III. Relationship Management and Infrastructure Domain Results and Analysis

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A. Test Results: Change Management Practices Verification and Validation Review (PPR1)

1.0 Description

The Change Management Practices Verification and Validation Review (PPR1) evaluated BellSouth's policies and procedures for managing changes to the Operating Support Systems (OSS) interfaces and business processes used by Alternative Local Exchange Carriers (ALEC). The change management practices for changes initiated by either BellSouth or an ALEC were evaluated in the test. Additionally, data were reviewed to evaluate change management of a major software release from initiation through implementation. The objectives of the test were to determine the adequacy and completeness of procedures for developing, publicizing, conducting, and monitoring change management. Interviews, attendance at change management meetings, reviews of BellSouth change notifications, and documentation reviews were conducted to evaluate BellSouth's change management process.

2.0 Business Process

This section describes BellSouth's change management business process used for changes to OSS interfaces and business processes.

2.1 Business Process Description

BellSouth uses the Change Control Process (CCP) to manage all changes to the current BellSouth OSS interfaces that impact ALECs. Competitive Local Exchange Carrier (CLEC)-affecting[3] changes require ALECs to modify the way they operate or to make modifications to system code. The CCP is also used to manage the retirement of OSS interfaces, as well as the addition of new OSS interfaces within CCP-specified intervals.[4] The BellSouth Change Control Team is comprised of the Change Control Manager and support personnel. While the Change Control Manager is responsible for CCP oversight, the support staff manages the CCP email distribution list, reviews Change Requests, and facilitates CCP meetings. The CCP supports the following types of Change Requests:

♦ Type 1 – System Outages;

♦ Type 2 – Regulatory Changes;

♦ Type 3 – Industry Standard Changes;

♦ Type 4 – BellSouth-Initiated Changes;

♦ Type 5 – ALEC-Initiated Changes; and

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[3] CLEC-affecting is defined as "any change that potentially may cause a CLEC to modify the way it operates in conducting wholesale business transactions with BellSouth. Modifications to the way CLECs operate in conducting wholesale business transactions with BellSouth include, but are not limited to: (1) changes to system code; (2) changes in CLECs employee training; (3) changes to CLEC business methods and procedures at the transaction, clarification, or escalation levels (4) changes to the work assignments of CLEC personnel. Internal BellSouth process changes (either software or procedural) unique to the CLEC wholesale environment are CLEC-affecting." This definition applies to changes in the following: "…all three groupings of the components of "interfaces" as described by the FCC. These include (1) a point of interface (or gateway); (2) any electronic or manual processing links (transmission links) between the interface and BellSouth's internal operations systems (including all necessary back office systems and personnel); and (3) all of the internal operations support systems (or "legacy systems") that BellSouth uses in providing network elements and resale services to competing carriers."

[4] www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp_doc_bccp.html

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♦ Type 6 – Correction of System and Documentation Defects.
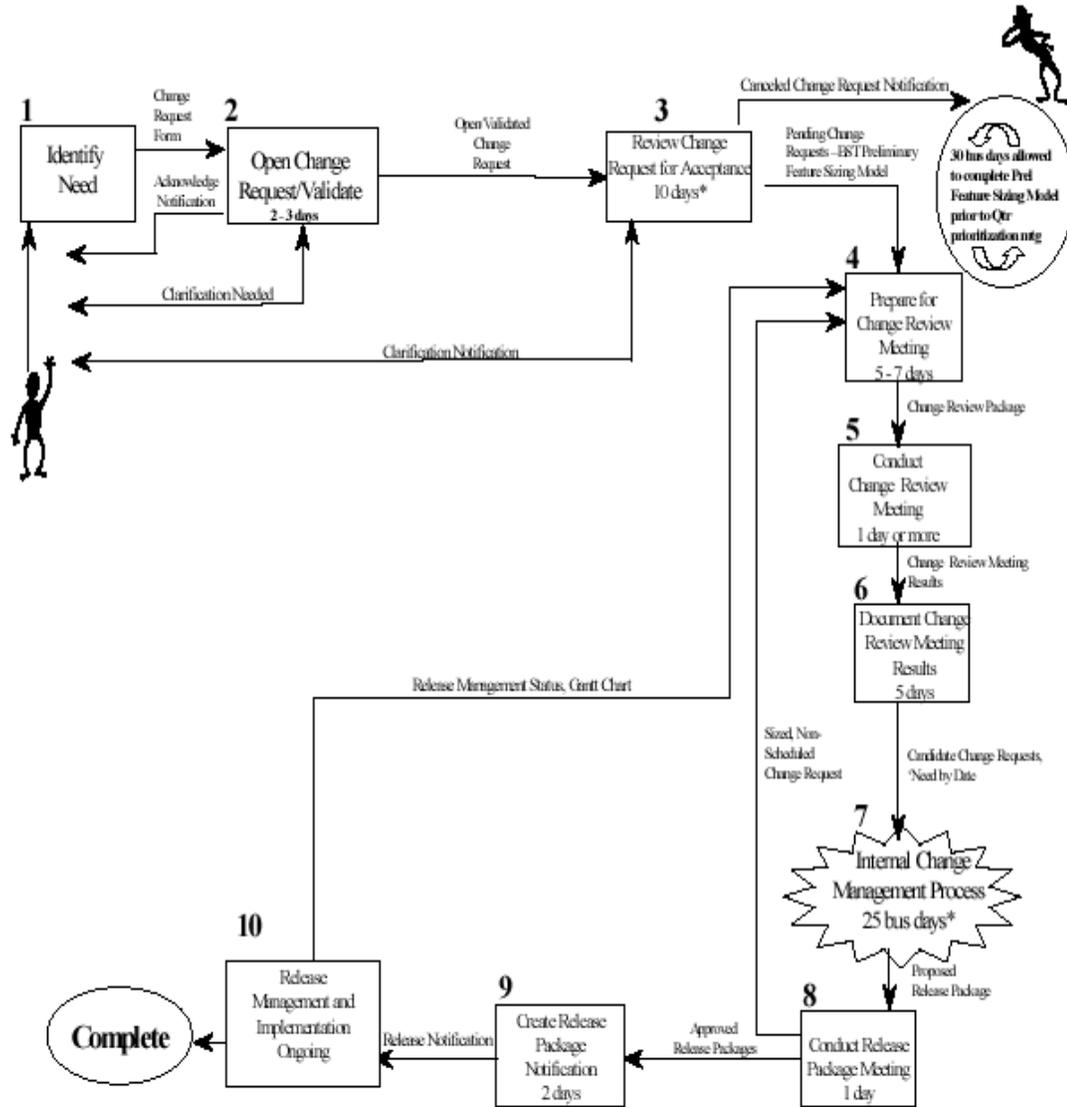
System Outages (Type 1)

The BellSouth CCP is used to report system outages known as Type 1 Change Requests. System outages occur when the BellSouth OSS is unusable or there is degradation in an existing interface feature. The Electronic Communications Support Group communicates system outages to ALECs via notifications posted to the BellSouth CCP website in conjunction with sending these notifications to the CCP distribution list via email[5]. For system outages, the CCP is only responsible for maintaining the website and distribution lists.

Type 2 through Type 5 Change Requests

Type 2 through Type 5 Change Requests begin with the initiation of a Change Request Form. Each Change Request is categorized into one of the four types as described below. The Change Request then moves through the CCP as depicted in Figure 1.1.

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[5] ALECs may add themselves to this distribution through a link on the CCP website.

Figure 1.1: Change Control Process[6]

1 — Identify Need

Change Request Form

2 — Open Change Request/Validate — 2 – 3 days

Acknowledge Notification

Clarification Needed

Clarification Notification

Open Validated Change Request

3 — Review Change Request for Acceptance — 10 days*

Canceled Change Request Notification

Pending Change Requests –BST Preliminary Feature Sizing Model

30 bus days allowed to complete Prel Feature Sizing Model prior to Qtr prioritization mtg

4 — Prepare for Change Review Meeting — 5 - 7 days

Change Review Package

5 — Conduct Change Review Meeting — 1 day or more

Change Review Meeting Results

6 — Document Change Review Meeting Results — 5 days

Release Management Status, Gantt Chart

Sized Non-Scheduled Change Request

Candidate Change Requests, 'Need by Date

7 — Internal Change Management Process — 25 bus days*

Proposed Release Package

8 — Conduct Release Package Meeting — 1 day

Approved Release Packages

9 — Create Release Package Notification — 2 days

Release Notification

10 — Release Management and Implementation Ongoing

Complete

*FL-PSC-Dockect No. 000731-TP, Order No. PSC-01-1402-FOF-TP

The CCP is used to initiate all Type 2-5 Change Requests, which are initiated by either BellSouth or an ALEC. Once initiated, BellSouth reviews the Change Request for completeness, logs the Change Request into the internal database, and assigns a number to each Change Request. BellSouth then provides an acknowledgement to the ALEC confirming that the Change Request was received and forwards the Change Request to the BellSouth Change Review Board (CRB). The CRB is comprised of BellSouth product subject matter experts (SME) and business rule

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[6] Change Control Process, Version 3.1, May 29, 2002, Pg. 27.

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authors. The CRB reviews the Change Request for acceptance and provides a response within 10 business days to the Change Control Team of either "accepted" or "BellSouth cannot support." The Change Control Team provides this response to the originator (i.e. BellSouth or ALEC). If BellSouth cannot support the request, the CRB provides an explanation of the reason for denial. BellSouth may deny a Change Request for one or more of the following three reasons: high cost of implementing change, the change does not follow general industry direction, or the change is not technically feasible. BellSouth returns the Change Request to the originator with the reason for denial. The Change Request status is updated to show that the request has been canceled. The originating ALEC may request a BellSouth SME to participate in the next monthly status meeting to address the denial of a Change Request. If the Change Request is accepted by the CRB, the request moves to "pending" status.

Regulatory Changes (Type 2)

BellSouth initiates Regulatory Change Requests when a state or federal regulatory body (e.g. FCC or State Public Service Commission) mandates a change to BellSouth's OSS. Once initiated, the Change Request moves through the CCP as described above. However, Regulatory Change Requests may not be denied by the CRB.

Once a Regulatory Change Request enters "pending" status, BellSouth moves it to the internal change management process for consideration for implementation in a future BellSouth software release[7].

Industry Standard Changes (Type 3)

BellSouth or an ALEC may initiate Industry Standard Change Requests when a new industry standard becomes available (e.g. New EDI Local Mechanization Specification (ELMS) or Local Service Order Gateway (LSOG) version). Once initiated, the Change Request moves through the CCP as described above. If an Industry Standard Change Request is approved by the CRB[8], the Change Request enters "pending" status. BellSouth then moves it to the internal change management process for consideration for implementation in a future BellSouth software release.

BellSouth-Initiated Changes (Type 4)

BellSouth-initiated Change Requests are introduced to the CCP during the CRB step of the process and follow the acceptance process explained above. In addition, BellSouth reviews the Change Request to determine if it is "CLEC-Affecting[3]." If a Change Request is accepted by the CRB and determined to be CLEC-affecting, a BellSouth-initiated Change Request is logged by the Change Control Team and assigned a Change Request number. The BellSouth-initiated request then receives a "pending" status. Once a Change Request has been placed in pending status, it is sent to the BellSouth User Requirements Team to be sized. This consists of BellSouth determining the number of units of development capacity necessary to implement the Change Request in a release. Accepted BellSouth-initiated Change Requests in "pending" status appear on the agenda at the following month's CCP Monthly Status meeting, at which time they are introduced to the ALEC community. The originator of a new Change Request is asked to provide a brief description and to address any questions.

Once every quarter, the monthly status meeting includes prioritization of pending Change Requests. Prior to a prioritization meeting, the ALEC Community is provided with the sizing

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[7] See Release Management Process described in the Business Process Description section of this report.
[8] CRB may not deny an Industry Standard Change Request by citing a failure to follow general industry direction. Technical infeasibility or high cost of implementation may be reason for CRB denial.

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information for each Change Request as well as the projected capacity of the year's remaining releases. Both BellSouth and the ALECs attending the meeting use this information to rank the pending BellSouth-initiated Change Requests. Once prioritized, the Change Request enters the BellSouth internal CCP for consideration for implementation in future releases. BellSouth uses the rankings resulting from prioritization to aid in the determination of which BellSouth-initiated Change Requests will be implemented.

CLEC-Initiated Changes (Type 5)

ALEC-initiated Change Requests enter the CCP when an ALEC sends a Change Request to BellSouth. BellSouth reviews the Change Request for completeness, logs the Change Request into the internal database, and assigns a number to each Change Request. BellSouth then provides an acknowledgement to the ALEC confirming that the Change Request was received and subsequently forwards the Change Request to the BellSouth CRB as described above.

ALEC-accepted Change Requests are placed in "pending" status and appear on the agenda at the following month's CCP Monthly Status meeting, at which time they are introduced to the ALEC community. The originator of a new Change Request is asked to provide a brief description and to address any associated questions.

Change Requests placed in pending status are also sent to the BellSouth User Requirements Team to be sized. This consists of BellSouth determining the number of units of development capacity necessary to implement the Change Request in a release. Once every quarter, the monthly status meeting includes prioritization of pending Change Requests. Prior to a prioritization meeting, the ALEC Community is provided with the sizing information for each Change Request as well as the projected capacity of the years remaining releases. Both BellSouth and the ALECs attending the meeting use this information to rank the pending ALEC-initiated Change Requests. Once prioritized, the Change Request enters the BellSouth internal Change Control Process for consideration for implementation in future releases. BellSouth uses the rankings resulting from prioritization to aid in the determination of which ALEC-initiated Change Requests will be implemented.

Documentation and Interface Defects (Type 6)

The BellSouth CCP has a separate process for Defect Change Requests. Either BellSouth or an ALEC may submit Defect Change Requests to the Change Control Team. The Defect Change Request is logged, assigned a number, and forwarded to a group of SMEs for validation. The Change Control Team provides an acknowledgement to the originator indicating the Change Request was received. The intervals for this process vary based on the impact level of the defect. High-impact defects[9] require BellSouth to acknowledge the request within four hours; medium[10] or low[11]-impact defects require BellSouth to acknowledge the request within one business day. Further, high-impact defects are validated within one business day and corrected within ten business days. Medium-impact defects are corrected within ninety business days or using best effort, and low-impact defects are corrected using best effort.

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[9] Defined as a "failure (that) causes impairment of critical system functions and no electronic workaround solution exists."
[10] Defined as a "failure (that) causes impairment of critical system functions, though a workaround solution does exist."
[11] Defined as a "failure (that) causes inconvenience or annoyance."

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Release Management

Once BellSouth and the ALECs prioritize a Change Request, the Change Control Team provides the prioritization list to the BellSouth Release Management Team. The Release Management Team is responsible for integrating Change Requests from the CCP and the BellSouth internal groups into a master prioritized list. The Release Management team provides the master list to the BellSouth Executive Review Board (ERB) for approval.

From the BellSouth ERB approved master list, the Release Management Team develops a candidate request list, which typically consists of the 100 highest ranked Change Requests. The candidate request list is provided to BellSouth Technology Group (BTG), the liaison between BellSouth and the OSS development vendors, who develop the code for all of the BellSouth interfaces.

The OSS development vendors review the candidate request list and propose a release package, which is defined as a set of Change Requests to be implemented and a project plan for implementation milestones. BTG communicates the release package to the Release Management Team. Once the Release Management Team approves the release package, the OSS development vendors begin work on the draft user requirements. The approved release package is also provided to the Change Control Team for distribution to the ALECs. After the user requirements are drafted, the Change Control Team hosts a meeting with the ALECs to review and discuss the requirements.

BellSouth publishes an annual release schedule to the ALECs. The release schedule includes two major releases, two minor releases, and one industry release (i.e. new LSOG or ELMS version); or three major releases and two minor releases each year. The release types (i.e. Major, Minor, or Industry) have different intervals for completion of implementation steps. However, each type of release may contain similar release content. The intervals include the timeframes for providing Draft User Requirements, Final User Requirements, Final BellSouth Business Rules for Local Ordering (BBR-LO), and the Telecommunications Access Gateway (TAG) Application Program Interface (API) and/or Electronic Date Interchange (EDI) specifications. The release intervals also include dates when ALEC testing will be available in the CLEC Application Verification Environment (CAVE).

Documentation Changes (related to Release Management)

BellSouth documentation changes arising from a software release are distributed to ALECs via a Carrier Notification. These documentation changes are considered CLEC-affecting; therefore, the documentation is provided in accordance with the intervals specified in the CCP. BellSouth considers changes to documentation that do not cause ALEC code or operations changes to be non-system impacting. Non-system impacting changes to BellSouth business rules documentation are provided to ALECs at least 30 days in advance of the effective date. Software Release Notifications are provided 30 calendar days or more in advance of the implementation date.

3.0 Methodology

This section summarizes the test methodology.

3.1 Scenarios

Scenarios were not applicable to this test.

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3.2   Test Targets and Measures

The test target was to measure the completeness of procedures for developing, publicizing, conducting, and monitoring change management. The test included a review of the following change management sub-processes:

♦ Developing change proposals;

♦ Evaluating change proposals;

♦ Implementing change;

♦ Compliance with existing intervals;

♦ Updating documentation; and

♦ Tracking change proposals.

3.3   Data Sources

The data collected for the Change Management Practices Verification and Validation Review (PPR1) included the following:

♦ Two interviews with personnel from the BellSouth Change Control Team;

♦ Three interviews with personnel from the BellSouth Change Review Board;

♦ Three interviews with personnel from the BellSouth Release Management Team;

♦ The BellSouth Change Control Process, Version 3.1;

♦ BellSouth and ALEC-initiated Change Requests;

♦ BellSouth published Carrier Notifications;

♦ BellSouth End-to-End Process Flow, Version 1.0; and

♦ Observation of BellSouth CCP meetings (June 2000-June 2002).

3.4   Data Generation/Volumes

This test did not rely on data generation or volume testing.

3.5   Evaluation and Analysis Methods

KPMG Consulting's review relied on interviews with members of the BellSouth Change Control Team, Change Review Board, and Release Management Team, as well as documentation reviews and observations of the CCP. Summaries of the information gathered during the interviews with the BellSouth Change Control Team, Change Review Board, and Release Management Team were provided to BellSouth for review and verification. The data were then analyzed against the evaluation measures established for the test.

The Change Management Practices Verification and Validation Review (PPR1) included a checklist of evaluation criteria developed by KPMG Consulting during the initial phase of the BellSouth OSS Evaluation.   These evaluation criteria provided the framework of norms, standards, and guidelines for the Change Management Practices Verification and Validation Review (PPR1).

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The data collected were analyzed employing the evaluation criteria detailed in Table 1-2 below.

4.0   Results

This section contains the overall test results.

4.1   Results Summary

The number of exceptions and observations issued during the life of the test is depicted in Table 1-1. For additional exception and observation information, refer to Appendices D and E, respectively. The test criteria and results are presented in Table 1-2.

Table 1-1: Exception and Observation Count

Activity	Exceptions	Observations
Total Issued	8	9
Total Closed as of as of Final Report Date	7	9
Total Remaining Open as of Final Report Date	1	0

Table 1-2: PPR1 Evaluation Criteria and Results

Test Reference	Evaluation Criteria	Result	Comments
PPR1-1	Change management process responsibilities and activities are defined.	Satisfied	Change management process responsibilities and activities are defined. KPMG Consulting conducted interviews with the Change Control Team, Change Review Board, and the Release Management Team. During an interview with the Change Control Team on June 12, 2000, KPMG Consulting found that the change management process was not clearly defined or documented in the Change Control Process, Version 1.5. As a result, KPMG Consulting issued Exception 23, addressing definition and documentation deficiencies of Carrier Notification procedures, and Exception 26, addressing definition and documentation deficiencies for correcting documentation defects. BellSouth updated the Change Control Process and published Version 2.3 on May 18, 2001. The updated version defined and documented the procedures for correcting documentation defects. KPMG Consulting closed Exception 26. BellSouth updated the Change Control Process and published Version 2.5 on June 18, 2001. The updated version defined and documented the Carrier Notification procedures. As a result, KPMG Consulting closed Exception 23. KPMG Consulting also conducted interviews

Test Reference	Evaluation Criteria	Result	Comments
			with the Change Review Board on October 18, 2000 and April 26, 2001. KPMG Consulting found that the Change Review Board process was defined and documented in the BellSouth End-to-End Process Flow, Version 1.0.
			KPMG Consulting conducted an interview with the Release Management Team April 26, 2001. KPMG Consulting found that portions of the release management process were neither defined nor documented. As a result of the interview, KPMG Consulting issued Exception 106.
			KPMG Consulting conducted a refresh interview with the Change Control Team on October 8, 2001. KPMG Consulting verified that the Change Control Process, Version 3.1, was defined and implemented.
			KPMG Consulting conducted a refresh interview with the Change Review Board on October 11, 2001. KPMG Consulting confirmed that the Change Review Board followed the previously reviewed processes and re-verified that the process was defined and documented in the BellSouth End-to-End Process Flow, Version 1.0.
			KPMG Consulting conducted a refresh interview with the Release Management Team on October 9, 2001. KPMG Consulting confirmed that the Release Management Team still followed the previously reviewed process and confirmed portions of the process remained undefined.
			BellSouth provided KPMG Consulting with additional documentation explaining the procedures for release development. KPMG Consulting reviewed the documentation and found it defined and documented the portion of the release process at issue in Exception 106. KPMG Consulting closed Exception 106.
			KPMG Consulting's review of the BellSouth Change Request website found that BellSouth was not classifying Change Requests as defects (Type 6) in accordance with the BellSouth definition of a defect. KPMG Consulting identified issues that were either incorrectly classified as features (Types 2, 4 or 5) or were not initiated in any change request. Therefore BellSouth was not providing documentation of system defects. As a result, KPMG Consulting issued Exception 123.

