

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. No. 99-271

COMMENTS BY AT&T COMMUNICATIONS OF NEW ENGLAND, INC.,
REGARDING KPMG'S EXCEPTION NO. 8

KPMG Exception No. 8 KPMG observed that it is receiving incorrect and/or missing Provisioning Completion Notifications and Completion Notices for orders submitted via EDI in the CTE environment. KPMG noticed this condition in both the LSOG 2 and LSOG 4 environment.

Domain: Pre-Order, Order and Provisioning (POP)

KPMG Assessment: KPMG recognized and concluded that under these testing conditions a CLEC will not be able to test to know if orders have been provisioned and billed correctly and timely.

Date of Exception: March 7, 2000

Date of BA Response: March 14, 2000

Date of AT&T Comments: March 24, 2000

AT&T Comments:

Receipt of timely and accurate completion notices from Bell Atlantic is very important to CLECs in the production environment, and thus it is very important that this functionality can be accurately tested in the CLEC Test Environment ("CTE"). Notwithstanding the limited nature of Bell Atlantic's response to this Exception, AT&T fears that the CTE experience described by KPMG matches the production environment all too accurately. Bell Atlantic's response to this Exception ignores the important fact that its problems with missing completion notices go beyond the CTE into the production environment. It is now undisputed and well known that Bell Atlantic is making major changes to its hardware and software systems, including testing the replacement of its ECXpert systems with brand new software, in an effort to solve the substantial problem it has been having with completion notices in the production environment.

AT&T agrees with the KPMG assessment of the CTE in this Exception. Without proper status notices a CLEC will not be able to test its systems to know if BA is capable of provisioning and billing orders correctly and on time. It is vitally important that Bell Atlantic send timely completion notices of all kinds in the production environment, because without timely completion notices the CLEC would not be able to know if orders have been provisioned and billed accurately and timely. For this reason, it is very important that this functionality can be proven to work properly in the CTE. Since the CTE is designed to mirror the Bell Atlantic production systems, it is essential that the

same status messages that are supposed to be received from the Bell Atlantic production systems be sent to the CLEC during testing. An unstable CTE is reflective of what will be experienced in the production environment.

Prior to the development of the CTE, the test environment in the New York (NY) Third Party OSS tests did not consistently provide either status messages or any completion notices. In NY, KPMG found that a separate environment was required for CLECs to conduct new release and new entrant testing. The CTE was created. One of the reasons that the CTE was developed was to ensure that the CLECs would receive from Bell Atlantic, all of the applicable status messages that should be generated with each Local Service Request (LSR).

The full compliment of notices in the CTE is necessary for each order so that the CLECs may validate that they have correctly designed their systems to receive and process status messages from Bell Atlantic. The CLECs will need to process these messages within their own systems as a way to manage orders to completion and to begin billing their customers. This is a critical requirement not only for the CTE but for the commercial production environment as well where lost orders have to be tracked by the CLEC. If Bell Atlantic does not provide these notices during testing then the CLECs own testing of its systems is delayed or incomplete. It is also important that these notices are received on all orders so that the CLECs can validate that they still can process the notices after changes have been made to the CTE software by Bell Atlantic.

To demonstrate, AT&T had a similar experience to KPMG's when it conducted testing for LSOG4 in the CTE. The majority of AT&T's test cases received no Billing Completion Notice from Bell Atlantic. Several of the test cases received Provisioning Completion Notices that were incorrectly formatted and that failed AT&T's EDI edits. This is indicative of the instability of the test environment as has been documented in KPMG's Exception No. 5 and AT&T's comments on that Exception.

BA has promised in its response to "enhance its internal testing process for the generation of PCN's and BCN's in the CTE. BA hopes to have this process in place for the CTE delivery of June release..." of its LSOG 4. KPMG must validate that the fixes and enhancements BA is claiming will be available in that version do work, in fact. The CLECs need a test environment that provides consistent and complete status messages for every step of the LSR lifecycle. More important, all of the status messages must be available in the commercial production environment. In fact, Bell Atlantic has yet to demonstrate that they can reliably provide the appropriate status messages within either the test environment or the commercial production environment.