

AT&T Supplemental Comments on the Disposition Report for KPMG Exception 49

On April 26, 2002 AT&T provided its Comments on the Disposition Report that has been prepared for KPMG Consulting's Exception 49. We asked that due reconsideration be given to the MTP's requirement to test corrections Ameritech hopes to make to resolve the problems that were brought to the surface through Exception 49 dealing with late Firm Order Confirmations for orders submitted through the GUI interface. We urge that the GUI interface that has been implemented by Ameritech for its Uniform Systems release, a.k.a LSOG 5, be that testing mechanism.

We would like to supplement these Comments with the following facts that we will explain in AT&T's position in greater detail. Ameritech's processes that produce FOCs for LSRs submitted manually yield results that have been shown by KPMG Consulting to be sub-standard relative to established benchmarks across a variety of product lines. These include EDI UNE-Loop (Exception 38 and Observation 321), EDI Simple Residence and Business UNE-P (Exception 39), EDI xDSL capable loops (Observation 309), GUI UNE-Loop (Observation 322) and GUI orders in general (Exception 49). We refer only to the Michigan Exceptions and Observations, but point out in Attachment A that the problem is found to exist in the other Ameritech states as well.

One of the beneficial by-products of the third-party test is to gain Ameritech's attention to problem areas and insist that those get repaired under the propitious pressure to have a final report that shows that the goal of "military-style" testing has produced demonstrable results – i.e., the correction of deficient systems and processes. It is clear that the Ameritech processes that generate FOCs manually, regardless of the electronic interface that places the order, are in

need of significant attention by Ameritech. It doesn't seem that specific products escape the problems, and as more testing is done, we believe the extent of the problem will show that it is systematic and not limited. We think it is wrong to take the pressure off, as Ameritech would have KPMG Consulting and the Commission do, and close Exception 49. If Ameritech can make Exception 49 go away, it would argue that the same reasons not to remedy the underlying problems of "manual processing errors and data outages" should apply to each of the additional Exceptions and Observations on this subject. If the root cause were as Ameritech claims, the number of Exceptions and Observations would not be climbing, and the breadth of the problem would not be for so many products and services.

The proper course, AT&T believes, is to keep these Exceptions and Observations open so that KPMG's focus remains on them and Ameritech devotes the appropriate level of resource commitment to achieve satisfactory results in providing timely order confirmations.

Attachment A embedded below:



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