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Test Reference	Evaluation Criteria	Result	Comments
			BellSouth responded that the defects had been identified, but BellSouth had failed to initiate Change Requests in the CCP for each issue. BellSouth provided documentation entitled Type 6 Defect Notification Process as well as a job aid, which describes the internal processes for identifying, managing, and resolving Type 6 defects in accordance with the Change Control Process. BellSouth has trained internal personnel on this process and provided them with both the Type 6 Defect Notification Process documentation and the relevant job aid End-To-End Process and Type 6 Job Aid. KPMG Consulting reviewed this documentation and found that it explains the roles and responsibilities for initiating and validating defects. KPMG Consulting closed Exception 123. As a result, KPMG Consulting has found that the BellSouth Change Management Process responsibilities and activities are defined.
PPR1-2	The change management process is in place and documented.	Satisfied	The change management process is in place and documented. KPMG Consulting conducted interviews with the Change Control Team, Change Review Board (CRB), and the Release Management Team. KPMG Consulting conducted an interview with the Change Control Team on June 12, 2000. KPMG Consulting found that the CCP was in place and documented in the Change Control Process, Version 1.5. KPMG Consulting also conducted interviews with the CRB on October 18, 2000 and April 26, 2001. KPMG Consulting found that CRB process was in place and documented in the BellSouth End-to-End Process Flow, Version 1.0. KPMG Consulting conducted an interview with the Release Management Team on April 26 2001. KPMG Consulting found that portions of the release management process were neither in place nor documented. As a result, KPMG Consulting issued Exception 106. KPMG Consulting conducted a refresh interview with the Change Control Team on October 8, 2001. KPMG Consulting was able to verify that the Change Control Process, Version 3.1, was documented and implemented. KPMG Consulting conducted a refresh interview

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Test Reference	Evaluation Criteria	Result	Comments
			with the CRB on October 11, 2001. KPMG Consulting confirmed that the CRB continued to follow the previously reviewed processes and verified the processes remained in place and are documented in the BellSouth End-to-End-Process Flow, Version 1.0.
			KPMG Consulting conducted a refresh interview with the Release Management Team on October 9, 2001. KPMG Consulting confirmed that the Release Management Team continued to follow the previously reviewed processes and found portions of the process were neither in place nor documented.
			BellSouth provided KPMG Consulting with additional documentation explaining the procedures for release development. KPMG Consulting reviewed the documentation and found that the portion of the release process at issue in Exception 106 was in place and documented. KPMG Consulting closed Exception 106.
			KPMG Consulting reviewed the following:
			♦ Correspondence between the ALECs and the BellSouth Change Control Team;
			♦ Change Requests; and
			♦ Carrier Notifications.
			KPMG Consulting also regularly attended the following:
			♦ CCP Monthly Status Meetings;
			♦ Prioritization Meetings;
			♦ Process Improvement Meetings; and
			♦ User Requirements Meetings.
			KPMG Consulting's analysis of BellSouth Change Request website found that BellSouth was not classifying Change Requests as defects (Type 6) in accordance with the BellSouth definition of a defect. KPMG Consulting identified issues that were either incorrectly classified as features (Types 2, 4 or 5) or were not initiated in any change request. Therefore BellSouth was not providing documentation of system defects. As a result, KPMG Consulting issued Exception 123.

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Test Reference	Evaluation Criteria	Result	Comments
			BellSouth responded that the defects had been identified, but BellSouth had failed to initiate Change Requests in the CCP for each issue. BellSouth provided documentation entitled Type 6 Defect Notification Process as well as a job aid, which describes the internal processes for identifying, managing, and resolving Type 6 defects in accordance with the Change Control Process. BellSouth has trained internal personnel on this process and provided them with both the Type 6 Defect Notification Process documentation and the relevant job aid End-To-End Process and Type 6 Job Aid.
			KPMG Consulting reviewed this documentation and found that the defect process is in place and documented. KPMG Consulting closed Exception 123.
			Through review of documentation produced by the Change Control Team and attendance at CCP meetings, KPMG Consulting was able to verify that the change management process is in place as documented in the Change Control Process, Version 3.1
PPR1-3	The change management process has a framework to evaluate, categorize, and prioritize proposed changes.	Not Satisfied	The change management process does not have a complete framework to evaluate, categorize and prioritize Change Requests. KPMG Consulting conducted interviews with the Change Control Team, Change Review Board, and the Release Management Team.
			During an interview with the Change Control Team on June 12, 2000, KPMG Consulting found that the change management process for evaluating, categorizing and prioritizing Change Requests was defined in the Change Control Process, Version 1.5.
			KPMG Consulting also conducted interviews with the CRB on October 18, 2000 and April 26, 2001. KPMG Consulting found that the CRB process had a framework for evaluation and categorization of Change Requests. The CRB has no role in the prioritization process. KPMG Consulting reviewed the BellSouth End-to-End Process Flow, Version 1.0, to ensure that the CRB process for evaluating and categorizing Change Requests was included.
			KPMG Consulting conducted an interview with the Release Management Team April 26, 2001.

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Test Reference	Evaluation Criteria	Result	Comments
			KPMG Consulting found that portions of the release management process did not provide a framework for the evaluation, categorization, and prioritization of Change Requests that allowed ALECs the ability to prioritize, assess the impact of, and plan resources for all Change Requests affecting the ALEC community. As a result, KPMG Consulting issued Exception 88.
			KPMG Consulting conducted a refresh interview with the Change Control Team October 8, 2001. KPMG Consulting verified that the Change Control Process, Version 3.1, was implemented and provided a framework for the evaluation, categorization, and prioritization of Change Requests.
			KPMG Consulting conducted a refresh interview with the CRB on October 11, 2001. KPMG Consulting confirmed that the CRB followed the previously reviewed process and provided a framework for the evaluation and categorization of Change Requests. This process is documented in the BellSouth End-to-End Process Flow, Version 1.0.
			KPMG Consulting conducted a refresh interview with the Release Management Team on October 9, 2001. KPMG Consulting confirmed that the Release Management Team continued to follow the previously reviewed processes and verified that the framework for the evaluation, categorization, and prioritization of Change Requests did not provide ALECs with the ability to prioritize, assess the impact of, and plan resources for all Change Requests affecting the ALEC community.
			On May 1, 2002, BellSouth provided a response to Second Amended Exception 88. The response proposed that BellSouth would implement a new Change Control Prioritization Process. The proposal stated that BellSouth would implement all Type 2 and Type 6 Change Requests as the highest priority in all future releases. The proposal further stated that BellSouth would use the remaining release capacity, after Type 2 and 6 Change Requests had been scheduled, to schedule Type 3, 4 and 5 Change Requests. The proposal stated that this remaining capacity would be split equally between BellSouth and ALECs with ALECs receiving half of the remaining releases

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Test Reference	Evaluation Criteria	Result	Comments
			in which to prioritize and implement Change Requests. BellSouth would repeat this process with the other half of the remaining releases.
			On June 10, 2002, BellSouth provided a draft of the End-To-End Process Flow, Version 2.1. KPMG Consulting reviewed the documentation and conducted an interview regarding this process with BellSouth on June 11, 2002. KPMG Consulting found that the BellSouth proposed prioritization process, along with the draft End-To-End Process Flow, Version 2.1, if implemented as described, would provide ALECs with a process to conduct mutual impact assessment and resource planning. Further, the process would allow ALECs a framework to evaluate, categorize, and prioritize Change Request that effect them. As this proposal has not yet been implemented and KPMG Consulting has therefore not had an opportunity to review it in operation, Exception 88 remains open.
PPR1-4	The change management process includes procedures for allowing input from all interested parties.	Not Satisfied	The change management process does not have a procedure to allow input from all interested parties. KPMG Consulting interviewed the Change Control and Release Management teams.
			During an interview with the Change Control Team on June 12, 2000, KPMG Consulting found that the change management process allowed ALECs to provide input on Change Requests via the Change Control Process, Version 1.5.
			KPMG Consulting conducted an interview with the Release Management Team on April 26, 2001 and found that portions of the release management process did not allow ALECs to provide input into all Change Requests. Specifically, the process did not provide ALECs with the ability to prioritize, assess the impact of, and plan resources for all Change Requests affecting the ALEC community. KPMG Consulting issued Exception 88.
			KPMG Consulting conducted a refresh interview with the Change Control Team on October 8, 2001 and was able to verify that the Change Control Process, Version 3.1, was implemented and provided ALECs the opportunity to provide input on Change Requests.
			KPMG Consulting conducted a refresh interview with the Release Management Team on October

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Test Reference	Evaluation Criteria	Result	Comments
			9, 2001 and confirmed that the Release Management Team continued to follow the previously reviewed processes and verified that a framework for ALECs to provide input to the internal change management process did not exist.
			On May 1, 2002, BellSouth provided a response to Second Amended Exception 88. The response proposed that BellSouth would implement a new Change Control Prioritization Process. The proposal stated that BellSouth would implement all Type 2 and Type 6 Change Requests as the highest priority in all future releases. The proposal further stated that BellSouth would use the remaining release capacity, after Type 2 and 6 Change Requests had been scheduled, to schedule Type 3, 4 and 5 Change Requests. The proposal stated that this remaining capacity would be split equally between BellSouth and ALECs with ALECs receiving half of the remaining releases in which to prioritize and implement Change Requests. BellSouth would repeat this process with the other half of the remaining releases.
			On June 10, 2002, BellSouth provided a draft of the End-To-End Process Flow, Version 2.1. KPMG Consulting reviewed the documentation and conducted an interview regarding this process with BellSouth on June 11, 2002. KPMG Consulting found that the BellSouth proposed prioritization process along with the draft End-To-End Process Flow, Version 2.1, if implemented as described, would provide ALECs with a process to prioritize, assess the impact of, and plan resources for all Change Requests affecting the ALEC community. As this proposal has not yet been implemented and KPMG Consulting has therefore not had an opportunity to review it in operation, Exception 88 remains open.
PPR1-5	The change management process has defined intervals for considering and notifying customers about proposed changes.	Satisfied	The change management process has defined intervals for considering and notifying customers about proposed changes as defined in the Change Control Process, Version 3.1.

During an interview conducted with the Change Control Team on June 12, 2000, KPMG Consulting found that the change management process had defined intervals for most steps in the Change Control Process, Version 1.5. |

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Test Reference	Evaluation Criteria	Result	Comments
			KPMG Consulting conducted a refresh interview with the Change Control Team on October 8, 2001. KPMG Consulting was able to verify that the Change Control Process, Version 3.1, was implemented and included defined intervals for considering and notifying ALECs of Change Requests.
PPR1-6	Documentation regarding proposed changes is distributed on a timely basis.	Satisfied	The change management process does not provide documentation of proposed changes on a timely basis.

KPMG Consulting conducted a review of the BellSouth Carrier Notification Website beginning in May 2000. KPMG Consulting found that documentation of proposed changes was not provided on a timely basis as defined by the Change Control Process, Version 1.5. KPMG Consulting issued Exception 5.

BellSouth responded that KPMG Consulting had misclassified the types of notification provided and, therefore, applied the incorrect interval standard. KPMG Consulting agreed that an inappropriate standard was applied, but noted deficiencies in the Carrier Notification and Documentation defect processes. As a result, KPMG Consulting closed Exception 5 and issued Exception 23 and Exception 26.

BellSouth updated the Change Control Process and published Version 2.3 on May 18, 2001. The updated version defined and documented the procedures for correcting and providing notification of documentation defects. As a result, KPMG Consulting closed Exception 26.

BellSouth updated the Change Control Process and published Version 2.5 on June 18, 2001. The updated version defined and documented the Carrier Notification procedures. As a result, KPMG Consulting closed Exception 23.

During further analysis of the BellSouth procedures for notifying ALECs of proposed changes, KPMG Consulting found that BellSouth did not provide notification of System Outages (Type 1 Changes) in accordance with the Change Control Process, Version 2.0. As a result, KPMG Consulting issued Exception 12.

KPMG Consulting conducted a retest from March 12 through April 27, 2001 of Exception 12 and found that BellSouth failed to provide notification |

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Test Reference	Evaluation Criteria	Result	Comments
			in accordance with the Change Control Process, Version 2.2. KPMG Consulting issued Amended Exception 12.
			KPMG Consulting conducted a second retest on October 22 through December 10, 2001 of Exception 12 and confirmed that BellSouth provides notification in accordance with the Change Control Process, Version 3.1. As a result, KPMG Consulting closed Exception 12.
			KPMG Consulting's analysis of BellSouth Change Request website found that BellSouth was not classifying Change Requests as defects (Type 6) in accordance with the BellSouth definition of a defect. KPMG Consulting identified issues that were either incorrectly classified as features (Types 2, 4 or 5) or were not initiated in any change request. Therefore BellSouth was not providing documentation of system defects. As a result, KPMG Consulting issued Exception 123.
			BellSouth responded that the defects had been identified, but BellSouth had failed to initiate Change Requests in the CCP for each issue. BellSouth provided documentation entitled Type 6 Defect Notification Process as well as a job aid that describes the internal processes for identifying, managing, and resolving Type 6 defects in accordance with the Change Control Process. BellSouth has trained internal personnel on this process and provided them with both the Type 6 Defect Notification Process documentation and the relevant job aid, End-To-End Process and Type 6 Job Aid.
			KPMG Consulting conducted a retest to ensure Type 6 defects are now initiated in accordance with the Change Control Process Version 3.1 and internal procedures. The retest reviewed defects initiated from June 2, 2002 through July 22, 2002. During the retest Bellsouth initiated 30 Type 6 Change Requests. KPMG Consulting found that the Type 6 Change Requests reviewed during the retest were initiated in accordance with the Change Control Process and internal procedures. KPMG Consulting closed Exception 123.
			KPMG Consulting continued to review the BellSouth website to ensure that notification and documentation of System Impacting Changes are

Test Reference	Evaluation Criteria	Result	Comments
			provided in a timely manner. KPMG Consulting identified additional instances of BellSouth's failure to provide timely notification and documentation of system impacting changes. As a result, KPMG Consulting issued Exception 155.
			BellSouth stated in their response to Exception 155 that some documentation referenced in Exception 155 had not been provided in accordance with the intervals defined by the Change Control Process. KPMG Consulting conducted a retest by reviewing the documentation associated with release 10.5, 10.6, and 11.0. KPMG Consulting found that the documentation associated with these releases had been provided in accordance with the Change Control Process and in a timely manner. As a result, KPMG Consulting closed Exception 155.
PPR1-7	Procedures and systems are in place to track information such as descriptions of proposed changes, key notification dates, and change status.	Satisfied	The Change Control Process, Version 1.5, includes procedures to track Change Requests from initiation to implementation. Tracking information is available on the Change Control Process website.
			During an interview with the Change Control Team conducted on June 12, 2000, KPMG Consulting found that the change management process has procedures to track and provide status of Change Requests to all interested parties.
			The procedures for tracking Change Requests are located in the Change Control Process, Version 1.5, as well as on the change management website. KPMG Consulting reviewed the tracking mechanisms available on the Change Control Process website.
			KPMG Consulting conducted a refresh interview with the Change Control Team on October 8, 2001. KPMG Consulting was able to verify that the Change Control Process, Version 3.1, was implemented with procedures to track Change Requests. KPMG Consulting verified that the tracking information is available and accurate on the Change Control Process website.
PPR1-8	Criteria are defined for prioritizing and assigning severity codes to Change	Not Satisfied	While the change management process does have criteria for prioritization and assigning severity codes to Change Requests, the criteria does not

Test Reference	Evaluation Criteria	Result	Comments
	severity codes to Change Requests[12].		codes to Change Requests, the criteria does not allow ALECs to prioritize, assess the impact of, and plan resources for all Change Requests affecting the ALEC community.
			During an interview conducted with the Change Control Team on June 12, 2000, KPMG Consulting found that the change management process had criteria for prioritization and severity coding in the Change Control Process, Version 1.5.
			During an interview with the Release Management Team on April 26, 2001, KPMG Consulting found that the existing criteria for portions of the release management process did not allow ALECs to assess the impact of, and plan resources for all Change Requests affecting the ALEC community. As a result, KPMG Consulting issued Exception 88.
			KPMG Consulting conducted a refresh interview with the Change Control Team on October 8, 2001. KPMG Consulting verified that the Change Control Process, Version 3.1, was implemented and had criteria for prioritization and severity coding on Change Requests.
			KPMG Consulting conducted a refresh interview with the Release Management Team on October 9, 2001. KPMG Consulting found that the Release Management Team had undergone no changes and still operated using the existing criteria for prioritization and severity coding.
			On May 1, 2002, BellSouth provided a response to Second Amended Exception 88. The response proposed that BellSouth would implement a new Change Control Prioritization Process. The proposal stated that BellSouth would implement all Type 2 and Type 6 Change Requests as the highest priority in all future releases. The proposal further stated that BellSouth would use the remaining release capacity, after Type 2 and 6 Change Requests had been scheduled, to schedule Type 3, 4 and 5 Change Requests. The proposal stated that this remaining capacity would be split equally between BellSouth and ALECs with ALECs receiving half of the remaining releases

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[12]Defined as a process or set of processes for determining the order in which Change Requests will be implemented based on each Change Requests relative importance.

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Test Reference	Evaluation Criteria	Result	Comments
			in which to prioritize and implement Change Requests. BellSouth would repeat this process with the other half of the remaining releases.
			On June 10, 2002, BellSouth provided a draft of the End-To-End Process Flow, Version 2.1. KPMG Consulting reviewed the documentation and conducted an interview regarding this process with BellSouth on June 11, 2002. KPMG Consulting found that the BellSouth proposed prioritization process along with the draft End-To-End Process Flow, Version 2.1, if implemented as described, would provide ALECs with criteria to prioritize, assess the impact of, and plan resources for all Change Requests affecting the ALEC community. As this proposal has not yet been implemented and KPMG Consulting has therefore not had an opportunity to review it in operation, Exception 88 remains open.

5.0   Parity Evaluation

A parity evaluation was not required for this test.

6.0   Final Summary

This section summarizes the number of test evaluation criteria discussed above and the number that was satisfied or not satisfied at the conclusion of this test.

6.1   Summary of Findings

There were eight evaluation criteria considered for the Change Management Practices Verification and Validation (PPR1) test. Five evaluation criteria received a satisfied result. Three evaluation criteria received a not satisfied result.

Due to the not satisfied evaluation criteria (PPR1-3, PPR1-4, and PPR1-8), it is KPMG Consulting's opinion that significant issues remain unresolved in the PPR1 testing area.

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B. Test Results: Account Establishment and Management Process Verification and Validation Review (PPR2)

1.0 Description

The Account Establishment and Management Process Verification and Validation Review (PPR2) evaluated key aspects of BellSouth's policies and practices for establishing and managing account relationships with Alternate Local Exchange Carrier (ALEC) and Resale customers. The objective of this test was to determine the adequacy, completeness, and compliance with procedures for developing, publicizing, conducting, and monitoring account establishment and management activities. Interviews, documentation reviews, and comparisons were conducted to evaluate BellSouth's account establishment and management program. Additionally, the BellSouth ALEC Account Establishment and Management process was compared with retail practices for parity, to the extent that specific retail analogs were identified.

2.0 Business Process

This section describes BellSouth's account establishment and management process.

2.1 Business Process Description

The BellSouth Pre-Sale Quality Team (PQT)/Advisory Team[13] is responsible for the account establishment process. ALECs seeking to establish an account with BellSouth are directed to the PQT/Advisory Team via a toll free telephone number, the BellSouth website, or by referral from another BellSouth group. The PQT/Advisory Team provides ALECs with information related to the establishment of an account and also acts as the interface between BellSouth and ALECs during the account establishment process.

The PQT/Advisory Team provides an electronic brochure[14] that explains the account establishment process as well as the steps required to become an ALEC in the BellSouth region. Included in the brochure are a sample contract and details of the steps necessary for initiating a wholesale contract with BellSouth. Once a contract is signed, the PQT/Advisory Team sends the ALEC a start-up guide binder that includes a checklist that details the items that must be completed by the ALEC. The binder includes a master account application, a credit profile, and applications for obtaining Local Exchange Navigation System (LENS) access, Operating Company Numbers (OCNs) and Access Customer Name Abbreviation (ACNA) codes. The information provided to the ALEC is customized based on the ALEC's service offerings. The PQT/Advisory Team reviews this start-up binder with the ALEC and maintains an active file for each ALEC until the account establishment package is complete.

When the ALEC completes the requirements listed above the PQT/Advisory Team works with the Local Carrier Service Center (LCSC) to establish a Q account, or Master Account, for the ALEC. Once a Q account is established, the PQT/Advisory Team forwards the ALEC's file to the Sales Director and the Sales Support Director. The Sales Director and Sales Support Director review the ALECs file and determine which Account Team, if applicable, and CLEC Care Team will be assigned. The PQT/Advisory Team then notifies the ALEC of the CLEC Care Team

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[13] The PQT was renamed the Advisory Team on January 1, 2002. The responsibilities for Account Establishment did not change as a result. The group will be referred to as the "PQT/Advisory Team" for the purposes of this report.
[14] http://www.interconnection.bellsouth.com/become_a_clec/html/set_up.html

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assignment and, if applicable, the Account Team assignment. The ALEC is directed to begin contacting its assigned CLEC Care Team and / or its Account Team for all future issues.

The Account Team, if one is assigned, and the CLEC Care Team conduct an initial meeting with each newly assigned ALEC. During the initial meeting, the Account Team and the CLEC Care explain their respective roles and responsibilities to the ALEC. In addition, the Account Team/CLEC Care Team and the ALEC negotiate the procedures used for both normal and urgent communication. For example, agreeing to communicate via email under normal circumstances, but to send a page in the event of an urgent matter. The Account Team/CLEC Care Team also stresses the importance of reading Carrier Notifications posted to the BellSouth interconnection website. These notifications provide general information to wholesale customers.

During the initial meeting, new ALECs are also provided with contact information for the various BellSouth support organizations (e.g. LCSC, Performance Measurements Analysis Platform CLEC Interface Group (PMAP CIG) or Electronic Communications (EC) Support Group). Escalation procedures related to the Account Team/CLEC Care Team as well as the BellSouth organizations with which ALECs interact are also provided. Escalation information is also provided via the BellSouth interconnection website.

The BellSouth Account Team and CLEC Care Team are responsible for ongoing account management of an ALEC account. The CLEC Care Team includes a Sales Support Director, a Local Contract Manager, and a Local Support Manager. Local Support Managers may support customers from a pooled resource group or be assigned to specific customers. Pooled Local Support Managers are contacted via a toll free telephone number[15]. The CLEC Care Team is responsible for providing support to ALECs prior to the issuance of orders and pre-orders for simple resale and Unbundled Network Elements (UNE) products. This support is focused on both helping ALECs understand business rules and also in reviewing issues and concerns related to an ALEC's interconnection with BellSouth. When an ALEC brings an issue to the CLEC Care Team, the CLEC Care Team is responsible for either resolving the ALEC's issue or facilitating its resolution. Issue resolution may require the CLEC Care Team to work with internal BellSouth groups (e.g. ordering and pre-order subject matter experts (SMEs), Billing Team, PMAP Team, and contract negotiators). The CLEC Care Team has methods and procedures that detail the processes used to manage issues that must be worked by internal BellSouth groups. These methods and procedures include processes for issue intake, contact information for all applicable internal BellSouth groups, and procedures for issue tracking.

In certain cases, the CLEC Care Team may refer an ALEC directly to a BellSouth center for resolution of an issue. For example, questions regarding the processing of a Local Service Request (LSR) may be directed to the LCSC or the Customer Support Manager (CSM) while issues with PMAP report content may be best directed to the PMAP group.

