BELLSOUTH AMENDED RESPONSE TO GA AMENDED EXCEPTION 150

BELLSOUTH

GA Amended Exception #150

September 6, 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 "Ordering: Reject Interval" Service Quality Measurement (SQM) report for the CLEC Aggregate (February 2002).

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 "Reject_Interval_022002.xls" SQM Report. The discrepancies are listed in the following tables.

Non-Mechanized:

Level of Disaggregation	Interval	BellSouth Reported Value	KPMG Consulting Calculated Value
UNE xDSL (ADSL, HDSL, UCL)	0-<=1 hr	7.04%	6.94%
	>1-<=4 hrs	45.07%	44.44%
	>4-<=8 hrs	35.21%	36.11%
	>8-<=12 hrs	9.86%	9.72%

[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 Users 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 June 18, 2002 version 4.0.9B of the Manual.

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Level of Disaggregation	Interval	BellSouth Reported Value	KPMG Consulting Calculated Value
	>16-<=20 hrs	1.41%	1.39%
	>=0-<=24 hrs	98.59%	98.61%
	>24 hrs	1.41%	1.39%
	Average Interval (hr)	4.98	5.00
2W Analog Loop w/ LNP Design	0-<=1 hr	5.26%	3.70%
	>1-<=4 hrs	52.63%	44.44%
	>4-<=8 hrs	26.32%	29.63%
	>8-<=12 hrs	15.79%	22.22%
	Average Interval (hr)	4.08	4.60
2W Analog Loop w/ LNP Non-Design	0-<=1 hr	8.33%	14.29%
	>1-<=4 hrs	50.00%	42.86%
	>4-<=8 hrs	37.50%	32.14%
	>8-<=12 hrs	4.17%	7.14%
	>=0-<=24 hrs	100.00%	96.43%
	>24 hrs	0.00%	3.57%
	Average Interval (hr)	4.14	4.92
	>1-<=4 hrs	41.67%	38.46%
	>4-<=8 hrs	58.33%	61.54%
	Average Interval (hr)	4.20	4.47
LNP Standalone	0-<=1 hr	6.52%	5.66%
	>1-<=4 hrs	48.91%	34.70%
	>4-<=8 hrs	34.24%	38.05%
	>8-<=12 hrs	4.89%	12.85%
	>12-<=16 hrs	2.72%	4.37%
	>16-<=20 hrs	2.17%	3.34%
	>20-<=24 hrs	0.54%	0.51%
	>=0-<=24 hrs	100.00%	99.49%
	>24 hrs	0.00%	0.51%
	Average Interval (hr)	4.60	5.96
Non-Design Loops	0-<=1 hr	5.97%	5.87%
	>1-<=4 hrs	62.19%	61.37%
	>4-<=8 hrs	27.36%	27.63%
	>8-<=12 hrs	3.98%	4.16%
	>12-<=16 hrs	0.50%	0.73%
	>16-<=20 hrs	0.00%	0.24%
	Average Interval (hr)	3.58	3.66
	>1-<=4 hrs	50.00%	33.33%
	>4-<=8 hrs	50.00%	66.67%
	Average Interval (hr)	3.38	3.76
Non-Design Loops with LNP	0-<=1 hr	12.00%	14.29%
	>1-<=4 hrs	48.00%	42.86%
	>4-<=8 hrs	36.00%	32.14%
	>8-<=12 hrs	4.00%	7.14%
	>=0-<=24 hrs	100.00%	96.43%
	>24 hrs	0.00%	3.57%
	Average Interval (hr)	4.00	4.92
	>1-<=4 hrs	50.00%	43.64%
	>4-<=8 hrs	31.82%	30.91%
	>8-<=12 hrs	9.09%	14.55%

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Level of Disaggregation	Interval	BellSouth Reported Value	KPMG Consulting Calculated Value
	>=0-<=24 hrs	100.00%	98.18%
	>24 hrs	0.00%	1.82%
	Average Interval (hr)	4.03	4.76

Partially Mechanized:

