Date: December 17, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Remedy Replication Review. (PMR7.5)

Exception:

BearingPoint is unable to replicate the reported CM-3 ("Timeliness of Documents Associated with Change") Tier II numerator and denominator values for July 2002 data.

Background:

Self-Effectuating Enforcement Mechanism (SEEM) reports are created to illustrate BellSouth's Operational Support System enforcement mechanism. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes SEEM reports of remedy values for Competitive Local Exchange Carriers (CLECs) engaged in business activity with BellSouth in the State of Georgia and for the Georgia Public Service Commission.

Issue:

BearingPoint is unable to replicate the BellSouth Tier II numerator and denominator values for "Timeliness of Documents Associated with Change". The discrepancies are listed in the following table:

Tier II Discrepancies for July 2002

		BearingPoint Calculated Values		BellSouth Reported Values (Interim Solution)	
Item	Year/Month	Numerator (Documentation Notifications received >=30 days from release)	Denominator (Total Number of Documentation Notifications)	Numerator (BM_NUMR_VL)	Denominator (BM_DENM_VL)
1	200207	1	1	8	8

On page 11-6 of Georgia's *BellSouth Service Quality Measurement Plan (SQM)*[1], the SEEM Analog/Benchmark is listed as "95% >= 30 days of the change" for "Timeliness of Documents Associated with Change". Through correspondence with the Georgia Public Service Commission, BearingPoint

[1] *BellSouth Service Quality Measurement Plan (SQM), Georgia Performance Metrics, Version 1.01*, Issue Date: April 6, 2001.

©2002 BearingPoint, Inc.

confirmed that the SEEM Analog/Benchmark for this metric is equivalent to the SQM Analog/Benchmark of "95% >= 30 days if new features coding is required". The SEEM Disaggregation for this metric does not measure timeliness of documents associated with non-system changes. It appears that BellSouth has included non-system changes in their calculation of "Timeliness of Documents Associated with Change" in July 2002.

BellSouth Response:

BellSouth incorrectly included non-system changes in the calculation of "Timeliness of Documents Associated with Change" for the month of July 2002. This was a one-time calculation issue and resulted in no material impact related to past remedies.

Amendment:

BellSouth's Response to Exception 182 stated that the incorrect calculation of CM-3 for the month of July 2002 "was a one-time calculation issue". BearingPoint tested August 2002 data and found that BellSouth again included non-system changes in its calculation of "Timeliness of Documents Associated with Change". The discrepancies are listed in the following table:

Tier II Discrepancies for August 2002

		BearingPoint Calculated Values		BellSouth Reported Values (Interim Solution)	
Item	Year/Month	Numerator (Documentation Notifications received >=30 days from release)	Denominator (Total Number of Documentation Notifications)	Numerator (BM_NUMR_VL)	Denominator (BM_DENM_VL)
1	200208	0	0	1	1

BellSouth's Response to Exception 182 implies that it will not recalculate results for the July 2002 data month since there was "no material impact related to past remedies". BearingPoint requests to find out whether BellSouth plans to correct the reported values in the Interim Solution database for the July and August 2002 data months.

BellSouth Response to Amended Exception:

BellSouth incorrectly included non-system changes in the calculation of "Timeliness of Documents Associated with Change" for the months of July and August 2002. BellSouth previously recalculated and corrected the reported values in the Interim Solutions database for the July 2002. BellSouth has recalculated the August results, and updated the Interim Solutions database to reflect these recalculations.

©2002 BearingPoint, Inc.

2nd Amendment:

BellSouth's Response to Amended Exception 182 stated that CM-3 has been recalculated for the months of July 2002 and August 2002 and that the Interim Solutions database has been updated to reflect the correct calculations. The Interim Solutions database has been updated to reflect the correct calculations for July 2002; however, the database still reflects the incorrect calculations for August 2002.

Impact:

CLECs and the state commission rely on BellSouth's SEEM reports to assess the remedies, if applicable, to be paid to them. BearingPoint's inability to replicate BellSouth's reported Tier II numerator and denominator values may signify that BellSouth's remedy calculation for "Timeliness of Documents Associated with Change" is inaccurate. Without accurate SEEM Reports, CLECs and the state commission might not be paid correct remedy amounts by BellSouth.

BellSouth Response:

Based on BearingPoint's finding, the IS database was rechecked and it was discovered that an update query had not been run to pull the corrected August data into the IS database. The query has been run, and the corrected data pulled into the IS database for examination.

Summary of BearingPoint Re-Test Activities:

BearingPoint retested CM-3 for September 2002 and reviewed BellSouth's August 2002 reported Tier II values in the Interim Solutions database.

Summary of BearingPoint Re-Test Results:

BearingPoint was able to successsfully replicate the reported Tier II calculations for CM-3 for September 2002. BearingPoint also verified that the corrected August 2002 values were updated in the Interim Solution database.

BearingPoint believes that BellSouth has adequately addressed the issue identified in Exception 182.

Based on re-testing activities, BearingPoint, with the concurrence of the Georgia Public Service Commission, closes Exception 182.

©2002 BearingPoint, Inc.