

AT&T, CoreComm, and Nextlink submit the following issues involving structure and roles of the test manager, pseudo-CLEC and the performance measurements auditor that are to be addressed by KPMG for the Michigan OSS Collaborative on 3rd Party Testing.

I. Roles and Responsibilities

In order for the Michigan Collaborative CLECs to assess the structural separations that may be necessary between the person(s) conducting different “roles” in the third-party test, we have prepared the following summary of our understanding of those roles. Please indicate where KPMG disagrees or has comments on the following itemization of roles for each of these three OSS Testing functions.

The **Test Manager** has overall responsibility for the management of the testing process including assisting other participants (i.e., the Commission, Ameritech, CLECs and other parties) in preparing for and conducting the tests, providing change control throughout the testing cycle and reporting the results and evaluation to the Commission. Specific responsibilities include:

Test Manager Responsibility	Agree/Disagree -- Comments
❖ Manage the development of the Master Test Plan (MTP)	
❖ Create test specifications based on the MTP through collaborative development and validation of Ameritech's capabilities and CLEC requirements for Ameritech's capabilities	
❖ Develop test parameters for	

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Test Manager Responsibility	Agree/Disagree -- Comments
○ Transaction testing	
○ Operations analysis testing -- both manual and electronic	
○ Parity testing	
○ Capacity testing	
○ Relationship evaluation testing	
❖ Determine transaction mix for the market being tested in terms of	
○ Statistically valid volumes of transactions by type	
○ Allocation of test transactions across the product/service forecasts	
○ Reasonably expected demand levels for the capacity test	
❖ Develop and maintain the detailed test schedule, milestones, and action items	
❖ Plan and direct the activities of all testing participants including Ameritech, pseudo-CLEC, CLECs, and the performance measurement auditor	
❖ Provide day-to-day supervision and evaluation of all tests	
❖ Ensure that testing processes and execution achieves adequate blindness to Ameritech	
❖ Monitor test sites and testing activities	
❖ Collect testing status from all participants and issue status reports as required	
❖ Provide and manage a formal, predictable and public mechanism for communication with CLECs, Ameritech and other parties	

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Test Manager Responsibility	Agree/Disagree -- Comments
❖ Provide issue management for all testing related issues including the assignment of accountabilities, tracking, reporting and escalation	
❖ Collect, measure, evaluate and report test results	
❖ Develop and submit to the Commission a final report that describes the overall test results and recommendations.	

The primary role of the **Pseudo-CLEC** is to emulate a newly established CLEC that will serve as an unbiased entity for testing Ameritech OSS, documentation and processes. Pseudo-CLEC primary responsibilities include:

Pseudo-CLEC Responsibility	Agree/Disagree -- Comments
❖ Establish the CLEC-ILEC business relationship with Ameritech	
❖ Establish the CLEC-ILEC technical relationships with Ameritech	
○ Interconnection	
○ OSS	
❖ Acquire appropriate documentation, attend training and build an application-to-application OSS interface (EDI) interface, and prepare to utilize repair and maintenance and billing functions, as they are provided by Ameritech to CLECs	
❖ Develop and maintain a comprehensive list of the	

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Pseudo-CLEC Responsibility	Agree/Disagree -- Comments
documentation that was used to establish interfaces with Ameritech	
❖ Evaluate the adequacy of documentation and assistance provided by Ameritech to CLECs for the establishment, maintenance and use of the pre-ordering, ordering, provisioning, repair and billing interfaces	
❖ Build the capabilities, install facilities and establish connectivity for the electronic and manual OSS interfaces to Ameritech as required to process the volume and mix of transactions for tests specified in the Master Test Plan. These specified types and volumes would be consistent with the statistical soundness principle that the Commission is to adopt for the Test	
❖ Create and submit test transactions to Ameritech over the appropriate manual and electronic interfaces under the direction of the Test Manager	
❖ Collect, measure and document the results of all transactions	
❖ Compile a test-duration log that captures the details of its experiences in dealing with Ameritech	

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The primary role of the **Performance Measurements Auditor** is to perform an audit to ensure that all aspects of Ameritech's wholesale performance measures and retail parity standards are sound and in compliance with carrier-to-carrier Performance Measures that the Commission has (will) approved. The Commission has ordered that three months of results data showing compliance by Ameritech to the Commission's measurements system be verified. The auditor's primary responsibilities include:

Performance Measurements Auditor Responsibility	Agree/Disagree -- Comments
❖ Prepare the audit plan (a phased approach may be necessary due to the timing of the availability of results data)	
❖ Provide the audit schedule for use by the test manager in the planning and scheduling of the related OSS tests that involve performance measures	
❖ Conduct an overall process analysis of Ameritech's performance measures collection, calculation and reporting processes	
❖ Verify system requirements documentation to ensure consistency between software and business rules	
❖ Audit performance data collection steps for completeness, timeliness and accuracy	
❖ Audit performance measures calculation processes and procedures	
❖ Audit the accuracy of performance measurement data points to the underlying business transactions	
❖ Verify data retention and the existence of proper security around reporting and archiving the data	
❖ Identify exceptions and recommendations	

Performance Measurements Auditor Responsibility	Agree/Disagree -- Comments
❖ Prepare and deliver a final audit report	

Developing KPMG’s background knowledge about Michigan and Ameritech

The Master Test Plan must demonstrate the extent to which Ameritech existing and planned systems, operations, interfaces, products and services and methods of operations for CLEC support are being provided on a non-discriminatory basis. The OSS test is the means to acquire sufficient information that help form judgments about the provision of services to competitors as compared to the service Ameritech provides to its retail operations.

