Mr. K. C. Timmons
Manager Supplier Performance Measurements
Local Services – Southern Region

Re: November Percent Provisioning Troubles within 30 Days

Dear K.C.

This is in response to your email of Tuesday January 29, 2002 regarding the November Percent Provisioning Troubles within 30 Days report for LNP Standalone. Your email expressed concern with the data reported for the November service month for AT&T Broadband OCNs 7170 and 7562. You stated that most of the LSRs issued for these OCNs were for LNP Standalone services and requested an explanation for the low volume reported for these OCNs in the November PT30 report.

For the data month of November the BellSouth PMAP development group was in the process of converting the reporting of LNP services from the existing "Barney" database to the PMAP database which produces all of our automated Performance Measurement reports. Up until this time, these LNP reports produced in "Barney" were posted in the Miscellaneous Reports folder with all of the manual reports. Discrepancies between the "Barney" created report and the new PMAP created report were discovered during the conversion process. While these discrepancies were being resolved the October completed orders for LNP Standalone were inadvertently deleted from the database. Unfortunately this data was not recoverable. The November PT30 report, without the October provisioned orders, was incorrect for LNP Standalone data. The three provisioning troubles reported for OCN 7170 for LNP Standalone were actually BST customer troubles that were charged to the LNP trigger order, and should not have been counted on the AT&T PT30 report. I am attaching the report, as it exists in our database, to reflect the correction of the LNP provisioning troubles. As you can see, the November report does not have an accurate count of LNP provisioned orders. The October and December reports were unaffected by this error.

I would like to express my regret that we were unable to provide AT&T with a corrected report for Provisioning Troubles within 30 Days for LNP Standalone service for November 2001. If you have additional questions please feel free to contact me.

Phil Porter
Manager – CLEC Interface Group
BellSouth Interconnection Services
404-927-2182

ATTACHMENT 4

-----Original Message-----
From: Timmons, King C (K.C.), NCAM [mailto:ktimmons@att.com]
Sent: Tuesday, January 29, 2002 4:20 PM
To: Phillip Porter - BellSouth
Subject: FW: November Percent Provisioning Troubles within 30 Days

Phil,

Please see the attached PMAP report below for Percent Provisioning Troubles in 30 Days. This report is for the AT&T Broadband OCNs. I am concerned with the data in this report. Most of the AT&T Broadband LSR volume will fall under the Standalone LNP category. However, this report is only showing 1 LSR being provisioned in the October time period. Even more confusing is that the report shows 3 provisioning troubles during the time that only 1 order was provisioned. This report cannot be correct. Will you investigate these inaccuracies and provide AT&T with the correct data? Why is this report not showing correct data for AT&T Broadband?

Thanks in advance for your help.

KC
404-810-3914

ATTACHMENT 5

October 23, 2001

Ms. Lisa Harvey
Division Regulatory Oversight
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 235D
Tallahassee, FL 32399-0865

Dear Ms. Harvey:

This letter is in response to the Florida Public Service Commission's Staff request for KPMG Consulting to provide a recommendation regarding the inclusion of BellSouth's new UNE billing solution in the Third-Party OSS Test. The remainder of this letter details the Background, Issue, Analysis, Reporting Options, Evaluation and Recommendation.

Background
The Florida Master Test Plan (MTP) directed the evaluation of BellSouth's billing systems, including bill accuracy (validation), usage accuracy, and adequacy of billing processes. KPMG Consulting has been engaged in billing testing since the fall of 2000. Several areas of billing analysis have been completed since that time. Some tests, most notably the usage billing tests, have significant issues which are in the process of resolution. During the week of October 1, 2001, BellSouth confirmed that new UNE billing elements will be rolled out in Florida on December 14, 2001. The Florida OSS Evaluation is currently scheduled to end on December 16, 2001.

Issue
Should the new UNE billing changes be tested and if so, should the test results be included in the OSS Evaluation Final Report?

Analysis

Based on information provided by BellSouth, KPMG Consulting believes that elements of bill validation, usage, and process tests associated with changes in the UNE billing systems require additional testing. KPMG Consulting also believes this testing to be within the scope of the OSS Evaluation activities directed by the MTP. If testing were to occur, it would begin in November 2001, and if no substantial issues arise, finish in March 2002.

Reporting Options

There are two primary options for reporting the results of the UNE tests recommended above:

A) Include the additional UNE billing test results as part of the Florida OSS Evaluation Final Report.
B) Separate the additional UNE billing tests from the Florida OSS Evaluation Final Report. The Final Report would include all other OSS Evaluation results, except those for the changed UNE billing elements. A separate report would be presented upon completion of the additional UNE billing testing.

Evaluation

Option A – Include the additional UNE billing test results as part of the Florida OSS Evaluation Final Report

Benefits:

a. Florida OSS Evaluation Final Report is an all-inclusive document.
b. Any problems discovered in the additional UNE bill testing related to other test areas can be addressed within the 271 process.

Risks:

a. As the test lengthens, all tests results begin to age. As the test results age, KPMG Consulting's confidence that the results represent current operations decreases.
b. The UNE billing modifications may not be implemented on schedule, or significant issues may be discovered, lengthening the entire test past Spring 2002.

Option B – Separate the additional UNE billing test reporting from the Florida OSS Evaluation Final Report

Benefits:

a. Ensures that majority of the test results do not age significantly.

b. Keeps issues with the additional UNE billing tests from drawing out the other parts of the OSS Evaluation process.

Risks:

a. The Florida OSS Evaluation Final Report is not all-inclusive.
b. The Florida OSS Evaluation Final Report presents an incomplete record on billing.
c. Issues discovered in non-UNE areas during the additional UNE billing tests cannot be addressed in the normal OSS Evaluation process.

Recommendation

KPMG Consulting recommends that the Florida Public Service Commission pursue testing of the new UNE billing elements. In KPMG Consulting's opinion, the risk of other test elements aging outweighs other considerations. Therefore it is KPMG Consulting's recommendation that the new UNE billing testing results be separated from the Florida OSS Evaluation Final Report.

Very truly yours,

KPMG Consulting

David B. Wirsching, III
Managing Director

cc: Mr. Walter D'Haeseleer, Florida Public Service Commission
Mr. Milton McElroy, BellSouth Telecommunications, Inc.
Mr. Marshall Criser, BellSouth Telecommunications, Inc.
Ms. Maryrose Sirianni, BellSouth Telecommunications, Inc.
Ms. Kathy Wilson-Chu, BellSouth Telecommunications, Inc.

ATTACHMENT 6

KPMG Consulting

AMENDED EXCEPTION 36

BellSouth Florida OSS Testing Evaluation

Date: August 21, 2001

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Data Integrity Verification and Validation Review (PMR-4). This exception was originally issued as Observation 6.

Exception:

BellSouth does not properly construct the processed data used to validate certain Ordering Service Quality Measurements (Ordering: FOC timeliness {non-trunks} and Reject Interval). (PMR4)

Background:

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

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting validated the SQM reports, including the creation of processed data. KPMG Consulting inspected the processed data for 2 Ordering SQMs and found that the fields for reject duration and FOC duration were not calculated properly for non-mechanized orders with weekend activity. The following table identifies the CLEC Aggregate SQM reports and PMAP Raw Data tables (May 2000) affected:

	SQM Name	PMAP Raw Data Table Name	PMAP Raw Data Field Name
1	Ordering; FOC Timeliness (Non-Trunks)	Ordering: FOC Timeliness	foc_duration

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

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

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

	SQM Name	PMAP Raw Data Table Name	PMAP Raw Data Field Name
2	Ordering: Reject Interval	Ordering: Reject Interval & Percent Reject by Interval	rej_duration

BellSouth calculates the FOC duration as the time elapsed between (1) BellSouth receipt of a service request[4] and (2) the issuance of an FOC. BellSouth calculates for the reject duration (rej_duration) as the time elapsed between (1) BellSouth receipt of a service request and (2) the time the service request is rejected.

