BELLSOUTH'S RESPONSE TO EXCEPTION 205

GA Exception #205

March 3, 2003

EXCEPTION REPORT

An exception has been identified as a result of testing activities associated with the Remedy Change Management Review (PMR7.3).

Exception:

BellSouth failed to properly execute the TestDirector Change Management Process for Defect 1680 which resulted in BellSouth's failure to make necessary adjustments to Self-Effectuating Enforcement Mechanism (SEEM) payments.

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 the Georgia Public Service Commission and for Competitive Local Exchange Carriers (CLECs) engaged in business activity with BellSouth in the State of Georgia.

Issue:

During replication of the MR-4 measure for May 2002 data BearingPoint found a problem with the BellSouth results. BellSouth stated that the problem was being addressed in Defect 1680 for all the affected Maintenance & Repair and Provisioning measures. BearingPoint reviewed Defect 1680 and found that BellSouth had corrected the defect for July 2002 data, but had not recalculated the results for May 2002 data.

BellSouth's defect management process includes a step designed to review prior months of data to ensure that a defect does not affect prior results and/or SEEM payments. BearingPoint's analysis in Table 1 is an example showing that Defect 1680 did affect remedy payments for a CLEC in a prior month.

Table 1: BearingPoint Analysis for Percent Repeat Trouble within 30 Days (MR-4), May 2002

	BearingPoint Results									
Item	Company	Aggregate Z	Balancing Critical Value	Parity Gap	Pass/Fail	Vol Prop	TAV	Rnd TAV	Fail Mo	Fee
1	-1	3.95907	-4.51614	8.47521	PASS	0	0	0	0	$0.00
2	22979	0.4158091	-0.2927699	0.708579	PASS	0	0	0	0	$0.00
3	23280	1.220684	-1.094331	2.315015	PASS	0	0	0	0	$0.00
4	23564	2.493324	-5.105214	7.598538	PASS	0	0	0	0	$0.00
5	23747	-0.7706848	-0.5431411	-0.2275437	FAIL	0.05689	0.28443	1	1	$400
6	23886	2.033966	-2.272393	4.306359	PASS	0	0	0	0	$0.00

Table 2: BellSouth Results for Percent Repeat Trouble within 30 Days (MR-4), May 2002

	BellSouth Results								
Item	Company	Aggregate Z	Balancing Critical Value	Parity Gap	Pass Fail Num	Vol Prop	TAV	Fail Mo	Remedy Amt
1	-1	4.2853693	-5.3250304	9.6103997	0	0	0	0	$0.00
2	22979	0.5747714	-0.4119109	0.9866823	0	0	0	0	$0.00
3	23280	1.5037512	-1.4499982	2.9537493	0	0	0	0	$0.00
4	23564	2.9168749	-6.855414	9.7722889	0	0	0	0	$0.00
5	23747	-0.5210982	-0.6090479	0.0879497	0	0	0	0	$0.00
6	23886	2.0600628	-2.3928319	4.4528947	0	0	0	0	$0.00

Comparing the examples in Table 1 and Table 2, the implementation of Defect 1680 resulted in a change in the Parity Gap. For Item 5 in Table 1 it also resulted in a difference in the remedy amount.

BearingPoint finds that BellSouth either did not execute or did not effectively execute the step of the change management process necessary to determine that Defect 1680 affected prior months.

Impact:

A thorough review process which analyzes a defect's affect on prior months is essential to ensure that correct adjustments are made to the CLECs or State Commission. BellSouth's failure to effectively execute the TestDirector Change Management Process may result in an underpayment to CLECs or the State Commission for the affected Maintenance & Repair and Provisioning measures.

BellSouth Response:

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It was determined that the like-to-like comparison used in BearingPoint's rerun is not the same as the like-to-like comparisons in effect in the PARIS system at the time of defect #1680. At the time of that defect, the Wholesale comparator that was causing CLEC duplication was EXSB (EXcluding Switch Based). The step in the change management process BearingPoint refers to in the Exception was not skipped. Rather, that step led to the discovery that in using the like-to-like comparison rules in effect at the time, if eliminated, the duplicate CLEC records could not result in an underpayment to CLECs and that the error addressed by defect #1680 would always result in an overpayment to CLECs. A decision was made to leave the overpayments that had already occurred in place and to not attempt recovery of the overpayments.