II. OSS Capabilities of Ameritech

the CLECs assume that the following steps will be taken by the Test Manager as it develops the Master Test Plan to gather information about the existing and planned OSS environment that will form the basis for the OSS Test. In order to assess the need of structural separations, the CLECs believe the following information must be provided by KPMG

Request	Response
1) Indicate the names or titles of the KPMG staff that would be involved in the data gathering and analysis activities associated with obtaining OSS technical information from Ameritech’s web site “TCNet”.	

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2) Describe and/or provide the methods and procedures that KPMG will employ to canvass Ameritech personnel for information that supplements the information that Ameritech provides on TCNet.	
3) Describe and/or provide the methods and procedures that KPMG will employ to canvass Ameritech personnel for information that supplements the information that Ameritech provides on TCNet.	
4) Describe the activities that KPMG will undertake to develop its understanding of the future plans (2000 and 2001) that Ameritech has for developing and implementing changes to its electronic and manual OSS interfaces, OSS, legacy systems, operations, products and services and performance measurements for Michigan.	
5) Describe the activities that KPMG will undertake to develop its understanding of	

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<p>the Change Management Process that is in effect and the CMP that will be evaluated in the course of the OSS Test.</p>	
<p>6) Describe and/or provide the methods and procedures that KPMG will employ to build its database of Ameritech's "Management Assertions" for the Michigan test.</p>	
<p>7) Describe and/or provide the time frames within which KPMG will obtain the above classes of information, all of which presumably would be used to develop the Michigan Master Test Plan.</p>	
<p>8) Describe the means by which KPMG will post the content of its gathered information on the Michigan OSS Test web site, and recommend the time frame within which the posting would be first made available.</p>	

III. CLEC Support Information

The steps that will be taken by the Test Manager in its Master Test Plan development capacity to obtain information about the types of assistance that Ameritech makes available to CLECs in “getting connected” to Ameritech. This information assists KPMG in developing certain aspects of the Master Test Plan that deal with Account set-up, Account management, operations assistance, and other CLEC support

Request	Response
1) Indicate the names or titles of the KPMG staff that would be involved in the data gathering and analysis activities associated with obtaining CLEC support information including the functions and locations of service centers, the identity and contact information about the Account Team for the pseudo-CLEC, the IS/IT support resources that assist the Account Team in working with the pseudo-CLEC.	
2) Describe and/or provide the methods and procedures that KPMG will employ to perform its data gathering activities associated with CLEC support	

Request	Response
resources, including those mentioned above.	
3) Please confirm that all documents obtained from Ameritech in the course of developing the Master Test Plan activities for CLEC support functions will be identified and posted to the documentation database and posted on the Test web site.	

IV Performance Measurements

The steps that will be taken to develop KPMG’s understanding of the Michigan Performance Measurements that will be tested in the OSS Test and that will be used as success criteria in evaluating the results of the OSS Test.

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1) Indicate the names or titles of the KPMG staff that would be involved in the data gathering and analysis activities associated with the testing of the Ameritech performance measurements system.	

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2) Describe the methods and procedures that KPMG will use to accumulate the performance measurements business rules that are used by Ameritech to produce its performance measurements results.	
3) Describe the methods and procedures that KPMG will use to collect information about manual processing that is performed by Ameritech in its performance measurement system(s).	
4) Describe the methods and procedures that KPMG will employ to develop its understanding of the disaggregations that are made to provide product/service and other performance measurement results.	
5) Please confirm that all documents obtained from Ameritech in the course of developing the Master Test Plan activities for	

Request	Response
performance measurement functions will be identified and posted to the documentation database and posted on the OSS Test web site.	

Organizational “Firewalls” that KPMG Builds as A Standard Practice

KPMG has advised the Michigan Collaborative that its practice has been to organize its testing teams such that the staff who have worked on developing the OSS Master Test Plan are not assigned to activities associated with conducting the OSS Test. The work activities outlined in this section are the ones that provide the opportunity for information to be inappropriately passed to the testing team. The Test Manager has been given information about Ameritech, its systems and operations under the free exchanges that are needed to develop the Master Test Plan. The base of knowledge about how the overall Ameritech systems work, is not knowledge given to CLECs, and it becomes inappropriate to utilize this information in the role of pseudo-CLEC and performance measurements auditor. Our key concerns are – Were the pseudo-CLEC to be given the types of information that the Test Manager obtained to write the Test Plan, it would be advantaged beyond the typical CLEC. Were the auditor to have understandings about the ways in which Ameritech

management designed its performance measurement system, it would be influenced by that fore-knowledge and may be less objective in assessing how the Ameritech system of measurements actually works.

Information about the steps that KPMG takes to prepare the way for the p-CLEC and performance auditor to do their tasks will enable Collaborative to understand whether the earlier-gained knowledge is to be used by the p-CLEC and the auditor in their assigned roles.

V Preparation for Testing Ameritech's OSS

Request	Response
1) To validate the OSS Management Assertions, what steps does KPMG take to prepare briefing materials, checklists, interview guides, or questionnaires that are based on materials provided by Ameritech in the process of explaining its OSS functions, features, capabilities and processes?	
2) To validate the CLEC Support Management Assertions, what does KPMG do to outline the research activities or specific tests, to develop questionnaires or interview guides, or prepare checklists that are based on information gathered by KPMG in	

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developing the Master Test Plan relative to CLEC Support services?	
3) To validate the Ameritech Performance Measurements system, what information gathered in the test planning stage is used to prepare the detailed testing requirements for the Performance Measurements Audit?	
4) What are KPMG's practices that enable reviews of the detailed testing specifications for OSS capabilities, CLEC support and Performance Measurements by the KPMG Master Test Planning team?	
5) What are KPMG's practices that are designed to ensure consistency between the information obtained to develop the Michigan Master Test Plan and the test specifications that are developed by the KPMG testing organizations?	