If a non-mechanized order is received during normal business hours and then FOC'd or rejected outside normal business hours during the weekend, BellSouth subtracted a fixed duration (33) hours from the calculation of the FOC duration and reject duration. This calculation introduces a downward bias by only including part of the weekend.[5]

KPMG Consulting re-tested using the October 2000 processed data and reports provided by BellSouth in the Amended Response to Observation 6.[6] KPMG Consulting found that the fields for reject duration and FOC duration were not calculated properly for non-mechanized orders. KPMG Consulting will provide files containing the records with discrepancies to BellSouth for evaluation.[7]

KPMG Consulting examined the PMAP Raw Data tables and calculated its own values for the Reject and FOC durations using as inputs: (1) the start and end times for processing a service order (PMAP Raw Data Fields); and (2) the business rules and exclusions identified in the Raw Data Users Manual (including the exclusions to account for weekend processing of service orders).

BellSouth provided KPMG Consulting[8] specific examples for calculating the Ordering: FOC Timeliness and Ordering: Reject Interval metric. KPMG Consulting applied the clarifications found in these examples and found discrepancies within FOC Timeliness and Reject Interval. BellSouth's documented exclusions governing the calculations of FOC Timeliness and Reject Interval do not agree with KPMG Consulting's calculations for PON's last_received on a weekend.

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[4] BellSouth considers the date the service request was last received.
[5] Transactions involving weekend activity are affected by the introduction of downward bias to the reject or FOC duration calculation.
[6] BellSouth's Amended Response to Observation 6 was received October 31, 2000.
[7] These files are proprietary and have been provided to BellSouth and the Florida Public Service Commission under separate cover.
[8] BellSouth forwarded examples of SQM rules on March 7, 2001.

BellSouth's third Amended Response to Observation 6[9] detailed additional clarifications, exclusions, and a change to PMAP calculations. KPMG Consulting will be requesting March 2001 data for retest of Ordering: FOC Timeliness and Reject Interval metrics.

	SQM Name	PMAP Raw Data Table Name	PMAP Raw Data Field Name	PMAP Raw Data Field Inputs
1	Ordering: FOC Timeliness (Non-Trunks)	Ordering: FOC Timeliness	foc_duration	last_rcvd, FOC_date
2	Ordering: Reject Interval	Ordering: Reject Interval & Percent Reject by Interval	rej_duration	first_rcvd, first_inclr

Amendment – KPMG Consulting reviewed BellSouth's initial response[10] and red-line SQM in addition to the amended response[11] and amended red-line SQM for Exception 36. A retest was conducted based on March 2001 data. KPMG Consulting applied BellSouth's exclusions as outlined in the red-line SQM, but found discrepancies within the "Ordering: Firm Order Confirmation Timeliness" and "Ordering: Reject Interval" SQMs. The discrepancies are summarized below.[12]

Firm Order Confirmation Timeliness – Partially Mechanized – Non-Residential[13]

	Last_rcvd	FOC_date	KPMG Consulting calculated duration[14]	BellSouth reported duration
1	2/12/01 9:19:10	3/1/01 15:23:15	136.07	.01

Firm Order Confirmation Timeliness – Non-Mechanized – Non-Residential

	Last_rcvd	FOC_date	KPMG Consulting calculated duration	BellSouth reported duration
1	3/2/01 9:43	3/2/01 9:36	-0.12	.02
2	3/7/01 11:17	3/7/01 11:08	-0.15	.02
3	3/1/01 16:12	3/1/01 15:41	-0.52	.02

[9] BellSouth's 3rd Amended Response to Observation 6, March 13, 2001.
[10] Florida OSS BellSouth's Response to Exception 36, 5/16/01.
[11] Florida OSS BellSouth's Amended Response to Exception 36, 6/11/01.
[12] The transactions are proprietary and will be provided to BellSouth and the Florida Public Service Commission separately.
[13] Non-Residential transactions include Business, Complex, and UNE transactions.
[14] Durations are calculated in hours.

AMENDED EXCEPTION 36

BellSouth Florida OSS Testing Evaluation

Firm Order Confirmation Timeliness – Non-Mechanized – Residential

	Last_rcvd	FOC_date	KPMG Consulting calculated duration	BellSouth reported duration
1	3/20/01 16:59	3/20/01 16:53	-0.10	.02

Reject Interval – Partially Mechanized – Non-Residential

	First_rcvd	First_inclr	KPMG Consulting calculated duration	BellSouth reported duration
1	3/12/01 12:07:12	3/12/01 12:08:10	.02	59.25
2	3/7/01 11:14:44	3/7/01 11:18:32	.06	20.18
3	3/15/01 9:55:52	3/19/01 12:50:20	22.91	.02
4	3/13/01 8:31:54	3/14/01 9:13:41	10.70	.04
5	3/13/01 9:02:41	3/14/01 9:21:55	10.32	.03
6	3/19/01 6:49:41	3/20/01 11:54:37	13.91	.02
7	3/19/01 6:59:52	3/19/01 7:02:25	.02	14.15
8	3/6/01 11:35:59	3/6/01 16:01:42	4.43	.02
9	3/19/01 15:53:08	3/19/01 15:54:46	.03	22.11
10	3/23/01 9:51:52	3/23/01 9:53:48	.03	14.9
11	3/26/01 10:25:29	3/28/01 12:43:05	22.29	.04
12	3/6/01 15:10:17	3/6/01 15:12:49	.04	19.62
13	3/9/01 8:06:22	3/9/01 8:07:44	.02	1.03
14	3/2/01 14:28:51	3/2/01 14:29:42	.01	41.77
15	3/15/01 11:10:30	3/15/01 11:12:20	.03	39.48
16	3/14/01 11:27:39	3/14/01 11:30:34	.05	9.82
17	3/23/01 16:28:45	3/23/01 16:30:07	.02	40.13
18	3/5/01 15:10:56	3/7/01 13:09:15	17.97	.02

Reject Interval – Partially Mechanized – Residential

	First_rcvd	First_inclr	KPMG Consulting calculated duration	BellSouth reported duration
1	3/14/01 16:04:38	3/14/01 16:06:30	.03	.67
2	3/20/01 17:25:56	3/20/01 17:28:03	.04	1.1
3	3/15/01 13:02:39	3/20/01 9:35:45	44.55	.01
4	3/30/01 13:47:57	3/30/01 15:42:35	1.91	.04
5	3/23/01 10:50:35	3/23/01 10:51:19	.01	.75
6	3/17/01 12:35:23	3/17/01 12:37:28	.03	12.3
7	3/2/01 10:15:21	3/2/01 10:17:39	.04	17.86
8	3/28/01 14:16:54	3/29/01 16:56:35	14.66	.01
9	3/19/01 15:55:09	3/19/01 15:57:10	.03	.64
10	3/13/01 23:38:39	3/14/01 10:51:54	3.87	.02

