July 19, 2001

OBSERVATION REPORT #20

KPMG Consulting received late Billing Completion Messages (BCM).

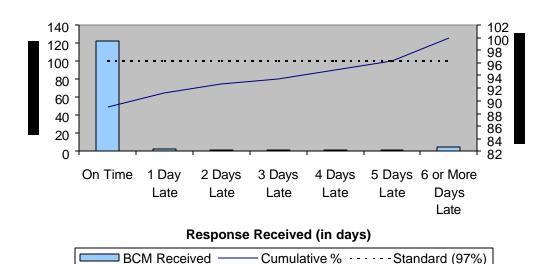
Issue

According to the Billing Completion Timeliness metric, OR-4-02, CLECs should receive 97% of their billing completion messages by noon of the next business day, following the actual order completion in the billing system.

As of June 5, 2001, KPMG Consulting received 137 Billing Completion Messages (BCMs), of which 90.18% were received on time. Exhibit 1 shows the distribution of billing completion responses by receipt day and Exhibit 2 demonstrates specific examples of late BCMs.

Exhibit 1: Distribution of Billing Completion Responses

Billing Completion Timeliness



¹ The Virginia Carrier-to-Carrier Guidelines Performance Standards and Reports, dated August 11, 2000.

Exhibit 2: Examples of Late Billing Completion Messages

Item	PON & VER	BCM Received	BCM Cd ²
1	019021TE0X000001AC	05/25/01 12:55:22	05/11/01 00:00:00
2	019021TE0X000002AA	05/24/01 11:20:39	05/14/01 00:00:00
3	025012TE0X000001AA	05/25/01 12:39:50	05/11/01 00:00:00
4	016121TE0X000002AA	05/31/01 13:26:34	05/21/01 00:00:00
5	011101TE0X000001BA	05/31/01 13:52:47	05/21/01 00:00:00
6	020021TE0X000001AC	05/23/01 13:47:54	05/16/01 00:00:00
7	018041TE0X000001AC	05/24/01 11:25:25	05/16/01 00:00:00
8	072091TE0X010001AA	05/17/01 11:27:25	05/10/01 00:00:00
9	001012TE0X010501AA	05/23/01 11:29:00	05/16/01 00:00:00
10	100021TE0X020001AD	05/09/01 16:12:45	05/04/01 00:00:00
11	100021TE0X020002AB	05/15/01 16:27:17	05/11/01 00:00:00
12	001041TE0X000002AA	05/17/01 09:47:24	05/14/01 00:00:00
13	072072TE0X000001AC	05/24/01 19:08:28	05/23/01 00:00:00
14	100011TE0X000001AG	05/21/01 16:06:28	05/18/01 00:00:00
15	072072TE0X000002AA	05/24/01 19:07:17	05/23/01 00:00:00

Assessment

Without timely BCMs, CLECs will not know when their customer orders are completed. In addition, CLECs cannot determine when billing was transferred to the CLEC, leading to potential double billing of customers or lost revenue for the CLEC.

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² BCM Cd is a field on the BCM form that indicates the date when Verizon completed the order.