An Account Team is assigned to support those ALECs that purchase (or expect to purchase) premium and complex resale products. Account Team support typically involves sales oriented activities focused on identifying and developing business solutions that incorporate the use of these products. Examples of premium products include access related products, wireless transport, and Advanced Intelligent Network (AIN) services. Examples of complex resale products include ISDN, Frame Relay, and Centrex. The Account Team is comprised of an

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[15] Determination of whether or not an ALEC is assigned to a Local Support Manager (LSM) or the pool of Local Support Mangers is based on certain requirements preset by BellSouth. ALECs that meet the requirements will be assigned to a specific LSM.

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Account Manager, a Network Sales Engineer, and an Industrial Specialist. Only ALECs that order access and complex resale products will be assigned to an Account Team. The Account Team is also provided methods and procedures for issue resolution in the event ALEC inquiries require consultation with internal BellSouth groups. These procedures are identical to those provided to the CLEC Care Team described above.

Both the Account Team and CLEC Care Team may be required to have written responses to ALEC inquires reviewed by the BellSouth External Response Team (ERT). The ERT is responsible for ensuring that responses provided to ALECs are accurate and written in a professional manner. The Account Team and CLEC Care Team are provided with methods and procedures for determining which issues must be reviewed by the ERT and processes for providing the ERT with the necessary materials to complete its review.

The BellSouth Account Team and CLEC Care Team are evaluated semi–annually based on preset revenue targets and customer feedback. Customer feedback is received through customer report cards. The Account Team/CLEC Care Team chooses the ALECs from which to request feedback. In addition, the number of escalations for each Account Team/CLEC Care Team is taken into consideration. The combination of these factors is used to complete employee evaluations for the Account Team and CLEC Care Team.

3.0   Methodology

This section summarizes the test methodology.

3.1   Scenarios

Scenarios were not applicable to this test.

3.2   Test Targets and Measures

The test target was BellSouth policies and practices for establishing and managing ALEC account relationships. Account establishment and management activities, such as requests for Account Manager assistance, are included in the scope of this test. The Account Establishment and Management Process Verification and Validation Review (PPR2) included the following processes and sub-processes:

♦ Establishing an account relationship with specific attention to staffing;

♦ Maintaining an account relationship;

  ♦ Customer contact;

  ♦ Intervals;

  ♦ Escalation;

  ♦ Routine and urgent customer communication;

  ♦ Customer documentation; and

  ♦ Account and capacity management process.

3.3   Data Sources

The data collected for the Account Establishment and Management Process Verification and Validation Review (PPR2) included the following:

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♦ Interviews with personnel from the BellSouth Account Team and CLEC Care Team;

♦ Interviews with personnel from the BellSouth PQT/Advisory Team;

♦ Interviews with personnel from the ALEC's who routinely interact with the Account Team and CLEC Care Team.

♦ The BellSouth Start-Up Guide[16];

♦ The BellSouth Account Team/CLEC Care Team Methods and Procedures – Account Team Information Package; and

♦ Observations of interaction between the KPMG Consulting Pseudo-ALEC and the BellSouth Account Team and CLEC Care Team.

3.4   Data Generation/Volumes

This test did not rely on data generation or volume testing.

3.5   Evaluation and Analysis Methods

KPMG Consulting's review relied upon documentation review and interviews with members of the BellSouth Account Team, the CLEC Care Team, and the PQT/Advisory Team. Summaries of the information gathered during the interviews with the Account Team, CLEC Care Team, and the PQT/Advisory Team were provided to BellSouth to verify the accuracy of the information documented. KPMG Consulting then analyzed the data against the evaluation measures established for the test.

The Account Establishment and Management Process Verification and Validation Review (PPR2) included a checklist of evaluation criteria developed by KPMG Consulting during the initial phase of the BellSouth OSS Evaluation. These evaluation criteria provided the framework of norms, standards, and guidelines for the Account Establishment and Management Process Verification and Validation Review (PPR2).

The data collected were analyzed employing the evaluation criteria detailed in Section 4.1 below.

4.0   Results

This section contains the overall test results.

4.1   Results Summary

The number of exceptions and observations issued during the life of the test is depicted in Table 2-1. For additional exception and observation information, refer to Appendices D and E, respectively. The test criteria and results are presented in Table 2-2.

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[16]http://www.interconnection.bellsouth.com/guides/activation/pdf/startup5.pdf

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Table 2-1: Exception and Observation Count

Activity	Exceptions	Observations
Total Issued	5	4
Total Disposed of as of Final Report Date	5	4
Total Remaining Open as of Final Report Date	0	0

Table 2-2: PPR2 Evaluation Criteria and Results

Test Reference	Evaluation Criteria	Result	Comments
PPR2-1	Account establishment and management responsibilities and activities are defined.	Satisfied	BellSouth has defined responsibilities for account establishment and management as documented in the Account Team/CLEC Care Team Information Package – Account Team Methods and Procedures, Version 10.
			KPMG Consulting conducted initial interviews with the Account Team on June 29, 2000 and the PQT/Advisory Team on August 15, 2000 to review account establishment and management process responsibilities and activities.
			KPMG Consulting's initial review found that BellSouth did not have defined procedures and activities for the Account Team. As a result, KPMG Consulting issued Exception 4.
			BellSouth provided KPMG Consulting with the Account Team Information Package –Account Team Methods and Procedures, Version 3, and the Account Team Rules of Engagement, Version 1. KPMG Consulting reviewed the documentation and found that it defined the responsibilities and activities of the Account Management team. KPMG Consulting closed Exception 4.
			KPMG Consulting found that BellSouth did not have a defined process for addressing ALEC issues related to collocation. As a result, KPMG Consulting issued Exception 65.
			BellSouth updated the Account Team Information Package – Account Team Methods and Procedures, Version 7 to include a process for addressing ALEC issues related to collocation. In addition, BellSouth provided the Account Team Regional Collocation Center – Account Team Regional Collocation Coordinator Procedures and the Transfer of Collocation Ownership Procedures. KPMG Consulting reviewed the documentation and found that it

Test Reference	Evaluation Criteria	Result	Comments
			defined the Account Team's responsibilities in the collocation process. KPMG Consulting closed Exception 65.
			KPMG Consulting found that BellSouth did not have a defined process for addressing ALEC billing related inquiries. As a result, KPMG Consulting issued Exception 67.
			BellSouth updated the Account Team Information Package – Account Team Methods and Procedures, Version 7 to include a process for addressing ALEC billing inquiries. An updated version of the CLEC Billing Guide, dated August 29, 2001, was posted to the BellSouth interconnection website. KPMG Consulting reviewed the documentation and found that it defined the Account Team's responsibilities and actions for resolving ALEC billing inquiries. KPMG Consulting closed Exception 67.
			KPMG Consulting also found that BellSouth did not have a defined process for addressing ALEC inquiries related to BellSouth published metrics. As a result, KPMG Consulting issued Exception 95.
			BellSouth updated the Account Team Information Package – Account Team Methods and Procedures, Version 8 with a process for addressing ALEC inquiries related to BellSouth published metrics. In addition, BellSouth provided Performance Measurement Analysis Platform (PMAP) Procedures, CLEC Interface Group (CIG) Information Package, Version 1. KPMG Consulting reviewed the documentation and found that it defined the Account Team's responsibilities and actions for resolving ALEC metrics inquiries. KPMG Consulting closed Exception 95.
			KPMG Consulting conducted additional interviews with the Account Team and the PQT/Advisory Team on October 16, 2001. KPMG Consulting verified that the process responsibilities and activities documented in the Account Team Information Package – Account Team Methods and Procedures, Version 8 were in place.
			On January 4, 2002, BellSouth announced changes to the BellSouth Account Team structure. This change resulted in the formation

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Test Reference	Evaluation Criteria	Result	Comments
			of the CLEC Care Team. KPMG Consulting reviewed the updated Account Team/CLEC Care Team Information Package - Account Team Methods and Procedures, Version 9, and conducted new interviews with the Account Team and CLEC Care Team.
			KPMG Consulting found that neither the Account Team nor the CLEC Care Team had defined procedures for handling ordering issues. As a result, KPMG Consulting issued Exception 148.
			BellSouth updated the Account Team/CLEC Care Team Information Package – Account Team Methods and Procedures, Version 10 to include procedures for handling ordering issues. KPMG Consulting reviewed the documentation and found that it defined both the Account Team and CLEC Care Team's role in handling ALEC ordering issues. KPMG Consulting found that the BellSouth Account Management responsibilities were documented and in place and closed Exception 148.
PPR2-2	Account management staff is organized to provide account coverage.	Satisfied	The BellSouth Account Team, CLEC Care Team, and PQT/Advisory Team are organized to provide account coverage as documented in the Account Team/CLEC Care Team Information Package – Account Team Methods and Procedures, Version 10.
			KPMG Consulting conducted initial interviews with the Account Team on June 29, 2000 and the PQT/Advisory Team on August 15, 2002 and determined that the Account Team, CLEC Care Team, and PQT/Advisory Team are organized to provide account coverage.
			KPMG Consulting reviewed the Account Team Information Package – Account Team Methods and Procedures, Version 10. This document explains the BellSouth organization structure and account coverage.
			KPMG Consulting conducted additional interviews with the Account Team and the PQT/Advisory Team on October 16, 2001. KPMG Consulting verified that the BellSouth account establishment and management staffs were organized to provide account coverage.
			On January 4, 2002, BellSouth announced changes to the BellSouth Account Team structure. This change resulted in the formation

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Test Reference	Evaluation Criteria	Result	Comments
			of the CLEC Care Team. KPMG Consulting reviewed the new Account Team/CLEC Care Team Information Package - Account Team Methods and Procedures, Version 10 and conducted interviews with both the Account Team and the CLEC Care Team representatives on March 12, 2002 and March 14, 2002, respectively.
			KPMG Consulting's review of the Account Team/CLEC Care Team documentation as well as the interviews conducted confirmed that the BellSouth Account Management staff is organized to provide account coverage.
			KPMG Consulting also observed account coverage between KPMG Consulting's pseudo-ALEC and the BellSouth Account Team and CLEC Care Team and found that the BellSouth Account Management staff was organized to provide account coverage.
PPR2-3	A description of the account establishment and management process is documented.	Satisfied	BellSouth has a full description of the account establishment and management process documented.
			KPMG Consulting reviewed the Account Team/CLEC Care Team Information Package – Account Team Methods and Procedures, Version 10, and The ALEC Start-Up Guide, Version 1.5 and discovered that a description of the account establishment and management process was not fully documented.
			KPMG Consulting's initial review found that BellSouth did not have documentation of account management and establishment procedures. As a result, KPMG Consulting issued Exception 4.
			BellSouth provided KPMG Consulting with the Account Team Information Package – Account Team Methods and Procedures, Version 3 and the Account Team Rules of Engagement, Version 1. KPMG Consulting reviewed the documentation and found that it described the account establishment and management process. KPMG Consulting closed Exception 4.
			KPMG Consulting found that BellSouth did not have documentation for the process for addressing ALEC issues related to collocation. As a result, KPMG Consulting issued Exception 65.
			BellSouth updated the Account Team

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Test Reference	Evaluation Criteria	Result	Comments
			Information Package – Account Team Methods and Procedures, Version 7 to include a process for addressing ALEC issues related to collocation. BellSouth also provided KPMG Consulting with the Account Team Regional Collocation Center – Account Team Regional Collocation Coordinator Procedures and the Transfer of Collocation Ownership Procedures. KPMG Consulting reviewed the documentation and found that it described the Account Team's responsibilities in the collocation process. KPMG Consulting closed Exception 65.
			KPMG Consulting found that BellSouth did not have documentation of the process for addressing ALEC billing related inquiries. As a result, KPMG Consulting issued Exception 67.
			BellSouth updated the Account Team/CLEC Care Team Information Package – Account Team Methods and Procedures, Version 7 to include a process for addressing ALEC billing related inquiries and posted an updated version of the CLEC Billing Guide on the BellSouth interconnection website. KPMG Consulting reviewed the documentation and found that it described the Account Team's role in resolving ALEC billing inquiries. KPMG Consulting closed Exception 67.
			KPMG Consulting found that BellSouth did not have documentation of the process for addressing ALEC inquiries related to BellSouth published metrics. As a result KPMG Consulting issued Exception 95.
			BellSouth updated the Account Team Information Package – Account Team Methods and Procedures, Version 8 to include a process for addressing ALEC inquiries related to BellSouth published metrics. BellSouth also provided KPMG Consulting with Performance Measurement Analysis Platform (PMAP) Procedures and CLEC Interface Group (CIG) Information Package, Version 1. KPMG Consulting reviewed the documentation and found that it described the Account Team's role in resolving ALEC metrics inquiries. KPMG Consulting closed Exception 95.
			KPMG Consulting conducted additional interviews with the Account Team and the PQT/Advisory Team on October 16, 2001.

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Test Reference	Evaluation Criteria	Result	Comments
			KPMG Consulting verified that the account establishment and management processes, documented in the Account Team Information Package – Account Team Methods and Procedures, Version 8 were in place.
			On January 4, 2002, BellSouth announced changes to the BellSouth Account Team structure. This change resulted in the formation of the CLEC Care Team. KPMG Consulting reviewed the updated Account Team/CLEC Care Team Information Package - Account Team Methods and Procedures, Version 9.
			KPMG Consulting found that neither the Account Team nor the CLEC Care Team had documented procedures for handling ordering issues. As a result, KPMG Consulting issued Exception 148.
			BellSouth updated the Account Team Information Package – Account Team Methods and Procedures, Version 10 to include procedures for handling ordering issues. KPMG Consulting reviewed the documentation and found that it defined the Account Team and CLEC Care Team's role in handling ALEC ordering issues. KPMG Consulting closed Exception 148.
PPR2-4	Instructions for contacting Account Managers are defined and published.	Satisfied	BellSouth has defined and published contact information for the account management and establishment staff. Initial contact information for the PQT/Advisory Team is published on the BellSouth interconnection website. Once the ALEC completes the interconnection process, the ALEC is assigned to an Account Team and CLEC Care Team and provided with contact information.
			KPMG Consulting conducted interviews with the Account Team on June 29, 2000 and the PQT/Advisory Team on August 15, 2000 to review the process for contacting the PQT/Advisory Team and the Account Team.
			KPMG Consulting reviewed the Account Team/CLEC Care Team Information Package – Account Team Methods and Procedures, Version 10. The documentation explains how the Account Team instructs their customers to contact them and other BellSouth groups. The

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Test Reference	Evaluation Criteria	Result	Comments
			BellSouth website contains contact information for the PQT/Advisory Team[17].
			KPMG Consulting conducted additional interviews with the Account Team and the PQT/Advisory Team on October 16, 2001. KPMG Consulting verified that the processes for contacting the PQT/Advisory Team and the Account Team, documented in the Account Team Information Package – Account Team Methods and Procedures, Version 8 were in place.
			On January 4, 2002, BellSouth announced changes to the BellSouth Account Team structure. This change resulted in the formation of the CLEC Care Team. KPMG Consulting reviewed the updated Account Team/CLEC Care Team Information Package - Account Team Methods and Procedures, Version 10 and conducted interviews with the Account Team and CLEC Care Team on March 12, 2002 and March 14, 2002 respectively.
			During the new Account Team and CLEC Care Team interviews, review of updated Account Team/CLEC Care Team documentation, and review of the BellSouth website, KPMG Consulting verified that the processes for contacting the Account Team, CLEC Care Team, and PQT/Advisory Team are defined and published.
			KPMG Consulting observed the interaction between BellSouth Account Management Personnel and the KPMG Consulting pseudo-ALEC throughout the duration of the test. KPMG Consulting was able to verify through these observations that the processes used to contact the Account Team, CLEC Care Team, and Advisory functioned as documented. KPMG Consulting also held discussion with ALECs regarding their contact with the Account Team/CLEC Care Team.
PPR2-5	Procedures for receiving, managing and resolving customer inquiries are defined.	Satisfied	BellSouth has defined procedures for receiving, managing, and resolving customer inquiries as documented in the Account Team/CLEC Care Team Information Package – Account Team Methods and Procedures, Version 10.
			KPMG Consulting conducted interviews with the

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[17] http://www.interconnection.bellsouth.com/become_a_clec/index.html

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Test Reference	Evaluation Criteria	Result	Comments
			Account Team on June 29, 2000 regarding this process. KPMG Consulting's initial review found that BellSouth did not have defined procedures for receiving, managing, and resolving ALEC issues. As a result, KPMG Consulting issued Exception 4.
			BellSouth provided KPMG Consulting with the Account Team Information Package – Account Team Methods and Procedures, Version 3 and the Account Team Rules of Engagement, Version 1. KPMG Consulting reviewed the documentation and found that it defines the procedures for managing customer inquiries. KPMG Consulting closed Exception 4.
			Further review found that BellSouth did not have a defined process for managing ALEC issues related to collocation. As a result, KPMG Consulting issued Exception 65.
			BellSouth updated the Account Team Information Package – Account Team Methods and Procedures, Version 7 to include a process for managing ALEC issues related to collocation. BellSouth also provided KPMG Consulting with the Account Team Regional Collocation Center – Account Team Regional Collocation Coordinator Procedures and the Transfer of Collocation Ownership Procedures documents. KPMG Consulting reviewed the documentation and found that it defined the Account Team process for managing ALEC issues related to collocation. KPMG Consulting closed Exception 65.
			KPMG Consulting found that BellSouth did not have a defined process for managing ALEC billing related inquiries. As a result, KPMG Consulting issued Exception 67.
			BellSouth updated the Account Team Information Package – Account Team Methods and Procedures, Version 7 to include a process for managing ALEC billing inquiries as well as posted an updated version of the CLEC Billing Guide to the BellSouth interconnection website. KPMG Consulting reviewed the documentation and found that it defined the Account Team process for resolving ALEC billing inquiries. KPMG Consulting closed Exception 67.
			KPMG Consulting found that BellSouth did not have a defined process for managing ALEC inquiries related to BellSouth published metrics.

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Test Reference	Evaluation Criteria	Result	Comments
			As a result KPMG Consulting issued Exception 95.
			BellSouth updated the Account Team Information Package – Account Team Methods and Procedures, Version 8 to include a defined process for managing ALEC inquiries related to BellSouth published metrics. BellSouth also provided KPMG Consulting with PMAP procedures, (CIG) Information Package, Version 1. KPMG Consulting reviewed the documentation and found that it defined the Account Team process for resolving ALEC metrics issues. KPMG Consulting closed Exception 95.
			KPMG Consulting conducted additional interviews with the Account Team on October 16, 2001. KPMG Consulting verified that the processes for receiving, managing, and resolving customer inquiries, documented in the Account Team Information Package – Account Team Methods and Procedures, Version 8 were in place.
			On January 4, 2002, BellSouth announced changes to the BellSouth Account Team structure. This change resulted in the formation of the CLEC Care Team. KPMG Consulting reviewed the updated Account Team/CLEC Care Team Information Package - Account Team Methods and Procedures, Version 9 and conducted interviews with the Account Team and CLEC Care Team on March 12 2002, and March 14, 2002 respectively.
			KPMG Consulting found that neither the Account Team nor the CLEC Care Team had defined procedures for managing or resolving ordering issues. As a result, KPMG Consulting issued Exception 148.
			BellSouth updated the Account Team/CLEC Care Team Information Package – Account Team Methods and Procedures, Version 10 to include procedures for managing or resolving ordering issues. KPMG Consulting reviewed the documentation and found that it defined the Account Team's and CLEC Care Team's roles in managing and resolving ALEC ordering issues.
			As a result, KPMG Consulting found that BellSouth had defined procedures for managing and resolving customer inquiries and closed

Test Reference	Evaluation Criteria	Result	Comments
			Exception 148.
PPR2-6	Procedures for escalating time-sensitive and unresolved customer issues are defined.	Satisfied	BellSouth has procedures for escalating time-sensitive and unresolved customer issues documented in the Account Team/CLEC Care Team Information Package – Account Team Methods and Procedures, Version 10.
			KPMG Consulting conducted interviews with the Account Team on June 29, 2000 to review these procedures.
			KPMG Consulting's initial review found that BellSouth did not have procedures for escalating critical, time-sensitive, and unresolved customer inquiries. As a result, KPMG Consulting issued Exception 4.
			BellSouth provided KPMG Consulting with the Account Team Information Package – Account Team Methods and Procedures, Version 3 and the Account Team Rules of Engagement, Version 1. KPMG Consulting reviewed the documentation and found that it defines procedures for escalating critical, time-sensitive, and unresolved customer issues. KPMG Consulting closed Exception 4.
			KPMG Consulting conducted additional interviews with the Account Team on October 16, 2001. KPMG Consulting verified that the processes for escalating critical, time-sensitive, and unresolved customer issues, documented in the Account Team Information Package – Account Team Methods and Procedures, Version 8 were in place.
			KPMG Consulting reviewed the ERT processes including review of the Account Team/CLEC Care Team Information Package - Account Team Methods and Procedures, Version 10. KPMG Consulting found that the document provides the Account Team with direction on which issues to forward to ERT. The process also explains what information the Account Team/CLEC Care Team needs to provide to ERT in order to conduct its review.
			On January 4, 2002, BellSouth announced changes to the BellSouth Account Team structure. This change resulted in the formation of the CLEC Care Team. KPMG Consulting reviewed the updated Account Team/CLEC Care Team Information Package - Account Team Methods and Procedures, Version 10 and

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Test Reference	Evaluation Criteria	Result	Comments
			conducted interviews with the Account Team and CLEC Care Team on March 12, 2002 and March 14, 2002 respectively.
			During both the new Account Team and CLEC Care Team interviews and review of updated Account Team/CLEC Care Team documentation, KPMG Consulting verified that the procedures for escalating critical, time-sensitive, and unresolved customer issues were defined and published.
PPR2-7	Procedures for routine, regular communications to customers are defined.	Satisfied	BellSouth procedures for routine, regular communications to customers are defined in the Account Team/CLEC Care Team Information Package – Account Team Methods and Procedures, Version 10.
			KPMG Consulting conducted interviews with the Account Team on June 29, 2000 to review procedures for making routine, regular communications to customers.
			KPMG Consulting's initial review found that BellSouth did not have procedures for routine customer communications. As a result, KPMG Consulting issued Exception 4.
			BellSouth provided KPMG Consulting with the Account Team Information Package – Account Team Methods and Procedures, Version 3 and the Account Team Rules of Engagement, Version 1. KPMG Consulting reviewed the documentation and found that it defines the procedures for routine, regular communications with ALECs. KPMG Consulting closed Exception 4.
			KPMG Consulting conducted additional interviews with the Account Team on October 16, 2001. KPMG Consulting verified that the process for routine, regular communications to customers, documented in the Account Team Information Package – Account Team Methods and Procedures, Version 8 were in place.
			On January 4, 2002, BellSouth announced changes to the BellSouth Account Team structure. This change resulted in the formation of the CLEC Care Team. KPMG Consulting reviewed the updated Account Team/CLEC Care Team Information Package - Account Team Methods and Procedures, Version 10 and conducted interviews with the Account Team and CLEC Care Team on March 12, 2002 and March