Level of Disaggregation	Interval	BellSouth Reported Value	KPMG Consulting Calculated Value
2W Analog Loop w/ LNP Design	0-<=1 hr	7.02%	8.06%
	>1-<=4 hrs	28.07%	25.81%
	>4-<=8 hrs	42.11%	38.71%
	>8-<=12 hrs	7.02%	12.90%
	>12-<=16 hrs	84.21%	85.48%
	>16-<=20 hrs	10.53%	9.68%
	>20-<=24 hrs	94.74%	95.16%
	>=0-<=24 hrs	3.51%	3.23%
	>24 hrs	1.75%	1.61%
	Average Interval (hr)	6.28	6.40
2W Analog Loop w/ LNP Non-Design	0-<=1 hr	10.20%	10.00%
	>1-<=4 hrs	18.37%	18.00%
	>4-<=8 hrs	38.78%	38.00%
	>8-<=12 hrs	22.45%	22.00%
	>12-<=16 hrs	89.80%	88.00%
	>16-<=20 hrs	10.20%	12.00%
	Average Interval (hr)	6.12	6.20
LNP Standalone	0-<=1 hr	24.10%	23.43%
	>1-<=4 hrs	45.78%	45.14%
	>4-<=8 hrs	25.00%	24.86%
	>8-<=12 hrs	2.41%	2.86%
	>12-<=16 hrs	97.29%	96.29%
	>16-<=20 hrs	2.11%	2.86%
	>20-<=24 hrs	99.40%	99.14%
	>=0-<=24 hrs	0.60%	0.86%
	Average Interval (hr)	3.21	3.40
UNE Loop with LNP	0-<=1 hr	8.74%	8.93%
	>1-<=4 hrs	24.27%	22.32%
	>4-<=8 hrs	40.78%	38.39%
	>8-<=12 hrs	14.56%	16.96%
	>12-<=16 hrs	88.35%	86.61%
	>16-<=20 hrs	9.71%	10.71%
	>20-<=24 hrs	98.06%	97.32%
	>=0-<=24 hrs	1.94%	1.79%
	>24 hrs	0.00%	0.89%
	Average Interval (hr)	5.90	6.31

Totally Mechanized:

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Level of Disaggregation	Interval	BellSouth Reported Value	KPMG Consulting Calculated Value
2W Analog Loop w/ LNP Design	0-<=1 hr	10.17%	10.94%
	>1-<=4 hrs	27.12%	25.00%
	>4-<=8 hrs	40.68%	37.50%
	>8-<=12 hrs	6.78%	12.50%
	>12-<=16 hrs	84.75%	85.94%
	>16-<=20 hrs	10.17%	9.38%
	>20-<=24 hrs	94.92%	95.31%
	>=0-<=24 hrs	3.39%	3.13%
	>24 hrs	1.69%	1.56%
	Average Interval (hr)	6.07	6.20
2W Analog Loop w/ LNP Non-Design	0-<=1 hr	18.18%	17.86%
	>1-<=4 hrs	18.18%	17.86%
	>4-<=8 hrs	34.55%	33.93%
	>8-<=12 hrs	20.00%	19.64%
	>12-<=16 hrs	90.91%	89.29%
	>16-<=20 hrs	9.09%	10.71%
	Average Interval (hr)	5.48	5.56
LNP Standalone	0-<=1 hr	47.51%	46.20%
	>1-<=4 hrs	31.54%	31.60%
	>4-<=8 hrs	17.43%	17.60%
	>8-<=12 hrs	1.66%	2.00%
	>12-<=16 hrs	98.13%	97.40%
	>16-<=20 hrs	1.45%	2.00%
	>20-<=24 hrs	99.59%	99.40%
	>=0-<=24 hrs	0.41%	0.60%
	Average Interval (hr)	2.27	2.44
UNE Loop with LNP	0-<=1 hr	14.41%	14.17%
	>1-<=4 hrs	23.42%	21.67%
	>4-<=8 hrs	37.84%	35.83%
	>8-<=12 hrs	13.51%	15.83%
	>12-<=16 hrs	89.19%	87.50%
	>16-<=20 hrs	9.01%	10.00%
	>20-<=24 hrs	98.20%	97.50%
	>=0-<=24 hrs	1.80%	1.67%
	>24 hrs	0.00%	0.83%
	Average Interval (hr)	5.48	5.90

BellSouth's Response:

KPMG Consulting was unable to replicate BellSouth's reported values for Reject Interval Barney products that reflect February 2002 data because of a known defect. TD1271 was issued to correct March 2002 data. Additionally, BellSouth has entered Test Director RQ 1040 to update the RDUM instructions which will be implemented with the April release of the RDUM.

