ID	Brief Description	Status	Status Reason	Notes	Additional Documents
1	KPMG initial review of maintenance and repair metrics reports found several discrepancies among reported information.	Closed	Discussion Completed	<ul> <li>10/02/99: Issued</li> <li>11/08/99: BA stated that the 61.27% represents the percentage of the top 100 retail customers that were out of service less than 24 hours and is correctly reported. Also, BA states that transcription errors should be eliminated by the implementation of the "mechanized data tool" that is to be utilized to create the October metrics reports and all reports going forward. KPMG stated that it will review BA's response to the Observation and will communicate results of this analysis on the 11/12/99 call.</li> <li>11/12/99: BA's response was that 1) the error was due to manual transcription and BA will no longer have manual transcription beginning with October reports, and 2) the retail 100 metric for M&amp;R out of service is calculated differently than the regular retail metric for M&amp;R out of service. According to the Consolidated Arbitration report by BA that is valid. The "top 100 retail customers" issue is closed. The observation status will remain deferred until BA can confirm that the new transcription process is in place (with the October reports).</li> <li>12/10/99: KPMG indicated that the October reports have been received by BA and are currently under review. KPMG anticipates being prepared for discussion about this observation on the 12/30/99 call.</li> <li>01/07/00: KPMG revised the statement from 12/10/99. The October M&amp;R reports have not been received yet. The status this Observation remains deferred until the reports have been reviewed.</li> <li>01/14/00: KPMG has received the October M&amp;R reports and will be giving an update on the status of this Observation on 01/21/00.</li> <li>01/21/00: KPMG has reviewed the October M&amp;R reports and was able to confirm that the new transcription process is in place. Therefore, this Observation can be closed.</li> </ul>	MA Observation report 1.doc
2	The mapping for PIC and LPIC is confusing and appears to be incorrect.	Closed	Discussion completed	11/23/99: Issued 12/03/99: Issue 2.1 BA agreed that the mapping is incorrect. It should state	MA Observation report 2.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				"N1*P9**41*PIC". BA expects documentation changes only, unless CLEC software changes are required. BA will send out a change report process email by 12/17 COB.  Issue 2.2 BA agreed to the issue. The EDI sample is correct. BA will change the qualifying data element to reflect this (e.g. "N101=83"). BA expects that only documentation changes will be necessary, unless CLEC software changes are required. BA will send out a change report process email by 12/17/99.  Issue 2.1 BA Flash CR# 1153 was sent on 12/16/99 giving an update on the issue. This Observation is closed.  Issue 2.2 BA Flash CR# 1153 was sent on 12/16/99 giving an update on the issue. The notification was partly incorrect. It is actually in the P01 loop and the PID03 value is "TI" instead of "T1". This Observation is going to be closed when BA sends the corrected version of the Flash announcement.  01/07/00:  Issue 2.2 BA sent the corrected version of the Flash announcement on 12/20/99. Therefore, this Observation can be closed.	Documents
3	KPMG observed misleading and missing references (3.1), misplaced documentation (3.2) and unclear commands (3.3) in the BA North Order Business Rules v 1.7.	Closed	Discussion completed	<ul> <li>11/23/99: Issued</li> <li>12/03/99:</li> <li>Issue 3.1 (A) BA agreed that the reference is misleading. BA will change the reference to make it clearer. BA will send out CLEC change notification by 12/10/99.</li> <li>(B) BA agrees that clarification is needed. BA will insert cross-references, and BA will send out a clarification statement by 12/17/99.</li> <li>Issue 3.2 BA agreed to the mistake. BA is going to take out the misplaced page and issue a CLEC change notification by 12/10/99.</li> <li>Issue 3.3 BA agreed that the interdependency of SVGTYP and CFA in the North Order Business Rules v 1.7 makes it confusing to write an order. BA explained that the interdependency of the two fields is required for order</li> </ul>	MA Observation report 3.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				writing. The SVGTYP field is required when the CFA field is populated and the LNA field equals "V." The CFA field is required when the LNA field is "C" or "V" and the SVGTYP field is "M." The SVGTYP field may not be populated unless the CFA field is populated. Similarly, the CFA field may not be populated unless the SVGTYP field is populated (specifically with "M"). KPMG will review the issue and look for alternative wording for this business rule by 12/7/99.  Issue 3.3 After reviewing the complex nature of this issue, KPMG believes that the rules could not be written any clearer. Therefore, no changes to the business rules are needed. Issue 3.3 is closed.  12/10/99: Flash CR# 1135 on changes with regard to Issues 3.1 (A) and 3.2 was sent 12/9/99. These issues are closed. The review of Issue 3.1 (B) is pending. A Flash is going to be sent by 12/17/99.  01/07/00: Issue 3.1 (B) BA sent the corrected version of a Flash CR# 1174 on 12/21/99. Therefore, this Observation can be closed.	
4	KPMG observed a discrepancy between the North Order EDI Guide v 1.7 and the North Order Business Rules v 1.7 specifications.	Closed	Discussion completed	<ul> <li>11/23/99: Issued</li> <li>12/03/99: BA agreed to the issue. The North Order EDI Guide v 1.7 mapping for an N1 loop is correct. BA will update the North Order Business rules v 1.7 specifications accordingly. BA expects a documentation only change and will send out a CLEC change notification by 12/10/99.</li> <li>12/10/99: Flash CR# 1135 announcement was sent on 12/9/99 giving an update on the North Order Business rules v 1.7 specifications. This Observation is closed.</li> </ul>	MA Observation report 4.doc
5	KPMG observed inconsistencies between EDI specifications and EDI examples in the North Order EDI Guide v 1.7.	Closed	Discussion completed	11/23/99: Issued 12/03/99: Issue 5.1 BA agreed. The ORI tag in the EDI specifications for the TCMULT field on page 184 is missing. The North Order EDI Guide v 1.7 should state "N9*H5*ORI*TCMULT"	MA Observation report 5.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				for the TCMULT data field in the detailed explanation like in the example on page 192. BA expects a documentation only change and will send out a CLEC change notification by 12/17/99.  Issue 5.2 BA agreed. The example for the OA data field mapp specification on page 184 in the North Order EDI Gui 1.7 is wrong. The example should state instead "N9*H5*OROA". BA expects a documentation only change and will send out a CLEC change notification 12/17/99.  12/17/99: Flash CR# 1154 was sent on 12/16/99 giving an upda on both issues to ensure consistency throughout the N Order EDI Guide v 1.7. This Observation is closed.	ing de v by
6	A system software error in Bell Atlantic's DCF server is preventing the correct routing and processing of Level 5 (flow through) orders.	Closed	Discussion Completed	12/14/99: Issued 12/17/99: Although BA has already addressed this issue satisfactorily on 12/5, KPMG is publishing this Observation. The Observation is closed.	MA Observation report 6.doc
7	Flow through documentation is not publicly or readily available to CLECs.	Closed	Discussion Completed	12/14/99: Issued 12/17/99: Issue 7.1 BA agreed. BA is going to change all North Notes an Conditions on Web and will create and post by 02/21/ Issue 7.2 BA agreed. BA will send an update by 12/31/99. 01/07/00: Issue 7.2 BA revised its announcement from 12/17/99 and will an update by 01/14/99. 01/28/00: Issue 7.2 BA has updated the BA North Generic Ordering Flow Through Scenario Document on BA's TISOC web-sit It appears to be current and comprehensive. Issue 7.2 be closed. 02/18/00: Issue 7.1 BA revised its announcement from 12/17/99 and will a new completion date for the change on 02/25/00. 02/25/00: Issue 7.1 BA has not announced a new completion date for the	send - e. can

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				change yet. This Issue remains deferred.  03/10/00:  Issue 7.1 BA stated that the North Notes and Conditions on the web-site will be posted by 03/17/00. This Issue remains deferred until KPMG has been able to verify the changes in the North Notes and Conditions on the web-site.  03/24/00:  Issue 7.1 BA stated that the documentation changes have partially been implemented on the web-site. This Issue remains deferred until KPMG has been able to verify all changes in the North Notes and Conditions on the web-site.  04/24/00:  Issue 7.1 KPMG has verified that all documentation changes have been implemented on the web-site. This Issue can be closed.	
8	KPMG observed missing and unclear commands in the BA North Order Business Rules v 1. 7	Closed	Discussion completed	12/14/99: Issued 12/17/99: Issue 8.1 BA agreed. The CFA field will be changed to "optional". A CLEC notification will be sent by 12/31/99. Issue 8.2 BA stated that "E" and "J" should not be grayed out. BA is going to clarify the command and send out a CLEC notification by 12/31/99.  01/07/00: Issue 8.1 BA revised its announcement from 12/17/99 and will send out a CLEC notification by 01/14/99. Issue 8.2 BA revised its announcement from 12/17/99 and will send out a CLEC notification by 01/14/99.  01/14/00: Issue 8.1 BA explained that the investigation on this Observation could not be concluded yet and announced to send out a CLEC notification by 01/21/99.  Issue 8.2 BA explained that the investigation on this Observation could not be concluded yet and announced to send out a CLEC notification by 01/21/99.  O1/21/00: Flash CR# 1223 was sent on 01/19/00 giving a satisfactory solution for both issues. This Observation can be closed.	MA Observation report 8.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
9	KPMG observed a discrepancy between the BA North Order EDI Guide v 1.7 and the BA North Order Business Rules v 1.7	Closed	Discussion Complete	<ul> <li>12/14/99: Issued</li> <li>12/17/99: BA agreed. For Web GUI, the following work around exists: "Platform as is" must be submitted as "platform as specified" to BA. In addition, BA will issue a change request to correct this issue. This will take 2-6 months.</li> <li>01/21/00: BA offered a work-around as an interim solution for the problem in Flash CR#1222 sent 01/20/00. The status of the Observation remains deferred until the correction on the issue could be confirmed.</li> <li>05/12/00: BA announced that there is no schedule for the code changes yet. The status of this Observation remains deferred.</li> <li>06/02/00: Related Observation #82 has been issued.</li> <li>06/30/00: KPMG has been able to verify the BA work-around. This Observation is closed.</li> </ul>	MA Observation report 9.doc
10	KPMG observed a discrepancy between RETAS on-line help and the RETAS Student User Guide for CLECs	Closed	Discussion Complete	<ul> <li>01/04/00: Issued</li> <li>01/07/00: BA agreed. BA will place a change request on the matter and expects to deliver a change notification within the next 4 to 6 weeks.</li> <li>03/07/00: The status of the Observation remains deferred until the scheduled release and verification of CR#1197.</li> <li>03/28/00: BA stated that correction for this Observation will be included in the April release of the RETAS Student User Guide for CLECs. The status of this Observation remains deferred until KPMG has been able to validate that the discrepancy between RETAS on-line help and the RETAS Student User Guide no longer exists.</li> <li>04/28/00:</li> <li>Issue 10.1 The status of this Issue remains deferred. KPMG reviewed the updates to the RETAS online Help. Previously the Online Help for the Circuit ID field incorrectly referenced Appendix E of the RETAS Student User Guide for CLECs to obtain valid circuit ID formats. KPMG observed that the help provided for the circuit ID field now correctly references the appendix E in the Trouble Administration Business Rules (version 2.5) for</li> </ul>	MA Observation report 10.doc