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Test Reference	Evaluation Criteria	Result	Comments
			14, 2002 respectively.
			During the new Account Team and CLEC Care Team interviews and review of updated Account Team/CLEC Care Team documentation, KPMG Consulting verified that the procedures for regular communication with ALECs were defined.
PPR2-8	Procedures for emergency notifications and communications to customers are defined.	Satisfied	BellSouth has procedures for emergency notifications and communications to customers documented in the Account Team/CLEC Care Team Information – Account Team Methods and Procedures, Version 10.
			KPMG Consulting conducted interviews with the Account Team on June 29, 2000 to review these procedures.
			KPMG Consulting's initial review found that BellSouth did not have any of the procedures stated above. As a result, KPMG Consulting issued Exception 4.
			BellSouth provided KPMG Consulting with the Account Team Information Package – Account Team Methods and Procedures, Version 3 and the Account Team Rules of Engagement, Version 1. KPMG Consulting reviewed the documentation and found that it defines the account team emergency notification and communication. KPMG Consulting closed Exception 4.
			KPMG Consulting conducted additional interviews with the Account Team on October 16, 2001. KPMG Consulting verified that the process for emergency notifications and communications to customers, documented in the Account Team Information Package – Account Team Methods and Procedures, Version 8 were in place.
			On January 4, 2002, BellSouth announced changes to the BellSouth Account Team structure. This change resulted in the formation of an additional group known as the CLEC Care Team. KPMG Consulting reviewed the updated Account Team/CLEC Care Team Information Package - Account Team Methods and Procedures, Version 9 and conducted new interviews with the Account Team and CLEC Care Team on March 12, 2002 and March 14, 2002 respectively.
			During the new Account Team and CLEC Care

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Test Reference	Evaluation Criteria	Result	Comments
			Team interviews and review of updated Account Team/CLEC Care Team documentation, KPMG Consulting verified that the procedures for emergency communications with ALECs are defined.
PPR2-9	BellSouth has procedures for Account Manager coverage in the event that Account Managers are absent from the office for more than one day for vacations, illness, training and similar occurrences.	Satisfied	BellSouth has procedures for account coverage in the event that account team personnel are absent from the office documented in the Account Team/CLEC Care Team Information – Account Team Methods and Procedures, Version 10.
			KPMG Consulting conducted interviews with the Account Team on June 29, 2000 and the PQT/Advisory Team on August 15, 2000 to review the procedures for account coverage in the event that account team personnel are absent from the office.
			KPMG Consulting's initial review found that BellSouth did not have defined coverage procedures and activities for the Account Management team. As a result, KPMG Consulting issued Exception 4.
			BellSouth provided KPMG Consulting with the Account Team Information Package – Account Team Methods and Procedures, Version 3 and the Account Team Rules of Engagement, Version 1. KPMG Consulting reviewed the documentation and found that it defines the policy for Account Coverage in the event Account Team personnel are away from the office. KPMG Consulting closed Exception 4.
			KPMG Consulting conducted additional interviews with the Account Team and the PQT/Advisory Team on October 16, 2001. KPMG Consulting verified that the process for account coverage, documented in the Account Team Information Package – Account Team Methods and Procedures, Version 8 were in place.
			On January 4, 2002, BellSouth announced changes to the BellSouth Account Team structure. This change resulted in the formation of the CLEC Care Team. KPMG Consulting reviewed the updated Account Team/CLEC Care Team Information Package - Account Team Methods and Procedures, Version 10 and conducted new interviews with the Account Team and CLEC Care Team on March 12, 2002

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Test Reference	Evaluation Criteria	Result	Comments
			and March 14, 2002 respectively.
			During the new Account Team and CLEC Care Team interviews and review of updated Account Team/CLEC Care Team documentation, KPMG Consulting verified that the procedures for Account Team, CLEC Care Team, and PQT/Advisory Team coverage were defined.
			KPMG Consulting observed interaction between BellSouth and the KPMG Consulting Pseudo-ALEC to confirm that the procedures for account coverage are in place as documented.
PPR2-10	Account Manager responsibilities are posted on the BellSouth website.	Satisfied	The Account Team and the PQT/Advisory Team responsibilities are accurately posted on the BellSouth website[18].
			KPMG Consulting reviewed the BellSouth Start-Up Guide, Version 1.5. The Start-Up Guide provides an overview of the Account Team responsibilities and explains the PQT/Advisory Team process.
			KPMG Consulting conducted additional interviews with the Account Team and the PQT/Advisory Team on October 16, 2001. KPMG Consulting verified that the Account Manager and the PQT/Advisory Team responsibilities posted on the BellSouth website are in place.
			On January 4, 2002, BellSouth announced changes to the BellSouth Account Team structure. This change resulted in the formation of an additional group known as the CLEC Care Team. KPMG Consulting reviewed the updated Account Team/CLEC Care Team Information Package - Account Team Methods and Procedures, Version 10 and conducted new interviews with the Account Team and CLEC Care Team on March 12, 2002 and March 14, 2002 respectively. KPMG Consulting verified that the Account Team/CLEC Care Team responsibilities posted on the BellSouth website are in place.
PPR2-11	Customer calls are returned on the same day in which they are received when the Account Manager is in the office, but in no event later	Satisfied	KPMG Consulting observed the BellSouth Account Team and CLEC Care Team personnel respond to KPMG Consulting Pseudo-ALEC inquiries within eight business hours as documented in the Account Team/CLEC Care

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[18] http://www.interconnection.bellsouth.com/guides/activation/pdf/startup5.pdf

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Test Reference	Evaluation Criteria	Result	Comments
	than the next business day.		Team Information Package – Account Team Methods and Procedures, Version 10.
			KPMG Consulting has continued to observe BellSouth CLEC Care Team personnel responding within the timeframes specified in the Account Team/CLEC Care Team Information Package– Account Team Methods and Procedures, Version 10.
PPR2-12	Procedures are in place to allocate Account Team personnel and evaluate the need to augment those personnel.	Satisfied	BellSouth has procedures in place to allocate Account Team personnel and determine the need for additional personnel as documented in the Account Team/CLEC Care Team Information – Account Team Methods and Procedures, Version 10.
			KPMG Consulting conducted interviews with the Account Team on June 29, 2000 and the PQT/Advisory Team on August 15, 2000 to review procedures for allocating Account Team personnel as well as the evaluation of when to augment Account Team personnel.
			KPMG Consulting reviewed the Account Team/CLEC Care Team Information Package – Account Team Methods and Procedures, Version 10. The documentation explains the procedures for allocating Account Team personnel.
			KPMG Consulting conducted additional interviews with the Account Team (and the PQT/Advisory Team) on October 16, 2001. KPMG Consulting verified that the procedures for allocating Account Team personnel and evaluating when to add Account Team personnel, documented in the Account Team Information Package – Account Team Methods and Procedures, Version 8 were in place.
			On January 4, 2002, BellSouth announced changes to the BellSouth Account Team structure. This change resulted in the formation of an additional group known as the CLEC Care Team. KPMG Consulting reviewed the new Account Team/CLEC Care Team Information Package - Account Team Methods and Procedures, Version 10 and conducted new interviews with the Account Team and CLEC Care Team on March 12, 2002 and March 14, 2002 respectively.
			KPMG Consulting's review of the Account Team/CLEC Care Team documentation as well

Test Reference	Evaluation Criteria	Result	Comments
			as the interviews conducted confirmed that the BellSouth Account Management staff has procedures to allocate staff.
PPR2-13	Responsibilities and procedures for developing, updating, and correcting documentation are defined.	Satisfied	BellSouth has defined responsibilities and procedures for. developing, updating, and correcting documentation. KPMG Consulting conducted an interview with the Senior Manager of Local Policy and Strategy within the BellSouth Interconnection Marketing group on August 31, 2000 to review procedures for developing, updating, and correcting documentation. On January 4, 2002, BellSouth announced changes to the BellSouth Account Team structure. This change resulted in the formation of the CLEC Care Team. KPMG Consulting reviewed the new Account Team/CLEC Care Team Information Package - Account Team Methods and Procedures, Version 10 and conducted new interviews with the Account Team and CLEC Care Team on March 12, 2002 and March 14, 2002 respectively. During the new Account Team and CLEC Care Team interviews, KPMG Consulting verified that the process for updating Account Team, CLEC Care Team, and PQT/Advisory Team documentation was not affected by the Account Team restructuring. Therefore, KPMG Consulting found that the responsibilities and procedures for updating documentation were still defined.
PPR2-14	Responsibilities and procedures for maintaining distribution lists and distributing documentation are adequately defined.	Satisfied	BellSouth has procedures for distributing documentation to the ALEC community defined in the Account Team/CLEC Care Team Information Package – Account Team Methods and Procedures, Version 10. KPMG Consulting conducted interviews with the Account Team on June 29, 2000 to review procedures for distributing documentation to the ALEC community. KPMG Consulting reviewed the Account Team Information Package – Account Team Methods and Procedures, Version 10 that instructs the Account Team to explain the Carrier Notification process to its customers. KPMG Consulting also

Test Reference	Evaluation Criteria	Result	Comments
			reviewed Carrier Notifications posted to BellSouth interconnection website[19].
			KPMG Consulting conducted additional interviews with the Account Team on October 16, 2001. KPMG Consulting verified that the procedures for distributing documentation to the ALEC community were functioning as documented in the Account Team Information Package – Account Team Methods and Procedures, Version 8.
			On January 4, 2002, BellSouth announced changes to the BellSouth Account Team structure. This change resulted in the formation of an additional group known as the CLEC Care Team. KPMG Consulting reviewed the updated Account Team/CLEC Care Team Information Package - Account Team Methods and Procedures, Version 10 and conducted new interviews with the Account Team and CLEC Care Team on March 12, 2002 and March 14, 2002 respectively.
			During the new Account Team and CLEC Care Team interviews, KPMG Consulting verified that the process for updating Account Team, CLEC Care Team, and PQT/Advisory Team distribution lists was not affected by the Account Team restructuring. Therefore, KPMG Consulting found that the responsibilities and procedures for updating distribution lists were still defined.
PPR2-15	Distribution procedure allows the latest document versions to be made available to interested parties in electronic version as soon as they are complete.	Satisfied	BellSouth has procedures for distribution that allow the current document version to be made available to ALECs in electronic format as soon as they are complete. KPMG Consulting conducted interviews with the Account Team on June 29, 2000 to review distribution procedures for making documentation available to the ALEC community in electronic format.
			KPMG Consulting reviewed the Account Team/CLEC Care Team Information Package – Account Team Methods and Procedures, Version 10 and Carrier Notifications posted to BellSouth interconnection website[20].
			KPMG Consulting conducted additional interviews with the Account Team on October 16,

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[19] http://www.interconnection.bellsouth.com/notifications/carrier/carrier_lett_02.html
[20] http://www.interconnection.bellsouth.com/notifications/carrier/carrier_lett_02.html

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Test Reference	Evaluation Criteria	Result	Comments
			2001. KPMG Consulting verified that the distribution procedures that allow the current document version to be made available to the ALEC community in electronic format were functioning as documented in the Account Team Information Package – Account Team Methods and Procedures, Version 8.
			On January 4, 2002, BellSouth announced changes to the BellSouth Account Team structure. This change resulted in the formation of an additional group known as the CLEC Care Team. KPMG Consulting reviewed the updated Account Team/CLEC Care Team Information Package - Account Team Methods and Procedures, Version 10 and conducted new interviews with the Account Team and CLEC Care Team on March 12, 2002 and March 14, 2002 respectively.
			During the new Account Team and CLEC Care Team interviews, KPMG Consulting verified that the Account Team, CLEC Care Team, and PQT/Advisory Team documentation distribution procedures were not affected by the Account Team restructuring. Therefore, KPMG Consulting found that the responsibilities and procedures for documentation distribution were still defined.
PPR2-16	BellSouth documentation is organized in a manner that makes information accessible to ALECs.	Satisfied	BellSouth documentation is organized in a manner that makes information accessible to the ALEC community on the BellSouth interconnection website.
			KPMG Consulting reviewed the BellSouth interconnection website and found that the documentation is organized in a manner that makes information accessible to ALECs.
			On January 4, 2002, BellSouth announced changes to the BellSouth Account Team structure. This change resulted in the formation of an additional group known as the CLEC Care Team. KPMG Consulting reviewed the updated Account Team/CLEC Care Team Information Package - Account Team Methods and Procedures, Version 10 and conducted new interviews with the Account Team and CLEC Care Team on March 12, 2002 and March 14, 2002 respectively.
			During the new Account Team and CLEC Care Team interviews and review of BellSouth

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Test Reference	Evaluation Criteria	Result	Comments
			interconnection website, KPMG Consulting verified that the Account Team, CLEC Care Team, and PQT/Advisory Team documentation remained organized in a format to make information accessible to ALECs.

5.0   Parity Evaluation

This section contains the parity evaluation for the Account Establishment and Management Process Verification and Validation Review (PPR2).

5.1   Overview

In accordance with the Florida Master Test Plan, KPMG Consulting examined processes used by BellSouth to establish and manage accounts for ALECs as well as those used for the retail customer to determine whether the processes are in parity. Based on information gathered during the Account Establishment and Management Process Verification and Validation Review (PPR2), KPMG Consulting's analysis indicates that BellSouth does not have a retail analog to the BellSouth Wholesale (ALEC) Account Team.

5.2   Method of Analysis

KPMG Consulting conducted interviews with BellSouth personnel for both the Retail and Wholesale (ALEC) Account Teams. These interviews focused on the customers, processes and procedures, methods of communication, and documentation associated with the account management function. KPMG Consulting also reviewed documentation that details the processes and procedures for both the Retail and Wholesale Account Teams.

5.3   Results

A summary of the results of KPMG Consulting's parity evaluation is presented in Table 2-3 below:

Table 2-3: Account Establishment and Management Process Verification and Validation
(PPR2) Parity Review

Process Area	Retail Account Team	Wholesale Account Team and CLEC Care Team	KPMG Consulting Comments
Customers	The BellSouth Retail Account team services a large number of customer accounts. These accounts range in size and revenue from small businesses with minimal revenues to large Fortune 500 corporations. Customers include: Information Service Providers (ISP), Alternate Service Providers (ASP), educational institutions, manufacturing firms, and government agencies. The BellSouth Retail Account Team provides customers with all BellSouth Products and Services (e.g., one flat-rate business line or several highly complex data products).	The Wholesale Account Team and CLEC Care Team services accounts for all ALECs interconnected with BellSouth OSS. The Wholesale Account Team and CLEC Care Team provide ALECs with all services related to BellSouth's OSS (i.e., Billing questions or interface development).	KPMG Consulting determined that the retail and wholesale account teams' customers are significantly different; this results in non-analogous account team processes.
Personnel	The BellSouth Retail Account Team is composed of Sales Directors, Account Managers, and Systems Designers. Sales Directors are responsible for approximately 60 accounts assigned to one of several account teams. The account teams are comprised of Account Managers and Systems Designers. Account Managers are responsible for selling new products and services to customers. System designers are responsible for providing support to the Account Managers.	The BellSouth Wholesale Account Team is composed of Sales Directors, Account Managers, Network Sales Engineers, and Industrial Specialists. The CLEC Care Team is comprised of a Sales Support Director, Local Contract Manager and a Local Support Manager, who may be assigned to a specific ALEC or to a pool of Local Support Managers available through a toll free number. Sales Directors are responsible for Managing several ALEC accounts assigned to one of their account teams. Account Managers work directly with the client to provide access to BellSouth's OSS network. System Designers work with	KPMG Consulting found that while the personnel and technical competencies of the Retail Account Team and Wholesale Account Team and CLEC Care Team are not analogous, each group's personnel and technical competencies are appropriate for their assigned roles and responsibilities.

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Process Area	Retail Account Team	Wholesale Account Team and CLEC Care Team	KPMG Consulting Comments
		Account Managers to provide pricing and system architecture for ALEC interconnection. The Account Manager and System Designer have both sales and consultative roles. Industrial Specialists assist the account teams by providing technical knowledge of the interconnection services provided by BellSouth. Industry Specialists work with multiple account teams to provide expertise. ALEC accounts have a Local Contract Manager and a Local Support Manager. The Local Contract Manager is responsible for managing issues related to the interconnection agreement between the ALEC and BellSouth. The Local Support Manager provides assistance to ALECs prior to execution of various ordering and pre-ordering transactions.	
Products and Services	The BellSouth Retail Account Team sells the full range of BellSouth tariffed products (e.g., Sonet Rings, POTS lines, data lines, etc.) to businesses.	The BellSouth Wholesale Account Team and CLEC Care Team provide ALECs with the full range of BellSouth tariffed products. The Account Team and CLEC Care Team provide ALECs with BellSouth interfaces and development materials for ALECs to develop their own interconnection systems. The BellSouth Wholesale Account Team and CLEC Care Team also provide services to each ALEC via the ALEC's interconnection agreement.	KPMG Consulting found that the products and services sold by the Retail Account Team are not analogous to the products and services sold by the Wholesale Account Team and CLEC Care Team. This fact is the result of additional products and services used by ALECs in their role as wholesalers. Retail products are developed and provisioned by BellSouth while Wholesale products are developed and provisioned by both ALECs and BellSouth.

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Process Area	Retail Account Team	Wholesale Account Team and CLEC Care Team	KPMG Consulting Comments
Account Management for new customers	The BellSouth Retail Account Team is not responsible for account establishment. The Customer Care group is responsible for account establishment as well as all support functions for BellSouth's retail customers (e.g. Billing or provisioning concerns).	The BellSouth Wholesale Account Team and CLEC Care Team have a subgroup, the PQT/Advisory Team, which is responsible for ALEC account establishment. The PQT/Advisory Team is responsible for guiding ALECs through the process of opening a Q account, or master account.	KPMG Consulting found that the Retail Account Team is not responsible for establishing new accounts. Therefore, the Retail Account Team does not have a new market entry account establishment process analogous to that of the Wholesale Account Team and CLEC Care Team.
Customer Contact	The BellSouth Retail Account Team contacts customers regarding sales opportunities. All other customer contact is handled by BellSouth support groups. For example, repairs and technical questions are handled by a completely independent and separate organization from the account team. The Retail Account Team can be contacted by customers for information on new and existing products and services, pricing, and network design. Contact for any other reason is transferred to the appropriate BellSouth operational group (e.g., BellSouth Wireless or Billing/Credit and Collections).	The Wholesale Account Team and CLEC Care Team contact ALECs for several reasons (e.g., new products, system outages, emergencies, and subsequent procedures). The Wholesale Account Team and Customer Care Team are also contacted by ALECs for several issues (e.g., account establishment, interface setup, training, interface problems, billing, etc.). The Account Team and CLEC Care Team are responsible for management of many of these issues. Some issues may be referred to the appropriate BellSouth Wholesale support groups.	KPMG Consulting found that the Retail and Wholesale Account Teams and CLEC Care Teams do not have analogous procedures for contacting customers or job responsibilities.
Escalation Procedures	Any employee of a customer organization can escalate an issue within the account team. This process is made available to customers via the Customer Partnership Program (CPP) binder.	Any employee of an ALEC can escalate an issue within the Account Team or CLEC Care Team. ALECs are provided with a contact/escalation list once an account has been established.	KPMG Consulting found that the Retail and Wholesale Account Team and CLEC Care Team escalation procedures are analogous.

Process Area	Retail Account Team	Wholesale Account Team and CLEC Care Team	KPMG Consulting Comments
Performance Measurement	The BellSouth Retail Account Team is measured on attainment of revenue targets and revenue growth for assigned accounts. In addition, Account Team members are evaluated based upon the performance gradients and competencies listed in their job descriptions. General observations by Sales Directors and customer feedback are also taken into consideration.	The BellSouth Wholesale Account Team/CLEC Care Team is measured on revenue objectives for both group and individual performance. Account Teams/CLEC Care Teams and individuals are also evaluated using a survey sent to ALECs. The survey provides ALECs the opportunity to evaluate their account team. Account Team members are also required to meet established service objectives. The CLEC Care Team is measured on group revenue objectives. CLEC Care Teams and individuals are also evaluated using a survey sent to ALECs of the CLEC Care Team's preference. The survey provides ALECs the opportunity to evaluate their account team. CLEC Care Team members are also required to meet established service objectives.	KPMG Consulting found that the evaluation process used by the Retail Account Team have similarities to the evaluation process used by the Wholesale Account Teams and CLEC Care Teams. However, the processes are not completely analogous.
Testing and Turn-up	The BellSouth Retail Account Team does not provide coordination of testing or turn-up of BellSouth products sold to customers. The appropriate BellSouth operational support groups are responsible for this function.	The BellSouth Wholesale Account Team and CLEC Care Team coordinate all initial connectivity and turn-up testing between BellSouth and an ALEC.	KPMG Consulting found that the Retail Account Team does not support this function. Therefore, the Retail Account Team does not have a process analogous to the testing and turn-up processes of the Wholesale Account Team or CLEC Care Team.

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Process Area	Retail Account Team	Wholesale Account Team and CLEC Care Team	KPMG Consulting Comments
Documentation	The BellSouth Retail Account Team has internal documentation of processes available to employees. The Retail Account Team also produces the Customer Partnership Program (CPP) binders to familiarize customers with account team processes.	The BellSouth Wholesale Account Team and CLEC Care Team have internal documentation of processes available to employees[21]. The Wholesale Account Team and CLEC Care Team also have the ALEC Start-Up Guide as well as escalation lists to provide guidance to ALECs.	KPMG Consulting found that the documentation, both internal and external, for the Retail Account Team is analogous to the documentation of the Wholesale Account Team and CLEC Care Team.

5.4   Parity Results Summary

The BellSouth Retail Account Team is not analogous to the BellSouth Wholesale Account Team and/or CLEC Care Team. The wholesale and retail units serve different customers with different business needs; as a result, the technical competencies and products and services offered also differ. KPMG Consulting determined that BellSouth's processes for managing the Retail and Wholesale units are not analogous and, therefore, parity between the retail and wholesale units cannot be determined.

6.0   Final Summary

This section summarizes the number of test evaluation criteria discussed in Section 4.1 above and the number that was satisfied or not satisfied at the conclusion of this test.

6.1   Summary of Findings

There were 16 evaluation criteria considered for the Account Establishment and Management Verification and Validation (PPR2) test. All sixteen evaluation criteria received a satisfied result.

As all evaluation criteria are satisfied, KPMG Consulting considers the Account Establishment and Management Verification and Validation Review (PPR2) test area satisfied at the time of the final report delivery.

