

BELL ATLANTIC RESPONSE TO MA DTE KPMG EXCEPTION

Exception #:	11
Component:	Given the following input, KPMG was unable to adequately verify UNE charges on the Y40 bills received for UNE services provided by Bell Atlantic.
Domain:	BLG
Date Uncovered by KPMG:	6/19/00
Date BA Received:	6/20/00
Date BA Responded:	6/30/00; 7/12/00 (1 st Revision); 7/14/00 (2 nd Revision)
KPMG Summary Statement and	CLECs are unable to validate the accuracy of charges applicable to UNE services provided by Bell Atlantic.
BA Response:	<p><u>7/14/00 Bell Atlantic Response</u></p> <p>BA agrees with KPMG's findings that the documentation currently available to a CLEC, in some instances, may be insufficient for assisting in validating UNE Usage charges using the DUF received by the CLEC.</p> <p>BA will update the CLEC handbook Section 9.3 to reflect additional scenarios for "0-" Operator assisted calls, and modify scenario 15 & 27 to reflect the proper rate elements a CLEC should expect to see. These updates along with the existing tools will allow the CLEC to perform the process of translating DUF into call scenarios for purposes of validation.</p> <p>This has been addressed via an industry mailing as well as call scenario updates to the WEB on July 12.</p> <p>As a result of this clarification and additional information, KPMG was able to apply the necessary logic and use available media to satisfactorily match their DUF to the bill in all but 2 cases.</p> <p>These 2 instances were –</p> <ul style="list-style-type: none">a) Shared Trunk port charges where BA-MA under billed 16 MOU's, andb) Branding Surcharge where BA under billed 7 surcharges. <p>BA-MA reconciled 305 of the 321 MOU's and 5 of 12 BSCs on the bill with the DUF. The billing data in question is more than 5 months old. As indicated in the CLEC handbook, Bell Atlantic keeps the recorded billing data for 45 days. It is impossible to reconcile 100% the differences between the DUF and the bill when the recorded billing data is no longer available.</p> <p>The results are detailed below (CABS BAN: 413 Y40-0014 104).</p>

CABS BAN: 413 Y40-0014													
104													
January Bill - Current Usage - WSFDMAWADS0													
Rate		Call Scenarios									DUF		Bill
Element	Per	1	4	12A/19A	21A	30	33	39	40B-1	40B-6	Totals		Totals
ULSC	MOU	2	31	63	5		2		2	1	104	MOU	107
TTSC	MOU								2	1	4	MOU	4
ULCTC	MOU		31								31	MOU	43
UTCTC	MOU										0	MOU	0
UNRC	MOU		31						2	1	34	MOU	37
UCRC	MOU										0	MOU	0
USTPC	MOU			63	5		2		2	1	73	MOU	57
UTTC1	MOU								2	1	4	MOU	8
UTTC2	MOU								2	1	4	MOU	0
UIC	Call		16	28	3				11	3	61	Calls	57
UTC	Call					5					5	Calls	0
DIPC	Call										0	Calls	0
DAC	Call						2				2	Calls	2
BSC	Call						2		7	3	12	Calls	5
CCSC	Call							1			1	Calls	1
IPACC	Call										0	Calls	0

7/12/00 Bell Atlantic Response

BA agrees with KPMG's findings that the documentation currently available to a CLEC, in some instances, may be insufficient for assisting in validating UNE Usage charges using the DUF received by the CLEC.

BA will update the CLEC handbook Section 9.3 to reflect additional scenarios for "0-" Operator assisted calls, and modify scenario 15 & 27 to reflect the proper rate elements a CLEC should expect to see. These updates along with the existing tools will allow the CLEC to perform the process of translating DUF into call scenarios for purposes of validation.

This update will be handled via an industry mailing as well as call scenario updates to the WEB by July 14.

As a result of this clarification and additional information, KPMG was able to apply the necessary logic and use available media to satisfactorily match their DUF to the bill in all but 2 cases.

These 2 instances were –

- c) Shared Trunk port charges where BA-MA under billed 16 MOU's, and
- d) Branding Surcharge where BA under billed 7 surcharges.

BA-MA reconciled 305 of the 321 MOU's and 5 of 12 BSCs on the bill with the DUF. The billing data in question is more than 5 months old. As indicated in the CLEC handbook, Bell Atlantic keeps the recorded billing data for 45 days. It is impossible to reconcile 100% the differences between the DUF and the bill when the recorded billing data is no longer available.

Bell Atlantic Response: (06-30-00)

BA understands that matching a single months bill to a DUF transmission is extremely complicated and as stated in the handbook should be done using a 3 month period to allow for late usage, delayed billing due to order activity etc...