ID	<b>Brief Description</b>	Status	Status Reason	Notes	Additional Documents
				most RETAS masks. However, the help provided for the circuit ID field for the "Extended Trouble History Request Message Set" mask still incorrectly references Appendix E in the Training Guide. The status of this Issue remains deferred.  Issue 10.2 KPMG reviewed the updates to the RETAS online Help and observed that the "Test Result Codes" field in the Create Trouble Ticket Menu is incorrectly referenced in Appendix G in the Trouble Administration Business Rules (version 2.5) for valid values. The status of this Issue remains deferred.  05/12/00: BA announced that corrections on both Issue 10.1 and 10.2 are going to be included in the June release of the RETAS Student User Guide for CLECs. The status of this Observation remains deferred until KPMG has been able to verify those changes.  06/30/00: On further retest KPMG was able to validate the changes made by BA to KPMG's comments dated 4/28/00. This Observation can be closed.	Documents
11	KPMG observed an inconsistency between the BA North Order Business Rules v 1.7.1 and operating procedures	Closed	Discussion completed	<ul> <li>01/04/00: Issued</li> <li>01/07/00: BA agreed. The Observation refers to the field with the name "Access Information" and appears to be a discrepancy of TISOC and Business Rules. BA will discuss this issue with TISOC and analyze and investigate any changes. No date for a change notification has been announced.</li> <li>01/21/00: BA stated that the "LCTELNUM" field will be changed to a "conditional" field in the Notes and Conditions. BA announced that Flash CR# 1242 is going to be sent with an update by 01/28/00.</li> <li>01/28/00: BA announced that updates have been made to the BA North Order Business Rules v 1.7.1 to ensure consistency with current BA business processes. These updates also apply to the North Order Business Rules v 1.8.1 released for February. To address the defect, the usage for the "LCTELNUM" field will be changed from "optional" to "conditional." Also, there will be an appendix the Notes</li> </ul>	MA Observation report 11.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				and Conditions for the "LCTELNUM" field on the EU form for further clarification. This Observation can be closed.	
12	KPMG has received standard error messages when adding TNs that were reserved using the ADR/TN Reservation form to hunting sequences	Closed	Discussion completed	01/11/00: Issued 01/14/00: Although BA has already addressed this issue satisfactorily, KPMG is publishing this Observation. This Observation can be closed.	MA Observation report 12.doc
13	KPMG observed that the process regarding xDSL migration scenarios in the BA-North Order Business Rules v 1.7 is insufficient	Closed	Discussion completed	<ul> <li>01/11/00: Issued</li> <li>01/14/00: BA stated that after further analysis and clarification of this Observation with KPMG BA will send out a CLEC change notification. KPMG could clarify on the call that the observation is not referring to a partial migration, but a resale xDSL migration as a loop. BA will provide an update on the Observation by 01/21/00.</li> <li>01/21/00: BA stated that migrations are currently not permitted. A change of the Business Rules would be necessary to solve the issue. BA will send out a CLEC notification on the change. BA will invite the xDSL manager to elaborate on the issue on the Observation Status call on 01/28/00.</li> <li>01/28/00: BA announced a Business Rule change noting that migrations are not permitted. Following the Change Control process BA is going to send out a change notification within the next 2 to 6 weeks.</li> <li>02/11/00: BA has sent Flash CR#1285 on 02/10/00 giving a satisfactory solution for the issue. This Observation can be closed.</li> </ul>	MA Observation report 13.doc
14	KPMG observed an inconsistency between the published documentation outlining the billing help desk process and Bell Atlantic's actual billing help desk practice.	Closed	Discussion completed	01/18/00: Issued 01/21/00: Issue A BA corrected the Billing Helpdesk Minutes from the interview on December 9, 1999. With this, the issue has been resolved and can be closed.  Issue B BA agreed that the inquiry phone number included on the bills is not the correct "help-call" number. BA stated that the inquiry phone number on the bills is going to be corrected. The Observation status will remain deferred	MA Observation report 14.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				until the change is in place in the CLEC Handbook, Volume 1, 8.1 Contact List, located on Bell Atlantic's web-site.  02/04/00: Issue B BA stated that the inquiry phone number on the bills has been corrected. KPMG will verify this change on 02/11/00.  02/18/00: Issue B KPMG revised its statement from 02/04/00 and will verify the change by 02/25/00.  02/25/00: Issue B KPMG has been able to verify that the inquiry phone number on the bills has been changed. This Observation can be closed.	
15	KPMG experienced a discrepancy regarding Bell Atlantic's timely sending of bills.	Closed	Discussion completed	01/25/00: Issued 01/28/00:  Issue 15.1 BA agreed. BA is supposed to send bills via mail within 10 business days of their respective billing dates. With this understanding, KPMG received bills later than expected. The receipt of bills by KPMG was delayed, however, as a result of BA having incorrect billing addresses. BA stated that the addresses have been corrected and future bills will be sent within ten business days of their respective bill dates.  Issue 15.2 BA is supposed to send bills via NDM or CD-ROM within 10 business days of their respective billing dates. BA stated that resale bills were only sent via CD-ROM prior to establishment of the NDM connection. After this connection was established, resale bills would only be sent via NDM. All bills expected via NDM, including CABS bills, have been accounted for, though some were late. The status of this Issue remains deferred pending the timely receipt of February bills.  03/10/00: Issue 15.1 Subsequent bills have been received by KPMG in a timely manner. This issue can be closed. Issue 15.2 KPMG verified the timely receipt of the subsequent bills.	MA Observation report 15.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				This Observation can be closed.	
16	The process for completing work in the TISOC is not consistently documented.	Closed	Discussion completed	<ul> <li>02/01/00: Issued</li> <li>02/04/00: BA disagreed. BA sees KPMG's issue based in a misunderstanding in a TISOC interview with BA. The status of this Observation remains deferred until KPMG can confirm that the process for completing work in the TISOC is consistently documented.</li> <li>02/18/00: The M&amp;P documentation received from BA describes the processes required to complete the processing of an order. The process description includes product intervals, business rules, step-by-step instructions, screen shots of the system, and references to other documentation. This Observation can be closed.</li> </ul>	MA Observation report 16.doc
17	KPMG noticed a discrepancy between the CRIS contract rate for USOC "ULB" and the rate that appears on the CSR.	Closed	Discussion completed	<ul> <li>02/08/00: Issued</li> <li>02/11/00: BA agreed. BA expects to present a solution regarding the correction of the rate by 02/18/00. The status of this Observation will remain deferred until Bell Atlantic's correction of the rate can be verified.</li> <li>02/18/00: BA explained that the correction of this issue is not as simple as expected and requires further analysis. BA expects to give the next update on 02/25/00.</li> <li>02/25/00: BA stated that the correction of the rate will be implemented by 03/18/00.</li> <li>03/28/00: KPMG will not be able to verify the correction until April. The status of this Observation remains deferred.</li> <li>04/07/00: KPMG stated that it has not been able to verify the correction yet.</li> <li>04/28/00: KPMG has been able to verify the correction. This Observation can be closed.</li> </ul>	MA Observation report 17.doc
18	KPMG noticed a change in format between the November and December Loop Summary paper bills. KPMG does not have documentation to explain the reason for the change.	Closed	Discussion Completed	02/08/00: Issued 02/11/00: BA disagreed. BA believes that the billing help desk can address questions CLECs have regarding these types of issues. In addition, BA feels that this issue does not affect the charges on the bill or the ability of the CLEC to validate the bill.	MA Observation report 18.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				02/15/00: KPMG agrees that BA's Helpdesk provides a platform for the CLECs to clarify specific bill format questions. This Observation can be closed.	
19	The information provided in the CLEC Handbook regarding publishing the Standard Quality Baseline Validation Test Deck on the web-site is incorrect.	Closed	Discussion Completed	<ul> <li>02/08/00: Issued</li> <li>02/11/00: BA agreed. BA explained that this Test Deck was sent to the CLEC community as part of the Change control emails. BA further stated that the standard Quality Baseline Validation Test Deck for MA as well as for the other states under its jurisdiction would be made available on the TIS web-site by the 02/16/2000.</li> <li>02/18/00: BA has posted the correct information on the TIS web-site, but not at the location it should be. The issue remains deferred until the location has been changed.</li> <li>02/25/00: BA stated that the location of the correct information on the TIS web-site will be changed by the end of March.</li> <li>04/07/00: KPMG stated that it has not been able to verify the changes on the TIS web-site yet.</li> <li>04/11/00: KPMG has verified that the location of the correct information on the TIS web-site has been changed. This Observation can be closed.</li> </ul>	MA Observation report 19.doc
20	A disparity exists between retail and wholesale provisioning.	Closed	Discussion Completed	02/08/00: Issued 02/11/00: BA disagreed. BA explained that mobile phones are being used to either contact BA or to contact customer. BA stated that every wholesale technician carries a "butt-set" to access dial tone or to contact BA. The wholesale organization distributes mobile phones to technicians on an "as of need" basis. Various communication methods are being used by wholesale. BA feels that the difference in communication methods between resale and wholesale does not impact parity. Further, BA explained that SSTs do not use IBM laptops to access BA's systems. SSTs use handheld terminals instead. These terminals are used by both resale and wholesale technicians, and, if they do not have it, the technicians call the dispatch centers in either Tauten or Lowell.	MA Observation report 20.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				02/15/00: KPMG agrees to amend this Observation to say "any terminal with the ability to close orders." The status of this Observation remains deferred for further discussion on the disparity issues.  03/21/00: KPMG received data from BA that supports the parity of wholesale and resale provisioning. This Observation can be closed.	
21	KPMG has identified the hours of operation for the Bell Atlantic System Support Help Desk as published in the CLEC/Resale Handbook to be incorrect.	Closed	Discussion Completed	<ul> <li>02/15/00: Issued</li> <li>02/18/00: BA agreed. The information published in the CLEC/Resale Handbook is incorrect. BA will send out a notification regarding the correction by 03/01/00 via email. The new version of the Handbook will be released by the end of March.</li> <li>02/29/00: BA sent an Informational Message: Help Desk Hours of Operation that states that the hours of operation for the BA System Support Help Desk reflected in the CLEC Handbook are incorrect.</li> <li>03/10/00: KPMG explained that the status of this Observation remains deferred until the new version of the Handbook has been released and the correction of the information published has been verified.</li> <li>04/07/00: KPMG stated that it has not been able to verify the correction of the information published in the CLEC Handbook on the TIS web-site yet.</li> <li>04/11/00: The corrected CLEC Handbook version has been posted. This Observation can be closed.</li> </ul>	MA Observation report 21.doc
22	Certain USOC rates cannot be validated in either CLEC contract rates or DTE tariffs.	Closed	Discussion completed	02/15/00: Issued 02/18/00: BA disagreed. BA explained that the rates for POR1X and POR2X could be found in FCC tariff #11, Section 31.13.13. KPMG confirmed that "service provider number portability," as described in FCC # 11, refers to the same charge as BA's "telephone number portability cost recovery surcharge" for USOCs POR1X and POR2X. The appropriate monthly rate per line as outlined in this FCC tariff is \$0.23. This Observation can be closed.	MA Observation report 22.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
23	The 'Type of Access' field found in Category 11 records contains an undefined value.	Closed	Discussion completed	<ul> <li>02/15/00: Issued</li> <li>02/18/00: BA agreed. The cause for the error has been identified as a program problem. KPMG will verify the changes with its DUF test after 02/23/00.</li> <li>03/10/00: KPMG deferred the closure of this Observation until the change could be verified.</li> <li>04/07/00: KPMG stated that the DUF usage re-test has been completed. The test results are currently being analyzed by KPMG.</li> <li>05/12/00: KPMG has been able to verify that the field is no longer populated with an undefined value. This Observation can be closed.</li> </ul>	MA Observation report 23.doc
24	KPMG has been receiving extraneous usage records in certain NDM files.	Closed	Discussion completed	<ul> <li>02/15/00: Issued</li> <li>02/18/00: BA disagreed. BA explained that all accounts currently billed are KPMG accounts. The first six accounts listed in the table in the Observation report are an internal testing error. KPMG will research this issue further and give feedback on 02/25/00.</li> <li>02/25/00: KPMG concurs with BA's assessment. After further research, it was determined that the last nine accounts listed in the table in the Observation report belong to KPMG. This Observation can be closed.</li> </ul>	MA Observation report 24.doc
25	The information provided in the CLEC Handbook regarding publishing the 'specific test scenarios' on the web-site is incorrect.	Closed	Discussion Completed	02/15/00: Issued 02/18/00: BA agreed that the current wording in section 4.5.1 [4th paragraph] CLEC Handbook, Volume II (September release) is incorrect. BA will re-phrase this paragraph in their March 2000 release of the CLEC Handbook series. BA confirmed that the "specific test scenarios" will be sent to the CLEC's via BA Change Control e-mail only when the new release offers a different functionality which cannot be tested based on the scenarios presented in the standard Quality Baseline Validation Test Deck. They will also be posted on the web-site. 04/07/00: KPMG stated that it has not been able to verify the corrections on the TIS web-site yet.	MA Observation report 25.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				04/11/00: KPMG has verified that the information provided in the CLEC Handbook regarding publishing the 'specific test scenarios' has been corrected on the web-site. This Observation can be closed.	
26	KPMG is receiving duplicate usage records.	Closed	Discussion Complete	<ul> <li>02/22/00: Issued</li> <li>02/25/00: BA is trying to identify the cause for the receipt of duplicate usage records. BA expects to give an update of this Observation by 03/03/00.</li> <li>03/03/00: BA agreed. BA explained that these credit records have been issued against the original call, and have mistakenl been classified as code 10. BA is going to fix this error. The code fix is scheduled on 03/03/00, the implementation on 03/06/00.</li> <li>03/07/00: KPMG concurs with Bell Atlantic's assessment and will test and verify the code fix during the DUF re-test. This Observation remains deferred.</li> <li>04/07/00: KPMG stated that the DUF usage re-test has been completed. The test results are currently being analyzed by KPMG.</li> <li>05/12/00: BA received additional DUF records that contribute to the clarification of this Issue and is investigating the problem. The status of this Observation remains deferred.</li> <li>05/19/00: KPMG has finished analyzing the DUF re-test, and the results are satisfactory. Therefore, this observation is closed.</li> </ul>	e
27	KPMG is receiving Header and Trailer Records with an undefined value in the 'Directional Indicator' field.	Closed	Discussion completed	<ul> <li>02/22/00: Issued</li> <li>02/25/00: BA is investigating the error. If a code change is require to correct the undefined value in the 'Directional Indicator' field, a change notification will be send by 03/03/00.</li> <li>03/03/00: BA has completed its analysis and has found that no code change is required. BA stated that indicator 4 is now used to determine ownership offline.</li> <li>03/07/00: KPMG agrees with BA's response. However, Bell Atlantic's population of the 'Directional Indicator' with a 7 remains incorrect. If Bell Atlantic will not correct this</li> </ul>	report 27.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				issue then Bell Atlantic should not put a value in the 'Directional Indicator' field and populate this field with a 0 instead. This observation remains deferred.  03/10/00: KPMG has been able to validate BA's response based on documentation that BA provided on the correct population of the field. This Observation can be closed.	
28	Bell Atlantic did not adhere to the prescribed processes, intervals, and procedures for notifying CLECs about a recommended upgrade to PGP version 6.5.1.	Closed	Discussion Completed	<ul> <li>02/22/00: Issued</li> <li>02/25/00: BA stated that this Observation requires further BA internal discussion. BA explained that PGP is a third party vendor software upgrade for Y2K that was described to have "no CLEC impact." BA will send this issue through the Change Management process. Furthermore, any process and procedure documentation related to this issue will be available by 04/01/00 and controlled through the Change Management process.</li> <li>03/10/00: KPMG is investigating this issue and will be able to give an update on the conditional closure of this Observation by 03/16/00.</li> <li>04/14/00: BA has indicated that the PGP software upgrade is optional to the CLEC. It is new functionality that is backwards compatible to older versions. KPMG accepted this explanation. This Observation can be closed.</li> </ul>	MA Observation report 28.doc
29	KPMG is not receiving all 030101 credit records.	Closed	Discussion Completed	<ul> <li>02/29/00: Issued</li> <li>03/03/00: BA explained that this Observation is directly related to MA Observation #26. The code fix for MA Observation #26 will by default result in a correction of the issue in this Observation.</li> <li>03/07/00: KPMG concurs with BA's assessment and will test and verify the code fix during the DUF re-test. This Observation remains deferred.</li> <li>04/07/00: KPMG stated that the DUF usage re-test has been completed. The test results are currently being analyzed by KPMG.</li> <li>05/05/00: A set of 03 records (credit request) were found to be incomplete in the re-test. KPMG is going to send a clarification via email to BA. This Observation remains</li> </ul>	MA Observation report 29.doc