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[21] Based on interviews and document reviews, KPMG Consulting determined that Wholesale Account Team documentation does not adequately detail the account team internal processes potentially leading to inconsistency in process execution (See Exception 4). The findings contained in Exception 4 are based on evaluation criteria and not any comparison with Retail Account Team documentation.

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C.   Test Results: OSS Interface Help Desk Functional Review (PPR3)

1.0   Description

The Operational Support Systems (OSS) Interface Help Desk Functional Review (PPR3) evaluated the BellSouth help desk functions through a process-oriented assessment. The OSS interface help desk provides technical and system administration support for its OSS interfaces. The objectives of the test were to determine that processes for the OSS interface help desk were documented; escalation procedures were maintained, documented and published; management oversight procedures were documented and followed; procedures existed for measuring, tracking, projecting, and maintaining OSS interface help desk performance; and reasonable security measures existed to ensure integrity of help desk data.

2.0   Business Process

This section describes BellSouth's OSS interface help desk business process.

2.1   Business Process Description

The Electronic Communications (EC) Support Group is the single point of contact for BellSouth wholesale customers who require technical support related to the BellSouth OSS. The EC Support Group is responsible for resolving OSS technical issues, building company and user profiles[22] for the OSS, and acting as the interface between wholesale customers and the BellSouth Information Technology (IT) Team.

Wholesale customers are provided with contact information and escalation procedures for the EC Support Group through their Account Team/CLEC Care Team. Information on EC Support is also available to wholesale customers on the BellSouth interconnection website and through error messages in all of the BellSouth Graphical User Interfaces (GUI) (e.g. Local Exchange Navigation System or Common Access Front End).

The EC Support Group uses a trouble ticket system that assigns each OSS-related issue a number when a ticket is opened. The trouble ticket system issues two types of trouble tickets: User tickets and system tickets. EC Support assigns user tickets for OSS-related issues specific to one customer. System tickets are assigned to OSS-related issues that affect multiple customers (e.g. System Outages). During such a problem, EC Support typically receives calls from a high number of customers. EC Support opens a user ticket for each of these callers and links each user ticket to the system ticket for the specific problem. Once a trouble ticket has been opened, EC Support provides the trouble ticket number to the customer for tracking purposes. When opening a trouble ticket, EC Support identifies each caller by User ID. EC Support verifies that the name, company, and contact information are correct before proceeding. Callers that do not have a User ID are referred to their assigned BellSouth Account Team/CLEC Care Team who will assist the ALEC in the process of choosing and setting up any of the various BellSouth electronic interfaces. This process includes issuance of User IDs.

The EC Support Group opens trouble tickets for connectivity issues with the following OSS interfaces: - Connect: DIRECT via TCP/IP[23], Circuit Provisioning Status System (CPSS), CLEC

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[22] This consists of entering company contact information into each system as well as information for each user and their corresponding user ID. This is the initial administrative set-up necessary for an ALEC to begin using the BellSouth electronic interfaces.
[23] Transmission Control Protocol/Internet Protocol

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Service Order Tracking System (CSOTS), EC-Interconnection Reference (ICREF), EC-Preferred Interexchange Carrier (EC PIC), EC-Trouble Administration (TA), Local Exchange Navigation System (LENS), Performance Measurement and Analysis Platform (PMAP), Robust GUI Telecommunications Access Gateway[24] (ROBOTAG), Trouble Analysis Facilitation Interface (TAFI), Telecommunications Access Gateway (TAG), and Common Access Front End (CAFÉ). EC Support Representatives log all steps taken by BellSouth in the resolution of a trouble ticket. The log for each trouble ticket captures the nature of each issue, any contact between EC Support and internal BellSouth groups, any contact between EC Support and the customer, and any other relevant information. EC Support maintains a history of all trouble tickets and the associated trouble ticket logs. The history and logs are queried to produce various types of daily and monthly reports. These reports are reviewed by EC Support Management to ensure that EC support representatives properly resolve and document all issues. In addition, the EC Support Management group reviews the reports in order to identify trends or systemic issues in the supported systems. Such issues, should they arise, are noted and forwarded to the appropriate BellSouth product support group for further investigation.

If EC Support representatives cannot resolve an issue, they may contact BellSouth IT subject matter experts (SME) for each interface for assistance, but they will continue to provide status updates to the customer. All interaction between internal SMEs and EC support representatives is reflected in the trouble ticket logs. Once EC Support resolves the issue, the EC support representative is responsible for contacting the originator of each User or System ticket to ensure that the user is no longer experiencing the issue. EC Support closes the ticket only after the originator of the ticket acknowledges that the problem is resolved.

In the event that an EC support representative cannot immediately answer an ALEC call, the call is forwarded to a voice mail system. ALECs are instructed to leave a name and contact number so that the call can be returned. The voice mail system then automatically pages the on-duty EC support representative who retrieves the message and returns the ALEC's call within one hour. These voicemail procedures are also used to contact EC Support during non-business hours.

Customers that are dissatisfied with the resolution of the issues or the time required to resolve the issues may escalate issues within EC Support using procedures provided on the BellSouth website by the Account Team, and EC Support Managers and Directors may escalate issues within BellSouth. All escalations are recorded in the trouble ticket log.

3.0 Methodology

This section summarizes the test methodology.

3.1 Scenarios

Scenarios were not applicable to this test.

3.2 Test Targets and Measures

The test target was the EC Support Group functions and included reviews of the following processes and sub-processes:

♦ Process help desk calls with specific attention to the resolution of user questions, problems, or issues;

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[24] As of April 3, 2002, the FPSC removed RoboTAG from the Florida OSS test (Order # PSC-02-0450-PCO-TP).

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♦   Close help desk call with specific attention to the process for closure posting;

♦   Track and report status;

♦   Escalate problems with specific attention to user and BellSouth initiated escalation;

♦   Manage capacity planning process;

♦   Maintain security and integrity of customer data with specific attention to data access controls;

♦   Manage oversight practices;

♦   Performance measurement process; and

♦   Process improvement.

3.3   Data Sources

The data collected for the OSS Interface Help Desk Functional Review (PPR3) included the following:

♦   Interviews with personnel from the BellSouth EC Support Group;

♦   Observations of EC Support Group procedures (e.g. call intake, closure posting, tracking of trouble tickets, referral of trouble tickets to SMEs, system outage procedures, and call back procedures);

♦   Review of the EC Support database;

♦   Review of KPMG Consulting Pseudo CLEC interaction with EC Support during transaction testing periods;

♦   Review of Electronic Communications Support Group – Customer Support Procedures, Version 2.5; and

♦   Review of the EC Support intranet site.

3.4   Data Generation/Volumes

This test did not rely on data generation or volume testing.

3.5   Evaluation and Analysis Methods

The OSS Interface Help Desk Functional Review (PPR3) evaluation measures were established by KPMG Consulting to provide a framework and a basis for the test. The evaluation criteria cover the measures set forth in the Master Test Plan. KPMG Consulting's assessment relied on interviews with members of the EC Support Group, observation of procedures, and documentation reviews. Summaries of the information gathered during the interviews with EC Support Group personnel were provided to BellSouth to verify the accuracy of the information. The data were then analyzed against the evaluation measures established for the test.

The OSS Interface Help Desk Functional Review (PPR3) included a checklist of evaluation criteria developed by KPMG Consulting during the initial phase of the BellSouth OSS Evaluation. These evaluation criteria provided the framework of norms, standards, and guidelines for the OSS Interface Help Desk Functional Review (PPR3).

The data collected were analyzed employing the evaluation criteria detailed in Section 4.1 below.

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4.0   Results

This section contains the overall test results.

4.1   Results Summary

The number of exceptions and observations issued during the life of the test is depicted in Table 3-1.   For additional exception and observation information, refer to Appendices D and E, respectively. The test criteria and results are presented in Table 3-2.

Table 3-1: Exception and Observation Count

Activity	Exceptions	Observations
Total Issued	0	1
Total Disposed as of Final Report Date	0	1
Total Remaining Open as of Final Report Date	0	0

Table 3-2: PPR3 Evaluation Criteria and Results

Test Reference	Evaluation Criteria	Result	Comments
PPR3-1	Help desk responsibilities and activities are defined and documented.	Satisfied	EC Support Group responsibilities and activities are defined and documented in the Electronic Commerce Support Group – Customer Support Procedures, Version 2.5 and on the EC Support Intranet website. KPMG Consulting observed the EC Support Group personnel address customer inquiries on August 16, 2000. KPMG Consulting observed the EC Support procedures in use as defined and documented. KPMG Consulting conducted refresh interviews and observations of the EC Support Group during October 27-29, 2001. KPMG Consulting found the EC Support Group operated using the same procedures determined to exist during the initial review.
PPR3-2	Customers can initiate a claim or query.	Satisfied	ALECs can initiate a claim or query with the EC Support Group as documented in Electronic Commerce Support Group – Customer Support Procedures, Version 2.5 and on the EC Support Intranet website. KPMG Consulting conducted an interview with EC Support Group personnel on August 16, 2000 and found that processes for handling a customer claim or inquiry were in place. KPMG

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Test Reference	Evaluation Criteria	Result	Comments
			Consulting observed the EC Support Group address customer inquiries on August 16, 2000.
			KPMG Consulting conducted refresh interviews and observations of the EC Support Group on October 27-29, 2001. KPMG Consulting found the EC Support Group operated using the same procedures determined to exist during the initial review. KPMG Consulting was able to verify and observe the EC Support Group addressing and supporting claims and queries from ALECs.
PPR3-3	Customers have access to the status of a claim or query.	Satisfied	KPMG Consulting verified that the EC Support group provides customers with access to the status of a claim or query upon request. This information was confirmed through an interview and observations conducted on August 16, 2000.
			KPMG Consulting conducted refresh interviews and observations of the EC Support Group on October 27-29, 2001. KPMG Consulting found the EC Support Group operated under the same procedures determined to exist during the initial review. KPMG Consulting was able to verify and observe the EC Support Group following the procedures for providing customers with the status of a claim or query.
PPR3-4	Customer escalation procedures are defined and documented.	Satisfied	The EC Support Group escalation procedures are defined and documented in the BellSouth Electronic Commerce Support Group – Customer Support Procedures, Version 2.5.
			KPMG Consulting conducted an interview with EC Support Group personnel on August 16, 2000 and found that the EC Support Group escalation procedures are defined and documented. Further, information on the EC Support Group escalation procedures is provided to ALECs via the Account Team. Procedures for the Account Team providing this information to ALECs are defined and documented in the Account Team Procedures – Account Team Information Package, Version 8.
			KPMG Consulting conducted refresh interviews and observations of the EC Support Group on October 27-29, 2001 and determined that the EC Support Group operated using the same procedures found to exist during the initial review. KPMG Consulting found escalation

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Test Reference	Evaluation Criteria	Result	Comments
			procedures are defined and documented.
PPR3-5	Process includes call intake procedures (logging and acknowledgement).	Satisfied	The EC Support Group has procedures for call intake documented in BellSouth Electronic Commerce Support Group – Customer Support Procedures, Version 2.5 and also on the EC Support Intranet website. KPMG Consulting reviewed the BellSouth Electronic Commerce Support Group – Customer Support Procedures, Version 2.5. KPMG Consulting found that the EC Support Group has call intake procedures in place. KPMG Consulting confirmed these findings during an observation of the EC Support Group's execution of call intake procedures on August 16, 2000. KPMG Consulting conducted refresh interviews and observations of the EC Support Group on October 27-29, 2001 and determined that the EC Support Group operated using the same procedures found to exist during the initial review. KPMG Consulting was able to verify the existence and execution of call intake procedures.
PPR3-6	Process includes procedures for resolving calls in a timely manner.	Satisfied	The EC Support Group has procedures for resolving calls in a timely manner documented in the BellSouth Electronic Commerce Support Group – Customer Support Procedures, Version 2.5 and on the EC Support Intranet website. KPMG Consulting reviewed the BellSouth Electronic Commerce Support Group – Customer Support Procedures, Version 2.5. KPMG Consulting found that the EC Support Group has procedures for resolving calls in a timely manner. KPMG Consulting observed the EC Support Group resolve calls and return customer inquiries initiated via the voice mail system within the one hour interval specified in the Electronic Commerce Support Group – Customer Support Procedures, Version 2.5. KPMG Consulting conducted refresh interviews and observations of the EC Support Group on October 27-29, 200 and determined that the EC Support Group operated using the same procedures found to exist during the initial review. KPMG Consulting was again able to verify the existence and execution of procedures

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Test Reference	Evaluation Criteria	Result	Comments
			for resolving calls in a timely manner.
PPR3-7	Process includes procedures for closure posting.	Satisfied	EC Support Group has procedures for closure posting.

KPMG Consulting conducted an interview with EC Support Group personnel on August 16, 2000 and found that the EC Support Group has procedures for closure posting. KPMG Consulting observed the EC Support group executing the procedures for closure posting.

KPMG Consulting reviewed the EC Support Group database for the period of April 1, 2001 – August 31, 2001 and found the database to contain incorrect closure postings for some trouble tickets. BellSouth found that inaccuracies in the database were caused by a software problem with the QuickClose function. KPMG Consulting retested the EC Support database to verify that corrections were made. The retest found additional instances of incorrect closure postings. BellSouth implemented a correction to the QuickClose function on February 1, 2002. KPMG Consulting conducted a second retest from February 1, 2002 through February 20, 2002. KPMG Consulting found that BellSouth had corrected the error in the QuickClose function and that closures were now posted in accordance with procedures.

KPMG Consulting conducted refresh interviews and observations of the EC Support Group on October 27-29, 2001. KPMG Consulting found the EC Support Group operated using the same procedures found to exist during the initial review. |
| PPR3-8 | Process includes procedures for status tracking, management reporting and management intervention. | Satisfied | The EC Support Group has procedures for status tracking, management reporting and management intervention.

KPMG Consulting conducted an interview with EC Support Group personnel on August 16, 2000 and found that the EC Support Group has procedures for status tracking, management reporting and management intervention.

During refresh interviews and observations of the EC Support Group on October 27-29, 2001, KPMG Consulting found that the EC Support |

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Test Reference	Evaluation Criteria	Result	Comments
			Group operated using the same procedures determined to exist during the initial review. KPMG Consulting also reviewed both the weekly and monthly management reports.
PPR3-9	Process includes procedures for maintaining security and integrity of data access controls and for ensuring accuracy of data.	Satisfied	The EC Support Group has procedures for maintaining security and integrity of data access controls and ensuring the accuracy of the data.

During an interview with EC Support Group personnel on August 16, 2000, KPMG Consulting found that the EC Support Group has procedures for maintaining security and integrity of data access controls, but not for ensuring accuracy of data. KPMG Consulting was able to observe the EC Support Group following the data access procedures on August 16, 2000.

KPMG Consulting reviewed the EC Support Group database for the period of April 1, 2001 – August 31, 2001 and found the database contained inaccurate information. BellSouth explained that inaccurate data was caused by a software problem with the QuickClose function. KPMG Consulting retested the EC Support database to verify that corrections were made. The retest found additional instances of incorrect closure postings. BellSouth implemented a correction to the QuickClose function on February 1, 2002. KPMG Consulting conducted a second retest from February 1, 2002 through February 20, 2002. KPMG Consulting found that BellSouth had corrected the error in the QuickClose function and that closures were posted correctly in the database.

KPMG Consulting conducted refresh interviews and observations of the EC Support Group on October 27-29, 2001. KPMG Consulting found the EC Support Group operated under the same procedures found to exist during the initial review. The EC Support Group continues to have procedures for maintaining security and integrity of data access controls for ensuring the accuracy of the data in place. |
| PPR3-10 | Process includes procedures for obtaining ALEC feedback. | Satisfied | The EC Support Group has procedures for obtaining ALEC feedback through an ALEC survey process.

KPMG Consulting conducted an interview with |

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Test Reference	Evaluation Criteria	Result	Comments
			EC Support Group personnel on August 16, 2000 and found that procedures were in place to obtain ALEC feedback through ALEC surveys. KPMG Consulting reviewed the EC Support Group's ALEC survey, which is available on the BellSouth interconnection website, as well as through links in the BellSouth GUIs (e.g. LENS or CAFÉ). KPMG Consulting conducted refresh interviews and observations of the EC Support Group on October 27-29, 2001 and determined that the group operated under the same procedures found to exist during the initial review. Therefore, EC Support Group has procedures for obtaining ALEC feedback.
PPR3-11	Process performance measures are defined, measured and reviewed.	Satisfied	EC Support Group performance measures are defined, measured, and reviewed. KPMG Consulting conducted an interview with EC Support Group personnel on August 16, 2000 and reviewed reports for EC Support Group personnel and supported systems. KPMG Consulting confirmed that performance measures are defined, measured, and reviewed. KPMG Consulting conducted refresh interviews and observations of the EC Support Group on October 27-29, 2001. KPMG Consulting determined that the EC Support Group operated under the same procedures found to exist during the initial review.
PPR3-12	Process includes procedures for capacity planning.	Satisfied	The EC Support Group has procedures for capacity planning documented in the EC Support Capacity Plan for 2002. KPMG Consulting reviewed the EC Support Group Capacity Plan and determined that the EC Support Group has procedures for capacity planning in place. KPMG Consulting conducted refresh interviews and observations of the EC Support Group on October 27-29, 2001 and determined that the EC Support Group operated using the same procedures found to exist during the initial review. Consistent procedures for capacity planning continue to exist.

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Test Reference	Evaluation Criteria	Result	Comments
			KPMG Consulting reviewed the EC Support Capacity Plan for 2002 to ensure that these procedures continued to be followed. KPMG Consulting confirmed that the procedures were being followed.
PPR3-13	Process improvement responsibilities are assigned and executed.	Satisfied	The EC Support Group process improvement responsibilities are assigned and executed. KPMG Consulting conducted an interview with EC Support Group personnel on August 16, 2000 and found that process improvement responsibilities had been assigned. KPMG Consulting conducted refresh interviews and observations of the EC Support Group on October 27-29, 2001 and determined that the EC Support Group operated using the same procedures found to exist during the initial review. KPMG Consulting observed process improvements in the system outage procedures, representative performance evaluations, and observed the implementation of lesser time intervals for completing certain tasks.

5.0 Parity Evaluation

A parity evaluation was not required for this test.

6.0 Final Summary

This section summarizes the number of test evaluation criteria discussed in Section 4.1, Table 3-2 above and the number that was satisfied or not satisfied at the conclusion of this test.

6.1 Summary of Findings

There were 13 evaluation criteria considered for the OSS Interface Help Desk Functional Review (PPR3) test. All 13 evaluation criteria received a satisfied result.

As all evaluation criteria are satisfied, KPMG Consulting considers the OSS Interface Help Desk Functional Review (PPR3) test area satisfied at the time of the final report delivery.

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D.   Test Results: CLEC Training Verification and Validation Review (PPR4)

1.0   Description

The CLEC Training Verification and Validation Review (PPR4) evaluated BellSouth's training program for Alternative Local Exchange Carriers (ALEC). The objectives of the test were to determine the existence and functionality of procedures for developing, publicizing, conducting, managing, and monitoring ALEC training. Additionally, the BellSouth ALEC training program was compared with retail practices for parity, to the extent that specific retail analogs were identified.

2.0   Business Process

This section provides a description of the processes used by BellSouth to administer the ALEC training program.

2.1   Business Process Description

The BellSouth Professional Training Services organization is responsible for providing training to ALECs on BellSouth's products, services, pre-ordering, ordering, provisioning, billing, maintenance functions, and related Operating Support Systems (OSS). The organization is comprised of a Senior Manager, Professional Training Services Coordinator, Instructional Designers, Instructors, and a Sales Coordinator.

The Professional Training Services organization offers classes to ALECs on all aspects of interconnection with BellSouth. The list of training courses offered to ALECs and the procedures for enrollment are available on the Professional Training Services website. BellSouth offers training courses in three formats: i) BellSouth instructor led training at a BellSouth training facility; ii) BellSouth instructor led training at an ALEC facility for ALEC customized training; and iii) web-based training. In addition, Professional Training Services offers approximately six free training courses per year with a curriculum that incorporates corrective action to address frequent ordering errors that BellSouth has observed.

Professional Training Services has offered ALECs an opportunity to learn more about BellSouth and interconnection at the bi-annual CLEC Inforum. This two to three day event is open to all BellSouth wholesale customers and offers an opportunity to meet BellSouth representatives, review new products and interfaces, gain insight into future offerings, and discuss issues that arise during the year. The format and content for each Inforum has varied.

In addition to developing and delivering training courses, Professional Training Services actively seeks ALEC feedback. This allows ALECs and individual groups to aid Professional Training Services in modifying course offerings and focusing course activities to ensure ALECs receive the greatest benefit from training. The opportunity to provide feedback occurs at the end of every training course as well as at CLEC Inforums where ALECs were asked for new training ideas for the coming year.

Professional Training Services is also responsible for developing the CLEC User Guides available on the BellSouth interconnection website. All training courses are designed to use the CLEC User Guides as reference material for ALECs both during and after the courses. Professional Training Services updates the CLEC User Guides when BellSouth's procedures change to ensure ALECs have current reference materials.

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3.0   Methodology

This section summarizes the test methodology.

3.1   Scenarios

Scenarios were not applicable to this test.

3.2   Test Targets and Measures

The test target was to determine the existence and functionality of procedures for developing, publicizing, conducting, and monitoring ALEC training and to ensure the ALEC training effort has effective management oversight. The following processes and sub-processes were included in the review:

♦   Training Program Development;

   ♦   Develop curriculum;

   ♦   Publicize training opportunities;

♦   Training Program Quality Assurance;

   ♦   Attendance and utilization tracking;

   ♦   Session effectiveness tracking;

   ♦   Instructor oversight;

♦   Process Management;

   ♦   Performance measurement process; and

   ♦   Process improvement.

3.3   Data Sources

The data collected for the CLEC Training Verification and Validation Review (PPR4) included the following:

♦   Interviews with personnel from the BellSouth Professional Training Services Team;

♦   The BellSouth Management Practices for Professional Training Services, Version 3;

♦   An extract from the BellSouth Professional Training Services database that includes attendance and utilization at a course level by specific ALEC and attendee; and

♦   Review of feedback from KPMG Consulting attendance at ALEC training courses.

3.4.   Data Generation/Volumes

This test did not rely on data generation or volume testing.

3.5   Evaluation and Analysis Methods

The CLEC Training Verification and Validation Review (PPR4) evaluation measures were established by KPMG Consulting to provide a framework and a basis for the evaluation. The evaluation criteria cover the measures set forth in the Florida Master Test Plan. KPMG Consulting's assessments relied on interviews with members of the BellSouth Professional

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Training Services group and documentation reviews. Summaries of the information gathered during the interviews with BellSouth Professional Training Services personnel were provided to BellSouth for review to verify the accuracy of the information documented. After verifying the accuracy of the information KMPG Consulting collected, the data was analyzed against the evaluation measures established for the test.

