AT&T Comments on the September 10, 2002 Disposition Report for Exception 159

Summary of Recommendation: **KPMG should not close Exception 159. It has explained its rationale for closing the Exception and that information prompts additional questions that AT&T requires be answered before the Exception is closed. To date, the information responsive to AT&T's concerns has not been released.**

KPMG provided its Disposition Report for Exception 159 concluding that Test CLEC calls to the SBC Ameritech Local Service Center are being answered within the timeliness interval required according to the business rules for Performance Measurement 22 "Local Service Center (LSC) Grade Of Service (GOS)". There are issues raised in this Exception that require additional information before AT&T can agree that the testing and analysis should be concluded.

Observation 484 described KPMG's initial findings that "Ameritech's Local Service Center (LSC) did not answer calls from the Test CLEC within the established benchmark", and on July, 2002, this deficiency was escalated to Exception 159 with essentially the same caption, "SBC Ameritech's Local Service Center (LSC) did not answer calls from the Test CLEC within the established benchmark."

KPMG's disposition report discusses its methodology for examining the Test CLEC experience:

> Using the data for the calls answered by SBC Ameritech's LSC from March through August 2002 for Michigan, Illinois, Indiana, Ohio and Wisconsin, KPMG Consulting has reviewed the speed of answer statistics for this center and compared them against a weighted average retail parity benchmark for this timeframe.

This methodology is questionable for this testing because the retail benchmark is developed and reported monthly. However, the KPMG results that it reports are aggregated for determining whether SBC Ameritech meets a *weighted* monthly average. The information collected by KPMG regarding the test CLEC calls contains the date of the call, and these can be grouped by month to make a comparison on a monthly basis with the SBC Ameritech retail parity standard. ***AT&T requests KPMG to report on a monthly basis the results of its testing of LSC speed of answer, for each month March through August, in a format consistent with Exhibit 5 in its Disposition Report:***

KPMG has agreed to provide these data during the week of September 23, 2002.

	March	*April*	*May*	*June*	*July*	*August*
Calls answered by the LSC within the 20-second timeframe						
Total Sample Size						
ILEC Performance (LSC GOS)						
Retail Parity	*41.9%*	*51.1%*	*54.4%*	*47.0%*	*43.5%*	*49.0%*

In Footnote 9 of its Disposition Report, KPMG states: "The KPMG Consulting August retail parity benchmark is 49.0%." Presumably this is a surrogate for the SBC Ameritech retail parity benchmark, as the published benchmarks were not available at the time of the Disposition Report. ***Please explain the basis for this benchmark, including the methods used to calculate it, the data sources, and any assumptions applied in developing the benchmark.***

KPMG calculated the August benchmark by averaging the prior five month benchmarks. (March + April + May + June + July)/5.

KPMG's description of the calculation of the weighted average for retail is contained in its Disposition Report footnote 10:

> [(Sample Size for March/Sample Size for March + April + May + June + July + August) * (Retail Parity for March)] + [(Sample Size for April/Sample Size for March + April + May + June + July + August) * (Retail Parity for April)] + [(Sample Size for May/Sample Size for March + April + May + June + July + August) * (Retail Parity for May)] + [(Sample Size for June/Sample Size for March + April + May + June + July + August) * (Retail Parity for June)] + [(Sample Size for July/Sample Size for March + April + May + June + July + August) * (Retail Parity for July)] + [(Sample Size for August/Sample Size for March + April + May + June + July + August) * [(Retail Parity for March + Retail Parity for April + Retail Parity for May + Retail Parity for June + Retail Parity for July)/5]].

It is not clear from the Disposition Report what data KPMG used to determine each month's LSC call volume. The methods employed to gather the "samples" need to be identified and the source data for the samples needs to be explained. ***AT&T requests KPMG provide descriptions of the methods it employed to collect the samples and identify the sources of the data.***

KPMG advises that the Sample Sizes are the number of calls it made to the LSC.

In the SBC Ameritech response to Exception 159 it notes: "In addition, shortly after the conclusion of this test, KPMG discovered a timing problem in one of their computers, which caused inaccurate start/stop times to be listed on a number of the failures listed in the Exception. Because of this problem, many of the failure incidents, as reported, cannot be validated or utilized to research potential causes." KPMG does not reflect such an error in its documentation for this Exception. AT&T subsequently asked KPMG about this alleged error and was advised that there was no error. ***The Disposition Report should provide the facts from KPMG's perspective about the alleged error.***

KPMG is considering what to do to correct the record on this Exception. R Hawkins admitted that the "error" tone used by Ameritech is likely to be harmful. The "error" was a

clock setting in one of the KPMG computers that incorrectly recorded the time of day when the call was made and the answer logged. The interval is accurate in all cases.

In its Observation 484 documentation, KPMG notes that the Test CLEC calls were made on the subjects of product/service categories, i.e., Resale, UNE-P, Unbundling, etc. The data provided by KPMG in its Disposition Report for Exception 159 provides no information on the extent to which its experience in contacting the LSC is impacted by the types of calls placed to the LSC, i.e., the Product Type ACD menu selections. ***AT&T requests KPMG provide detailed calculations for the Resale, UNE-P, Unbundling, and any other ACD menu-selection-based calls made to the LSC. This information should include for each product, those data as contained in Exhibit 5 of the Disposition Report, i.e.,***

KPMG will not provide this data because it did not consistently track the reasons for its calls to the LSC. KPMG admitted that it did make calls regarding UNE-P services and was able to get answers to UNE-P questions.

March to August, 2002	*Resale*	*UNE-P*	*Unbundling*	*Others, as available*	*Total*
Calls answered by the LSC within the 20-second timeframe					*328*
Total Sample Size					*550*
ILEC Performance (LSC GOS)					*59.6%*
Weighted Average Retail Parity	*48.6%*	*48.6%*	*48.6%*	*48.6%*	*48.6%*