ID	<b>Brief Description</b>	Status	Status Reason	Notes	Additional Documents
				deferred. 05/19/00: KPMG is awaiting a response from BA. This Observation remains deferred. 06/09/00: BA announced 06/30/00 release fix. 07/07/00: This Observation has been closed based on the announced release fix. However, this fix has not been verified. KPMG does not plan a verification of this fix.	
30	KPMG is receiving 110125 records with incomplete information.	Closed	Discussion completed	02/29/00: Issued 03/03/00: BA disagreed. BA explained that the information provided in the 'Destination Field' would present redundant information in the record. 03/07/00: KPMG agrees with BA's assessment. The absence of information in the 'Destination Field' on 110125 records would not adversely affect end-user billing. This Observation can be closed.	MA Observation report 30.doc
31	Charges related to Other Charges and Credits on the February M40 bill are incorrectly prorated.	Closed	Discussion completed	02/29/00: Issued 03/03/00: BA disagreed. BA explained that the 31 <sup>st</sup> day in prorating of charges is never counted according to the internal CABS reference guide 4.2, p.1. This Observation remains deferred for further investigation. 03/10/00: KPMG agrees that BA prorated the charges correctly assuming a 30 day month. This Observation can be closed.	MA Observation report 31.doc
32	KPMG noticed that Customer Service Records are missing from the January 31, 2000 resale bill.	Closed	Discussion completed	02/29/00: Issued 03/03/00: BA agreed. This Observation is tied to production problem that was fixed on 02/29/00. Corrected January bills will be resent thereafter. KPMG will receive a Billing help-desk call for further clarification. The status of the Observation remains deferred until the corrected bills have been received and reviewed. 03/21/00: KPMG has received and reviewed the corrected bills and has been able to verify the fix. This Observation can be closed.	MA Observation report 32.doc
33	KPMG observed that certain	Closed	Discussion	02/29/00: Issued	MA

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
	resale bill data records for "Other Charges and Credits" are not in line with the CABS Billing Output Specifications.		completed	03/03/00: BA explained that it needs more time to analyze this problem. BA will address this Observation on 03/10/00. 03/10/00: BA agreed. This Observation is tied to production problem that was fixed on 02/29/00. Corrected January bills will be resent thereafter. KPMG will receive a Billing help-desk call for further clarification. The status of the Observation remains deferred until the corrected bills have been received and reviewed. 03/21/00: KPMG has received and reviewed the corrected bills and has been able to verify the fix. This Observation can be closed.	Observation report 33.doc
34	The CSR information for one of KPMG's resale bills is incomplete.	Closed	Discussion completed	<ul> <li>02/29/00: Issued</li> <li>03/03/00: BA agreed. This Observation is tied to a production testing problem that was fixed on 02/29/00. The corrected January bills will be resent. Additionally, KPMG will receive a Billing help-desk call for further clarification. The status of the Observation remains deferred until the corrected bills have been received and reviewed.</li> <li>03/21/00: KPMG has received and reviewed the corrected bills and has been able to verify the fix. This Observation can be closed.</li> </ul>	MA Observation report 34.doc
35	KPMG is experiencing inconsistent data on it's 100119 records.	Closed	Discussion completed	02/29/00: Issued 03/03/00: BA explained that it needs more time to analyze this problem. BA will address this Observation on 03/10/00. 03/10/00: BA disagreed. BA explained that for "Call Trace" type calls, resale usage resembles retail usage. The number that was traced does not appear in these cases. For UNE customers, the traced number is provided at the switch and provided on usage records. KPMG agrees. This Observation can be closed.	MA Observation report 35.doc
36	KPMG is receiving rated records (010101) for calls made from KPMG-owned Resale lines.	Closed	Discussion completed	02/29/00: Issued 03/03/00: BA explained that it needs more time to analyze this problem. BA will address this Observation on 03/10/00. 03/10/00: BA agreed. BA stated that a code change is required. BA	MA Observation report 36.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				is going to announce when the change will be implemented. The status of this Observation remains deferred.  03/16/00: BA stated that a code change will be implemented by 03/31/00. Usage will be effected 04/03/00. KPMG will incorporate the fix in its usage retest. The status of this Observation remains deferred.  04/07/00: KPMG stated that the DUF usage re-test has been completed. The test results are currently being analyzed by KPMG.  04/28/00: Based on the DUF usage re-test results the code change has been confirmed. This Observation can be closed.	
37	KPMG CLEC is receiving access records (110101) with no Carrier Identification codes.	Closed	Discussion completed	<ul> <li>02/29/00: Issued</li> <li>03/03/00: BA explained that it needs more time to analyze this problem. BA will address this Observation on 03/10/00.</li> <li>03/10/00: BA agreed. BA stated that a code change is required. BA is going to announce when the change will be implemented. The status of this Observation remains deferred.</li> <li>03/16/00: BA stated that a code change will be implemented by 03/31/00. Usage will be effected 04/03/00. KPMG will incorporate the fix in its usage retest. The status of this Observation remains deferred.</li> <li>04/07/00: KPMG stated that the DUF usage re-test has been completed. The test results are currently being analyzed by KPMG.</li> <li>04/28/00: Based on the DUF usage re-test results the code change has been confirmed. This Observation can be closed.</li> </ul>	MA Observation report 37.doc
38	KPMG has received incorrect responses from Resale Private Line (RPL) orders submitted via EDI.	Closed	Discussion Complete	<ul> <li>03/07/00: Issued</li> <li>03/10/00: BA agreed. BA further explained that it needs more time to investigate this issue. BA will provide a response on 03/16/00.</li> <li>03/16/00: This Observation remains deferred for further investigation of the issue by BA.</li> <li>04/07/00: BA announced to develop a work-around to address this Issue. The status of this Observation remains deferred for</li> </ul>	MA Observation report 38.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				further discussion.  04/14/00: BA announced a system correction to be implemented by 4/22/00.  04/28/00: KPMG stated that it is currently re-testing the Issue. The status of this Observation remains deferred.  05/05/00: BA announced that an EDI fix is being worked on. The status of this Observation remains deferred.  05/12/00: BA announced that a change notification is going to be sent by 05/15/00. KPMG defers the closure of this Observation pending the verification of the fix.  05/19/00: KPMG continues to retest the fix BA provided on 5/15/00. This Observation remains deferred.  06/23/00: KPMG was able to verify the fix provided by BA. Observation #100 was issued to address an outstanding inconsistency between BA Change Control and the BA North Order Business Rules v1.8.1. Therefore, this observation can be closed.	
39	The Notes and Conditions of the REP field on the Local Service Confirmation form are not clear.	Closed	Discussion completed	03/07/00: Issued 03/10/00: BA did not agree to the issue. BA explained that "TISOC" and "AUTO" are valid entries for non-flow through and flow-through order respectively. KPMG will provide BA with a PON to analyze this issue further. BA will deliver a response by 03/16/00. 03/16/00: This Observation remains deferred for further discussion. 03/28/00: KPMG reviewed BA's response and accepts BA's explanation that "TISOC" and "AUTO" are valid entries for the REP field. This Observation can be closed.	MA Observation report 39.doc
40	On several KPMG Y40 bills a non zone specific rate rather than the expected rate zone has been applied to USOC U21.	Closed	Discussion completed	<ul> <li>03/07/00: Issued</li> <li>03/10/00: BA agreed. BA stated that the table entry is going to be changed. The status of this Observation remains deferred for further discussion and verification.</li> <li>03/16/00: BA stated that the fix for 03/10/00 has been put into place. This change will be reflected on the KPMG CLEC April bill. The Observation remains deferred until KPMG has been able to verify the change.</li> <li>03/21/00: This Observation can be closed. KPMG has been able to</li> </ul>	MA Observation report 40.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				verify the change on the subsequent bill.	
41	41 KPMG observed missing, unknown, incorrect and untimely charges on several bills.	Closed	Discussion completed	03/07/00: Issued 03/10/00: BA explained that it needs more time to analyze Issues 41.1 to 41.7. BA is going to deliver a response to this Observation on 03/16/00. 03/13/00: Issue 41.6 KPMG has been able to resolve the cause for the discrepancy in the subtotal that was associated with KPMG internal documentation. Issue 41.6 can be closed. 03/16/00: Issue 41.1 BA explained that recogning Itams #1 and #2 that the	MA Observation report 41.doc
				Issue 41.2 BA explained that regarding Items #1 and #2 that the USOC should have been applied but was not. BA explained further that Item #3 relates to a BA representative error. KPMG will verify BA's response. This Issue remains deferred.  Issue 41.3 BA explained it needs more time to analyze this Issue. Issue 41.4 BA explained it needs more time to analyze this Issue. Issue 41.5 BA stated that late payment charges less than \$5 do not appear on a bill.  Issue 41.7 BA explained it needs more time to analyze this Issue. Issue 41.8 BA explained it needs more time to analyze this Issue. O3/21/00: Addendum #1 issued.	
				O3/24/00: Issue 41.2 KPMG accepts BA's explanation regarding Item #3 that a BA representative entered the wrong USOC. This Item has been resolved. The status of the Issue remains deferred. Issue 41.4 BA disagreed. BA explained that the charge is not	
				applicable to the class of service on these lines. KPMG has been able to validate BA's explanation. This Issue can be closed.	
				Issue 41.5 BA disagreed. BA stated that taxes are not included in the calculations. Late payment charges are not accumulated from month to month, and late payment charges that are less than \$5 are not displayed on the bill. The status of this Issue remains deferred for further	

ID	<b>Brief Description</b>	Status	Status Reason	Notes	Additional Documents
				discussion.	Documents
				Issue 41.7 BA disagreed. The effective date of the tariff was in	
				January. However, the order was placed in December.	
				Therefore, the applicable tariff is the December tariff.	
				KPMG investigates this Issue. The status of this Issue	
				remains deferred.	
				Issue 41.8 BA disagreed. BA explained that billing was not	
				activated until 01/13/00 with BCN dated 12/21/00,	
				because the order did not complete until 01/13/00. The	
				status of this Issue remains deferred for further	
				discussion.	
				Issue 41.9 BA explained it needs more time to analyze this Issue.	
				Issue 41.10 BA disagreed. BA explained that the charge was for the	
				service of providing CRIS magnetic tapes. KPMG	
				accepts BA's explanation. This Issue can be closed.	
				Issue 41.11 BA disagreed. BA explained that the charge is not applicable under the KPMG/BA interconnection	
				agreement. KPMG accepts this explanation. This Issue	
				can be closed.	
				Issue 41.12 BA explained it needs more time to analyze this Issue.	
				Issue 41.13 BA explained it needs more time to analyze this Issue.	
				03/28/00: Addendum #2 issued.	
				03/31/00: BA deferred its response to Addendum #2 for further	
				investigation of the issues.	
				04/07/00:	
				Issue 41.1 BA agreed. The status of this Issue remains deferred.	
				Issue 41.3 BA explained that this Issue has been fixed in December	
				and can be verified with the January bills. KPMG is	
				going to investigate the Issue. The status of this Issue	
				remains deferred.	
				Issue 41.5 KPMG is still considering BA's response from 03/24/00.	
				The status of this Issue remains deferred.	
				Issue 41.7 KPMG accepts BA's explanation. This Issue can be	
				closed.	
				Issue 41.8 The status of this Issue remains deferred for further	
				investigation.	
				Issue 41.9 BA disagrees. BA explained that the methodology that	
				KPMG employed for the calculation of its charges is	

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				incorrect. KPMG stated that this methodology was provided to KPMG by BA help desk representatives. KPMG will recalculate the charges given the new method. The status of this Issue remains deferred for further discussion.  Issue 41.12 BA disagreed. BA stated that this charge was correctly applied. KPMG will revisit the calculation. The status of this Issue remains deferred.  Issue 41.13 BA disagreed. BA explained that CSRs are run prior to the bill, and thus pending orders may complete in between when the CSR is run and the bill is run, causing the difference in amount between the CSR account total and monthly access charges. KPMG will consider this explanation. The status of this Issue remains deferred.  Issue 41.14 BA stated that usage is collected for 31 days although the "from" and "through" dates end on the 30 <sup>th</sup> of the month. This Issue remains deferred for further discussion.  Issue 41.15 BA disagreed that the usage charges were incorrect. BA will further investigate. This Issue remains deferred.  Issue 41.16 BA disagreed, explaining that there were incorrect rates in Items 1 and 2. BA provided references in the tariff to the correct rates. Items 3 and 4 were operator handled calls that were incorrectly charged. This Issue remains deferred for further discussion.  Issue 41.17 BA disagreed. BA explained that all charges were applied to the new number, not the old number as specified in the Observation. KPMG will investigate the Issue. The status of this Issue remains deferred.  04/14/00:  Issue 41.5 KPMG has accepted BA's response. This Issue can be closed.  Issue 41.12 KPMG revisited the calculation and agreed that the credit was provided on the bill. The bill is in BOS BDT format. KPMG reviewed the BDT file and verify that the correct charges were billed. This Issue can be closed.	Documents
				Issue 41.14 KPMG has accepted BA's explanation. This Issue can be closed.	

