BELLSOUTH'S RESPONSE TO EXCEPTION 141

Date: December 13, 2001

EXCEPTION REPORT

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

Exception:


Background:

SQMs are calculated to illustrate BellSouth’s Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. 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 Timelines” SQM Report. The discrepancies are listed in the following table.

<table>
<thead>
<tr>
<th>Measurement</th>
<th>Category (Minutes)</th>
<th>KPMG Consulting Calculated Value</th>
<th>BellSouth Reported Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>EDI</td>
<td>&gt;=0- &lt;=10 Minutes</td>
<td>181,586</td>
<td>73,457</td>
</tr>
</tbody>
</table>

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 September 25, 2001 version 2.1.09 of the Manual.
### 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, CLEC's are unable to assess the quality of service received or plan for future business activities reliably.

### BellSouth’s Response:

Issues reflected in Team Connects F1208, F1597 and D2370 explain the discrepancies identified by KPMG. Team Connect F1208 was implemented with August 2001 data, Team Connect F1597 was implemented with September 2001 data, and Team Connect D2370 will be implemented with November 2001 data to resolve all discrepancies identified by KPMG. Below is a description of what each Team Connection entry is addressing:

**Team Connect F1208**, implemented in August 2001 data, excludes test data having an OCN equal to ‘9991’ from the SQM Reports. Accordingly, BellSouth calculations excluded test data having an OCN equal to ‘9991’. However, the KPMG replication of the August 2001 Acknowledgement Message Timeliness metric did not exclude test data having an OCN equal to ‘9991’.

**Team Connect F1597** calls for the exclusion of data having a null outbound timestamp, out_ts, from the SQM Reports. BellSouth August 2001 calculations did not exclude data having a null outbound timestamp from the SQM Reports. However, the KPMG replication of the August 2001 Acknowledgement Message Timeliness metric did exclude data having a null outbound timestamp. This issue has been resolved beginning with September 2001 data.

**Team Connect D2370** resolves the Acknowledgement Message Timeliness bucket issue. BellSouth August 2001 SQM Report calculations used bucket intervals different than those prescribed by the SQM. However, the KPMG replication of the August 2001 Acknowledgement Message Timeliness metric used the appropriate interval buckets. This issue has been resolved beginning with November 2001 data.