Amendment:

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Based on BellSouth's Amended Response to Exception 150, KPMG Consulting tested additional months of the "Ordering – Reject Interval" metric. KPMG Consulting was able to match March 2002 data, however, when testing April 2002 data in the PMAP 4.0 environment, additional discrepancies were noted. KPMG Consulting was unable to replicate the BellSouth reported values. The discrepancies are listed in the following table:

Fully Mechanized:

Level of Disaggregation	Interval	BellSouth Reported Value	KPMG Consulting Calculated Value
Resale Residence	>4 - <=8 min	3.77%	3.81%
	>8 - <=12 min	5.63%	5.59%
UNE Loop + Port Combinations	0 - <=4 min	20.94%	20.98%
	>4 - <=8 min	25.82%	26.05%
	>8 - <=12 min	40.22%	40.00%
	>12 - <=60 min	7.40%	7.35%

Partially Mechanized:

Level of Disaggregation	Interval	BellSouth Reported Value	KPMG Consulting Calculated Value
Resale Residence	0 - <=1 hr	22.90%	23.04%
	>1 - <=4 hrs	27.60%	27.45%
UNE Loop + Port Combinations	0 - <=1 hr	22.66%	22.70%
	>1 - <=4 hrs	32.28%	32.26%
	>4 - <=8 hrs	35.12%	35.10%
	>8 - <=10 hrs	4.99%	5.62%
	0 - <=10 hrs	95.05%	95.68%
	>10 - <=18 hrs	2.46%	1.84%
UNE Other Non-Design	>8 - <=10 hrs	3.65%	3.95%
	0 - <=10 hrs	91.19%	91.49%
	>10 - <=18 hrs	3.95%	3.65%

Totally Mechanized:

Level of Disaggregation	Interval	BellSouth Reported Value	KPMG Consulting Calculated Value
Resale Residence	0 - <=1 hr	80.50%	80.53%
	>1 - <=4 hrs	6.48%	6.45%
UNE Loop + Port Combinations	0 - <=1 hr	70.84%	70.85%
	>1 - <=4 hrs	11.23%	11.22%
	>4 - <=8 hrs	11.68%	11.67%
	>8 - <=10 hrs	1.71%	1.92%
	0 - <=10 hrs	95.46%	95.66%
	>10 - <=18 hrs	1.13%	0.93%
UNE Other Non-Design	>8 - <=10 hrs	0.68%	0.74%
	0 - <=10 hrs	66.31%	66.36%

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Level of Disaggregation	Interval	BellSouth Reported Value	KPMG Consulting Calculated Value
	>10 - <=18 hrs	2.95%	2.90%

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: Reject Interval" 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.

BellSouth Response:

KPMG was unable to replicate the April 2002 Ordering: Reject Interval Distribution & Average Reject Interval SQM Report because data does not reflect the interval label for all mechanizations. For example, an interval bucket labeled ">4 - <=8" should contain data where the Reject Interval duration is greater than four and less than or equal to eight. However, the interval bucket actually contains data where the Reject Interval duration is greater than or equal to four and less than eight. This applies to all of the interval buckets on the Ordering: Reject Interval Distribution & Average Reject Interval SQM Reports. Test Director RQ1370 has been worked. KPMG should retest with May 2002 data.

BellSouth's Amended Response:

BellSouth has entered RQ1690 to address additional replication issues with this metric. At this point it is not presently packaged for a release. KPMG will be notified when RQ1690 is packaged and what data month to test.