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				04/28/00:	Documents
				Issue 41.2 Items #1 and #2 have been retested and validated by	
				KPMG on April 04/06/00. This Issue can be closed.	
				Issue 41.8 KPMG has been able to determine that it has been	
				charged correctly according to BA's explanation. This	
				Issue can be closed.	
				05/05/00:	
				Issue 41.9 KPMG stated that this Issue could not be resolved yet.	
				BA is going to send further explanation via email to	
				KPMG. The Issue remains deferred.	
				Issue 41.15 BA is going to send the applicable records for the	
				associated calls. This Issue remains deferred.	
				Issue 41.16 Items 3 and 4 have not been resolved yet under this	
				Issue. Therefore, it remains deferred.	
				05/12/00:	
				Issue 41.1 BA announced the fix will be implemented in 10/00. The	
				status of this Issue remains deferred.	
				Issue 41.3 KPMG is retesting this Issue to ensure that the charges	
				are correctly applied. The status remains deferred.	
				Issue 41.9 This Issue has been re-tested and resolved. Therefore, it	
				can be closed.	
				Issue 41.13 KPMG has been unable to find orders in the time period	
				identified by BA. Therefore, this Issue remains deferred. Issue 41.15 KPMG validated that the records were received and the	
				usage charges were correct. Therefore, this Issue can be closed.	
				Issue 41.16 BA announced that this Issue (Items 3 and 4) will be	
				corrected by 06/16/00. The status of this Issue remains	
				deferred for verification of the correction.	
				Issue 41.17 KPMG verified that the charges were associated with	
				the right TN. Therefore, this Issue can be closed.	
				05/19/00:	
				Issue 41.3 KPMG continues to investigate this Issue. The status	
				remains deferred.	
				Issue 41.13 KPMG received additional documentation from BA	
				identifying the problem as the double-discounting of	
				several USOCs. KPMG continues to investigate this	
				Issue. The status remains deferred.	

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				05/30/00: Issue 41.1 A fix will be implemented in October (initiative #362472). The status of this issue remains deferred. Issue 41.3 KPMG has been able to verify the fix. This Issue can be closed. Issue 41.13 KPMG has been able to verify that the correct rates were applied in the OC+C section of the same bill prior to issuing the bill. This Issue can be closed. Issue 41.16 The status of this Issue remains deferred. 07/07/00: Issue 41.1 This Issue has been closed based on the announced fix. This fix has not been verified. KPMG does not plan a verification of this fix. Issue 41.16 This Issue has been closed based on the announced correction. This correction has not been verified. KPMG does not plan a verification of this fix.	
42	KPMG observed an unexpected and not communicated process change with regard to referencing Customer Service Records (CSR).	Closed	Discussion Completed	03/07/00: Issued 03/10/00: BA explained that it needs more time to analyze this problem. BA will address this Observation on 03/16/00. 03/16/00: BA agrees. The process change was effective as of 02/15/00. The March bills should reflect the change. The status of the Observation remains deferred until the March bills have been received and reviewed by KPMG. 04/07/00: Since the March bills have not been received and reviewed yet, the status of this Observation remains deferred. 04/24/00: KPMG has confirmed the receipt of the March bills and has been able to verify the change. This Observation can be closed.	MA Observation report 42.doc
43	Several Service Order numbers and Purchase Order Numbers on KPMG's bills do not match those that appear on Completion Notices.	Closed	Discussion Complete	03/07/00: Issued 03/10/00: Issue 43.1 KPMG verified that Items No. 9 and No. 10 have been addressed in the New York OSS Evaluation. BA's response with regard to those Items was found satisfactory. KPMG stated that, therefore, this issue is not valid with regard to Items No. 9 and No. 10.	MA Observation report 43.doc

ID	Brief Description	Status	Status Reason	Notes	Additional
				Esstern N. 1 a N. 5 DA and I database in the	Documents
				For Items No. 1 to No. 5, BA stated that the service order correction suffix is already included. KPMG asked for	
				the relevant documentation and BA will provide the	
				reference by 03/16/00. The discussion of Items No. 6	
				through No. 8 has been deferred since BA needs more	
				time for further investigation on these discrepancies. The	
				status of this Observation remains deferred.	
				Issue 43.2 BA explained that it needs more time to analyze this	
				problem. BA will address this Observation on 03/16/00.	
				03/16/00:	
				Issue 43.1 BA stated that it needs more time for its investigation.	
				This Issue remains deferred.	
				Issue 43.2 BA agreed. The Issue remains deferred.	
				03/24/00:	
				Issue 43.2 BA announced that a system fix will be implemented on	
				03/31/00. The status of this Issue remains deferred for	
				the verification of this statement.	
				04/07/00:	
				Issue 43.2 KPMG stated that the system fix has not yet been	
				implemented. The status of this Issue remains deferred.	
				04/14/00:	
				Issue 43.1 KPMG has considered and accepted BA's response with	
				regard to all Items under this Issue. This Issue can be	
				closed.	
				05/05/00:	
				Issue 43.2 KPMG has been able to verify that this Issue has been	
				fixed on the Y-40 bill. BA stated that the Loop Summary	
				was fixed on 4/31/00. The Issue remains deferred for	
				further verification.	
				05/19/00:	
				Issue 43.2 KPMG continues its analysis of this Issue. The status	
				remains deferred.	
				06/02/00:	
				Issue 43.2 KPMG has received the 4/30 loop bill. However, there	
				was no activity during this billing period. KPMG is still	
				working with BA on receiving a bill that will have	
				activity so that the fix can be verified. The status remains	
				deferred.	

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				06/16/00: Issue 43.2 KPMG was able to verify the fix implemented by BA on a loop bill associated with another KPMG CLEC. Therefore, this Observation can be closed.	
44	KPMG is missing a Field Identifier Description (FID) on one of its bills.	Closed	Discussion completed	03/07/00: Issued 03/10/00: BA explained that it needs more time to analyze this problem. BA will address this Observation on 03/16/00. 03/16/00: BA disagreed. The Issue remains deferred. 03/21/00: KPMG agrees with BA's response that the Field Identifier Description can be found in other sources. This Observation can be closed.	MA Observation report 44.doc
45	KPMG is receiving UNE-P usage records with incomplete information.	Closed	Discussion completed	03/07/00: Issued 03/10/00: BA explained that it needs more time to analyze this problem. BA will address this Observation on 03/16/00. 03/16/00: BA disagreed. BA gave the following explanation for originating access records: If the call is operator handled then the 'To Number' is not populated. BA gave the following explanation for Terminating access records: The 'from number' may or may not be populated depending on the transport equipment. The Issue remains deferred for further investigation by KPMG. 03/31/00: KPMG agreed. The presence of CIC code in the 110101 and 110120 records provides sufficient information to allow UNE calls to be rated as InterLATA/IntraLATA toll messages. Since InterLATA/IntraLATA toll messages are not distinguished separately on the UNE bill, the CLEC is able to reconcile the UNE bill despite missing To/From Numbers in the UNE messages. This Observation can be closed.	MA Observation report 45.doc
46	KPMG is receiving 100119 records with an undefined value in the 'Type of Class' field.	Closed	Discussion Completed	03/07/00: Issued 03/10/00: BA disagreed. BA stated that the value is defined in code O95 in ATIS (web-site). The status of this Observation remains deferred until KPMG has received and reviewed documentation to verify the validity of the O95 value for the "Type of Class" field.	MA Observation report 46.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				03/16/00: The Issue remains deferred until KPMG will be able to verify the documentation on the ATIS web-site. 03/21/00: After further research and examination of OBF documentation pertaining to issue #2049 (Type of CLASS field = 095), KPMG agrees with Bell Atlantic's previous responses that value '095' is valid for the 'Type of CLASS' field. This Issue can be closed.	
47	KPMG was not billed for third party and collect calls made by KPMG's end users.	Closed	Discussion Completed	<ul> <li>03/13/00: Issued</li> <li>03/16/00: BA explained that it needs more time to analyze this problem. BA will address this Observation on 03/24/00.</li> <li>03/24/00: BA announced that it needs more time to analyze this Observation. The status of this Observation remains deferred.</li> <li>04/07/00: BA disagreed. BA explained that the specified calls were "0-" calls and therefore "0+COC" charges are not applicable. KPMG will consider BA's response. The status of this Observation remains deferred.</li> <li>04/28/00: KPMG has accepted BA's response and verified that these calls were operator handled. This Observation can be closed.</li> </ul>	MA Observation report 47.doc
48	A charge on KPMG's M40 bill is incorrectly prorated.	Closed	Discussion Completed	03/13/00: Issued 03/16/00: BA explained that the incorrectly prorated charge was caused by an incorrect EBD date entered by a BA billing representative. The proration would be correct if the effective bill date (EBD) was correct. 03/28/00: KPMG has been able to validate that the billing system correctly prorated the charges given the EBD date. This Observation can be closed.	MA Observation report 48.doc
49	KPMG was incorrectly charged for service order activity on a business account.	Closed	Discussion Completed	03/13/00: Issued 03/16/00: BA explained that it needs more time to analyze this problem. BA will address this Observation on 03/24/00. 03/24/00: BA disagreed BA stated that this is a residence account. KPMG disagreed. This account should have been provisioned as a business account. KPMG is going to provide the documentation to substantiate the order. The	MA Observation report 49.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				status of this Observation remains deferred for further discussion.  04/07/00: KPMG accepts BA's explanation that the charges are correct, since the account was provisioned as a residence account. This Observation can be closed.	
50	KPMG observed that the file names of certain billing files sent via NDM by Bell Atlantic differ from the agreed upon file naming convention.	Closed	Discussion Completed	<ul> <li>03/21/00: Issued</li> <li>03/24/00: BA agreed. BA stated that training took place in January to fix this problem. The status of this Observation remains deferred for the verification of the correction.</li> <li>04/07/00: BA agreed to KPMG's concern that this problem has not been fixed by the training that took place in January. BA is investigating additional steps. However, BA commented that only "very few" customers request billing files via NDM. The status of this Observation remains deferred.</li> <li>04/14/00: KPMG requested an official statement in writing from BA on its plan to implement additional steps that address this Observation.</li> <li>04/28/00: KPMG has received the statement from BA. This Observation can be closed based on the communicated plan to correct the problem raised in the Observation. The correction has not been validated. KPMG does not plan a verification of this correction.</li> </ul>	MA Observation report 50.doc
51	A service order on KPMG's Y40 bill appears to be incorrectly prorated.	Closed	Discussion Completed	03/21/00: Issued 03/24/00: BA agreed. BA explained that this Observation is based on a BA representative's error. An EBD of '11300' was assigned for the "out" activity. And an EBD '11400' was assigned for the "in" activity. KPMG is investigating this explanation. The status of the Observation remains deferred. 04/07/00: KPMG is still investigating this Issue. 04/14/00: KPMG has accepted BA's response. This Observation can be closed.	MA Observation report 51.doc
52	KPMG observed that the "called from city" and "called from	Closed	Discussion Completed	03/21/00: Issued 03/24/00: BA disagreed. BA stated that there is no information	MA Observation

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
	state" are not populated in the 10 36 04 50 record of the Billing Output Specifications (BOS-BDT) format on several resale bills.			provided for direct dialed calls under 10360450. The record is a discretionary record.  03/28/00: KPMG accepts this explanation. This Observation can be closed.	report 52.doc
53	The validity of certain charges could not be substantiated.	Closed	Discussion Completed	<ul> <li>03/21/00: Issued</li> <li>03/24/00: BA explained that it needs more time to assess the Issues.</li> <li>04/07/00:</li> <li>Issue 53.1 BA agreed. BA explained that the charge was incorrect due to a representative error. The status of this Issue remains deferred.</li> <li>Issue 53.2 BA stated that it needs more time to analyze this Issue. This Issue remains deferred.</li> <li>04/14/00:</li> <li>Issue 53.1 KPMG has accepted BA's explanation. This Issue can be closed.</li> <li>Issue 53.2 BA explained that it does not offer suspensions on CENTREX accounts. BA offered a 'work-around' as a short-term solution to the Issue. BA explained that an edit has been implemented in program to prevent these types of errors from processing. The status of this Issue remains deferred for consideration of BA's response.</li> <li>04/28/00:</li> <li>Issue 53.2 KPMG has accepted BA's response. This Observation can be closed.</li> </ul>	MA Observation report 53.doc
54	The rates displayed on KPMG's Administrative bill appear to be incorrect.	Closed	Verification post Test	03/21/00: Issued 03/24/00: BA agreed. The rate displayed is truncated. BA is going to announce a date for the fix. The status of this Observation remains deferred. 05/12/00: BA communicated that a fix will be implemented in 10/00. The status of this Observation remains deferred. 07/07/00: This Observation has been closed based on the announced fix. This fix has not been verified. KPMG does not plan a verification of this fix.	MA Observation report 54.doc
55	KPMG has observed several	Closed	Discussion	03/28/00: Issued	MA

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
	areas of Bell Atlantic non-compliance with industry change control policies.		Completed	03/31/00: KPMG received BA's detailed response to this Observation. A status update will be given after this response has been reviewed.  04/07/00: KPMG has not completed its analysis of BA's response yet. This Observation remains deferred.  04/14/00: BA will be holding a workshop on notifications where KPMG will attend to address flow through change requests. BA is going to investigate the response to Exception ID 6 from the New York trial. The status of this Observation remains deferred.  05/05/00: KPMG is awaiting the results of the Industry Change Control Meeting scheduled for 05/09/00.  05/12/00: The Industry Change Control Meeting did not provide resolutions to this Observation. The status of this Observation remains deferred for further discussion.  05/19/00: This Observation remains deferred.  05/30/00: BA is going to investigate potential resolutions to this Observation.  07/14/00: BA explained that all Type 4 (Bell Atlantic originated) CR's that are classified as "Flow through" items should be considered to be non-CLEC affecting as defined by the TIS Change Management Process released on July 6, 2000: "In the event that Bell Atlantic is forced to deviate from the Type 4 (Bell Atlantic Originated) process for new non-impacting interface functionality, Bell Atlantic will notify all TCs of the deviation as promptly as possible." This Observation has been closed.	Observation report 55.doc
56	KPMG has found two different versions of collocation application forms posted on Bell Atlantic's Wholesale Markets web site.	Closed	Discussion Completed	03/28/00: Issued 03/31/00: BA stated that it needs more time to analyze the Issue. The status of this Observation remains deferred. 04/07/00: BA will remove the old version of the form. BA has not yet announced a date when the old version is being removed. This Observation remains deferred. 04/14/00: KPMG has been able to verify that the older version of the form has been removed. This Observation can be closed.	MA Observation report 56.doc