AMENDED EXCEPTION 36

BellSouth Florida OSS Testing Evaluation

	First_rcvd	First_inclr	KPMG Consulting calculated duration	BellSouth reported duration
11	3/5/01 11:55:47	3/7/01 14:03:10	26.12	.01
12	3/29/01 12:21:24	3/29/01 12:23:24	.03	3.91
13	3/6/01 12:53:56	3/6/01 12:56:41	.05	1.43
14	3/19/01 7:49:25	3/20/01 12:02:22	16.22	.05
15	3/16/01 16:40:20	3/16/01 16:41:31	.02	12.61
16	3/16/01 10:24:38	3/19/01 14:44:27	28.33	.03
17	3/2/01 20:14:19	3/5/01 17:01:27	22.02	.02
18	3/27/01 9:18:34	3/27/01 9:20:59	.04	62.35
19	3/27/01 18:15:56	3/31/01 8:59:33	38.73	.02
20	3/28/01 15:02:28	3/28/01 15:05:03	.04	.51
21	3/31/01 7:04:03	4/2/01 10:06:27	15.04	.03
22	3/27/01 12:37:47	3/28/01 14:15:35	13.63	.05
23	3/19/01 16:16:03	3/19/01 16:16:58	.02	9.22
24	3/20/01 13:38:53	3/20/01 13:39:38	.01	5.35
25	3/21/01 15:42:19	3/22/01 16:35:44	12.89	.04
26	3/7/01 9:35:39	3/12/01 7:24:06	45.81	.05
27	3/5/01 17:41:18	3/5/01 18:32:03	.85	.05
28	3/19/01 16:51:23	3/22/01 7:34:35	26.72	.04
29	3/3/01 14:32:19	3/6/01 12:31:09	21.98	.05
30	3/23/01 11:07:56	3/23/01 11:08:51	.02	33.42
31	3/27/01 9:15:24	3/27/01 9:17:36	.04	1.56
32	3/21/01 16:01:57	3/21/01 16:02:34	.01	41.78
33	3/14/01 11:37:36	3/15/01 15:09:24	15.53	.05
34	3/14/01 11:28:37	3/14/01 16:40:34	5.20	.03
35	3/19/01 12:14:28	3/19/01 12:15:44	.02	.12

Reject Interval – Non-Mechanized – Non-Residential*

	First_rcvd	First_inclr	KPMG Consulting calculated duration	BellSouth reported duration
1	12/20/00 11:29	3/23/01 12:27	670.97	650.97
2	12/6/00 14:53	3/17/01 14:04	723.12	703.12
3	7/23/99 14:14	3/20/01 8:55	4314.68	4214.69
4	1/13/00 11:42	3/3/01 8:36	2966.30	2906.3
5	11/2/00 15:06	3/27/01 12:59	1027.88	997.88
6	12/4/00 15:51	3/20/01 7:32	752.15	732.15

* Given the time span of the transactions above, KPMG Consulting would like to request an updated list of BellSouth-designated holidays for this period.

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. If BellSouth inappropriately calculates durations for the "Ordering: Reject Interval" and "Ordering: FOC Timeliness (Non-Trunks)" SQMs, KPMG Consulting cannot validate the accuracy of the SQM reports. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

ATTACHMENT 7

KPMG Consulting

AMENDED EXCEPTION 113

BellSouth Florida OSS Testing Evaluation

Date: February 18, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Data Integrity Verification and Validation Review (PMR4).

Exception:

KPMG Consulting has found that BellSouth does not capture xDSL transactions, which are processed through Corporate Order Gateway (COG), for the "Ordering: Percent Flow-Through Service Requests (Summary)" and "Ordering: Percent Flow-Through Service Requests (Detail)" Service Quality Measurements (SQMs). (PMR4).

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida.

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting is evaluating the completeness of data from source systems to the point where SQM values are calculated. During the course of its investigation, KPMG Consulting found that BellSouth does not capture xDSL transactions, which are processed through COG, for its flow-through metrics.

Amendment

KPMG Consulting reviewed BellSouth's Response to Exception 113,[1] which stated that xDSL Flow through data will be captured mechanically starting the end of the first quarter 2002.
Subsequent to this response, BellSouth informed KPMG Consulting that the flows for xDSL data had changed. BellSouth stated that several tables were also being pulled from the Regulatory Ad-hoc Database System (RADS) and no longer only from BARNEY.[2] KPMG Consulting will conduct the re-test based on the new data flows.

[1] Florida OSS BellSouth's Response to Exception 113, 10/24/01.
[2] KPMG Consulting received this clarification via e-mail on 1/29/02.

Impact:

If BellSouth does not capture all relevant data, BellSouth's SQM reports for the "Ordering: Percent Flow-Through Service Requests (Summary)" and "Ordering: Percent Flow-Through Service Requests (Detail)" SQMs may be incomplete. Without complete and accurate SQMs, CLECs might not be able to assess the quality of service received or plan for future business activities reliably.

ATTACHMENT 8

KPMG Consulting

EXCEPTION 114

BellSouth Florida OSS Testing Evaluation

Date: October 5, 2001

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Data Integrity Verification and Validation Review (PMR-4).

Exception:

BellSouth incorrectly excludes data between the BARNEY Snapshots and NODS stages of the PMAP process that go into the calculation of the fully mechanized and partially mechanized orders for the "Ordering: Firm Order Confirmation (FOC) Timeliness (Non-Trunks)" Service Quality Measurement (SQM) for June 2001 data (PMR4).

Background:

Service Quality Measurements (SQMs) are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida.

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting tested the integrity of metrics-related data as it flowed from the Legacy/Source systems to BARNEY and then to the NODS stage of the PMAP process. KPMG Consulting tested data that was used for the calculation of the "Ordering: FOC Timeliness (Non-Trunks)" SQM for fully mechanized and partially mechanized records and found that BellSouth was incorrectly excluding records between BARNEY Snapshots and the NODS data used to calculate the SQM.

The excluded records were orders that had actually received a FOC (Firm Order Confirmation) and should have been included in the data set used to calculate the "Ordering: FOC Timeliness (Non-Trunks)" SQM for fully and partially mechanized records. The following table identifies the SQM report and the PMAP Raw Data tables (June 2001) affected:

	SQM Name	PMAP Raw Data Table Name	Number of records incorrectly excluded
1	Ordering: FOC Timeliness (Non-Trunks)-fully	Ordering: FOC Timeliness	6084

	SQM Name	PMAP Raw Data Table Name	Number of records incorrectly excluded
	mechanized records		
2	Ordering: FOC Timeliness (Non-Trunks)-partially mechanized records	Ordering: FOC Timeliness	1527

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. If BellSouth incorrectly excludes records that should be included in calculating the "Ordering: FOC Timeliness (Non-Trunks)" SQM, the reported values would not be an accurate reflection of the actual quality of service provided. Without accurate and complete data sets, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

ATTACHMENT 9

KPMG Consulting

AMENDED EXCEPTION 120

BellSouth Florida OSS Testing Evaluation

Date: January 22, 2001

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Data Integrity Verification and Validation Review (PMR4).

Exception:

BellSouth incorrectly excludes data between the BARNEY Snapshots and NODS stages of the PMAP process that go into the calculation of the fully mechanized and partially mechanized orders for the "Ordering: Percent Rejected Service Requests (Non-Trunks)" Service Quality Measurement (SQM) for June 2001 data (PMR4).

Background:

Service Quality Measurements (SQMs) are calculated to illustrate BellSouth's Operational Support System (OSS) performance. The Florida Public Service Commission has mandated that BellSouth publish monthly performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida.

