September 13, 2001

OBSERVATION REPORT #31

KPMG Consulting received late Rejected responses for pre-orders submitted via the Electronic Data Interface (EDI).

Issue

Using the June Carrier-to-Carrier (C2C) Report, KPMG Consulting compared our Rejected preorder response timeliness results against the value reported for metric PO-1-07, Average Response Time – Rejected Query. The June report shows a parity response time of 0.17 seconds for this metric, making the standard 4.17 seconds (parity plus 4 seconds).

Through September 5, 2001, KPMG Consulting submitted 939 pre-orders and received 95 rejected responses. These responses averaged 4.66 seconds, exceeding the 4.17 second standard. Exhibit 1 shows the distribution of responses in seconds. Exhibit 2 provides 42 specific examples of late Rejected responses.

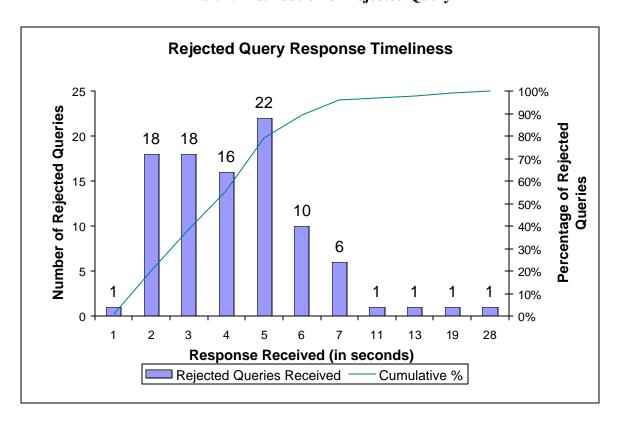


Exhibit 1: Distribution of Rejected Query

This observation report is for discussion purposes only and is subject to change without notice.

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

Exhibit 2: Examples of INQNUM that exceed the PO-1-07 Standard

Item	INQNUM	Response Time (seconds)	Exceeded C2C Guidelines by (seconds)
1	405061VY1G000015	5	0.83
2	405021VY1G000046	5	0.83
3	405061VY1G000010	5	0.83
4	405021VY1G000044	5	0.83
5	405061VY1G000018	5	0.83
6	405061VY1G000020	5	0.83
7	405061VY1G000024	5	0.83
8	405021VY1G000060	5	0.83
9	405021VY1G000058	5	0.83
10	405021VY1G000057	5	0.83
11	405061VY1G000008	5	0.83
12	405021VY1G000056	5	0.83
13	405021VY1G000050	5	0.83
14	405021VY1G000048	5	0.83
15	405021VY1G000047	5	0.83
16	405061VY1G010022	5	0.83
17	405021VY1G000001	5	0.83
18	405061VY1G000028	5	0.83
19	405021VY1G000003	5	0.83
20	405021VY1G000026	5	0.83
21	074071VY1J020001	5	0.83
22	414091VY1A000011	5	0.83
23	405061VY1G000012	6	1.83
24	405061VY1G000014	6	1.83
25	405061VY1G000016	6	1.83
26	405061VY1G000017	6	1.83
27	405061VY1G000019	6	1.83
28	405061VY1G000009	6	1.83
29	405061VY1G000001	6	1.83
30	405021VY1G000004	6	1.83
31	405061VY1G010024	6	1.83
32	405021VY1G000036	6	1.83
33	405021VY1G000059	7	2.83
34	405021VY1G000055	7	2.83

Item	INQNUM	Response Time (seconds)	Exceeded C2C Guidelines by (seconds)
35	405061VY1G000026	7	2.83
36	405021VY1G000002	7	2.83
37	405061VY1G020022	7	2.83
38	401051VY1F010011	7	2.83
39	405021VY1G000043	11	6.83
40	012063VY1A000001	13	8.83
41	405021VY1G000045	19	14.83
42	404021VY1A000034	28	23.83

Assessment

Delays in receiving pre-order responses prevent a CLEC from obtaining the information necessary to efficiently process customer service requests on a timely basis.