ID	<b>Brief Description</b>	Status	Status Reason	Notes	Additional Documents
57	KPMG observed missing DUF records for usage and conversation time.	Closed	Discussion Completed	03/28/00: Issued 03/31/00: Issue 57.1 The status of the Issue remains deferred for further investigation on BA's side. Issue 57.2 This Issue is directly related to MA Observation #36 and will remain deferred until the DUF re-test has been conducted, and KPMG has been able to verify that the problem has been fixed. 04/07/00: Issue 57.2 The status of this Issue remains deferred pending the results of the DUF usage re-test. 04/14/00: Issue 57.1 BA explained that the files were sent to KPMG. KPMG will review the DUF files received. This Issue remains deferred. 05/05/00: Issue 57.1 KPMG found Items 1 through 4 to be correct given BA's additional information. Item 5, however, does not show DUF records for the calls that were billed. This Item was related to the typographical error. Item 6 is related to Issue 41.17 that is a migration to a different type of service. The entire Issue remains deferred. 05/12/00: Issue 57.1 Based on KPMG's analysis, this Issue can be closed. Issue 57.2 Based on the DUF usage re-test results, this Issue can be closed.	MA Observation report 57.doc
58	KPMG has received invalid TNs when using the Direct TN Selection Inquiry method for Pre-orders submitted via EDI.	Closed	Discussion Completed	04/04/00: Issued 04/07/00: The status of this Observation remains deferred for further discussion. 04/14/00: KPMG stated that it has re-tested the Issue. The results of the re-test have been satisfying. This Observation can be closed.	MA Observation report 58.doc

ID	<b>Brief Description</b>	Status	Status Reason	Notes	Additional
					Documents
59	KPMG is unable to process	Closed	Discussion	04/11/00: Issued	MA
	Directory Listing Service orders submitted via EDI.		Complete	04/14/00:	Observation
	submitted via EDI.			Issue 59.1 BA agreed. BA explained that this Issue is related to confusion in TISOC. BA further stated that resale	report 59.doc
				representatives looked at the particular orders and	
				"mistakenly" sent queries back, not knowing that the	
				cause for the drop out of the order was a system error. As	
				an interim solution, BA offered a manual correction by	
				04/22/00. This Issue remains deferred for verification.	
				Issue 59.2 KPMG is going to provide BA with additional	
				information on this Issue. The status remains deferred.	
				Issue 59.3 BA agreed. BA explained that this Issue is related to	
				confusion in TISOC. BA further stated that resale	
				representatives looked at the particular orders and	
				"mistakenly" sent queries back, not knowing that the	
				cause for the drop out of the order was a system error. As	
				an interim solution, BA offered a manual correction by	
				04/22/00. This Issue remains deferred for verification.	
				04/28/00:	
				Issue 59.1 KPMG stated that it is currently re-testing this Issue. The status of this Issue remains deferred.	
				Issue 59.2 KPMG has provided BA with additional information, and	
				BA stated that is further investigating the Issue. The	
				status of this Issue remains deferred.	
				Issue 59.3 KPMG stated that it is currently re-testing this Issue. The	
				status of this Issue remains deferred.	
				05/05/00:	
				Issue 59.1 This Issue can be closed based on KPMG's re-test results.	
				Issue 59.2 BA has identified a system problem with the TISOC name	
				and number and announced a fix for 5/20/00.	
				Issue 59.3 This Issue can be closed based on KPMG's re-test results.	
				05/12/00:	
				Issue 59.2 The status of this Issue will remain deferred pending the	
				verification of the fix scheduled for 05/20/00.	
				05/19/00:	
				Issue 59.2 Bell Atlantic announced that the fix for this Issue has	
				been delayed until 06/17/00. The status of this Issue	
				remains deferred until that time when KPMG can verify	

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				the fix. 06/23/00: Issue 59.2 This Issue can be closed based on KPMG's re-test results.	
60	KPMG observed that the Cable-Id field in the Local Service Confirmation (LSC) is being returned with a code that is different from the code in the Local Service Request (LSR).	Closed	Discussion Completed	<ul> <li>04/11/00: Issued</li> <li>04/14/00: BA agreed. BA explained that a change bulletin (CR#928) has been sent in December 1999 to address this Issue. Additionally, a CLEC conference call took place. The status of this Observation remains deferred for further clarification.</li> <li>04/28/00: KPMG explained that the change bulleting is not satisfactorily addressing this Observation. The status of this Observation remains deferred.</li> <li>05/05/00: BA announced to publish an informational CLEC notice on the changes of the Notes and Conditions for the cable ID field on the LSC for clarification. The status of this Observation remains deferred.</li> <li>05/12/00: BA has submitted a change notification (#1435) to address this problem. KPMG is assessing the offered solution. The status of this Observation remains deferred.</li> <li>05/19/00: KPMG continues to analyze the solution provided by BA. This Observation remains deferred until 05/30/00.</li> <li>05/30/00: KPMG explained that including the Cable-ID on the LSC is the desired solution to this Observation. BA suggested the change request to be addressed via Change Control by the CLEC community. KPMG is considering BA's response. This Observation remains deferred.</li> <li>06/02/00: KPMG has completed its analysis of BA's response. KPMG agrees to the solution provided on 5/30/00. This Observation can be closed.</li> </ul>	MA Observation report 60.doc

ID	Brief Description	Status	Status Reason	Notes	Additional
61	KPMG observed that the CLEC	Closed	Discussion	04/18/00: Issued	Documents MA
01	Handbook and the CLEC	Closed	Complete	04/18/00: Issued 04/24/00:	Observation
	Contact Lists on BA's TIS web		Complete	Issue 61.1 BA agreed. BA provided a New Contact List for BA	report 61.doc
	site do not provide complete			North TISOC in an Informational Message to change	report or doc
	process descriptions, contact			control via email on 04/20/00. There has been no further	
	lists, or help desk numbers.			definition of the TISOC process. Hours of operation have	
	lists, of help desk numbers.			been provided for the NE UNE Loop and the DSL	
				TISOC, but are not listed for the other Centers in Section	
				8.1 or the Change Control Message. These Issues remain	
				deferred for further analysis and is pending the update of	
				the CLEC Handbook.	
				Issue 61.2 BA agreed. BA provided a New Contact List for BA	
				North TISOC in an Informational Message to change	
				control via email on 04/20/00. No response has been	
				provided with respect to the missing Information on the	
				Ordering (North) Helpdesk or BA System Support. These	
				Issues remain deferred for further analysis and is pending	
				the update of the CLEC Handbook.	
				04/28/00:	
				Issue 61.1 BA announced that the Handbook on the web site will be	
				updated by 05/15/00. The status of this Issue remains	
				deferred for verification of the changes.	
				Issue 61.2 BA announced that the Handbook on the web site will be	
				updated by 05/01/00. The status of this Issue remains	
				deferred for verification of the changes.	
				05/05/00:	
				Issue 61.2 The Handbook on the web site has not been updated yet.	
				BA corrected its statement from 04/28/00. The web site	
				will be updated by 05/15/00. The status of this Issue	
				remains deferred for verification of the changes.	
				05/19/00:	
				Issue 61.1 KPMG was able to verify the 05/15/00 update to the BA web site. Therefore, this Issue is closed.	
				Issue 61.2 Bell Atlantic announced that the web site was updated	
				05/19/00. The status of this information remains deferred	
				pending verification by KPMG.	
				05/30/00:	
				Issue 61.2 KPMG validated that the web site has been updated. The	

ID	<b>Brief Description</b>	Status	Status Reason	Notes	Additional Documents
				Issue can be closed. This Observation can be closed.	
62	KPMG was overcharged for the OWC rate applied to UNE Usage.	Closed	Discussion Completed	04/18/00: Issued 04/24/00: BA requested more time to investigate this Issue. 04/28/00: BA disagreed. BA explained that OWC was being charged on a "per second" basis. The rate on the bill was the "per second" rate multiplied by 60 and, therefore, expressed in minutes. KPMG confirmed BA's explanation. This Observation can be closed.	MA Observation report 62.doc
63	KPMG is not being charged for Operator Work Time (OWC) in a manner consistent with its Interconnection Agreement with Bell Atlantic.	Closed	Discussion Complete	04/25/00: Issued 04/28/00: BA agreed. BA explained that the rate being applied was displayed incorrectly in the "per second" rate. A fix was implemented 02/01/00 to show the "per minute" rate (refer to Observation 62). The correction should be evidenced on KPMG's February bills. This Observation remains deferred for the verification of the correction. 05/05/00: KPMG will take a look at its next bill. This Observation remains deferred for verification. 05/19/00: KPMG will analyze the April bill. This Observation remains deferred pending verification. 06/02/00: The correction has been verified. This Observation can be closed.	MA Observation report 63.doc
64	Directory assistance unbranded charges are not documented in the Unbundler Scenarios located in the CLEC handbook.	Closed	Discussion Complete	04/25/00: Issued 04/28/00: BA disagreed that there is no documentation for unbranded DAC charges in unbundler scenarios in the CLEC handbook. However, BA agreed that the documentation could be made clearer and announced that a documentation change will be made to reflect scenarios that apply to both branded and unbranded DAC charges. The status of this Observation remains deferred.	MA Observation report 64.doc

ID	<b>Brief Description</b>	Status	Status Reason	Notes	Additional Documents
				05/05/00: BA announced the changes to be implemented with release of Handbook on 07/15/00. BA is going to send an email to KPMG to confirm this statement.  06/23/00: BA has been able to update the Handbook by 06/15/00. KPMG was able to verify that the CLEC Handbook was updated. This Observation can be closed.	Documents
65	Based on Unbundler Scenario #4, KPMG was not charged as expected on its February bill for usage generated in the Winchester end office.	Closed	Verification post Test	04/25/00: Issued 04/28/00: BA requested more time to investigate this Issue. 05/05/00: BA agreed. The Observation remains deferred for verification of the announced change. 05/12/00: BA explained that the default value '00' was populated as message type and this was incorrectly passed to CABS where it was rated as a national directory call (WNDA) although the actual call was not. BA announced the scheduled change for 05/20/00. 07/07/00: This Observation has been closed based on the announced change. KPMG has not verified this change. KPMG does not plan a verification of this fix.	MA Observation report 65.doc
66	KPMG observed that several rate elements expected on the bill, based on the DUF records received, did not appear on the bill.	Closed	Discussion Complete	04/25/00: Issued 04/28/00: BA disagreed. BA indicated that KPMG applied the wrong unbundler scenario when rating these calls. This Observation will remain deferred for further discussion. 05/09/00: Addendum #1 to this Observation issued. 05/12/00: Issue 66.1 Based on BA's explanation for the rating of these calls, KPMG has been able to verify the charges and closes this Issue. Issue 66.2 This Issue remains deferred. 05/19/00: Issue 66.2 BA has no update to the addendum at this time. The status of this Issue remains deferred. 06/02/00: Issue 66.2: This Issue has been replaced by Issue 66.3 and can be closed. Issue 66.3 BA agreed. BA delivered an explanation for Item 3	MA Observation report 66.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				(refer also to Observation 65). This problem could be resolved. For the remaining Items 1, 2, 5, 6, 7, BA will revise the documentation by 7/15 stating that this rate element was not tariffed and, therefore, was not being billed. Instead, ULCTC was being billed in its place. Item 4: EMI does not provide any field to accommodate 'operator work time' as documented in the CLEC Handbook. This Issue remains deferred.  06/09/00: Issue 66.3 BA has sent KPMG records that erred out. KPMG has been able to verify these records. BA announced that the verbiage on UTCTC in the Handbook is going to be changed on 6/15/00. This Issue remains deferred.  06/16/00: Issue 66.3 KPMG verified that the Handbook was updated. This Issue can be closed. This Observation can be closed.	
67	KPMG observed discrepancies between the quantity information provided in the Usage section of its bills for UNE services and the DUF records provided to KPMG.	Closed	Discussion Complete	04/25/00: Issued 04/28/00: BA requested more time to investigate this Issue. 06/02/00: KPMG has received additional information and is assessing it. This Observation remains deferred. 07/10/00: KPMG has raised this Observation to an Exception (MA Exception #11). Therefore, this Observation can be closed.	MA Observation report 67.doc
68	KPMG observed that charges associated with certain rate elements appeared on a bill but were not expected based on the scenarios applicable to the DUF records provided by Bell Atlantic.	Closed	Discussion Complete	04/25/00: Issued 05/12/00: BA requested more time to investigate this Issue. 05/19/00: The status of this Observation remains deferred. 05/30/00: Addendum #1 issued. 06/02/00: Issue 68.1 This Issue has been replaced by Issue 68.2 and can be closed. Issue 68.2 BA disagreed with this Issue. KPMG is going to re-rate some of the usage based on additional information that BA is going to provide. This Issue remains deferred. 06/09/00: Issue 68.2 KPMG has validated that these calls were operator handled calls and, therefore, has re-rated these calls and	MA Observation report 68.doc

ID	<b>Brief Description</b>	Status	Status Reason	Notes	Additional Documents
				has been able to resolve the problem. This Issue can be closed.	
69	The charges associated with rate elements that apply to a certain scenario in the CLEC handbook appear to be missing in the DTE MA tariffs and in Bell Atlantic's Interconnection Agreement with KPMG.	Closed	Discussion Complete	04/25/00: Issued 05/12/00: BA disagreed. BA explained that if the DTE MA tariffs and Bell Atlantic's Interconnection Agreement with KPMG does not include certain charges the CLEC will not be billed these charges. KPMG is considering BA's response. The status of this Observation remains deferred. 05/19/00: KPMG agrees with BA's explanation. This Observation is closed.	MA Observation report 69.doc
70	KPMG is receiving extraneous usage from a retail line.	Closed	Discussion Complete	04/25/00: Issued 05/12/00: BA requested more time to investigate this Issue. 05/19/00: KPMG and BA agreed that KPMG was properly billed; however, BA continues to investigate why KPMG received 100101 instead of 010101 records. This Observation remains deferred. 06/02/00: KPMG received 100101 records for alternate billed calls records while expecting to receive 010101. BA's response is that alternate billed calls are now being recorded as 100101 records and forwarded on to the CLEC. Based on this response, KPMG is closing this Observation.	MA Observation report 70.doc

