

November 21, 2001

To: Mr. Tom Lonergan, MPSC Staff
Ms. Ann Schneidewind, MPSC Staff

cc: Rob Hawkins, KPMG Consulting

Re: KPMG Consulting Disposition Report for Exception 3

On November 15, 2001, KPMG posted its notice of intent to close Exception 3, along with its disposition report. Consistent with the Observations and Exceptions process, AT&T hereby provides these comments to that KPMG notice and report. It is our understanding that these comments will be posted by you to the MPSC's OSS Testing web-site.

First of all, AT&T does not object to KPMG's disposition of this exception. AT&T also believes that KPMG has sufficiently described the retesting steps it took once Ameritech's processes had been corrected to ensure DS-1 loop testing was done and the results posted to its systems.

Our comments go more toward the format of KPMG's disposition report than its ultimate conclusion. Specifically, we believe that KPMG's disposition report should better describe the activities/process changes Ameritech conducted to address the KPMG exception. As this test continues, and even after it is completely finished, it important for CLECs to know the steps that Ameritech took to "fix" the exceptions noted by KPMG.

At the very least, KPMG's disposition report should provide the same level of detail provided in Ameritech's initial response to the exception. In response to Exception 3, for example, Ameritech committed that it would update its Work Force Administration system to ensure that Ameritech technicians populate necessary WFA-C screens to reflect the testing results. Further, it advised that its technicians would be given "awareness training" to "review the required tests and the need to properly note results." KPMG's disposition report should confirm that these activities were completed by Ameritech. In fact, in its disposition of Exception 2, KPMG did just that – it first provided a description of the steps Ameritech took to address the exception and then explained its testing of those steps.

By providing the background underlying this disposition report, KPMG would make the disposition more clear and less subject to interpretation. In short, the disposition report should reflect the corrective work undertaken by Ameritech to resolve the issue of inadequate DS-1 loop testing.