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting tested the integrity of metrics-related data as it flowed from the Legacy/Source systems to BARNEY and then to the NODS stage of the PMAP process. KPMG Consulting tested data that was used for the calculation of the "Ordering: Percent Rejected Service Requests (Non-Trunks)" SQM for fully mechanized and partially mechanized records and found that BellSouth was incorrectly excluding records between BARNEY Snapshots and the NODS data used to calculate the SQM.

The excluded records were orders that had actually been rejected based on BellSouth's business rules provided to KPMG Consulting and should have been included in the data set used to calculate the "Ordering: Percent Rejected Service Requests (Non-Trunks)" SQM for fully and partially mechanized records. The following table identifies the SQM report and the PMAP Raw Data tables (June 2001) affected:

	SQM Name	PMAP Raw Data Table Name	Number of records incorrectly excluded
1	Ordering: Percent Rejected Service Requests (Non-Trunks)-fully mechanized records	Ordering: Reject Interval and Percent Reject by Interval	144
2	Ordering: Percent Rejected	Ordering: Reject Interval	303

AMENDED EXCEPTION 120

BellSouth Florida OSS Testing Evaluation

	SQM Name	PMAP Raw Data Table Name	Number of records incorrectly excluded
	Service Requests (Non-Trunks)-partially mechanized records	and Percent Reject by Interval	

Amendment:

KPMG Consulting is amending the above discrepancy table. . As KPMG Consulting was gathering the specific PON/VERs included in the above noted discrepancies, KPMG Consulting realized that the number of records incorrectly excluded, in the column entitled such, was only a partial count of the affected records. The table below reflects the total number of records impacted in each of the categories. The issue identified by Exception 120 remains the same.

	SQM Name	PMAP Raw Data Table Name	Number of records incorrectly excluded
1	Ordering: Percent Rejected Service Requests (Non-Trunks)-fully mechanized records	Ordering: Reject Interval and Percent Reject by Interval	1920[1]
2	Ordering: Percent Rejected Service Requests (Non-Trunks)-partially mechanized records	Ordering: Reject Interval and Percent Reject by Interval	761[2]

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. If BellSouth incorrectly excludes records that should be included in calculating the "Ordering: Percent Rejected Service Requests (Non-Trunks)" SQM, the reported values may not accurately reflect the actual quality of service provided. Without accurate and complete data sets, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

[1] The transactions are proprietary and will be provided to BellSouth and the Florida Public Service Commission separately.

[2] See footnote 1.

ATTACHMENT 10

Date: February 04, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Data Integrity Verification and Validation Review (PMR4).

Exception:

BellSouth incorrectly excludes data between the BARNEY Snapshots and NODS stages of the PMAP process for non-mechanized orders that go into the calculation of the "Ordering: Percent Rejected Service Requests (Non-Trunks)" Service Quality Measurement (SQM) for June 2001 data (PMR4).

Background:

Service Quality Measurements (SQMs) are calculated to illustrate BellSouth's Operational Support System (OSS) performance. The Florida Public Service Commission has mandated that BellSouth publish monthly performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida.

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting tested the integrity of metrics-related data as it flowed from the Legacy/Source systems to BARNEY and then to the NODS stage of the PMAP process. KPMG Consulting tested data that was used for the calculation of the "Ordering: Percent Rejected Service Requests (Non-Trunks)" SQM for non-mechanized records and found that BellSouth was incorrectly excluding records between BARNEY Snapshots and the NODS data used to calculate the SQM.

The excluded records were orders that should have been included in the data set used to calculate the "Ordering: Percent Rejected Service Requests (Non-Trunks)" SQM for non-mechanized records. The following table identifies the SQM report and the PMAP Raw Data tables (June 2001) affected:

	SQM Name	PMAP Raw Data Table Name	Number of records incorrectly excluded
1	Ordering: Percent Rejected Service Requests (Non-Trunks) – non-mechanized records	Ordering: Service Orders	17131[1]

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. If BellSouth incorrectly excludes records that should be included in calculating the "Ordering: Percent Rejected Service Requests (Non-Trunks)" SQM, the reported values may not accurately reflect the actual quality of service provided. Without accurate and complete data sets, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

[1] The transactions are proprietary and will be provided to BellSouth and the Florida Public Service Commission.

ATTACHMENT 11

KPMG Consulting

EXCEPTION 144

BellSouth Florida OSS Testing Evaluation

Date: February 04, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Data Integrity Verification and Validation Review (PMR-4).

Exception:

BellSouth incorrectly excludes data between the BARNEY Snapshots and NODS stages of the PMAP process for non-mechanized orders that go into the calculation of the "Ordering: Reject Interval (Non-Trunks)" Service Quality Measurement (SQM) for June 2001 data (PMR4).

Background:

Service Quality Measurements (SQMs) are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida.

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting tested the integrity of metrics-related data as it flowed from the Legacy/Source systems to BARNEY and then to the NODS stage of the PMAP process. KPMG Consulting tested data that was used for the calculation of the "Ordering: Reject Interval (Non-Trunks)" SQM for non-mechanized records and found that BellSouth was incorrectly excluding records between BARNEY Snapshots and the NODS data used to calculate the SQM.

The excluded records were orders that had actually been rejected based on BellSouth's business rules provided to KPMG Consulting, and should have been included in the data set used to calculate the "Ordering: Reject Interval (Non-Trunks)" SQM for non-mechanized records. The following table identifies the SQM report and the PMAP Raw Data tables (June 2001) affected:

EXCEPTION 144

BellSouth Florida OSS Testing Evaluation

	SQM Name	PMAP Raw Data Table Name	Number of records incorrectly excluded
1	Ordering: Reject Interval - non-mechanized records	Ordering: Reject Interval and Percent Reject by Interval	1630[1]

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. If BellSouth incorrectly excludes records that should be included in calculating the "Ordering: Reject Interval (Non-Trunks)" SQM, the reported values would not accurately reflect the percent of orders that were rejected nor reflect the actual quality of service provided. Without accurate and complete data sets, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

[1] The transactions are proprietary and will be provided to BellSouth and the Florida Public Service Commission.

ATTACHMENT 12

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 144

BELLSOUTH

Florida OSS Test
Exception 144

February 11, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Data Integrity Verification and Validation Review (PMR-4).

Exception:

BellSouth incorrectly excludes data between the BARNEY Snapshots and NODS stages of the PMAP process for non-mechanized orders that go into the calculation of the "Ordering: Reject Interval (Non-Trunks)" Service Quality Measurement (SQM) for June 2001 data (PMR4).

Background:

Service Quality Measurements (SQMs) are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida.

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting tested the integrity of metrics-related data as it flowed from the Legacy/Source systems to BARNEY and then to the NODS stage of the PMAP process. KPMG Consulting tested data that was used for the calculation of the "Ordering: Reject Interval (Non-Trunks)" SQM for non-mechanized records and found that BellSouth was incorrectly excluding records between BARNEY Snapshots and the NODS data used to calculate the SQM.