ID	<b>Brief Description</b>	Status	Status Reason	Notes	Additional Documents
71	KPMG observed an untimely charge on its Administrative Bill.	Closed	Discussion Complete	05/16/00: Issued. 05/19/00: BA disagrees with KPMG that this is a valid Observation. BA explained that all usage received for Administrative charges before the Administrative bill is printed will show up on the bill. There are no 'from' and 'through' dates on the bill. BA has not received any requests from CLECs to show the Administrative bill cut off date. KPMG will take BA's comments into consideration. This Observation remains deferred pending further discussion. 05/30/00: KPMG has accepted BA's response that usage received for Administrative charges before the Administrative bill is printed will show up on the bill. This Observation is closed.	MA Observation Report 71.doc
72	KPMG has received bills belonging to other CLECs.	Closed	Discussion Complete	05/23/00: Issued 05/30/00: BA agreed. This Observation is a result of manual misdirection. BA offered two solutions addressing this issue. BA has altered its process to prevent this problem in the future. The first and last pages of the printed bill will be checked to ensure that they belong to the same Billing Account. The Overnight office has been instructed by BA to double-check the billing address in the system before sending the bill. KPMG will consider BA's response. This Observation remains deferred. 06/02/00: KPMG has agreed to BA's explanation and is closing this Observation.	MA Observation Report 72.doc
73	Order transactions are being processed in a manner inconsistent with the Bell Atlantic North Generic Flow-Through Ordering Scenarios documentation.	Closed	Discussion Complete	05/23/00: Issued 05/30/00: BA agreed. BA announced that it will be issuing a new document on 06/02/00. This Observation remains deferred. 06/02/00: KPMG has been able to validate BA's response. This Observation has been closed.	MA Observation Report 73.doc

ID	Brief Description	Status	Status Reason	Notes	Additional
74	KPMG observed several instances of unclear documentation in the Bell	Closed	Discussion Complete	05/23/00: Issued 05/30/00: BA requested more time to investigate Issues 74.1, 74.2, 74.3, 74.4, and 74.6. KPMG has eliminated Issue 74.5.	MA Observation report 74.doc
	Atlantic North Order Business Rules, LSOG 2, v1.8.1.			06/23/00: BA provided KPMG a detailed response in writing via email on 06/18/00 addressing all deferred Issues under this Observation.	report /4.doc
				Issue 74.1 BA explained that the Order, as submitted, was in agreement with the business rules and accurate. As such, the order should not have been rejected. The SEM was incorrectly originated by a service representative. The representative has been instructed on the correct rules for this issue. A Methods flash will be sent to the TISOC to reinforce to the correct rules. KPMG is waiting to verify an internal flash BA sent to the TISOC to correct this issue. This Issue is deferred.	
				Issue 74.2 Bell Atlantic stated it will modify these fields to include a condition that states, "Required when ((the actual service address, as identified in Bell Atlantic databases, contains this component) and (the SASN is populated)), otherwise prohibited." KPMG has been able to verify this modification communicated Flash #1512. This Issue is closed.	
				Issue 74.3 Bell Atlantic stated in its response that it disagrees with KPMG's conclusion. The information about product USOC feature compatibility is not found in the Order Business Rules. To understand these relationships, a CLEC/Reseller should review: "Bell Atlantic North USOC In-Scope Table, Resale Products", located on the BA Web Site. This document identifies the different class of service USOCs for main lines and additional lines required by Bell Atlantic. KPMG was able to verify this statement by checking the BA North USOC in-scope document on BA's web site. This Issue is closed.	
				Issue 74.4 BA explained that, currently, the Business Rules state that the LAZC, LAST, and LALOC, are required when the LASN is populated. These conditions are accurate.  The LANO is conditional, with the notes and conditions stating "Optional when the LASN is populated, otherwise	

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				prohibited." This statement is accurate. The LATH is conditional, with the notes and conditions stating "Optional when the LASN is populated, otherwise prohibited." This statement will be modified to indicate: "Required when the (LASN field is populated) and ((the LATH is not a street) or (the LASN is a single digit) or (the LASN is a directional sign) or (the LASN is a letter) or (the LASN is the same as the LALOC)), otherwise prohibited. BA will modify the LASN field to make it conditional. In addition, a statement will be added to read: "Required when the LACT is = "N" or "I", otherwise optional". KPMG has been able to verify the information in Flash #1513. This Issue is closed.  Issue 74.6 Bell Atlantic announced it will modify a conditional statement in the Blocking Activity field on the PS form from: "When the ACT field on the LSR form = "V" and the LNA field = "N", only an entry of "A" is valid." To: "When the LNA field = "N", only an entry of "A" is valid." KPMG has been able to verify the information in Flash #1514. This Issue is closed.  06/30/00: Issue 74.1 KPMG received the internal flash BA sent to the TISOC to correct this issue and was able to verify BA's statement. This Issue is closed.  07/05/00: Addendum to Issue 74.2 has been issued.  07/07/00: BA deferred its response to the Addendum.  07/20/00: BA announced that a Flash CR# 1600 will address Addendum to Issue 74.2. This Observation remains deferred.  07/27/00: Flash CR# 1600 has been sent and is being analyzed by KPMG.  07/28/00: KPMG has analyzed and verified Flash CR#1600. This Observation has been closed.	

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
75	KPMG observed an instance of unclear documentation in the Network Channel (NC) and Network Channel Interface (NCI) Codes v1.1.	Closed	Discussion Complete	<ul> <li>05/23/00: Issued</li> <li>05/30/00: BA agreed. KPMG is considering BA's response. This Observation remains deferred.</li> <li>06/02/00: KPMG defers this Observation for verification of the web page update.</li> <li>06/09/00: KPMG has been able to verify the improved information included in the LSOG 4 appendix of the documentation. BA stated that the LSOG 4 information also applies to LSOG 2. This Observation remains deferred for verification of the update on BA's web site.</li> <li>06/23/00: KPMG has verified the update on BA's web site. This Observation is closed.</li> </ul>	MA Observation report 75.doc
76	HP observed missing documentation and discrepancies for BA CR#1308.	Closed	Discussion Complete	05/23/00: Issued 05/30/00: KPMG is considering BA's response. This Observation is deferred. 06/02/00: Issue 76.1 KPMG is considering BA's response. This Issue remains deferred. Issue 76.2 BA announced it would send a flash to address this Issue. This Issue remains deferred. Issue 76.3 BA announced it would send a flash to address this Issue. This Issue remains deferred. 06/09/00: Issue 76.1 Upon KPMG's request, BA explained that documentation is not existing. BA is going to send an email to provide further clarification. 06/13/00: Issue 76.1 BA explained in its email that the Data Size field is a calculation of the length of the CSSR text message. EDI returns the text message but not the calculated Data Size. Therefore, this will not be displayed in the specification or example. This Issue remains deferred. 06/23/00: KPMG received and is in the process of reviewing Flash #1308 addressing these Issues. This Observation remains deferred. 06/30/00: Issue 76.2 KPMG was able to validate the new Business Rules.	MA Observation report 76.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				This Issue is closed.  Issue 76.3 KPMG verified that the Business Rules were clarified. This Issue is closed.  07/25/00:  Issue 76.1 This issue is covered in Exception #10 under Issue (B) and Exception #12 under Issue 1 (E). Both Exception Issues have been closed based on CR#1605. CR# 1605 was issued for Pre-Order Business Rules v2.8.1 and v4.3.1. KPMG was able to verify that mapping specifications have been provided. Additionally, an EDI Example has been added. The Business Rules and EDI Guidelines match regarding the Data Size field. This Issue can be closed.	2 octanions
77	KPMG observed several instances of unexpected responses to erred orders and preorders.	Closed	Discussion Complete	<ul> <li>05/23/00: Issued</li> <li>05/30/00: KPMG is considering BA's response. All three Issues under this Observation remain deferred.</li> <li>06/02/00: Issue 77.1 BA disagreed. This Issue remains deferred for further discussion.</li> <li>Issue 77.2 BA explained this Issue and it can be closed.</li> <li>Issue 77.3 BA explained that this Issue is the result of human error. This Issue can be closed.</li> <li>06/09/00:</li> <li>Issue 77.1 Upon KPMG's request, BA is going to send an email to provide further clarification.</li> <li>06/13/00:</li> <li>Issue 77.1 In its email, BA explains that it does not agree with the conclusion drawn in this Observation. This order was correctly processed and confirmed without a SEM. On a REQTYPE = AB, Bell Atlantic allows CLECs to submit new listings as part of the request. Since the request is not associated with a Port Out transaction, this listing is processed in a similar manner as if it were submitted as a standalone listing. As with Standalone Listings, Bell Atlantic does not validate or verify the accuracy of the listed number – it expects the CLEC to be responsible for accurately listing the end user. This Issue remains</li> </ul>	MA Observation report 77.doc

ID	<b>Brief Description</b>	Status	Status Reason	Notes	Additional
				deferred. 06/23/00: Issue 77.1 After reviewing BA's email from 06/13, and conducting a retest with satisfactory results, KPMG is closing this Issue.	Documents
78	Several Loop-Qualification Basic pre-order inquiries have failed during testing.	Closed	Discussion Complete	05/23/00: Issued 05/30/00: BA agreed. The problem will be fixed with the June release (06/17/00). The Observation remains deferred for verification. 06/23/00: KPMG defers for additional re-testing. BA will also confirm that the fix was put in place. This Observation remains deferred. 06/30/00: Based on the results of KPMG's retest, this Observation is closed.	MA Observation report 78.doc
79	HP observed that a usage discrepancy for the PRILOC field exists between the Order Business Rules, v1.8.1, and the North Order EDI Guide, v1.8.	Closed	Discussion Complete	<ul> <li>05/23/00: Issued</li> <li>05/30/00: BA requested more time to investigate this issue. The Observation remains deferred.</li> <li>06/09/00: BA is going to initiate a CLEC notification on the field change to "conditional." The Observation remains deferred.</li> <li>06/23/00: KPMG has received and is in the process of reviewing Flash CR# 1496. This Observation remains deferred.</li> <li>06/30/00: The change of the field in the Business Rules has been confirmed, and this Observation is closed.</li> </ul>	MA Observation report 79.doc
80	KPMG observed two instances of unexpected responses to erred pre-orders.	Closed	Discussion Complete	05/30/00: Issued 06/02/00: BA agreed. The Notes and Conditions are going to reflect a field population change from conditional to optional. BA announced that it is going to send out a CLEC notification with the updates in the Notes and Conditions. This Observation remains deferred for verification. 06/23/00: BA has sent out Flash. The change of the field in the Business Rules has been confirmed, and this Observation	MA Observation report 80.doc

ID	<b>Brief Description</b>	Status	Status Reason	Notes	Additional
				is closed.	Documents
81	KPMG observed the receipt of a longer interval from a Due Date Availability (DDA) than was confirmed available by calling the TISOC.	Closed	Discussion Complete	05/30/00: Issued 06/02/00: BA requested more time to investigate this issue. This observation remains deferred. 06/09/00: BA has not been able to deliver a response based on the current information and, therefore, has requested a copy of an HP inbound request from KPMG. The status of this Observation remains deferred for further investigation. 06/23/00: KPMG has reviewed BA's response to the HP inbound request and determined this Observation can be closed.	MA Observation report 81.doc
82	HP observed that inconsistencies exist between the BA Order EDI Guide v1.8 and the Order Business Rules v1.8.1.	Closed	Discussion Complete	05/30/00: Issued 06/02/00: This Observation is directly related to Observation #9. It remains deferred. Both Observations remain deferred until the MA test has been completed. 06/30/00: KPMG was able to validate the BA workaround. This Observation is closed.	MA Observation report 82.doc
83	KPMG observed several instances of unexpected responses to orders.	Closed	Discussion Complete	05/30/00: Issued 06/02/00: Issue 83.1 KPMG requested the history for the noted PON from BA for further analysis of the issue. The Issue remains deferred. Issue 83.2 BA explained that this Issue is based on a manual rep error. KPMG should never have received a SEM. KPMG is considering this response. This Issue remains deferred. Issue 83.3 BA announced that the problem was fixed on 5/25/00. This statement is subject to verification, and the Issue remains deferred.	MA Observation report 83.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				06/09/00: Issue 83.2 KPMG agrees with BA's response. This Issue could be resolved and is closed. 06/23/00: Issue 83.1 KPMG has observed no additional occurrences of this problem. This Issue can be closed. Issue 83.3 KPMG continues to monitor, however no additional instances have been observed since BA put in the fix. This Issue remains deferred. 06/30/00: Issue 83.3 Based upon the results of KPMG's retest, this Issue is closed. There are no other issues, and so this Observation is closed.	
84	HP observed that the qualifier for the MLT mapping, as stated in the Pre-Order EDI Guide v2.8.1, differs from the qualifier received in the xDSL Loop Qualification Response (LXA).	Closed	Discussion Complete	<ul> <li>05/30/00: Issued</li> <li>06/02/00: BA announced that a map change will be implemented with the 6/17 release. This Observation remains deferred for verification of the map change.</li> <li>06/09/00: BA stated that the documentation regarding this map change has already been published. Flash CR# 1513 is going to follow. This Observation remains deferred for the validation of this statement.</li> <li>06/30/00: KPMG continues to retest. This Observation remains deferred.</li> <li>07/10/00: This same issue is has been raised in MA Exception 10, Issue (Z). Therefore, this Issue can be closed.</li> </ul>	MA Observation report 84.doc
85	Documented Flow-Through orders are not flowing through Level 5.	Closed	Discussion Complete	<ul> <li>05/30/00: Issued</li> <li>06/02/00: BA explained that it has not defined this migration scenario yet, but it is going to update the flow through document by the end of June. This observation remains deferred for validation.</li> <li>06/09/00: BA announced the update of the flow through documentation for 6/17/00. The status of this Observation remains deferred for final verification.</li> <li>06/23/00: KPMG has verified that the flow through document has been updated. This Observation is closed.</li> </ul>	MA Observation report 85.doc