The CLEC Training Verification and Validation Review (PPR4) included a checklist of evaluation criteria developed by KPMG Consulting during the initial phase of the BellSouth Florida OSS Evaluation. These evaluation criteria provided the framework of norms, standards, and guidelines for the CLEC Training Verification and Validation Review (PPR4).

The data collected were analyzed employing the evaluation criteria identified in Section 4.1 below.

4.0   Results

This section contains the overall test results.

4.1   Results Summary

The number of exceptions and observations issued during the life of the test is depicted in Table 4-1.   For additional exception and observation information, refer to Appendices D and E, respectively. The test criteria and results are presented in Table 4-2.

Table 4-1: Exception and Observation Count

Activity	Exceptions	Observations
Total Issued	1	0
Total Disposed as of Final Report Date	1	0
Total Remaining Open as of Final Report Date	0	0

Table 4-2: Evaluation Criteria and Results

Test Reference	Evaluation Criteria	Result	Comments
PPR4-1	Training process responsibilities and activities are defined.	Satisfied	Training process responsibilities and activities are defined in the Management Practices for Professional Training Services document.
			During an interview with the Professional Training Services Senior Manager and Coordinator, KPMG Consulting found that policies and procedures existed that defined responsibilities and activities for the training process. BellSouth was unable to provide formal documentation to support this. As a result, KPMG Consulting issued Exception 9. On February 25, 2001, BellSouth provided Management Practices for Professional

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Test Reference	Evaluation Criteria	Result	Comments
			Training Services, Version 3, which documents the responsibilities and activities of the training process. KPMG Consulting's review of the revised documentation found that all training process responsibilities and activities are clearly defined and documented. Exception 9 was subsequently closed.
			On October 15, 2001 KPMG Consulting conducted a refresh interview with BellSouth training personnel. KPMG Consulting verified the process responsibilities and activities documented in the Management Practices for Professional Training Services, Version 3 were implemented as documented.
PPR4-2	Scope and objectives of training process are defined and documented.	Satisfied	The scope and objectives of the training process are defined and documented in BellSouth's Management Practices for Professional Training Services.
			During an interview with the Professional Training Services Senior Manager and Coordinator, KPMG Consulting found clear processes existed that defined the objectives of the training process. BellSouth was unable to provide formal documentation to support this. As a result, KPMG Consulting issued Exception 9.
			On February 25, 2001, BellSouth provided Management Practices for Professional Training Services, Version 3, which documents the responsibilities and activities of the training process. KPMG Consulting's review of the revised documentation found that all training process objectives are defined and documented. Exception 9 was subsequently closed.
			On October 15, 2001, KPMG Consulting conducted a refresh interview with BellSouth Training personnel. KPMG Consulting verified the objectives of the training process

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Test Reference	Evaluation Criteria	Result	Comments
			were implemented as documented.
PPR4-3	Essential elements of the training process are in place and documented.	Satisfied	The essential elements of the training process are documented in BellSouth's Management Practices for Professional Training Services and are in place.
			During an interview with the Professional Training Services Senior Manager and Coordinator and through observation or attendance at classes, KPMG Consulting found the following elements were in place:
			♦ Descriptions of the roles and responsibilities of all Professional Training Services personnel.
			♦ Definition of the scope and objectives of the training process.
			♦ Procedures for accepting ALEC input regarding the training curriculum.
			♦ Procedures for publishing information about training opportunities.
			♦ Procedures for addressing errors and exceptions in training events and materials.
			♦ Procedures to monitor and ensure the quality of training. This includes surveying training recipients on the effectiveness of training, responding to feedback about training quality, correcting errors in training materials, and monitoring instructor performance.
			♦ Procedures for tracking utilization and attendance of training courses.
			♦ Procedures to ensure training offerings are scalable in response to demand.
			BellSouth was unable to provide formal documentation that the essential elements of the training process are in place. As a result, KPMG Consulting issued Exception 9. On February 25, 2001, BellSouth provided Management Practices for Professional Training

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Test Reference	Evaluation Criteria	Result	Comments
			Services, Version 3, which documents the responsibilities and activities of the training process. KPMG Consulting's review of the documentation found all essential elements of the training process are documented. Exception 9 was subsequently closed.
			On October 15, 2001, KPMG Consulting conducted a refresh interview with BellSouth training personnel. KPMG Consulting verified that the essential elements of the training process were implemented as documented.
PPR4-4	The training process includes procedures for addressing errors and inconsistencies in training materials.	Satisfied	The training process includes procedures for addressing errors and inconsistencies in training materials.
			The error and exception procedures are documented in the Management Practices for Professional Training Services, Version 3.
PPR4-5	The training process includes procedures for responding to feedback about training quality and utilization.	Satisfied	The training process includes procedures for responding to feedback about training quality and utilization in the Management Practices for Professional Training Services, Version 3.
			KPMG Consulting found that BellSouth implemented new training procedures as a result of ALEC feedback. New procedures include a program for instructor training, a standardized format for training materials, and web-based course enrollment and history. KPMG Consulting found these processes were implemented through a review of the Management Practices for Professional Training Services, Version 3 and the ALEC training website.
PPR4-6	Scope of training services covers customer requirements.	Satisfied	The scope of training services covers key customer requirements.
			KPMG Consulting's review of training course schedules and materials found courses were available for all wholesale products and services BellSouth offers to ALECs.
			Course schedules and descriptions are

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Test Reference	Evaluation Criteria	Result	Comments
			available to ALECs via the BellSouth training website[25] and to training personnel in the Management Practices for Professional Training Services, Version 3.
PPR4-7	The training process includes procedures for accepting ALEC input regarding training curriculum.	Satisfied	The Management Practices for Professional Training Services documentation includes procedures for accepting ALEC input regarding training curriculum. Procedures are available for ALECs to provide input regarding training curriculum through the ALEC Feedback Survey completed at the end of each training course. These processes are documented in the Management Practices for Professional Training Services, Version 3. KPMG Consulting reviewed both blank and completed BellSouth CLEC Training Feedback Surveys. KPMG Consulting personnel attended the Complex Service Order Class and observed the completion of ALEC Training Surveys by attendees.
PPR4-8	Training offerings are scalable in response to demand.	Satisfied	Training offerings are scalable in response to demand. Courses and instructors are added or removed as needed during the year. The process for scaling course offerings in response to demand is documented in the Management Practices for Professional Training Services, Version 3.
PPR4-9	The training process includes procedures for publishing information about training opportunities.	Satisfied	Management Practices for Professional Training Services, Version 3, documents the training process procedures for publishing information about training opportunities. Information on ALEC training offerings is published via the BellSouth training website[26], newsletters, and news articles. The BellSouth Account Team also provides

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[25] http://www.interconnection.bellsouth.com/training/html/info.html
[26] http://www.interconnection.bellsouth.com/training/html/info.html

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Test Reference	Evaluation Criteria	Result	Comments
			information to ALECs regarding training opportunities.
PPR4-10	Process includes procedures to track attendance and utilization of training offerings.	Satisfied	BellSouth Training Services has procedures to track attendance and utilization of training offerings. BellSouth Training Services uses an internal database to record and track ALEC attendance at each training session. Procedures for updating the tracking database are documented in the Management Practices for Professional Training Services, Version 3. KPMG Consulting reviewed this database and confirmed it contains the required information.
PPR4-11	Training process performance measures are defined and measured.	Satisfied	Training process performance measures are defined and procedures for performance measurements are documented in the Management Practices for Professional Training Services, Version 3. Training process performance is measured against course curriculum, course materials, instructor presentation, and instructors. KPMG Consulting reviewed the BellSouth Return on Investment (ROI) Study confirmed that the study evaluated the value of BellSouth ALEC training curriculum.
PPR4-12	Responsibilities for tracking performance of ALEC training offerings are assigned.	Satisfied	Responsibilities for tracking performance of ALEC training offerings are assigned to the Training Coordinator and Senior Manager. Tracking information is captured automatically through web-based registration and course management software. The tracking information is stored in a database that can be queried by the Training Coordinator. The Senior Manager reviews all data quarterly. The training review process is documented in the Management Practices for Professional Training

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Test Reference	Evaluation Criteria	Result	Comments
			Services, Version 3.
PPR4-13	Process includes procedures to survey training recipients on the effectiveness of training.	Satisfied	The procedures for surveying training recipients are documented in Management Practices for Professional Training Services, Version 3. KPMG Consulting personnel attended the Complex Service Order Class and observed the completion of ALEC training surveys.
PPR4-14	The training process includes procedures to monitor instructor performance.	Satisfied	The Professional Training Services' Senior Manager is responsible for monitoring instructor performance and for providing recommendations for improvement where needed. The processes for monitoring instructor performance are documented in Management Practices for Professional Training Services, Version 3.

5.0   Parity Evaluation

This section contains the parity evaluation for the ALEC Training Verification and Validation Review (PPR4).

5.1   Overview

In accordance with the Florida Master Test Plan, KPMG Consulting examined processes used by BellSouth to train retail customer care employees and those that are used to train ALECs to determine whether the processes are in parity.

In order to conduct this parity evaluation, KPMG Consulting identified analogous retail areas. These included two operational areas, personnel and management structure. In addition, five functional areas were selected including curriculum development, curriculum evaluation, instructor oversight, process documentation, and attendance and utilization tracking. Using these analogs, KPMG Consulting determined that the processes used by BellSouth to manage the retail training of customer care representatives are similar to the processes used to manage ALEC training. Any differences are attributable to variations in the size and scope of training. KPMG Consulting determined that BellSouth processes for managing ALEC training are in parity with processes used to manage retail training.

5.2   Method of Analysis

KPMG Consulting conducted a parity analysis of the ALEC Training Process by collecting and analyzing the following data sources:

♦   Conducted an Interview with the BellSouth University Customer Care Institute; and

♦   Reviewed process documentation for the BellSouth University Customer Care Institute.

5.3   Results

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A summary of the results of KPMG Consulting's parity evaluation is presented in Table 4-3 below:

Table 4-3: ALEC Training Process Verification and Validation (PPR4) Parity Review

Process Area	Retail Training BellSouth University Customer Care Institute Training	ALEC Training BellSouth Professional Training Services	Parity Evaluation
Personnel	The BellSouth University Customer Care Institute personnel consists of Training Instructors, Instructional Designers, and a Director of Internal Support. Training Instructors are responsible for delivery of specific courses within a BellSouth business unit. Instructional Designers are responsible for developing course curriculum and training materials. The Director of Internal Support is responsible for tracking all employee attendance data.	The BellSouth Professional Training Services personnel consist of a Training Coordinator, Training Instructor, and Technical Writer. Training Instructors are responsible for delivery of specific courses available to ALECs. Technical Writers are responsible for development of curriculum, training materials, and user guides. The Training Coordinator is responsible for tracking attendance and utilization of ALEC training.	The personnel responsible for wholesale and retail training are comparable. The retail and wholesale groups employ similar personnel who are responsible for delivering training curriculum. The retail and wholesale training groups employ different personnel for training development. The retail group employs Instructional Designers and the wholesale group employs Technical Writers. Instructional Designers and Technical Writers execute the same tasks. Similar types of personnel are responsible for tracking training course utilization and attendance. The BellSouth University Customer Care Institute employs a higher number of training personnel. Numbers of retail and wholesale training personnel are based on course demand. The retail training organization is responsible for training a greater number of students and therefore retail training employs more training personnel to meet the retail demand.
Management Structure	BellSouth University Customer Care Institute personnel report to a	BellSouth Professional Training Services personnel report to the	The management structure is nearly identical for the retail and wholesale training

Process Area	Retail Training BellSouth University Customer Care Institute Training	ALEC Training BellSouth Professional Training Services	Parity Evaluation
	Curriculum Manager responsible for their business unit.	Senior Manager in charge of Professional Training Services.	processes. Both retail and wholesale training personnel report to a manager who oversees the curriculum for the business unit (i.e. Customer Care Associates (CSA) Customer Care Business Unit).
Curriculum Development	Retail training curriculum development is driven by the customer care business units and is related to new systems, processes, or a need to provide better training on a particular topic. Retail training method and procedure guides to aid in curriculum development exist and are available to Instructional Designers.	Wholesale training curriculum development is driven by ALEC input, review of errors by the BellSouth Centers, and system and process changes. Wholesale training methods and procedures exist and are available to Technical Writers.	The curriculum development drivers and curriculum development procedures are comparable. The differences in curriculum development occur only at the content level. This is expected since the retail and wholesale training teams train personnel for execution of different tasks.
Training Effectiveness	Each training participant is provided with a survey to comment on course content and overall training effectiveness. The pre and post testing of students is conducted in order to gauge the amount of learning that occurs. Managers of each BellSouth business unit may determine that employees are deficient in certain areas and, subsequently, communicate the findings to the retail training organization. The retail training organization uses these effectiveness evaluations as a tool for potential	Each training participant is provided with a survey to comment on course content and overall training effectiveness. The participant is unable to receive a certificate of course completion until the survey is completed. The pre and post testing of students is conducted in order to gauge the amount of learning that occurs. The wholesale training organization reviews ALEC error reports to determine the effectiveness of training courses. The wholesale training organization uses these effectiveness evaluations as a tool for potential revisions to training	Both the retail and wholesale training organizations use nearly identical methods to evaluate the effectiveness of training curriculum. Both retail and wholesale training organizations use the effectiveness evaluations to update training curriculum and materials in order to focus on training areas requiring additional attention.

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Process Area	Retail Training BellSouth University Customer Care Institute Training	ALEC Training BellSouth Professional Training Services	Parity Evaluation
	revisions to training content or materials.	content or materials.	
Instructor Oversight	The Curriculum Manager reviews all training surveys. Issues identified in the surveys related to instructor performance are discussed with the instructor.

The Curriculum Manager attends each instructor's course once per quarter. | The Senior Manager responsible for Professional Training Services reviews data collected from the participant surveys for each instructor. The survey results are added to the training database. Reports are created for each instructor every quarter. Any issues identified are discussed with the instructor.

The Senior Manager attends each instructor's class at least once per year. An independent contractor also provides instructor review at least twice per year. | The retail and wholesale training organizations use similar processes to review instructor performance.

The frequency of review differs somewhat. The difference in number of observations is consistent with a lesser course schedule for ALEC training instructors. |
| Process Documentation | BellSouth University Customer Care Institute has internal methods and procedures available to all personnel conducting the various roles in the retail training process. | BellSouth Professional Training Service has internal methods and procedures documentation available to all personnel conducting the various roles in the wholesale training process. | Methods and procedures documentation is consistent between the retail and wholesale training organizations, except for those areas necessarily different due to differences in course content. |
| Attendance and Utilization Tracking | BellSouth University Customer Care Institute uses a database to track information on employee attendance.

The database also stores information on course enrollment and can be queried to show such issues as low course attendance.

The Director of Internal Support is responsible for updating the database. | BellSouth Professional Training Services uses a database to track attendance and course enrollment.

ALEC personnel who attend training can query the database via the training website. The database provides ALEC personnel with information pertaining to their course history.

The Training Coordinator is responsible for updating. | Similar attendance and utilization tracking processes are used by both the retail and wholesale training organizations. In addition, both databases are used to store similar data. |

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Process Area	Retail Training BellSouth University Customer Care Institute Training	ALEC Training BellSouth Professional Training Services	Parity Evaluation
		is responsible for updating this database.	

5.4   Parity Results Summary

BellSouth Professional Training Services is analogous to BellSouth University Customer Care Institute at the process level. Some variance occurs due to similar, but not identical, customers and course demand. KPMG Consulting determined that BellSouth's processes for managing Professional Training Services are in parity with the processes for managing BellSouth University Customer Care Institute.

6.0   Final Summary

This section summarizes the number of test evaluation criteria discussed in Section 4.1, Table 4-2 above and the number that was satisfied or not satisfied at the conclusion of this test.

6.1   Summary of Findings

There were 14 evaluation criteria considered for the ALEC Training Verification and Validation Review (PPR4). All 14 evaluation criteria received a satisfied result.

As all evaluation criteria are satisfied, KPMG Consulting considers the ALEC Training Verification and Validation Review (PPR4) test area satisfied at the time of the final report delivery.

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E.   Test Results: Interface Development Verification and Validation Review (PPR5)

1.0   Description

The Interface Development Verification and Validation Review (PPR5) evaluated the BellSouth interface development procedures. The objectives of this test were to determine the adequacy, consistency, and completeness of BellSouth's processes for developing, providing, and maintaining Operation Support Systems (OSS) interfaces for pre-ordering, ordering, and maintenance and repair (M&R). The interfaces relevant to the ordering and pre-ordering aspects of this test include BellSouth's Telecommunications Access Gateway (TAG), Electronic Data Interchange (EDI), and Local Exchange Navigation System (LENS). Interfaces relevant for M&R include BellSouth Trouble Administration Facilitation Interface (TAFI) and Electronic Communications Trouble Administration (ECTA) products. The information sources used for this evaluation included interviews with BellSouth personnel, reviews of BellSouth's documented methods and procedures, and discussions with Alternative Local Exchange Carriers (ALEC) and KPMG Consulting's test ALEC interface development team (CKS).

2.0   Business Process

This section describes BellSouth's interface development business processes.

2.1   Business Process Description

The initial point of contact for an ALEC interested in obtaining access to the BellSouth OSS is either the BellSouth Account Team or the CLEC Advisory Team, depending on the type of interface. An ALEC seeking to obtain pre-order access to the BellSouth OSS may choose to interconnect and exchange data with BellSouth through the LENS or TAG interfaces. For ordering, ALECs may choose to interface through LENS, TAG, or EDI.

To ensure successful interconnection with BellSouth as well as the proper format of submitted business transactions, BellSouth provides an environment for ALECs to test basic system connectivity and gateway-to-gateway interface functionality. A BellSouth Testing Coordinator is assigned to assist the ALEC in further developing the interface and also to ensure that the systems are capable of processing valid service orders and responses.

BellSouth provides the following testing environments to support ALEC interconnection testing:

♦   ALEC interface testing – Testing for ALECs implementing a new interface, product, or release;

♦   Vendor interface testing – Testing for vendors implementing a new interface or product on behalf of a single or multiple ALECs;

♦   Certification testing – Testing for vendors to apply for BellSouth certification on a particular interface, product, or release; and

♦   CLEC Application Verification Environment (CAVE) – Testing for ALECs and vendors to test a new release of TAG, EDI, or LENS.

ALECs initially developing their electronic interfaces with BellSouth undergo a process called new-entrant testing. This process assesses whether or not the interfaces and interactions work to the satisfaction of both the ALEC and BellSouth and that no adverse operational impacts occur to other ALECs.

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In order to properly test and enhance their EDI and TAG interface capabilities, new-entrant ALECs are provided access to the CLEC Test Environments (CTEs); these environments are separate from production and are specifically designed for new-entrant testing. CTEs and the production environment use the same connectivity and are both designed to process transactions with similar response times. These test environments are utilized by ALECs and vendors during the development of new TAG or EDI interfaces to BellSouth's OSS.

CAVE is used to test new software releases for ALECs and vendors that have completed certification testing and are already in production with BellSouth. New release testing offers ALECs a way to test upcoming BellSouth releases prior to the release(s) being implemented in production. Similar to new-entrant testing, ALECs test new releases through the EDI, LENS, or TAG interface and validate their systems development without triggering actual work orders.

BellSouth's interface testing process includes a standardized set of transactions, referred to as the Test Deck, which is composed of test customer account information, pre-order and order transactions, and Local Service Request (LSR) translation. BellSouth makes additions to the Test Deck when new products become available. Each test case has an expected result. BellSouth distributes an updated Test Deck for upcoming production releases before both the start of CAVE testing and the migration of code into production. For ALECs with relatively low volumes of pre-order and order transactions and for larger ALECs for pre-order transactions, BellSouth provides interconnection through LENS, which is a web-based graphical user interface (GUI). For this interface, BellSouth provides access to training and documentation and also provides necessary security identification (ID) cards, technical support, and passwords. Since LENS is available to any ALEC with a working internet connection, the process for this type of interface does not include support for establishing interface connectivity or the use of a specialized test environment.

3.0   Methodology

This section summarizes the test methodology.

3.1   Scenarios

Scenarios were not applicable to this test.

3.2   Test Targets and Measures

The test target included the functions of developing, publicizing, conducting, managing, and monitoring interface development and interface development support for ALECs. Reviews of the following processes and sub-processes were included in the test:

♦   Developing interfaces;

♦   Interface development methodology;

♦   Provision of interface specifications and related documentation;

♦   Enabling and testing interfaces;

♦   Interface enabling and testing methodology;

♦   Availability of test environments and technical support to ALECs;

♦   Interface enabling and testing support;

♦   Release management; and

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♦ Capacity management.

3.3 Data Sources

Data collected for the Interface Development Verification and Validation Review (PPR5) included the following:

♦ Initial and follow-up interviews with the BellSouth OSS development and support teams (for LENS, TAFI, EDI, ECTA, TAG, Capacity Planning, Carrier-to-Carrier Testing, Forecasting, LNP Gateway) in September, 2000 and December, 2000, respectively;

♦ Refresh interviews with the BellSouth OSS development and support teams (for LENS, TAFI, EDI, ECTA, TAG, Capacity Planning, Carrier-to-Carrier Testing, Forecasting, LNP Gateway) and OSS disaster recovery team in November, 2001;

♦ Interviews with the KPMG Consulting ALEC (CKS);

♦ Observations of OSS transactions by CKS;

♦ Initial and follow-up interviews with BellSouth OSS development teams for CAVE;

♦ The BellSouth Start-Up Guide;

♦ The BellSouth ECTA Start-Up Guide;

♦ CLEC TAFI User Guide;

♦ LENS Version 6.0 Training;

♦ TAG API Reference Guide;

♦ BellSouth EDI Specifications;

♦ Electronic Interface Implementation and Upgrade Communications Plan;

♦ Local Exchange Ordering Implementation Guide (LEO IG) Volumes 1 and 4; and

♦ BellSouth Business Rules for Local Ordering (BBR-LO).

3.4 Data Generation/Volumes

This test did not rely on data generation or volume testing.

3.5 Evaluation and Analysis Methods

Specific test activities conducted during the evaluation included:

♦ Review of both ALEC-facing documents and internal BellSouth interface development methods and procedures;

♦ Discussions with ALECs doing business with BellSouth;

♦ Interviews with BellSouth and internal KPMG Consulting interface development personnel;

♦ Observation of interface development efforts by KPMG Consulting internal development personnel;

♦ Attendance at BellSouth Inforum meetings;

♦ Observation of BellSouth Release Management; and

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♦   Analysis of CAVE new release testing.