The excluded records were orders that had actually been rejected based on BellSouth's business rules provided to KPMG Consulting, and should have been included in the data set used to calculate the "Ordering: Reject Interval (Non-Trunks)" SQM for non-mechanized records. The following table identifies the SQM report and the PMAP Raw Data tables (June 2001) affected:

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 144

	SQM Name	PMAP Raw Data Table Name	Number of records incorrectly excluded
1	Ordering: Reject Interval - non-mechanized records	Ordering: Reject Interval and Percent Reject by Interval	1630[1]

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. If BellSouth incorrectly excludes records that should be included in calculating the "Ordering: Reject Interval (Non-Trunks)" SQM, the reported values would not accurately reflect the percent of orders that were rejected nor reflect the actual quality of service provided. Without accurate and complete data sets, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

BellSouth Response:

The discrepancies between the BARNEY Snapshots and NODS stages of the PMAP process for non-mechanized orders that contribute to the calculation of Percent Rejected Service Requests in June 2001 were due to a problem excluding LSRs from non-mechanized data. This is a known issue and Test Director RQ1384 has addressed the matter beginning with January 2002 data. KPMG should retest using January 2002 data.

[1] The transactions are proprietary and will be provided to BellSouth and the Florida Public Service Commission.

ATTACHMENT 13

KPMG Consulting

EXCEPTION 145

BellSouth Florida OSS Testing Evaluation

Date: February 04, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Data Integrity Verification and Validation Review (PMR-4).

Exception:

BellSouth incorrectly excludes data between BARNEY Snapshots and NODS stages of the PMAP process that go into the calculation of the non-mechanized orders for the "Ordering: Firm Order Confirmation (FOC) Timeliness (Non-Trunks)" Service Quality Measurement (SQM) for June 2001 data (PMR4).

Background:

Service Quality Measurements (SQMs) are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida.

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting tested the integrity of metrics-related data as it flows from the Legacy/Source systems to BARNEY and then to the NODS stage of the PMAP process. KPMG Consulting tested data that is used for the calculation of the "Ordering: FOC Timeliness (Non-Trunks)" SQM for non-mechanized records and found that BellSouth was incorrectly excluding records between BARNEY Snapshots and the NODS data used to calculate the SQM. The following table identifies the SQM reports and PMAP Raw Data tables (June 2001) affected:

	SQM Name	PMAP Raw Data Table Name	Number of records incorrectly excluded
1	Ordering: FOC Timeliness (Non-Trunks) - non-mechanized records	Ordering: FOC Timeliness	6526[1]

[1] These transactions are proprietary and will be provided to BellSouth and the Florida Public Service Commission.

EXCEPTION 145

BellSouth Florida OSS Testing Evaluation

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. If BellSouth incorrectly excludes records that should be included in calculating the "Ordering: FOC Timeliness (Non-Trunks)" SQM, the reported values would not be an accurate reflection of the actual quality of service provided. Without accurate and complete data sets, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

ATTACHMENT 14

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 145

BELLSOUTH

Florida OSS Test
Exception 145

February 11, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Data Integrity Verification and Validation Review (PMR-4).

Exception:

BellSouth incorrectly excludes data between BARNEY Snapshots and NODS stages of the PMAP process that go into the calculation of the non-mechanized orders for the "Ordering: Firm Order Confirmation (FOC) Timeliness (Non-Trunks)" Service Quality Measurement (SQM) for June 2001 data (PMR4).

Background:

Service Quality Measurements (SQMs) are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida.

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting tested the integrity of metrics-related data as it flows from the Legacy/Source systems to BARNEY and then to the NODS stage of the PMAP process. KPMG Consulting tested data that is used for the calculation of the "Ordering: FOC Timeliness (Non-Trunks)" SQM for non-mechanized records and found that BellSouth was incorrectly excluding records between BARNEY Snapshots and the NODS data used to calculate the SQM. The following table identifies the SQM reports and PMAP Raw Data tables (June 2001) affected:

	SQM Name	PMAP Raw Data Table Name	Number of records incorrectly excluded
1	Ordering: FOC Timeliness (Non-Trunks) - non-mechanized records	Ordering: FOC Timeliness	6526[1]

[1] These transactions are proprietary and will be provided to BellSouth and the Florida Public Service Commission.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 145

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. If BellSouth incorrectly excludes records that should be included in calculating the "Ordering: FOC Timeliness (Non-Trunks)" SQM, the reported values would not be an accurate reflection of the actual quality of service provided. Without accurate and complete data sets, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

BellSouth Response:

The discrepancies between the BARNEY Snapshots and NODS stages of the PMAP process for non-mechanized orders that contribute to the calculation of FOC Timeliness in June 2001 were due to a problem excluding LSRs from non-mechanized data. This is a known issue and Test Director RQ1384 has addressed the matter beginning with January 2002 data. KPMG should retest using January 2002 data.

ATTACHMENT 15

Date: February 18, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Data Integrity Verification and Validation Review (PMR4).

Exception:

BellSouth incorrectly includes multiple instances of the same order in NODS for the "Ordering: Firm Order Confirmation (FOC) Timeliness (Non-Trunks)" Service Quality Measurement (SQM) for September 2001 data (PMR4).

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. The Florida Public Service Commission mandates that BellSouth publish monthly performance measurement reports of SQM values for the Competitive Local Exchange Carriers (CLECs) engaged in business activity with BellSouth in the State of Florida.

Issue:

KPMG Consulting tested the integrity of metrics-related data as it flowed from the Legacy/Source systems to BARNEY and then to the NODS stage of the PMAP process. Additionally, KPMG Consulting tested data that was used for the calculation of the "Ordering: FOC Timeliness (Non-Trunks)" SQM and found that BellSouth incorrectly included multiple instances of the same order at the NODS stage of the data.

The following table identifies the SQM report and the PMAP Raw Data tables (September 2001) affected:

	SQM Name	PMAP Raw Data Table Name	Number of orders with multiple occurrences[1]
1	Ordering: FOC Timeliness (Non-Trunks)	Ordering: FOC Timeliness	387

[1] The transactions are proprietary and will be provided to BellSouth and the Florida Public Service Commission.

Impact:

If BellSouth incorrectly includes records that should not be used in calculating the "Ordering: FOC Timeliness (Non-Trunks)" SQM, the reported values will not accurately reflect the quality of service provided. Without accurate and complete data sets, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

ATTACHMENT 16

KPMG Consulting

EXCEPTION 101

BellSouth Florida OSS Testing Evaluation

Date: August 24, 2001

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5). This exception was originally issued as Observation 57.

Exception:

KPMG Consulting cannot replicate the values in the "Provisioning: Total Service Order Cycle Time" Service Quality Measurement (SQM) report for the CLEC Aggregate (January 2001). (PMR5)

Background:

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

Issue:

KPMG Consulting was unable to replicate the BellSouth reported values for the "Provisioning: Total Service Order Cycle Time" SQM. The discrepancies are listed in the following table.

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
1	CLEC; UNE Design	0-5 Days; < 10 Circuits; Dispatch	6	345	1.74%	1.73%

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

[2] *The PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the January 15, 2001 version of the Manual.

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

EXCEPTION 101

BellSouth Florida OSS Testing Evaluation

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
2	CLEC; UNE Design	5-10 Days; < 10 Circuits; Dispatch	82	345	23.77%	23.70%
3	CLEC; UNE Design	10-15 Days; < 10 Circuits; Dispatch	177	345	51.30%	51.16%
4	CLEC; UNE Design	15-20 Days; < 10 Circuits; Dispatch	27	345	7.83%	7.80%
5	CLEC; UNE Design	20-25 Days; < 10 Circuits; Dispatch	26	345	7.54%	7.51%
6	CLEC; UNE Design	25-30 Days; < 10 Circuits; Dispatch	6	345	1.74%	1.73%
7	CLEC; UNE Design	> 30 Days; < 10 Circuits; Dispatch	21	345	6.09%	6.36%
8	CLEC; UNE Design	Avg Intvl (Days); < 10 Circuits; Dispatch	4886.33	345	14.16	14.21

KPMG Consulting has reviewed BellSouth's 2nd Amended Response to Observation 57.[4] BellSouth's 2nd Amended Response to Observation 57 stated that:

The coding changes planned for the July 1st production run (June data) were not implemented. The changes are targeted to be effective for August data.