ID	<b>Brief Description</b>	Status	Status Reason	Notes	Additional Documents
86	KPMG has detected the receipt of late Billing Completion Notices (BCNs).	Closed	Discussion Complete	05/30/00: Issued 06/02/00: BA disagreed. BA explained that KPMG has to look at the CRIS completion date in Metrics in order to verify that the BCNs are not late. KPMG has requested a printout of CRIS reports showing completion dates for verification. This Observation remains deferred. 06/23/00: BA provided the dates for the BCNs and KPMG was able to verify that the BCNs were not late. This Observation is closed.	MA Observation report 86.doc
87	KPMG has detected discrepancies between the completion date within the Provisioning Completion Notice (PCN CD) and the Due Date on the last Local Service Confirmation (LSC DD).	Closed	Discussion Complete	<ul> <li>05/30/00: Issued</li> <li>06/02/00: BA agreed. KPMG should not have received PCNs at all. This problem was fixed on 5/25/00. KPMG defers this Observation for verification.</li> <li>06/23/00: KPMG continues to collect data. This Observation remains deferred.</li> <li>06/30/00: KPMG has encountered further instances of this issue since BA implemented a fix on 5/25. KPMG will issue an addendum to this Observation. This Observation remains deferred.</li> <li>07/07/00: KPMG has provided BA the details on these instances via email. In its response BA explained that since 5/25, BA has received six PCNs with Completion Dates that have earlier than the Due Date on the last LSC. The first 5 PONs received PCNs with correct due dates. This Observation remains deferred for consideration of BA's response.</li> <li>07/21/00: BA explained that this Observation is based on human error. A BA representative changed the DD on the PCN to KPMG's requested DDD on the LSR and did not send a second LSC with the new DD. KPMG accepted this explanation. This Observation has been closed.</li> </ul>	MA Observation report 87.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
88	KPMG has detected three instances of orders that received BCNs without PCNs.	Closed	Discussion Complete	<ul> <li>05/30/00: Issued</li> <li>06/02/00: BA announced that this problem was fixed on 5/25/00. KPMG defers this Observation for verification.</li> <li>06/23/00: KPMG continues to collect data. This Observation remains deferred.</li> <li>06/30/00: KPMG has encountered further instances of this issue since BA implemented a fix on 5/25. This Observation remains deferred.</li> <li>07/07/00: KPMG has provided BA the details on these instances. BA stated that the Issue is still under investigation. The Observation status remains deferred.</li> <li>07/20/00: BA explained that the instances KPMG provided are all Level 5. The first PON's PCN was not generated due to a "sporadic" DCAS database issue that is scheduled to be corrected with the 08/19/00 release. BA further explained that the remainder of the PON's did not generate PCN's due to an intermittent DCAS issue with "R" orders. A fix is scheduled for the 08/19/00 release. KPMG accepts BA's explanation. However, both fixes have not been verified by KPMG. Currently, KPMG is not planning to retest this Issue. The Observation has been closed.</li> </ul>	MA Observation report 88.doc
89	Flow through documentation regarding the eligibility of hunting is not publicly or readily available to CLECs.	Closed	Discussion Complete	05/30/00: Issued 06/02/00: BA agreed that this is a valid Observation and announced that the flow through documentation is going to be updated by the end of June. The updated information is going to include information on hunting. The Observation remains deferred for verification. 06/09/00: BA announced the update of the flow through document for 6/17/00. The status of the Observation remains deferred for final verification. 06/23/00: KPMG was able to verify the updated documentation. This Observation is closed.	MA Observation report 89.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
90	KPMG observed that SEMs have not been returned for two orders in LSOG 4 Production due to incorrect EDI formatting.	Closed	Discussion Complete	06/06/00: Issued. Although BA has already addressed this Observation satisfactorily by correcting the EDI formatting, KPMG is publishing this Observation. The status of this Observation is closed.	MA Observation Report 90.doc
91	Flow through documentation is inaccurate or not publicly or readily available to CLECs.	Closed	Discussion Complete	<ul> <li>06/12/00: Issued</li> <li>06/23/00:</li> <li>Issue 91.1 BA is to provide flow through documentation for line upgrades. KPMG has not yet been able to verify. This Observation remains deferred.</li> <li>Issue 91.2 KPMG was able to verify BA's response. This Issue is closed.</li> <li>Issue 91.3 This Issue remains deferred.</li> <li>06/30/00:</li> <li>Issue 91.1 BA directed KPMG to the Flow Through Scenarios document, page 3. KPMG stated that some unlike cases will flow through. This Issue remains deferred pending further discussion.</li> <li>Issue 91.3 Based upon BA's response, KPMG believes this Issue can be closed.</li> <li>07/07/00:</li> <li>Issue 91.1 KPMG has been able to validate the implementation of the following note in the Flow-thru document on the Web: "Unless otherwise noted, all migrations are from and to 'like' service, e.g. pots line to pots line, or pots to basic loop." This Issue can be closed.</li> </ul>	MA Observation report 91.doc
92	Bell Atlantic's Industry Change Management documentation does not appear up to date.	Closed	Discussion Complete	06/12/00: Issued 06/23/00: BA expects updates to be complete by 6/30. This Observation remains deferred. 06/30/00: BA will forward KPMG proposed changes to the web site. This Observation remains deferred until those changes can be verified on the web site. 07/14/00: Based on the updates and revisions to the TIS Change Management Process release on May 22, 1998 by	MA Observation report 92.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				replacing it with the TIS Change Management Process released on July 6, 2000 this Observation has been closed.	
93	KPMG observed that BA's UNE Interval documentation is incorrect or inconsistent with information provided by TISOC reps.	Closed	Discussion Complete	06/13/00: Issued 06/23/00: BA announced that there was an error on the part of a TISOC representative, and that the TISOC was being sent clarifying instructions. KPMG requested a copy of this memo for validation. This Observation remains deferred. 06/30/00: KPMG was able to validate the clarifying instructions in the internal methods flash sent to the TISOC. This Issue is closed.	MA Observation report 93.doc
94	Bell Atlantic's process for implementing, documenting and tracking metrics change proposals is inadequate and incomplete.	Closed	Discussion Complete	<ul> <li>06/13/00: Issued</li> <li>06/23/00: Issue 94.1 BA deferred its response.</li> <li>Issue 94.2 BA Pre-Order team members completed training on 06/19/00. The team was instructed to include all changes in the monthly data. This Issue remains deferred for consideration of this explanation.</li> <li>Issue 94.3 BA stated that the 01/03/00 – 01/04/00 data had been purged by the time KPMG received the data for January. However, the algorithm is correct, and BA matches KPMG. BA will provide an entire month's data for KPMG to validate. This Issue is deferred pending validation.</li> <li>06/30/00:</li> <li>Issue 94.1 BA announced that future Change Control announcements will be issued with individual numbering for the different domains. BA also announced that a new Change Control manager has been named. This Issue remains deferred.</li> <li>07/26/00: This Observation has been raised to MA Exception #14 and can, therefore, be closed.</li> </ul>	MA Observation report 94.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
95	KPMG observed inconsistent processing of flow through orders.	Closed	Discussion Complete	06/19/00: Issued 06/23/00: BA has already satisfactorily explained the issue, but KPMG is publishing the Observation. This Observation is closed.	MA Observation report 95.doc
96	HP observed discrepancies in the EDI data files received for Bell Atlantic pre-order and order	Closed	Discussion Complete	06/19/00: Issued 06/23/00: Issue 96.1 Document specifies that GS04 date is eight characters in	MA Observation report 96.doc
	responses.			length. This Issue is closed. Issue 96.2 Deferred until 06/30/00 Issue 96.3 This Issue was corrected with the June release. BA will provide the date. This Issue remains deferred for	report 90.doc
				verification.  Issue 96.4 BA agreed, and is looking into the problem. This Issue remains deferred.  06/30/00:	
				Issue 96.2 BA stated that a fix was implemented on 6/14 for the CTE environment, and on 6/17 for the Production environment. This Issue remains deferred for discussion.	
				Issue 96.3 Based upon the results of KPMG's retest, this Issue is closed.  Issue 96.4 Based upon the results of KPMG's retest, this Issue is closed.	
				O7/07/00:  Issue 96.2 KPMG reported that no further instances have been reported during the remainder of the test. Therefore this Issue can be closed.	

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
97	KPMG observed that Bell	Closed	Discussion	06/19/00: Issued	MA
	Atlantic's documented Methods and Procedures and actual coordinated hot-cut practices are inconsistent.		Complete	<ul> <li>Issue 97.1 BA stated that RCCC logs indicate that the calls in question were completed. At KPMG's request, BA will forward a copy of these logs by 06/30/00. This Issue is deferred pending verification.</li> <li>Issue 97.2 BA stated that a call had been placed prior to the hot-cut. KPMG requested a copy of the call log. This Issue is deferred pending verification.</li> <li>Issue 97.3 BA agreed. The issue was the result of manual error. The tech is being trained. KPMG requested a copy of the internal memo. This Issue is deferred pending verification.</li> <li>Issue 97.4 BA stated that a new version of MDF Job Aid was released internally on 05/24/00. KPMG has requested a copy. This Issue is deferred pending verification.</li> <li>Issue 97.5 BA announced it would clarify the language within the M&amp;P documents. This Issue is deferred pending verification.</li> <li>07/07/00:</li> <li>Issue 97.4 KPMG has received and reviewed a copy of the new version of MDF Job Aid. This Issue can be closed.</li> <li>Issue 97.5 KPMG has reviewed the updated M&amp;P documents and agrees to the clarification. This Issue can be closed.</li> <li>07/17/00:</li> <li>Issue 97.1 KPMG has received and reviewed the RCCC logs that indicate that the calls in question were completed. This Issue can be closed.</li> <li>Issue 97.2 KPMG has received and reviewed the copy of the call log. This Issue can be closed.</li> </ul>	Observation report 97.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				Issue 97.3 KPMG has received and reviewed the copy of the internal memo. This Issue can be closed.	
98	Documented Methods and Procedures for provisioning coordinated hot-cuts are inconsistent across central office locations.	Closed	Discussion Complete	06/19/00: Issued 06/23/00: BA pointed out that KPMG visits occurred on different dates. BA was in the process of upgrading M&P documentation during that period, and some of the COs may have received the new version before others. KPMG will verify in the coming weeks that all COs are using consistent documentation. This Observation remains deferred pending verification. 07/07/00: KPMG has been able to verify that all COs are using consistent documentation. This Observation has been closed.	MA Observation report 98.doc
99	KPMG observed an instance of an unexpected SEM for a valid REQTYP entry.	Closed	Discussion Complete	06/19/00: Issued 06/23/00: Based upon the results of KPMG's re-test, this Observation can be closed.	MA Observation report 99.doc
100	KPMG observed an instance of inconsistent documentation provided by BA via Change Control and in the BA North Order Business Rules v1.8.1.	Closed	Discussion Complete	06/19/00: Issued 06/23/00: BA stated that the methods Flash it had sent out was not updated in the TISOC database. BA will send a communiqué to the TISOC with the update. KPMG requested a copy of this memo. This Observation remains deferred pending validation of BA's statement. 07/13/00: KPMG received and reviewed the memo on 6/26/2000 (Informational Letter #: 2000-0022). This Observation can be closed.	MA Observation report 100.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
101	KPMG observed instances of unclear documentation in the BA North Order Business Rules v1.8.1.	Closed	Discussion Complete	<ul> <li>06/19/00: Issued.</li> <li>06/23/00: BA agreed. BA stated that the Business Rules are incorrect. It will send a flash to correct. This Observation is deferred.</li> <li>07/17/00: BA announced that a Flash will go out on 07/20/00. The Flash will describe a workaround addressing this problem. This Observation is deferred pending the Flash and verification.</li> <li>07/25/00: BA released an Informational Message via Change Control to the CLEC community regarding "Loop Regrade Ordering Policy". KPMG is assessing and retesting the information. The status of this Observation remains deferred.</li> <li>08/04/00: KPMG has submitted orders to retest BA's fix for this Observation and has received LSCs. KPMG will monitor the orders until the Due Date of 8/10 and will look for a BCN shortly after this date. This Observation remains deferred.</li> <li>8/14/00: KPMG completed a successful retest following guidelines posted on July 25, 2000 by BA Change Control in an Informational Message titled, "Loop Regrade Ordering Policy". This Observation has been closed.</li> </ul>	MA Observation report 101.doc
102	KPMG has received Local Service order Confirmations (LSCs) from Bell Atlantic for flow-through orders during SOP downtime.	Closed	Discussion Complete	<ul> <li>06/19/00: Issued</li> <li>06/23/00: BA stated that the SOP may be available intermittently during the downtime. BA also stated that the SOP hours are being extended; the new hours will be communicated to the CLECs. KPMG requested a copy of this notification. This Observation remains deferred pending verification.</li> <li>06/30/00: KPMG has received Flash #1543. This Observation remains deferred.</li> <li>07/07/00: KPMG has been able to verify the updated web site on the extended SOP hours. KPMG has not validated that BA's offered solution is going to fix the problem.</li> </ul>	MA Observation report 102.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
103	Bell Atlantic records Complex ISDN orders as POTS orders I its transaction data.	Closed	Discussion Complete	06/22/00: Issued. 07/07/00: BA-MA agreed. BA-MA had been using a "quick fix" to identify Complex orders and had been using the AECN RISD field to identify the CLECs that submit only Complex orders. BA-MA has proposed both a short-term solution and a long-term solution. For the short term, a high-level SORD feed will be implemented on July 14 <sup>th</sup> to identify Complex orders. For the long term, BA-MA will implement a disaggregated direct feed that will supply Complex flags. This solution will be implemented on August 19 <sup>th</sup> and will be reported by September 1 <sup>st</sup> . This Observation remains deferred for further consideration of BA's suggested solutions. 07/13/00: KPMG received data from BA and was able to verify that BA has implemented the short-term fix proposed in their response from 07/07/00. This Observation can be closed based on this result. KPMG has not verified the long-term fix to be implemented on 09/01/00.	MA Observation report 103.doc
104	Both LSOG 2 and LSOG 4 documentation provide incorrect error correction procedures. In addition, BA error documentation excludes an explanation of REJ (reject) codes.	Closed	Discussion Complete	06/27/00: Issued 06/30/00: BA deferred its response. 07/14/00: Issue 104.1 BA disagreed. BA explained that the error corrections that are referred to in sections 3.2 and 1.5 are corrections to accepted orders, that is orders that have been accepted by the Bell Atlantic OSS systems. 860 or supplemental transactions may only be sent against these orders. Rejected orders (as detailed in CR#1586) are not accepted by Bell Atlantic Order Systems and therefore cannot be modified with a supplement or an 860 transaction. KPMG received Flash CR# 1586 on 7/14/00. The update will be incorporated into the next version of the Order Error Messages document. The Observation remains deferred. Issue 104.2 BA stated this Issue has been answered by Flash CR#1586. This Issue remains deferred for verification. 07/20/00: KPMG has reviewed Flash CR# 1586 and accepts BA's notification of the update to the Order Error Messages	MA Observation report 104.doc