The Interface Development Verification and Validation Review (PPR5) included a checklist of evaluation criteria developed by KPMG Consulting during the initial phase of the BellSouth OSS Evaluation. These evaluation criteria provided the framework of norms, standards, and guidelines for the Interface Development Verification and Validation Review (PPR5). The data collected were analyzed employing the evaluation criteria detailed in Section 4.1 below.

4.0   Results

This section contains the overall test results.

4.1   Results Summary

The number of exceptions and observations issued during the life of the test is depicted in Table 4-1. For additional exception and observation information, refer to Appendices D and E, respectively. The test criteria and results are presented in Table 4-2.

Table 5-1: PPR5 Exception and Observation Count

Activity	Exceptions	Observations
Total Issued	11	8
Total Disposed as of Final Report Date	10	7
Total Open as of Final Report Date	1	1

Table 5-2: PPR5 Evaluation Criteria and Results

Test Reference	Evaluation Criteria	Result	Comments
PPR5-1	Interface development methodology, responsibilities, and activities are defined.	Satisfied	BellSouth has interface development methodology responsibilities and activities defined for TAG, EDI, LENS, TAFI, and ECTA. **TAG** KPMG Consulting conducted interviews with the TAG Project Manager and the BellSouth TAG development team on September 27, 2000 to review BellSouth's interface development methodology. KPMG Consulting reviewed BellSouth documentation and monitored CKS interface implementation activities in order to test adherence to the defined methodology. KPMG Consulting determined that the interface development responsibilities and activities were defined. In refresh interviews conducted on November 14, 2001, KPMG Consulting confirmed that the development processes related to TAG had not changed. These methodologies, responsibilities, and activities are documented in BellSouth's November 2000 Communication Plan for TAG Version 5.0,

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Test Reference	Evaluation Criteria	Result	Comments
			November 2000, which lists key contact names and numbers. The specific steps required to comply with BellSouth's interface development process is contained in the BellSouth Startup Guide – BellSouth Interconnection Services Issue 1.5, April 2002 and is also published on the BellSouth interconnection website[27].
			KPMG Consulting verified that BellSouth maintains Advisory Teams, Account Teams/CLEC Care Team, and an Electronic Commerce (EC)/OSS CLEC Care Team to assist ALECs in documentation completion and issue resolution. The procedures used by these teams are documented in the Account Team /CLEC Care Team Methods and Procedures & Account Team/CLEC Care Team Information Package, Version 10, March 6, 2002. A refresh interview held on November 14, 2001 indicated that the methodology was both understood and was being followed. A master list outlining the specific steps required to comply with BellSouth's interface development process is contained in the BellSouth Startup Guide and is published on the interconnection website.
			EDI

KPMG Consulting conducted interviews with the BellSouth EDI Project Manager on September 13, 2000 and November 11, 2001. KPMG Consulting reviewed BellSouth documentation and monitored the CKS interface implementation activities in order to test for adherence to the methodology. KPMG Consulting determined that interface development responsibilities and activities were defined for the EDI interface. The EDI Project Team Roster defines responsibilities of the Lead Project Manger Encore, the Electronic Data Transfer and Transformation (EDTAT) Team Lead, EDTAT Team Development and Support Teams, LCSC Electronic Team, BellSouth Technology Group (BTG), and Sales Support. These activities are summarized in the Electronic Data Transfer and Transformation (EDAT) EDI Test Plan (T907) Encore Release 7.1, Version 1.0, December 19, 2002. |
| | | | **LENS**

The LENS interface development methodology, |

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[27] http://www.interconnection.bellsouth.com/guides/html/clec_ar.html

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Test Reference	Evaluation Criteria	Result	Comments
			responsibilities, and activities were described during interviews with BellSouth's LENS development teams during September 2000. They are documented in Encore Electronic Interface Ordering (EIO) Deliverable Project Definition (x9230) Final End-of-Design, January 6, 2001 document. These procedures were again confirmed in a refresh interview with the LENS Project Manager from BellSouth conducted on November 12, 2001. KPMG Consulting reviewed the BellSouth documentation and monitored the CKS interface implementation in order to verify that the methodology is carried out as documented. **ECTA** Upon review of BellSouth ECTA documentation, KPMG Consulting found that BellSouth lacked a consistent and documented process that enables ALECs to independently develop an ECTA interface. Exception 8 was issued as a result of these findings. In response, BellSouth issued the ECTA Start-Up Guide Issue 4, November 2001, which delineates interface development responsibilities and activities, and the Joint Implementation Agreement (JIA)[28], which contains a master list that outlines the specific steps required to comply with BellSouth's interface development process. Based on KPMG Consulting's review of this new documentation, Exception 8 was closed. KPMG Consulting monitored CKS interface implementation activities in order to test for adherence to the ECTA interface development methodology. **TAFI** KPMG Consulting conducted an interview on November 6, 2001 with the BellSouth TAFI Project Manager. Information gathered from this interview indicated that software development modifications, updates, and testing are performed by different parties, such as BellSouth, Andersen Consulting (now Accenture), and EDS. Interface development methodology responsibilities and activities are delineated in BellSouth's CLEC TAFI User Guide, Issue 6a, April 2002. KPMG Consulting monitored CKS in order to verify BellSouth's adherence to the

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[28] Joint Implementation Agreement (JIA) for Electronic Communications Trouble Administration (ECTA) Gateway for Local Service between CLEC and BellSouth Telecommunications, Inc. Issue 5.0, January 2002

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Test Reference	Evaluation Criteria	Result	Comments
			defined methodology. **ALL INTERFACES** In addition to maintaining interface development documentation, BellSouth Account Teams also provide assistance to ALECs for documentation completion and issue resolution for all interfaces. These procedures were updated to reflect BellSouth's restructuring of the Account Team organization in January 2002. They are defined in the Account Team/CLEC Care Team Methods Procedures, Account Team/CLEC Care Team Information Package, and in the EC/OSS Procedures document.
PPR5-2	BellSouth has a software/interface development methodology that addresses requirements and specification definition, design, development, testing, and implementation.	Not Satisfied	KPMG Consulting determined that BellSouth has a software/interface development methodology that addresses requirements and specification definition, design, development, testing, and implementation for all interfaces. Based on the number of defects encountered in BellSouth Releases 10.2 and 10.3, however, it appears that the BellSouth software/interface development methodology is not consistently followed for new software releases. Exception 157 was issued. KPMG Consulting reviewed the results of Release 10.5 to ensure adherence to the BellSouth quality assurance process. As of July 17, 2002 there have been 28 software and 24 documentation defects identified in Release 10.5. KPMG Consulting amended Exception 157 to reflect these additional issues. Exception 157 remains open. **TAG** KPMG Consulting determined that BellSouth employed a complete software/interface development methodology for TAG. This information was obtained in an interview conducted by KPMG Consulting with the BellSouth TAG development team on September 27, 2000. KPMG Consulting also reviewed BellSouth documentation and monitored CKS interface implementation activities and determined that BellSouth was adhering to the process. **EDI** Refresh interviews conducted with the EDI Project Manager on November 7, 2001 and with the BellSouth Carrier-to-Carrier Testing Managers for

Test Reference	Evaluation Criteria	Result	Comments
			EDI on November 15, 2001 confirmed that a methodology was in place and was being followed. KPMG Consulting reviewed BellSouth documentation and monitored CKS interface implementation activities and confirmed adherence to the interface development methodology.
			BellSouth's overall development lifecycle processes are defined in BellSouth's Change Control Process (CCP), Version 3.1, May 29, 2002 documentation. Methodologies that address requirements and specifications design and development are defined in the Requirements Development Process, Version 2a, May 19, 1999 and Requirements Process Flow documents. The methodology that addresses testing is defined in the Encore Electronic Interface Ordering (EIO) Overall Test Strategy (T911), Version 2.0, November 30, 2001 document. The methodology that addresses development and testing are defined in the Encore EIO Test Approach (T910) for EDI, Version 1.0, September 21, 2002 and EDI Test Plan documents. Overall testing methodology for all interfaces is contained in the EIO Release Test Strategy and EIO Product Test Approach documents.
			During an interview with the BellSouth ALEC testing team on December 5, 2001, KPMG Consulting determined that BellSouth does not support Pre-Order testing in the CLEC Application Verification Environment (CAVE). In a follow-up interview held on December 10, 2001, KPMG Consulting determined that BellSouth did not have processes in place to support an ALEC request for a new pre-order test scenario. As a result, Exception 128 was issued. KPMG Consulting's retesting activities consisted of interviews with ALECs and Vendors who had conducted testing in the CAVE. From these discussions it was determined that an ALEC or Vendor could issue a pre-order transaction in CAVE. Exception 128 was subsequently closed.
			KPMG Consulting found that BellSouth's EDI test environment is inadequate for testing an ALEC's EDI interface. The EDI test environment did not allow ALECs to fully test Local Number Portability (LNP) without the use of live customers. Exception 1 was issued. BellSouth developed a complete EDI test environment. KPMG Consulting was satisfied that this addressed the issues in Exception 1 and closed the exception.
			KPMG Consulting found, through testing of

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Test Reference	Evaluation Criteria	Result	Comments
			BellSouth's test cases provided to ALECs for EDI end-to-end testing, that the test cases were either incomplete or incorrect. KPMG Consulting issued Exception 3. BellSouth updated and completed the EDI test cases. KPMG Consulting was satisfied that this issue was resolved and closed Exception 3.
			Based on KPMG Consulting's experiences with EDI development and testing coupled with review of BellSouth documentation, KPMG Consulting determined that BellSouth lacked an appropriate process, methodology, and robust test environment for testing an ALEC-developed EDI interface. As a result, KPMG Consulting issued Exception 6.
			BellSouth developed the EDI test environment to address this issue. Based on a review of the testing process developed by BellSouth and observations of the CKS test transactions, KPMG Consulting was satisfied that this addressed the issues raised in Exception 6 and closed the exception.
			TAFI In the CLEC TAFI Specifications document, BellSouth defines system and functional requirements as well as design specifications, system components, testing, and implementation processes for ALECs. The above document is posted on the ALEC homepage of the BellSouth website. This information was confirmed in an interview with the BellSouth TAFI Project Manager on September 28, 2000. KPMG Consulting reviewed the BellSouth website and monitored CKS interface development activities. This allowed KPMG Consulting to determine that the information was correct and available to ALECs.
			ECTA KPMG Consulting reviewed BellSouth documentation and found that BellSouth did not have sufficient, publicly available, documentation that provided information to ALECs about how to establish physical connectivity with the ECTA interface. Exception 7 was issued as a result. Exception 7 was closed following the issuance of the ECTA Start-Up Guide and modified JIA.
			KPMG Consulting also monitored interface development efforts by CKS to confirm BellSouth's adherence to the process for ECTA requirements, specification definition, design, development, testing, and implementation. The monitoring of the

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Test Reference	Evaluation Criteria	Result	Comments
			CKS development of an ECTA interface allowed KPMG Consulting to determine that the required development information was available to ALECs and also correct.
PPR5-3	Interface development methodology has a defined quality assurance process.	Not Satisfied	KPMG Consulting determined that the BellSouth interface development methodology documentation includes a quality assurance process. However, as evidenced by the number of defects encountered in BellSouth Releases 10.2 and 10.3, it appears that the BellSouth Quality Assurance process is not consistently followed. Based on this finding, KPMG Consulting issued Exception 157. KPMG Consulting reviewed the results of Release 10.5 to ensure adherence to the BellSouth quality assurance process. As of July 17, 2002 there have been 28 software and 24 documentation defects identified in Release 10.5. KPMG Consulting amended Exception 157 to reflect these additional issues, and the exception remains open. **TAG** As a result of interviews with the BellSouth TAG Project Manager on September 27, 2000 and on November 14, 2001, KPMG Consulting determined that BellSouth has a defined and documented quality assurance process for interface development. The overall quality assurance strategy is defined in the TAG & RoboTAG Quality Assurance Plan, Version 3, April 17, 2001; the processes for verifying defects and managing defect resolution are defined in the document entitled Electronic Interface Testing Guidelines, Version 4.0, April 2002; and a release management strategy is set forth in the Release Management End-to-End Process Flow, Version 1.2, January 15, 2002 document. KPMG Consulting identified that BellSouth does not apply system fixes to defects for all production versions of the OSS interfaces. **EDI** Based on interviews held with the EDI Project Manager on September 13, 2000 and November 11, 2001, KPMG Consulting determined that BellSouth has a defined and documented quality assurance process for EDI interface development. These quality control processes are defined in the EIO Product Test Approach and Electronic Interface Testing Guidelines and the EDI Testing Guidelines

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			for CLECs, Version 4, June 20, 2001 documents.
			The problem resolution process for tracking defects was discussed in an interview with the EDI project team members of BellSouth on November 7, 2001 and with the LENS project team on September 11, 2000 and November 12, 2001. KPMG Consulting discovered that there was a standard procedure that assures that defects are properly verified, and that the management of the defect resolution processes is defined (as per the Release Management End-to-End Process Flow document).
PPR5-4	Responsibilities and procedures for developing and updating interface specification documents are defined. .	Satisfied	KPMG Consulting has determined that BellSouth has defined responsibilities and documents for developing and updating interface specification documents for all interfaces.
			KPMG Consulting issued Exception 168, which noted that BellSouth has not updated the BellSouth Pre-order business rules to correlate to the correct versions of TAG. This issue had previously been noted in Exception 25, which was closed when BellSouth updated the relevant documents. In BellSouth's response to Exception 168, it noted the problem and stated that it would correct the website. KPMG Consulting reviewed the BellSouth website, verified that the updates had been applied, and closed Exception 168.
			As a result of interviews conducted by KPMG Consulting with the BellSouth Interconnection Operations Group on September 12, 2000 and the Electronic Interface Support Group on September 19, 2000, KPMG Consulting determined that BellSouth has defined responsibilities and procedures for developing and updating interface specification documents. The BellSouth Interconnection Operations Group and the Electronic Interface Support Group are responsible for the documentation for all interfaces that include: TAG, EDI, LENS, TAFI, and ECTA. These procedures are defined in the Change Review Board Charter, Version 5.0, February 1, 2001, the Requirements Process Flow, and Change Control Process documents. Refresh interviews conducted on November 14, 2001, and a spot review of new versions of the interface development documentation confirmed the existence and adherence to the processes for updating interface documentation. **TAG**

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Test Reference	Evaluation Criteria	Result	Comments
			BellSouth did not have public documentation available for ALECs to correlate the available version(s) of the TAG interface with either the BBR-LO OSS 99 or the BellSouth Pre-Order Business Rules. Exception 25 was issued to reflect this issue. BellSouth updated the applicable documents and, as a result, Exception 25 was closed.
			LENS
			Information about developing and updating LENS interface specification documentation responsibilities and procedures was gathered in interviews with the LENS project team conducted by KPMG Consulting on September 11, 2000 and November 12, 2001. Following these interviews, KPMG Consulting reviewed the BellSouth interconnection website and determined that the LENS documents had been properly updated.
			TAFI
			During interviews with the TAFI Project Manager conducted on September 28, 2000 and November 6, 2001, BellSouth stated that there are generally four releases planned for each year. The BellSouth TAFI Project Manager is responsible for developing and updating TAFI Interface Specification, Version 02, May 1997 documents. A review of the TAFI documents determined that Interface Specifications were properly incorporated.
			ECTA
			The ECTA responsibilities and procedures for developing and updating interface specifications are defined in the JIA. ECTA is a standards-based interface and as such is ruled by the tenets of the JIA. Based on a review of the applicable standards by KPMG Consulting it was determined that BellSouth implemented the interface standards without modification.
PPR5-5	Interface specifications that define applicable business rules, data formats and definitions, and transmission protocols are available to customers.	Satisfied	BellSouth has interface specifications that define applicable business rules, data formats and definitions, and transmission protocols. KPMG Consulting confirmed that these are made available to its customers by reviewing the information delivered to CKS during interface development and through a review of the documents on the BellSouth interconnection website. Through an interview with the Electronic Project Management Organization of BellSouth on

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			September 12, 2000, KPMG Consulting was informed that BellSouth had made interface specifications available to customers. KPMG Consulting has also monitored both the BellSouth website and BellSouth communications (through the Change Management Process and with CKS) to confirm the availability of interface specifications.
			TAG
			During development of the TAG interface by the KPMG Consulting pseudo ALEC, KPMG Consulting identified that BellSouth did not have a documented process available for ALECs to establish connectivity. Exception 20 was issued. BellSouth updated the ALEC documents. KPMG Consulting reviewed the updated documentation and was satisfied that it included information for ALECs to establish connectivity. Exception 20 was closed.
			Data formats, definitions, and transmission protocols for TAG are defined in the TAG API Reference Guide, Issue 3, March 2002 and TAG Programmer's Job Aid, Version 6.0, January 15, 2000.
			EDI
			Interface specifications for EDI are available for ALEC reference. The purpose of the specifications is to define applicable business rules, data formats and definitions, and transmission protocols. These specifications can be found in BellSouth's EDI Specifications Guide, August 30, 2000 and BellSouth Business Rules for Local Ordering (BBR-LO), Issue 10.5, June 2002.
			KPMG Consulting reviewed BellSouth's EDI documentation and identified inconsistencies and omissions in both the EDI Specifications and BBR-LO. These errors would prevent successful ALEC EDI interface development. As a result, KPMG Consulting issued Exception 2. BellSouth corrected errors in the EDI Specifications and BBR-LO and issued a revised version of each to address these deficiencies. KPMG Consulting reviewed documentation and conducted retesting based on the updated documentation. KPMG Consulting determined that the errors had been corrected. Exception 2 was closed.
			LENS
			Interface specifications for LENS, including access

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			methods and rules, are defined in the LENS User Guide, Version 10.4, March 24, 2002. KPMG Consulting further confirmed information about how these specifications are made available to customers in an interview with the BellSouth LENS Project Manager on November 12, 2001. **TAFI** Interface specifications for TAFI that define business rules, data format, and transmission protocols are found in the CLEC TAFI User Guide, Issue 5.0, September 2000; CLEC TAFI End-User Training Manual, Issue 1.0, March 2000; and CLEC TAFI Specifications documents. This information was further corroborated in two interviews with the BellSouth TAFI Project Manager on September 28, 2000 and November 6, 2001. **ECTA** Data formats, definitions, and transmission protocols for ECTA are defined in the JIA and the ECTA Start-Up Guide documents. Through interviews with the BellSouth ECTA Project Manager conducted on September 28, 2000 and November 6, 2001, KPMG Consulting determined that the interface specifications contained the required information and that they were made available to ALECS wishing to use the ECTA interface.
PPR5-6	Customer support for interface development is available.	Satisfied	BellSouth provides interface development customer support for each available interface. KPMG Consulting determined that BellSouth provides customer support for interface development. This determination was confirmed during interviews conducted with the BellSouth Project Manager of Customer Systems Group on September 13, 2000, the BellSouth TAG Project Manager on November 14, 2001, the EDI Project Manager on September 13, 2000 and on November 7, 2001, and the BellSouth Electronic Communications (EC) Support team on March 26, 2002, as well as through continuous monitoring of customer support by BellSouth for CKS. KPMG Consulting also determined that the primary customer support channel for TAG API development and testing is provided by the BellSouth ALEC Account Team/CLEC Care Team and the EC/OSS CLEC Care Team, whose

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			customer support procedures, template forms, and specific contact information are detailed in the Account Team/CLEC Care Team Methods and Procedures and the EC/OSS CLEC Care Team documents.
			This criterion is not applicable to LENS or TAFI GUI interfaces into the BellSouth systems. LENS and TAFI do not require development by ALECs.
PPR5-7	Procedures for updating interface specifications are integrated with formal change management procedures.	Satisfied	KPMG Consulting determined that BellSouth has procedures in place for updating interface specifications and that they are integrated with the formal change management procedures.
			Based upon information provided during an interview on September 12, 2000 with the BellSouth Interconnection Operations Group, KPMG Consulting determined that the process for updating interface specifications is integrated with change management procedures. Procedures for updating interface specifications for all interfaces are defined in BellSouth's Change Control Process document.
			Processes for managing and deploying proposed changes are made in accordance with the industry average of major release cycles, which is every six months, or as required by regulatory changes. Change requests and Change Review Board (CRB) decisions are distributed via email to pre-identified, interested parties.
			Procedures for updating the EDI interface specifications are made in compliance with the ANSI ASC X12 EDI and TCIF industry standards.
			Processes for managing and deploying proposed ECTA changes are defined in the JIA document. Since ECTA is a standards-based interface and BellSouth does not modify the standards, the JIA covers all specifications and specification changes. These changes are consistent with the BellSouth Change Control Process.
PPR5-8	A methodology exists for conducting carrier-to-carrier testing of interfaces with customers seeking to interconnect.	Satisfied	BellSouth has a methodology for conducting carrier-to-carrier testing with customers seeking to interconnect.
			Processes for conducting carrier-to-carrier testing, including physical connectivity testing, API testing, application testing, validity testing, production verification testing, and service readiness testing are defined in the following documents: the TAG Testing Plan and Guidelines, October 12, 1998, the

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Test Reference	Evaluation Criteria	Result	Comments
			Electronic Interface Testing Guidelines, and the CLEC Testing Process, May 1999. The testing processes for ECTA are detailed in the JIA.
			During interviews with BellSouth on September 19, 2000, September 21, 2000 and November 15, 2001, KPMG Consulting learned that carrier-to-carrier test methods are outlined in the CLEC Technical Support Handbook, January 22, 2000 and are summarized in the Encore EIO Overall Release Test Strategy. Procedures governing BellSouth/ALEC communication throughout the testing process are outlined in the Electronic Interface Implementation and Upgrade Communications Plan, Version 4.0, March 2002.
			KPMG Consulting also monitored the interface development activities of CKS for TAG, EDI, LENS, TAFI, and ECTA.
			EDI
			As a result of the KPMG Consulting EDI development and testing and the review of BellSouth documentation, KPMG Consulting determined that BellSouth lacked an adequate process, methodology, and/or robust test environment for testing an ALEC-developed EDI interface. Exception 6 was issued. BellSouth developed the EDI test environment, and KPMG Consulting closed the exception.
			TAG
			BellSouth provides documented methods and procedures for conducting carrier-to-carrier testing of interfaces and makes them available to ALECs. Processes for conducting carrier-to-carrier testing, including physical connectivity testing, API testing, application testing, validity testing, production verification testing, and service readiness testing are defined in the TAG Testing Plan and Guidelines, Electronic Interface Testing Guidelines, and CLEC Testing Process documents.
			Test procedures are outlined in the CLEC Technical Support Handbook. The overall process for conducting carrier-to-carrier testing is outlined in the Electronic Interface Implementation and Upgrade Communications Plan and is summarized in the Encore EIO Overall Release Test Strategy.
			Carrier-to-carrier testing processes were determined to be complete based on information from interviews with the BellSouth carrier-to-carrier

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			testing managers for LNP and Non-LNP on September 21, 2000 and on November 15, 2001.
			LENS
			According to BellSouth Carrier Notification SN91083045 distributed on May 17, 2002, CAVE testing of LENS is scheduled for availability with Release 10.6 on August 24, 2002. This system is currently in ALEC Beta testing.
			ECTA
			KPMG Consulting reviewed BellSouth documentation and conducted testing activities and found that BellSouth did not have sufficient, publicly available documentation that provided information to ALECs regarding how to establish physical connectivity with the ECTA interface. Exception 7 was issued as a result.
			Exception 7 was closed following the issuance of the updated ECTA Start-Up Guide. This document defined processes for conducting physical and application connectivity testing, API testing, validity testing, production verification, and service readiness testing.
			TAFI
			Since there is no ALEC testing of the TAFI GUI interface, this criterion is not applicable to this interface.
PPR5-9	Functioning test environments are available to customers for all supported OSS Interfaces.	Satisfied	BellSouth makes test environments available to customers for all supported OSS Interfaces.
			During an interview with BellSouth test managers it was determined that pre-order functionality was not fully supported in the CAVE test environment. As a result, Exception 128 was issued. Following the issuance of Exception 128 KPMG Consulting conducted interviews with several ALECs/Vendors regarding CAVE Pre-order testing. Based on these interviews, KPMG Consulting is satisfied that pre-order testing can take place in CAVE and has closed Exception 128.
			TAG
			Test environments are available for new entrant, regression, and new release testing. BellSouth supports several different types of testing. The different types include:
			♦ ALEC Interface Testing – Testing for ALECs

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			implementing a new interface, product, or release;
			♦ ALEC Vendor Interface Testing – Testing for vendors implementing a new interface, or product (e.g., EDI, TAG, Resale, UNE-P, LNP, etc.);
			♦ Certification Testing – Testing for vendors who apply for BellSouth approved certification on a particular interface, product, or release; and
			♦ Functional Testing – Testing done in the CAVE, where ALECs can opt to conduct further functional testing, or vendors can conduct validity testing.
			In addition to conducting interviews, KPMG Consulting monitored the interface development and testing activities of CKS of all interfaces including TAG, EDI, LENS and ECTA. KPMG Consulting conducted reviews of relevant test environment BellSouth documentation.
			New release testing is conducted in the CAVE for TAG, EDI and LENS. The rules are detailed in the documents entitled CAVE One Hop Testing Guide, Version 0.3, March 8, 2001; CAVE Test Readiness Review Guide, Version 0.2 Draft, March 7, 2001; and CAVE Help Desk Defect Management Process, Version 0.3 Draft, March 7, 2001. The CLEC Technical Support Handbook also details the test environment including Ports and IP Addresses.
			Interviews conducted by KPMG Consulting with the TAG Project Manager on November 14, 2001 and the CAVE Project Managers on December 5, 2001 confirmed that functional test environments are available for all supported OSS interfaces.
			<u>EDI</u>
			The detailed process of how ALECs can go about testing an electronic interface in the EDI test environment was discussed in interviews with the Local Number Portability (LNP) system release management team member on September 21, 2000 and the LNP and Non-LNP testing managers on November 15, 2001.
			The BellSouth CAVE testing procedures were explained to KPMG Consulting by the CAVE support team of BellSouth in an interview on December 5, 2001.