Based on BellSouth's response, KPMG Consulting escalates Observation 57 to Exception status.

Impact:

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

[4] Florida OSS BellSouth's 2nd Amended Response to Observation 57, 8/16/01.

ATTACHMENT 17

KPMG Consulting

EXCEPTION 153

BellSouth Florida OSS Testing Evaluation

Date: February 22, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR5).

Exception:

KPMG Consulting cannot replicate the values in the "Provisioning: Local Number Portability (LNP) – Total Service Order Cycle Time" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2001). KPMG Consulting found that BellSouth's instructions in the Raw Data User Manual (RDUM) are insufficient for calculating the metrics values for this SQM. This exception was originally issued as Observation 113 (PMR5).

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. The Florida Public Service Commission mandates that BellSouth publish monthly performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the state of Florida.[1] BellSouth provides CLEC Aggregate processed data[2] (PMAP raw data[3]) as requested to KPMG Consulting.

KPMG Consulting discovered that the computation instructions for the "Provisioning: LNP-Total Service Order Cycle Time" SQM were insufficient for calculating metrics values. Specifically, Bellsouth's instructions do not address how users should distinguish between Mechanized, Partially Mechanized, and Non-Mechanized orders.

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

Furthermore, Step 2 in the RDUM states that:

[1] These reports are posted on the PMAP Web site.

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

[3] *The PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the July 25, 2001 version 2.1.06 of the Manual.

BellSouth excludes Sundays and holiday hours in the calculation of ***duration_day*** *as per the current SQM. The SQM contains a detailed description of the exclusions performed.*

KPMG Consulting was unable to identify any exclusions in the current *Revised Interim SQM*[4] related to Sundays and holiday hours. Since the RDUM user, not BellSouth, constructs the duration_day field, either exclusions BellSouth applied in its internal calculations have not been documented in the *Revised Interim SQM,* or this statement was included in error. If no Sunday and/or holiday exclusions are applied, KPMG Consulting finds this statement misleading and should be removed to avoid unnecessary confusion.

KPMG Consulting reviewed BellSouth's Response to Observation 113.[5] However, KPMG Consulting was still unable to replicate BellSouth reported values for the "Provisioning: LNP-Total Service Order Cycle Time" SQM.

KPMG Consulting found that the time buckets in BellSouth's published report and the *Revised Interim SQM* to be inconsistent. The discrepancies are listed in the following table.

	SQM Version 3.00 Time Buckets	BellSouth Reported Time Buckets
1	0-4.99 days	0-5 days
2	5-9.99 days	>5-<=10 days
3	10-14.99 days	>10-<=15 days
4	15-19.99 days	>15-<=20 days
5	20-24.99 days	>20-<=25 days
6	25-29.99 days	>25-<=30 days
7	>=30 days	>30 days

KPMG Consulting reviewed BellSouth's Response to Amended Observation 113[6] and the red-line SQM.[7] KPMG Consulting also reviewed BellSouth's revised red-line SQM[8] and re-tested using the version 2.1.08 RDUM. However, KPMG Consulting remained unable to replicate BellSouth reported values for the "Provisioning: LNP-Total Service Order Cycle Time" SQM.

[4] KPMG Consulting used the June 1, 2001 version 3.00 of the *Florida Interim Performance Metrics* document as a basis to perform this test.
[5] Florida OSS BellSouth's Response to Observation 113, 9/7/01.
[6] Florida OSS BellSouth's Response to Amended Observation 113, 10/29/01.
[7] Obs113aorSupDoc.pdf
[8] Obs113aorSupDocRev.pdf

KPMG Consulting discovered that the computation instructions for this SQM were insufficient for calculating metrics values. Specifically, BellSouth's instructions did not address how users should calculate the average interval.

Issue:

KPMG Consulting reviewed BellSouth's Response to 2nd Amended Observation 113.[9] BellSouth stated the following:

> *The migration of LNP products from Barney to PMAP is complete for Total Service Order Cycle Time and Test Director entry 512 was entered on February 5th 2002 to remove the LNP TSOCT instructions on pages 48 – 49 of the January 21st 2002 version 2.2.01 of the Raw Data Users Manual. This will be reflected in the next release of the Raw Data Users Manual.*

BellSouth's statement that LNP products have been migrated from Barney to PMAP indicated that system changes had taken place. BellSouth's response also implied that the instructions for the "Provisioning: LNP Total Service Order Cycle Time" SQM would be based on the "Provisioning: Total Service Order Cycle Time" SQM. Based on BellSouth's response, KPMG Consulting escalates Observation 113 to Exception status.

Impact:

BellSouth's current documentation does not provide CLECs with sufficient information to calculate the metrics values for the "Provisioning: LNP Total Service Order Cycle Time" SQM. Without accurate documentation, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

[9] Florida OSS BellSouth's Response to 2nd Amended Observation 113, 2/7/02.

ATTACHMENT 18

KPMG Consulting

EXCEPTION 109

BellSouth Florida OSS Testing Evaluation

Date: September 6, 2001

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5). This exception was originally issued as Observation 110.

Exception:

KPMG Consulting cannot replicate the values in the "Ordering: Acknowledgement Message Timeliness" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2001). (PMR5)

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the Competitive Local Exchange Carriers (CLECs) engaged in business activity with BellSouth in the State of Florida.[1] BellSouth provides CLEC Aggregate processed data[2] (PMAP raw data[3]) as needed to KPMG Consulting.

Issue:

KPMG Consulting was unable to replicate the BellSouth reported values for the "Ordering: Acknowledgement Message Timeliness" SQM. The discrepancies are listed in the following table.

	Measurement	Category (Minutes)	KPMG Consulting-Calculated Value	BellSouth Reported Value
1	EDI	0-<=10	74883	74496
2	EDI	>10-<=20	5902	6206
3	EDI	>20-<=30	6799	5751
4	EDI	0-<=30	87584	86453

[1] These reports are posted on the PMAP Web site.

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

[3] *The PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the July 25, 2001 version 2.1.0.6 of the Manual.

	Measurement	Category (Minutes)	KPMG Consulting-Calculated Value	BellSouth Reported Value
5	EDI	>30-<=45	7731	8514
6	EDI	>45-<=60	326	674

KPMG Consulting reviewed BellSouth's Response to Observation 110.[4] BellSouth's Response to Observation 110 stated that:

> *The calculation of the interval buckets for Acknowledgement Message Timeliness as reported by KPMG failed to match BellSouth calculations because values are being placed into the incorrect buckets. The reports and the SQM bucket designation are correct (0-<=10, etc), however the code is incorrect (0-<10, etc), as illustrated in the chart below. TeamConnection feature 2225 has been entered to correct this issue.*

Based on BellSouth's response, which states that a system fix must be implemented to resolve the discrepancies, KPMG Consulting escalates Observation 110 to Exception status.

Impact:

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

[4] Florida OSS BellSouth's Response to Observation 110, 8/28/01.

ATTACHMENT 19

KPMG Consulting

EXCEPTION 152

BellSouth Florida OSS Testing Evaluation

Date: February 22, 2002

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the Metrics Calculations Verification and Validation Review (PMR5).

