

**AT&T Comments on the September 24, 2002  
Notice of the Disposition Report for Exception 76**

**Summary of**

**Recommendation:** KPMG should not close Exception 76. It has explained that its retest results are not sufficiently strong to conclude with confidence that the performance is *below* the 95 percent benchmark. KPMG should continue its testing until it has sufficient data to conclude with confidence that Ameritech's performance *exceeds* the benchmark on a consistent basis.

In its testing of Ameritech's systems to determine whether CLEC requests for disconnection of service were actually provisioned properly, KPMG found a 14% failure rate. In each of the three re-tests, Ameritech's systems and processes have proven to be unreliable in correctly processing disconnection requests.

In retest 1, the failure rate was 27% -- nearly twice the original rate. In the second and third retests, Ameritech showed improvement, but continued to evidence that it cannot properly process service disconnections. The second re-test failure rate was 11% and the third, 6%.

Over the entire testing process, of the 404 orders that were examined for disconnect accuracy 39 were failures. Hence, overall Ameritech failed to properly disconnect services 10% of the time.

In other test analysis activities, KPMG has applied its overall experience to determine whether the Ameritech systems and operations provide correct results. This approach is valid here, as well. KPMG should test disconnections until its overall testing experience demonstrates that Ameritech correctly processes disconnections according to the KPMG benchmark.

This incorrect disconnect order processing performance problem is explained in KPMG's detailed records on Exception 76 where it shows that the problem is based on "service rep error" and "RCMAC technician error". While these may be the Ameritech explanation for the causes of the error, there is no finding by KPMG that if these are the causes of the problems, they have

been cured. There is no mention of the design and implementation of a process that reviews the disconnection order work of service representatives and RCMAC technicians to ensure that their processing of disconnection requests is accurately performed. Ameritech has offered that it developed prophylactic measures for Centrex disconnects, but has not indicated that other service disconnects will correctly be processed in its systems. KPMG should insist that Ameritech address this processing defect in a manner that ensures CLEC disconnection requests will correctly be processed.

KPMG states in its Disposition Report, addressing only the third re-test, “Although the test percentage is below the benchmark of 95 percent, the statistical evidence is not strong enough to conclude with confidence that the performance is below the 95 percent benchmark.” AT&T suggests that on the basis of the third retest, the results are also not strong enough to conclude with confidence that the performance is *above* the benchmark. If there is insufficient data, KPMG should continue testing until it has sufficient data.