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			ECTA New and existing entrant test environment availability is covered in the JIA. The functional test environment for ECTA was discussed with the ECTA Project Manager of BellSouth in interviews on September 28, 2000 and November 11, 2001. These interviews supported the fact that test environments were available to ALECs. **LENS** According to BellSouth Carrier Notification SN91083045 distributed on May 17, 2002, CAVE testing of LENS is scheduled for availability with Release 10.6 on August 24, 2002. This system is currently in ALEC Beta testing. **TAFI** This criterion was not applicable to the TAFI GUI interface. Application to application testing is not conducted for GUI-based systems.
PPR5-10	Carrier-to-carrier test environments are stable and segregated from development and production environments.	Satisfied	BellSouth has stable test environments that are segregated from development and production environments. During an interview with the BellSouth test managers it was determined that pre-order functionality was not fully supported in the CAVE test environment. As a result, Exception 128 was issued. Following the issuance of Exception 128 KPMG Consulting conducted interviews with several ALECs/vendors regarding CAVE Pre-order testing. Based on these interviews KPMG Consulting was satisfied that pre-order testing could take place in CAVE and closed Exception 128. During interviews conducted with BellSouth on November 14, 2001 and December 5, 2001 KPMG Consulting was informed that carrier-to-carrier test environments were stable and were segregated from production. New and existing entrant test environment availability is detailed in the JIA. **TAG** To ensure stability, the Encore Electronic Interface Implementation and Upgrade Communication Plan states that an ALEC should contact the Electronic Commerce Account Team and Vendors should contact the Software Vendor Process Project Manager (SVP PM) or the Test Desk in the event of operational issues.

Test Reference	Evaluation Criteria	Result	Comments
			Through interviews conducted with the TAG Project Manager on November 14, 2001 and the CAVE support team on December 5, 2001, KPMG Consulting was informed that carrier-to-carrier test environments were stable and segregated from production.
			EDI
			Through review of BellSouth's documentation, KPMG Consulting found that BellSouth's EDI test environment appeared to be inadequate for the testing of an ALEC's EDI interface. BellSouth lacked proper controls and processes to permit testing of LNP without affecting existing live customers. Exception 1 was issued.
			Modifications made by BellSouth to the test environment and business rules allowed the use of live customer data for testing EDI LNP with loop service. KPMG Consulting determined that these transactions would not impact the customer since Completion Notices and Number Portability Administration Center (NPAC) messages are not sent. Based on the BellSouth modifications, KPMG Consulting closed Exception 1.
			TAFI
			This criterion is not applicable since there is no ALEC testing of the TAFI GUI interface.
PPR5-11	On-call support is available for interface testing.	Satisfied	BellSouth provides on-call support during interface testing.
			TAG
			Through an interview conducted with BellSouth TAG Project Manager on September 27, 2000, KPMG Consulting determined that BellSouth provides communication channels to support interface testing. This information was corroborated during an interview with the BellSouth carrier-to-carrier test team that took place on December 5, 2001. KPMG Consulting monitored CKS interaction with BellSouth support during development of all interfaces.
			Contact information, phone numbers, and responsible organizations for production, testing, and the client API are listed in the TAG API Reference Guide document.
			EDI
			According to the terms and conditions within

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			BellSouth's Electronic Interface Testing Guidelines document, BellSouth's ALEC Help Desk and EC Support. EC Support is available Monday through Friday, between the hours of 8:00 a.m. and 5:00 p.m. Eastern Time and has after hour and weekend coverage available as described on the interconnection website. Support channels and work groups are defined in the Electronic Interface Implementation and Upgrade Communications Plan. **ECTA** The JIA provides details on support during ECTA testing. **TAFI** This criterion was not applicable to the TAFI GUI interface since CLECs do not undergo application-to-application testing of this interface.
PPR5-12	Carriers are provided with documented specifications for connection and administration of tests.	Satisfied	BellSouth provides documented specifications for connectivity and the administration of tests. **TAG** Through interviews with the Local Number Portability (LNP) System Release Manager on September 21, 2000 and the requirements and release manager for Encore Systems on September 26, 2000 coupled with refresh interviews with the test managers of LNP and Non-LNP testing for BellSouth on November 15, 2001, KPMG Consulting found that sufficient guidelines for connection and administration of tests were provided by BellSouth for carrier-to-carrier testing. KPMG Consulting monitored connectivity efforts undertaken by CKS the during interface development process. Processes for conducting physical connectivity testing, application connectivity testing, API testing, application testing, validity testing, production verification testing, and service readiness testing are defined in the Electronic Interface Testing Guidelines and the CLEC Testing Process documents. **EDI** KPMG Consulting's testing with BellSouth showed that the test cases BellSouth provides an ALEC for EDI end-to-end testing were either incomplete or incorrect. KPMG Consulting issued Exception 3. BellSouth updated and completed the EDI test

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			cases. Based on these revisions, Exception 3 was closed.
			The BellSouth Project Manager of Customer Support Group indicated in an interview on September 13, 2000 that details and documentation regarding the connection process could be obtained from the BellSouth Account/ CLEC Care Team.
			Processes for conducting physical connectivity testing, application connectivity testing, application testing, validity testing, production verification testing, and service readiness testing are defined in the Electronic Interface Testing Guidelines[29] that are used in conjunction with JIA documents.
			ECTA
			Specifications for connection of tests for ECTA are defined in the ECTA Start-Up Guide. The process of administration and connection of testing was discussed with the BellSouth CAVE support group in an interview on December 5, 2001. BellSouth personnel revealed that in addition to providing documentation, BellSouth also assigns a test manager to an ALEC to oversee the entire testing process.
			TAFI
			Specifications for TAFI connectivity are defined in the CLEC TAFI Specifications, Version 2, May 1997 document.
PPR5-13	Active test environments are subject to version control and carriers are notified before version changes are made in the test environment.	Satisfied	BellSouth test environments are subject to version control and carriers are notified before version changes are made. BellSouth and the ALECS conduct meetings on an on-going basis regarding improvements to the BellSouth testing procedures. KPMG Consulting attended these meetings and verified that they serve as a method of notifying ALECs about test environment enhancements. In addition, ALECs may use these meetings to participate in the test development process.
			TAG, EDI, and LENS
			KPMG Consulting conducted an interview with the Director of Disaster Recovery at BellSouth on November 14, 2001 and concluded that version control exists for active test environments and that carriers are notified by their BellSouth contacts

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[29] Electronic Interface Testing Guidelines are available at the following link:
http://www.interconnection.bellsouth.com/carriertypes/lec/EIITD/EI_Test_Guidelines.pdf

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			before version changes are made in the test environment.
			KPMG Consulting monitored the activities of CKS to determine if active test environments are subject to version control. KPMG Consulting also monitored BellSouth notifications regarding test environment changes and based on interviews with various ALECs and Vendors, KPMG Consulting is satisfied that the test environments are subject to version control and that proper notification is given to carriers.
			The Encore Electronic Interface Implementation and Upgrade Communication Plan document provides procedures from initial contact through planning, connectivity, technology support, test plans, end-to-end testing, and production support.
			Version control procedures for test environments are defined in the EIO Application Rolling Release Plan, Version 12, June 11, 2001. The information in this document was presented in an interview with the Project Manager of Customer Support Group of BellSouth on September 13, 2000. Information gathered during a refresh interview with the BellSouth Release Manager on November 7, 2001 further confirmed these procedures.
			During an interview with the BellSouth test managers it was determined that pre-order functionality was not fully supported in the CAVE test environment. As a result, Exception 128 was issued. Following the issuance of Exception 128 KPMG Consulting conducted interviews with several ALECs/vendors regarding CAVE Pre-order testing. Based on these interviews KPMG Consulting is satisfied that pre-order testing can take place in CAVE and has closed Exception 128.
			ECTA
			For ECTA, customer notification is covered under Change Management Practices Verification and Validation Review (PPR1).
			TAFI
			This criterion was not applicable to the TAFI interface because there is no ALEC testing of this GUI Interface.
PPR5-14	Procedures are defined to log software bugs, errors, and omissions in specifications,	Satisfied	Procedures are defined by BellSouth to log software bugs, errors, and omissions in specifications as well as other issues discovered during carrier-to-carrier

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	and other issues discovered during carrier-to-carrier testing.		testing. **TAG, EDI, and LENS** The CAVE Help Desk Defect Management Process document details the process to log software bugs, errors, and omissions in specifications, and other issues discovered during carrier-to-carrier testing. Once a defect is properly logged and submitted, BellSouth's Change Control Process is followed to ensure consistent review and prioritization. KPMG Consulting confirmed this conclusion in an interview with the BellSouth carrier-to-carrier test team on September 19, 2000. A refresh interview was conducted with the same team on November 15, 2001 and it was confirmed that no changes have occurred to the process. For EDI, the procedures for handling software defects and management of software fixes were explained in two interviews with the Project Manager of Customer Support Group on September 13, 2000 and the CAVE support team on December 5, 2001. **ECTA** The ECTA Start-Up Guide outlines the procedures for defect resolution. Every ECTA trouble incident, whether it occurs during testing or is reported in production, is tracked in BellSouth's Change Management Version Control (CMVC) system. Periodic reviews of CMVC logs by the ECTA support staff ensure timely, and/or appropriate, resolution of all problems or bugs. **TAFI** This criterion was not applicable to the TAFI interface because there is no ALEC testing of this GUI Interface.
PPR5-15	On-call technical support is available for production interfaces.	Satisfied	BellSouth provides on-call technical support for all production interfaces. KPMG Consulting monitored CKS during the interface development and production phases of this project. KPMG Consulting confirmed the availability of on-call technical support through interviews, document reviews, and monitoring of technical support provided to CKS. **TAG** Production support is made available for the TAG

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Test Reference	Evaluation Criteria	Result	Comments
			release currently in production. Contact information is provided in the TAG API Reference Guide. The BellSouth Account/CLEC Care Team coordinates production support with the EC Support team. Technical support procedures and contact information are documented in the EC Support Account Team Methods and Procedures and Account Team Information Package documents. These procedures were outlined by the BellSouth TAG Project Manager in interviews conducted on September 27, 2000 and on November 14, 2001 and with the EC Support Team Operations Director in an interview on November 27, 2001. **EDI** BellSouth provides on-call assistance for the EDI release currently in production. Support procedures were confirmed during an interview with the EC Support team on March 26, 2002. **LENS** Customer support is made available for the LENS release currently in production. Contact information is detailed in the LENS User Guide. As indicated by BellSouth in an interview with the LENS Project Manager on November 12, 2001, the EC Support Team is the contact point organization for ALEC for all support issues. **TAFI** Customer support is made available for TAFI release currently in production. Contact information is provided in the CLEC TAFI User Guide. **ECTA** The ECTA Start-Up Guide provides contact information and the normal hours of availability for technical support representatives available to ALECs.
PPR5-16	Regular communication forums (e.g., meetings, newsletters, workshops, etc.) are held for customer interface development.	Satisfied	BellSouth holds regular communications forums for customer interface development. These include the BellSouth CLEC Inforum and the TAG and EDI user groups. KPMG monitored the Inforum and the EDI users group discussions to determine adherence to related processes and procedures. **TAG** Through an interview conducted with the Interconnection Operations Group of BellSouth on

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Test Reference	Evaluation Criteria	Result	Comments
			September 12, 2000, KPMG Consulting was informed that regular communication forums were held for customer interface development.
			Procedures for handling and communicating changes or issues arising during TAG interface development and deployment are defined in the Change Review Board Charter and BellSouth's Change Control Process documents. Non-change related communication forums are outlined in the Electronic Interface Implementation and Upgrade Communication Plan documents. In March 2002, a new TAG user forum was established to improve communication among the BellSouth and TAG user communities. KPMG Consulting attended and monitored the TAG user forum discussions to verify that this forum was made available as part of on-going customer interface development.
			EDI
			KPMG Consulting conducted an interview with the BellSouth Interconnection Operations Group on September 12, 2000 and was informed that there was regular communication forums held for customer interface development. An EDI user forum was established to improve communication between BellSouth and the EDI user community.
			ECTA
			BellSouth ECTA is an ANSI standard interface and thus follows ANSI forums/meetings and newsletters. For ECTA, each client has a unique software module. New functionality is introduced to a client's module only after that client indicates a desire to use it thereby allowing the ALEC to decide whether to adopt the new national standard.
			Through interviews conducted with the BellSouth Project Manager for ECTA on September 28, 2000 and November 6, 2001, KPMG Consulting confirmed that procedures for regular communications for customer interface development with BellSouth are documented.
			LENS and TAFI
			This criterion was not applicable to the LENS or TAFI interfaces because there is no ALEC development required for these GUI interfaces.
PPR5-17	A software and interface development methodology exists that defines the process	Not Satisfied	KPMG Consulting determined that the BellSouth software and interface development methodology includes the process for release management and

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Test Reference	Evaluation Criteria	Result	Comments
	for release management and control.		control; however, it is not consistently followed. KPMG Consulting reviewed these procedures as related to Release 10.5 scheduled for production on May 31, 2002. Based on the number of defects encountered in BellSouth Releases 10.2 and 10.3, it appears that the BellSouth Quality Assurance process is not consistently followed for new software releases. Exception 157 was issued. KPMG Consulting reviewed the results of Release 10.5 to ensure adherence to the BellSouth quality assurance process. As of July 17, 2002 there have been 28 software and 24 documentation defects identified in Release 10.5. KPMG Consulting amended Exception 157 to reflect these additional issues, and this exception remains open. The overall release management process was discussed in interviews with the BellSouth Release Manager on September 26, 2001 and on November 11, 2001. This process is applicable to all BellSouth interfaces. Based on these interviews and review of formal documentation, BellSouth has a defined and documented release management process that is adhered to for all Encore releases. Release management and version control procedures are defined in the Release Management End-to-End Process Flow document and the Encore EIO Deliverable Application Rolling Release Plan documents.
PPR5-18	Business rules and software change logs exist, are updated and shared with ALECs in a timely manner.	Satisfied	KPMG Consulting has determined that BellSouth maintains and updates business and software change logs. These are shared with the ALECs in a timely manner. Through interviews with BellSouth documentation and Project Managers on September 12, 2000, and November 15, 2001, KPMG Consulting noted that business rules and software change logs existed and were updated by BellSouth for sharing with ALECs. Business rules and software changes are recorded and distributed via the Change Request Log, as documented in BellSouth's Change Control Process document. Changes are approved, prioritized, and managed according to the document entitled Release Management End-to-End Process Flow. This process is applicable to all BellSouth interfaces.
PPR5-19	Technical and business processes (i.e., software	Satisfied	BellSouth adheres to technical and business processes during development and pre-production

Test Reference	Evaluation Criteria	Result	Comments
	testing, bug fixes, release notification, etc.) exist and are adhered to during customer development and pre-production testing.		testing. **TAG, EDI, and LENS** New releases are developed, tested, and deployed on a scheduled basis, as defined in the Electronic Interface Implementation and Upgrade Communication Plan. Acceptance testing is completed prior to production release, as defined in CAVE User Acceptance Testing Plan, Version 4, April 20, 2001. Timing of new releases allows time for customers to develop changes and is controlled by the Release Management Team (which is governed by both the Change Review Board Charter and Change Control Process documents). This was further confirmed during interviews with the BellSouth Release Manager on September 26, 2000 and September 7, 2001. KPMG Consulting confirmed adherence with the process by reviewing BellSouth's internal development defect list, release management project schedule, and BellSouth Carrier Notifications throughout the release cycle. **ECTA** Minor releases of ECTA are deployed as required to fix "bugs," as defined in the ECTA Start-Up Guide, while major releases are driven by changes to ANSI standards. According to the ECTA Start-Up Guide: ♦ Timing of new releases allows time for customers to develop changes; ♦ A test bed for new releases is available to customers; ♦ Earlier versions are supported for a pre-defined period; ♦ Notification is given before support is withdrawn; and ♦ A process is in place that prioritizes needs for changes. This procedure was confirmed in an interview with the BellSouth ECTA Project Manager on September 28, 2000. KPMG Consulting confirmed that the process had not changed as part of a refresh interview conducted on November 6, 2001. **TAFI** This criterion was not applicable to the TAFI interface because there is no ALEC development

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Test Reference	Evaluation Criteria	Result	Comments
			required for this GUI interface.
PPR5-20	Measures exist for contingency planning within release management.	Satisfied	Measures exist for contingency planning within release management. An interview with EDS, BellSouth's contractor for network management and capacity planning, was conducted on September 11, 2000. KPMG Consulting determined that measures exist for contingency planning. BellSouth documented its measures for contingency planning in the Guide to Operational Understanding, Issue 2, July 2001 document. These measures apply to all interfaces. An additional interview with the BellSouth Directors with responsibility for the Disaster Recovery team was conducted on November 14, 2001. This interview confirmed the existence of the procedures, including assigned roles and responsibilities, and confirmed that there are procedures in place to handle disasters. Component and fall-over recovery are also covered in the JIA.
PPR5-21	Business scenarios, conditions, or transaction volumes that trigger the addition of capacity, load re-balancing, or system tuning are defined.	Satisfied	BellSouth has implemented capacity plans that allow load balancing and system tuning based on changes in business requirements, conditions, or changes in transition volumes. In the Capacity Planning Methodology, Practices, and Requirements, June 1, 2001 document, BellSouth defines the conditions used to identify the need for capacity expansion and/or performance tuning for all interfaces. This planning is applicable to all BellSouth interfaces. This document also lists the transaction-volumes tracking and forecasting details for all interfaces. BellSouth capacity planners also provided this information during an interview conducted on September 20, 2000. This information was confirmed to have not changed in a refresh interview conducted on November 6, 2001.
PPR5-22	Resources and procedures are in place to adjust for changes in demand of services.	Satisfied	BellSouth has processes and resources to allow adjustments based on changes in demand for service. **TAG, EDI, LENS, and TAFI** Through two interviews conducted with BellSouth Technology Services and EDS on September 11, 2000, it was confirmed that resources and procedures were in place to meet changes in demand of services. TAG, LENS, and EDI standard operation procedures (SOPs) documents

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			cover adjustments to changes in demand and resources for mainframe, midrange, and transport systems and are defined in the Capacity Planning Management Activity Definitions document and also in each separate SOP document. **ECTA** For ECTA, procedures are defined in the JIA. Based on the currently low volumes, resources to support changes in service demand are not warranted at this time.
PPR5-23	Contingency plans for production interfaces exist to mitigate the impact of unexpected changes in business and transaction volume.	Satisfied	BellSouth has contingency plans in place to mitigate the impact of unexpected changes in business or transaction volumes. **TAG, EDI, LENS, and TAFI** Through an interview conducted with the BellSouth disaster recovery team on November 14, 2001, BellSouth identified that contingency plans for production interfaces exist for unexpected circumstances. Procedures used by BellSouth and EDS to mitigate the impact of unexpected changes are defined in the Capacity Planning Methodology, Practices, and Requirements document. **ECTA** For ECTA, procedures for component and fail-over recovery are defined in the JIA.

5.0   Parity Evaluation

A parity evaluation was not required for this test.

6.0   Final Summary

This section summarizes the number of test evaluation criteria discussed above and the number that was satisfied or not satisfied at the conclusion of the test.

6.1   Summary of Findings

There were 23 evaluation criteria considered for the Interface Development Verification and Validation Review (PPR5) test. Twenty evaluation criteria received a satisfied result. Three evaluation criteria received a not satisfied result.

Due to the not satisfied evaluation criteria (PPR5-2, PPR5-3, PPR5-17), it is KPMG Consulting's opinion that significant issues remain unresolved in the PPR5 testing area.

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