ID	<b>Brief Description</b>	Status	Status Reason	Notes	Additional Documents
				document. Both Issues under this Observation have been closed. The update of the Preface in the next version has not been verified.	
105	KPMG observed discrepancies between the Local Service Request and EDI format of the June 2000 release of the Regression and Quality Baseline Validation Test Decks.	Closed	Discussion Complete	06/28/00: Issued 06/30/00: BA stated that EDI is used to generate the results of the test deck. The EDI inputs and outputs provided are correct. The LSRs provided are simply an additional reference for CLECs. These LSRs are manually typed in and any errors are typos. BA is working on a solution to automate this process. This Observation remains deferred.  07/14/00: BA explained the current steps undertaken to publish Local Service Request (LSR) information into the Qualit Baseline Validation Test Deck ("Test Deck") as follows: (1) The BA Business Rules team is the owner of an Exce spreadsheet which is called the "control sheet". The control sheet is where the Business Rules team enters all the LSR information for the Test Deck. (2) A copy of the control sheet is provided to the EDI testers to perform their quality assurance testing. (3) The information in the control sheet is also manually typed into a Word document which is then published to the CLEC industry as the new release Test Deck document. It is the manual entry step that causes quality problems with the Test Deck document.  For the upcoming October 2000 new release, BA will start implementing a new process to address this quality problem. BA's proposes the following new process: (1) The Business Rules team will still own a control sheet. (2) There will exist a separate spreadsheet for each Test Deck. This spreadsheet will be linked to the control sheet, so as changes are made to the control sheet, the linked spreadsheet(s) will automatically be updated. Irrelevant	

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				fields will not appear in the spreadsheet. (3) When a new Test Deck is published, the contents in the linked spreadsheet will be copied and pasted into the Word document. This Observation remains deferred for further consideration of BA's suggested new solution to this problem.  07/16/00: KPMG acknowledges that BA has initiated steps to address the quality concerns satisfactorily. This Observation can be closed. The process improvement has not been validated. KPMG has no plan to validate the improvement.	
106	Bell Atlantic did not process flow through-eligible resale and platform orders at Level 5.	Closed	Discussion Complete	06/28/00: Issued 06/30/00: BA stated that the first PON referenced should have flown through, but did not due to a rare application error. BA also stated that the second PON referenced is not flow-through as written. The TISOC manually processed the order when it should have been queried back to KPMG. KPMG will consider this response. This Observation remains deferred. 07/07/00: KPMG agreed to BA's response. The Observation is closed.	MA Observation report 106.doc
107	KPMG observed several instances of late notification of a "no facilities" condition during ADSL qualified loop installations.	Closed	Discussion Complete	06/29/00: Issued. 07/07/00: BA agreed. KPMG requested and received supporting documentation (RCCC logs). The status of this Observation remains deferred. 07/13/00: KPMG has received the supporting documentation regarding this Issue, and has been able to confirm that BA's performance was in an acceptable range. This Observation can be closed.	MA Observation report 107.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
108	A KPMG LSOG 4, resale, stand- alone directory listing service order was routed by Bell Atlantic to the wholesale department.	Closed	Discussion Complete	06/29/00: Issued. 07/07/00: BA agreed. In its response, BA referred to the Business Rules and clarified that the 'REQTYP' field on the LSR form should be populated with "DB" and the 'Activity' field with "J". The Observation remains deferred for further consideration of this response. 07/13/00: BA explained that LSR form should be populated with "EB" for 'REQTYP' and not "DB" as stated on 07/07/00. KPMG has retested this Issue and was able to confirm that BA's statement is correct. This Observation can be closed.	MA Observation report 108.doc
109	Call records were missing from the Daily Usage Feed (DUF) files received from Bell Atlantic.	Closed	Discussion Complete	06/30/00: Issued. 07/07/00: BA agreed. This Observation remains deferred. 07/14/00: BA explained the reason for the missing call records being the following: Eleven call records could not be found (ref # 2,3,6,9-13,18,21&22). For five call records, according to BA, no call event for date and time has been specified. The Call duration time was "0" (ref # 1,16,17,19,20). These calls would not be billable and, therefore, no records have been sent. For six call records, the Order activity was on the account (ref # 4,5,7,8,15,23). These accounts were switched from retail to resale/UNE. Calls were placed on due date of order, and before the toll guide was updated. Finally, one Valuflex call (ref # 14) that is owned by BA had no record sent. KPMG accepts BA's explanation regarding all Items. This Observation can be closed.	MA Observation report 109.doc

ID	<b>Brief Description</b>	Status	Status Reason	Notes	Additional
110	RPMG observed that the process for ordering xDSL migrations in the BA-North Order Business Rules v 4.3.1 is incorrect.	Closed	Discussion Complete	07/07/00: Issued. 07/14/00: BA stated that when the first character of the REQTYP is 'A', the ACT field cannot be populated with 'V'. 07/17/00: KPMG agreed to BA's response. However, in the instance referenced in the Observation report, the ACT field was populated with "C". And when using an LNA of "C" on the LS form according to Business Rules, KPMG received an error message. It appears that the Business Rules are incorrect for loop orders when the first character of the REQTYP = "A" in an upgrade from POTS to xDSL service. Currently, a character of "C" is not prohibited on the LNA field of the LS form when upgrading a POTS line to xDSL. KPMG stated that there was a typographical error in the listed PON. The corrected Observation report has been issued. This Observation remains deferred for further discussion. 07/18/00: BA explained that an upgrade of this nature is not supported by BA today. A CLEC would have to request a 'disconnect' first, and then a new. There is no specific documentation that states this process. 07/21/00: BA announced that a CLEC notification will go out regarding this Observation. 07/25/00: BA released an Informational Message via Change Control to the CLEC community regarding "Loop Regrade Ordering Policy". KPMG is assessing the information. The status of this Observation remains deferred.	Additional Documents MA Observation report 110.doc
				07/26/00: KPMG agrees that the "Loop Regrade Ordering Policy"	

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
111	KPMG observed that flow through orders have been processed inconsistently.	Closed	Discussion Complete	07/10/00: Issued. 07/14/00: BA stated that the PON's noted on this Observation received an internal system error message due to an unavailable backend system. BA further explained that the in the Observation listed LSR's went Level 4, as all service orders associated with those were mechanically generated. TISOC intervention was only required to allow the system to send the LSC. BA concluded that instances of this nature are captured in BA's Achieved Flow Through Metric. This Observation remains deferred for consideration of BA's response. 07/18/00: KPMG agrees to BA's response. This Observation can be closed.	MA Observation report 111.doc
112	The BA Pre-Order Business Rules version 2.8.1 states that the Service Address State/Province (SAST) Field is conditional on a Address Validate Inquiry/ Direct TN Selection Inquiry (ADR). KPMG observed, however, that this field is required.	Closed	Discussion Complete	07/12/00: Issued. 07/14/00: BA agreed. The Business Rules are not in line with the actual practice. Flash CR# 1516 addresses this Observation. This Observation remains deferred for further analysis of the Flash. 07/21/00: KPMG has received Flash CR# 1516 and acknowledged the announced change of the SAST Field from 'conditional' to 'required' with the next release of the Pre-Order Business Rules. This Observation can be closed. The change could not be verified.	MA Observation report 112.doc
113	Two DS1 circuits were found to be out of service due to Bell Atlantic wiring transpositions between the MUX and the RJ48 jack (Demarcation Point).	Closed	Discussion Complete	07/12/00: Issued. 07/14/00: BA stated that further clarification of this Observation is needed. The status of this Observation remains deferred. 07/17/00: This problem is a result of human error in wiring transposition. Therefore, this Observation can be closed.	MA Observation report 113.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
114	KPMG observed four DS1 circuits installed with an incorrect Demarcation Labeling based on BA's Methods & Procedures.	Closed	Discussion Complete	07/12/00: Issued. 07/14/00: BA suspects that the Demarcation of the listed DS1 circuits has been mislabeled. This Observation remains deferred for further investigation. 07/17/00: BA's assessment could be confirmed by KPMG. This Observation can be closed.	MA Observation report 114.doc
115	KPMG has received misleading error messages when submitting orders as described by the Bell Atlantic North Order Business Rules, Version 4.3.1.	Closed	Discussion Completed	07/19/00: Issued. 07/20/00: Addendum for clarification of both Issues released. As a result, the original Observation has been closed. 07/24/00: BA asked KPMG to supply the inbound EDI request and the EDI response from BA for the PON's referenced in Issues 1 and 2. 07/25/00: KPMG provided BA with two PON numbers and the related version of the LSR's. BA is still analyzing this Observation. This Observation remains deferred. 7/28/00: BA disagreed and explained that in both cases (Issue 115.1 and 115.2), the BA generated error messages were due to KPMG incorrectly constructing EDI inputs. These inputs, when read by BA, generated the messages based on what the order actually contained, which was not what KPMG intended or states above.  Issue 115.1 BA explained that KPMG submitted an order with incorrect EDI structure. The fifth PO1 Loop did not properly identify the loop as a Level 1 indent. (The level is missing from the SLN 5 data- see BA Order EDI LSOG Specification Document Example 3.5, DSCR depiction). BA then correctly mapped the SI/TI/C3 data to the Header Telephone Number. This generates the error message above correctly.  Issue 115.2 BA explained that KPMG incorrectly identified POC 1 as a Port Service Form ("SS") instead of identifying it as a Hunting segment (HNT). This caused BA to map the data to a Port Service Form, and since no Telephone Number (for a Port Service form) is present in this segment, the correct error message was generated. BA error messages were correct for the transactions as	MA Observation report 115.doc

ID	Brief Description	Status	Status Reason	Notes	Additional Documents
				submitted.  7/28/00: KPMG has considered BA's explanation regarding bo Issues and agrees. This Observation can be closed.	
116	KPMG noticed that in several cases Local Service Billing Completion (LSBCM) responses received from BA-MA did not contain the required fields 'Service Order Identifier' (SOID) and 'Service Order Billing Telephone Number' (SOBTN).	Closed	Discussion Completed	07/28/00: Issued. 08/03/00: Further analysis showed that the SOID and SOBTN fields are not in the Business Rules version 4.1.1 and, therefore, should not have been included in the analysis of the orders referenced in this Observation that were prior to the 4.3.1 release (June 17th). Orders sent after June 17th have the SOID and SOBTN fields. This Observation can be closed.	ent
117	KPMG observed that in several cases, the Due Date (DD) on the Local Response received from BA-MA contained a date that did not match the Desired Due Date (DDD) sent to BA-MA on the Local Service Request.	Closed	Discussion Completed	07/31/00: Issued. 08/01/00: BA explained that it understands the importance of be consistent with the Desired Due Date requested by the CLEC and the Due Date assigned by BA-MA. Furthe BA stated that in two of the three the cases mentioned this Observation, BA methods were followed as descrin document 2000-0015. The document states that "if CLEC requests a short interval BA may assign the corinterval and then confirm the new Due Date back to the CLEC on the LSC". This occurred for PON #037011ZM0X000001 and #058012ZM0X010001 (or this PON the rep over calculated the date by 1 day, therefore, a 13 day interval was assigned instead of the proper 12 day interval). On the third PON #025012ZM0X00004, the Due Date was changed due rep error. BA concluded that the 6/27/00 requested Du Date should have been used. The Observation remain deferred for further consideration of BA's response.  8/18/00: BA has provided KPMG with a second response	report 117.doc  report 117.doc  to e

ID	<b>Brief Description</b>	Status	Status Reason	Notes	Additional Documents
				addressing each of the 29 PONs in question. KPMG assessed BA's response and raised this Observation t MA Exception #16. Therefore, this Observation can closed.	nas O
118	KPMG observed that BA-MA is unable to perform CLEC to CLEC loop migrations in both LSOG 2 and LSOG 4.	Closed	Discussion Completed	08/07/00: Issued. 08/07/00: BA disagreed. BA explained that complex migration unbundled elements and resale and platform services an industry wide set of issues that still requires indus definition, consensus, and validation before BA can reasonably produce all the "rules' for all these transactions. Further, BA stated that it currently provides for transaction such as Platform to Platform migrations, migrations from Resale to Platform and Resale to Loop/Loop w/LNP. BA believes industry agreement permits such transactions. According to Be response activities such as Loop to Loop migrations contain unresolved industry issues, such as: "Does are order from a New Service provider give the Network Service Provider (BA) the authority to remove the lost from the old Local Service Provider's inventory with separate express permission from the that Provider?" pointed out that these issues are being discussed with Wholesale Community in several forums, including a Change Control hosted Workshops, the current OBF working committee, and under a NY PSC proceeding Finally, BA argued that until the industry resolves an concurs on these issues, BA could only handle such requests on a case by case basis with full cooperation both the new and old Local Service Provider. This Observation remains deferred for consideration of Baresponse.  8/18/00: KPMG has considered BA's response and has come conclusion that this Observation can be closed.	are report 118.doc ry ides  A's  pp out BA the 3A . d of A's