Exception:

KPMG Consulting cannot replicate the values in the "Provisioning: Local Number Portability (LNP) - Percent Missed Installation Appointments" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2001). This exception was originally issued as Observation 125 (PMR5).

Background:

SQMs are calculated to demonstrate BellSouth's Operational Support System (OSS) performance. The Florida Public Service Commission mandates that BellSouth publish monthly performance measurement reports of SQM values for the Competitive Local Exchange Carriers (CLECs) engaged in business activity with BellSouth in the State of Florida.[1] BellSouth provides CLEC Aggregate processed data[2] (PMAP raw data[3]) as requested to KPMG Consulting.

KPMG Consulting was unable to replicate the BellSouth reported values for the "Provisioning: LNP- Percent Missed Installation Appointments" SQM. The discrepancies are listed in the following table.

	Measurement	Category	KPMG Consulting-Calculated Value	BellSouth Reported Value
1	LNP	<10 circuits; Total Dispatch	3256	3260
2	LNP	<10 circuits; Missed Dispatch	43	11

[1] These reports are posted on the PMAP Web site.

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

[3] *The PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the July 25, 2001 version 2.1.06 of the Manual.

	Measurement	Category	KPMG Consulting-Calculated Value	BellSouth Reported Value
3	LNP	<10 circuits; % Missed Dispatch	1.32	.34
4	LNP	<10 circuits; Total Non-Dispatch	13106	13109
5	LNP	<10 circuits; Missed Non-Dispatch	121	8
6	LNP	<10 circuits; % Missed Non-Dispatch	.92	.06
7	LNP	>=10 circuits; Missed Non-Dispatch	6	0
8	LNP	>=10 circuits; % Missed Non-Dispatch	.24	0

KPMG Consulting reviewed BellSouth's Response to Observation 125[4] and attempted to re-test using October 2001 data.[5] However, KPMG Consulting discovered that the Raw Data User Manual (RDUM) instructions for the "Provisioning: LNP – Percent Missed Installation Appointments" SQM were insufficient for calculating metrics values.[6]

- BellSouth's instructions did not address how users should distinguish between Total Missed Appointments and End User Missed Appointments.
- BellSouth's published report for this SQM contained values for two levels of disaggregation: LNP and UNE Loop w/LNP, the data provided to KPMG Consulting contained only LNP orders. Furthermore, the *Florida Interim Performance Metrics*, Version 3.00 entry for the "Provisioning: LNP – Percent Missed Installation Appointments" SQM listed only LNP as the level of disaggregation.

Without clarification, KPMG Consulting is unable to calculate metrics values for this SQM.

[4] Florida OSS BellSouth's Response to Observation 125, 11/8/01.
[5] KPMG Consulting received data from BellSouth on 11/30/01.
[6] KPMG Consulting relied on the November 29, 2001 version 2.1.11 of the Manual.

EXCEPTION 152

BellSouth Florida OSS Testing Evaluation

Issue:

KPMG Consulting reviewed BellSouth's Response to Amended Observation 125.[7] BellSouth stated the following:

> *BellSouth is now sourcing the LNP data for this measure out of PMAP. As a result the instructions for the Provisioning: Percent Missed Installation Appointment report will also apply to the LNP - Percent Missed Installation Appointment report. KMPG will be able to replicate this measure by using the 2.2.01 version of the RDUM.*

Bellsouth's statement that LNP products have been migrated from Barney to PMAP indicates that system changes have taken place. BellSouth's response also states that the instructions for the "Provisioning: LNP – Percent Missed Installation Appointments" SQM will be based on the "Provisioning: Percent Missed Installation Appointments" SQM. Based on BellSouth's response, KPMG Consulting escalates Observation 125 to Exception status.

Impact:

KPMG Consulting's inability to replicate report values demonstrates that the accuracy of BellSouth's calculations for the "Provisioning: LNP - Percent Missed Installation Appointments" SQM may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or reliably plan for future business activities.

[7] Florida OSS BellSouth's Response to Amended Observation 125, 1/28/02.

ATTACHMENT 20

KPMG Consulting

EXCEPTION 151

BellSouth Florida OSS Testing Evaluation

Date: February 22, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR5).

Exception:

KPMG Consulting cannot replicate the values in the "Provisioning: % Completions/Attempts without Notice or <24 Hours Notice" Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001). KPMG Consulting found that BellSouth's instructions in the Raw Data User Manual (RDUM) are insufficient for calculating the metrics values for this SQM. This exception was originally issued as Observation 139 (PMR5).

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. The Florida Public Service Commission mandates that BellSouth publish monthly performance measurement reports of SQM values for Competitive Local Exchange Carriers (CLECs) engaged in business activity with BellSouth in the State of Florida.[1] BellSouth provides CLEC Aggregate processed data[2] (PMAP raw data[3]) as requested to KPMG Consulting.

KPMG Consulting discovered that the computation instructions for the "Provisioning: % Completions/Attempts without Notice or <24 Hours Notice" SQM are insufficient for calculating metrics values.

> BellSouth's instructions in the Raw Data User Manual do not address how users should distinguish between the levels of disaggregation.

KPMG Consulting found that the levels of disaggregation for other metrics were designated by the prod_desc (product description) and prod_id (product id) fields. However, upon review of the Glossary of Field Names and Descriptions by the Raw Data File entry for the 'Provisioning: % Completions/Attempts without Notice or <24 Hours

[1] These reports are posted on the PMAP Web site.

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

[3] *The PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the August 28, 2001 version 2.1.08 of the Manual.

Notice" SQM, KPMG Consulting found that the prod_desc and prod_id fields were not part of the raw data file.

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

KPMG Consulting reviewed BellSouth's Response to Observation 139.[4] BellSouth's response stated that BellSouth posted LNP raw data for "Provisioning: % Completions/Attempts without Notice or <24 Hours Notice" on the PMAP website and RDUM instructions on how to replicate the LNP level of disaggregation.

KPMG Consulting found two reports for this SQM on the PMAP website. The "Provisioning: % Completions/Attempts without Notice or <24 Hours Notice" SQM report, which reports values for LNP products only, is found in the Miscellaneous Aggregate folder. The other report, "Provisioning - Percent Completions Less Than 24Hr Notice" SQM, located in the SQM 3 Provisioning folder, reports values for other levels of disaggregation including:

Resale Residence
Resale Business
Resale PBX
Resale Centrex
Resale ISDN
Resale Residence and Business (POTS)
2W Analog Loop Design
LNP Standalone
UNE Digital Loop < DS1
Retail Residence
Retail Business
Retail Design
Retail PBX
Retail Residence, Business, Design
Retail Digital Loop < DS1
ADSL Provided to Retail
Local Interconnection Trunks

KPMG Consulting was unable to replicate the "Provisioning – Percent Completions Less Than 24Hr Notice" SQM report because the raw data BellSouth provided did not contain data for the other levels of disaggregation. BellSouth provided only LNP data to CLECs, which corresponds to the report found in the Miscellaneous Aggregate folder.

[4] Florida OSS BellSouth's Response to Observation 139, 11/19/01.

Also, the computation instructions for the "Provisioning: % Completions Less Than 24 Hours Notice" SQM were insufficient for calculating metrics values. BellSouth's instructions in the Raw Data User Manual failed to address how users should distinguish between the levels of disaggregation reported in the "Provisioning – Percent Completions Less than 24Hr Notice" SQM report.

Without complete data and adequate instructions, KPMG Consulting was unable to replicate metrics values for this SQM.