Many of the above referenced incidents are evident here. Keep in mind also that this exception is based on January data where various order activities had been requested on some of these lines, system fixes from previous observations were implemented and we are well beyond the 45-day limit for which we maintain EMI and other associated bill data.

In an effort to answer this exception and allow KPMG to see results on our analysis BA chose to analyze 1 end office, WSFDMAWADSO. Using the file sent to us from KPMG, we were able to validate the usage to the bill successfully.

Although BA will continue it's effort to match the remaining end offices it may be impossible given the aforementioned issues.

Details of our analysis are noted below. BA will make available a billing manager to review the analysis in depth upon request.

End Office: WSFDNA/WADS0					
Record	Bill	Scenario	Calls	MOU	OWS
10 01 01	Jan-00	1	10	2	
10 01 01	Jan-00	4	28	34	
10 01 01	Jan-00	15	0	0	
10 01 16	Jan-00	43	0	0	
10 01 18	Jan-00	39	1	1	
10 01 19	Jan-00	30	5	2	
10 01 32	Jan-00	33	2	2	
10 01 35	Jan-00	34	0	0	0
10 01 37	Jan-00	35	0	0	0
11 01 01	Jan-00	12A/19A	18	27	
11 01 01	Jan-00	12B/19B	0	0	
11 01 16	Jan-00	43	0	0	
11 01 20	Jan-00	21A	3	5	
11 01 20	Jan-00	21B	0	0	
Notes:	1. Each DUF EMI record type maps to one or more call scenarios. E.g., a 10 01 01 record maps to scenarios 1, 4 and 15.				
	2. The above table shows the total number of calls, MOU and OWS applicable to each call scenario within each EMI record type, for this end office.				

CALL SCENARIOS AND USAGE RATE ELEMENTS																		
Rate		Call Scenarios																
Element	Per	1	4	12A/19A	12B/19B	15	21A	21B	30	33	34	35	39	43				
ULSC	MOU	2	1	1	1	1	1	1		1	1	1						
TTSC	MOU				1			1										
ULCTC	MOU		1															
UTCTC	MOU					1												
UNRCC	MOU		1															
UCRCC	MOU																	
USTPC	MOU			1	1		1	1		1	1	1						
UTTC 1	MOU				1													
UTTC 2	MOU							1										
ALSC	MOU					1												
TCCLC	MOU					1												
UIC	Call		1	1	1	1	1	1										
UTC	Call								1									
DIPC	Call																	
DAC	Call									1								
BLVC	OWS										1							
BLIC	OWS											1						
BSC	Call									1	1	1						
CCSC	Call												1					
IPACC	Call													1				
Notes:																		
1. The above table shows which rate elements apply in which scenarios.																		
2. In scenario 1 ULSC applies twice per MOU; all other rate elements apply only once per MOU, call or OWS (Operator Work seconds), in each scenario.																		
<u>USAGE RATE ELEMENTS BILLED</u>																		
January Bill - Current – WSFDNAWADS0																		

Rate		Call Scenarios														DUF		Bill
Element	Per	1	4	12A/19A	12B/19B	15	21A	21B	30	33	34	35	39	43	Totals		Totals	
ULSC	MOU	3	34	63	0	0	5	0		2	0	0			107	MOU	107	
TTSC	MOU				0			0							0	MOU	0	
ULCTC	MOU		34												34	MOU	43	
UTCTC	MOU					0									0	MOU	0	
UNRCC	MOU		34												34	MOU	37	
UCRCC	MOU														0	MOU	0	
USTPC	MOU			63	0		5	0		2	0	0			70	MOU	57	
UTTC 1	MOU				0										0	MOU	8	
UTTC 2	MOU							0							0	MOU		
ALSC	MOU					0									0	MOU	0	
TCCLC	MOU					0									0	MOU	0	
UIC	Call		28	28	0	0	3	0							59	Calls	57	
UTC	Call								5						5	Calls	0	
DIPC	Call														0	Calls	0	
DAC	Call									2					2	Calls	2	
BLVC	OWS										0				0	OWS	0	
BLIC	OWS											0			0	OWS	0	
BSC	Call									2	0	0			2	Calls	5	
CCSC	Call												1		1	Calls	1	
IPACC	Call													0	0	Calls	0	
Notes:	1. The above table shows DUF record unit quantities for each usage rate element, by call scenario that should have appeared on the January 2000 bill for this end office.																	
	2. DUF/bill discrepancies may in general be explained as follows:																	
		DUF > Bill: Call record transmitted in DUF but erred by billing system.																
		DUF < Bill: Previously erred usage, already transmitted in DUF, now billed.																
	3. Due to time constraints this analysis did not include full verification of switch locations, and therefore some discrepancies may be due to intra-switch calls being treated as inter-switch, and vice versa. This also may account for discrepancies that would not occur in the real world.																	