Issue:

KPMG Consulting reviewed BellSouth's 2nd Amended Response to Amended Observation 139.[5] BellSouth stated:

When testing the December 2001 data, BellSouth discovered that the code was including zero due dated orders in the numerator. BellSouth has entered Test Director Defect 556 to correct this issue.

Based on BellSouth's response, which states that a system fix must be implemented to resolve the discrepancies, KPMG Consulting escalated Observation 139 to Exception status.

Impact:

BellSouth's current documentation prevents CLECs from calculating the metrics values for the "Provisioning: % Completions/Attempts without Notice or <24 Hours Notice" SQM. Without accurate documentation, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

[5] Florida OSS BellSouth's Response to Observation 139, 02/08/02.

ATTACHMENT 21

KPMG Consulting

EXCEPTION 154

BellSouth Florida OSS Testing Evaluation

Date: February 22, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR5).

Exception:

KPMG Consulting cannot replicate the values in the "Provisioning: Coordinated Customer Conversions Interval" Service Quality Measurement (SQM) report for the Competitive Local Exchange Carrier (CLEC) Aggregate (August 2001). This exception was originally issued as Observation 142 (PMR5).

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. The Florida Public Service Commission mandates that BellSouth publish monthly performance measurement reports of SQM values for CLECs engaged in business activity with BellSouth in the State of Florida.[1] BellSouth provides CLEC Aggregate processed data[2] (PMAP raw data[3]) as requested to KPMG Consulting.

KPMG Consulting was unable to replicate the BellSouth reported values for the "Provisioning: Coordinated Customer Conversions Interval" SQM. The discrepancies are listed in the following table.

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
1	Unbundled Loops with LNP	0-5 Min	4376	4859	90.06%	90.09%
2	Unbundled Loops with LNP	5-15 Min	463	4859	9.53%	9.49%

[1] These reports are posted on the PMAP Web site.

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

[3] *The PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the August 28, 2001 version 2.1.08 of the Manual.

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BellSouth Florida OSS Testing Evaluation

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
3	Unbundled Loops with LNP	Total CCC	N/A	N/A	4859	4845

KPMG Consulting reviewed BellSouth's Response to Observation 142[4] and re-tested using November 2001 data. However, KPMG Consulting could not replicate the BellSouth reported values for this SQM. The discrepancies are listed in the following table.

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
1	Unbundled Loops with LNP	0-5 Min	6,727	7,769	86.59%	87.17%
2	Unbundled Loops with LNP	5-15 Min	1,032	7,769	13.28%	12.73%
3	Unbundled Loops with LNP	>15 Min	10	7,769	0.13%	0.10%

KPMG Consulting reviewed BellSouth's Response to Amended Observation 142[5] and re-tested using December 2001 data. Again, KPMG Consulting was unable to replicate the BellSouth reported values for this SQM. The discrepancies are listed in the following table.

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
1	Unbundled Loops with LNP	0-5 Min	6844	7641	89.57%	89.52%

[4] Florida OSS BellSouth's Response to Observation 142, 12/10/01.
[5] Florida OSS BellSouth's Response to Amended Observation 142, 1/29/02.

EXCEPTION 154

BellSouth Florida OSS Testing Evaluation

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
2	Unbundled Loops with LNP	5-15 Min	777	7641	10.17%	10.22%
3	Unbundled Loops with LNP	Total CCC	7,641	N/A	7,641	7,665

Issue:

KPMG Consulting reviewed BellSouth's Response to 2nd Amended Observation 142.[6] BellSouth stated that:

Cust_id 1686, ACNA ZXC was still being reported even though they are Test CLEC orders. Team Connection Defect 2792 was entered to exclude all Test CLEC orders from the December 2001 data; however, this particular cust_id was inadvertently left out of the exclusions.

Based on BellSouth's response, which states that a system fix must be implemented to resolve the discrepancies, KPMG Consulting escalates Observation 142 to Exception status.

Impact:

KPMG Consulting's inability to replicate the reported metrics values challenges the accuracy of BellSouth's calculations for the "Provisioning: Coordinated Customer Conversions Interval" SQM. Without accurate SQMs, CLECs may not be able to assess the quality of service received or plan for future business activities reliably.

[6] Florida OSS BellSouth's Response to 2nd Amended Observation 142, 2/13/02.

ATTACHMENT 22

KPMG Consulting

EXCEPTION 10

BellSouth Florida OSS Testing Evaluation

Date: December 4, 2000

EXCEPTION REPORT

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

Exception:

KPMG Consulting has found that BellSouth's implemented metrics calculations for the "Ordering: Local Number Portability (LNP) – Reject Interval" Service Quality Measurement report (May 2000) are inconsistent with the documented metrics calculations. (PMR-5)

Background:

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

Issue:

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

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

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

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

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

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

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

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

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

	Measurement	Category	KPMG-Calculated Numerator	KPMG-Calculated Denominator	KPMG-Calculated Value	BellSouth Reported Value
1	Total Mech; UNE Loop w/LNP	0-4 min	28	830	3.37%	3.49%
2	Total Mech; UNE Loop w/LNP	4-8 min	3	830	0.36%	0.24%
3	Total Mech; UNE Loop w/LNP	1-8 hrs	62	830	7.47%	8.07%
4	Total Mech; UNE Loop w/LNP	8-24 hrs	30	830	3.61%	3.01%
5	Total Mech; LNP	0-4 min	0	155	0.00%	0.64%
6	Total Mech; LNP	4-8 min	1	155	0.65%	0.64%
7	Total Mech; LNP	12-60 min	4	155	2.58%	2.56%
8	Total Mech; LNP	0-1 hrs	5	155	3.23%	3.85%
9	Total Mech; LNP	1-8 hrs	17	155	10.97%	13.46%

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

EXCEPTION 10

BellSouth Florida OSS Testing Evaluation

	Measurement	Category	KPMG-Calculated Numerator	KPMG-Calculated Denominator	KPMG-Calculated Value	BellSouth Reported Value
10	Total Mech; LNP	8-24 hrs	11	155	7.10%	4.49%
11	Total Mech; LNP	24 hrs+	122	155	78.71%	78.21%
12	Total Mech; LNP	Avg Int Hour	456394.3	155	49.07[5]	48.76
13	Partial Mech; UNE Loop w/LNP	0-4 min	5	806	0.62%	0.74%
14	Partial Mech; UNE Loop w/LNP	4-8 min	2	806	0.25%	0.12%
15	Partial Mech; UNE Loop w/LNP	1-8 hrs	62	806	7.69%	8.31%
16	Partial Mech; UNE Loop w/LNP	8-24 hrs	30	806	3.72%	3.10%
17	Partial Mech; LNP	0-4 min	0	155	0.00%	0.64%
18	Partial Mech; LNP	4-8 min	1	155	0.65%	0.64%
19	Partial Mech; LNP	12-60 min	4	155	2.58%	2.56%
20	Partial Mech; LNP	0-1 hrs	5	155	3.23%	3.85%
21	Partial Mech; LNP	1-8 hrs	17	155	10.97%	13.46%
22	Partial Mech; LNP	8-24 hrs	11	155	7.10%	4.49%
23	Partial Mech; LNP	24 hrs+	122	155	78.71%	78.21%
24	Partial Mech; LNP	Avg Int Hour	456394.3	155	49.07[6]	48.76

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. KPMG Consulting found that BellSouth's actual calculation methods could potentially result in misleading reports for the "Ordering: LNP – Reject Interval" SQM. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

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