January 28, 2002

OBSERVATION REPORT #70

KPMG Consulting observed that Maintenance and Repair (M&R) Special troubles submitted by the KPMG CLEC in October 2001 did not appear on the KPMG CLEC Specific Carrier-to-Carrier (C2C) report.

<u>Issue</u>

As part of PMR4: Metrics Data Filtering and Integrity Verification and Validation Review, KPMG Consulting attempted to trace four Special troubles submitted by the KPMG CLEC during the month of October 2001 to Verizon's processed data files.

However, KPMG Consulting observed that the troubles submitted by the KPMG CLEC were inappropriately coded as "test" transactions, which were excluded from Verizon's processed data files, rather than as valid KPMG CLEC transactions. Because the troubles were excluded in the processed data files, they did not appear on the KPMG CLEC Specific C2C report for the October 2001 data month.

Exhibit 1 contains the four Special troubles excluded from Verizon's processed data files and, consequently, the KPMG CLEC Specific C2C report.

Trouble Creation Trouble Close Date Circuit ID Date 10/23/2001 10/24/2001 48.HCFU.780752..CV 10/17/2001 10/18/2001 52.HCFU.779701..CV 10/17/2001 10/18/2001 52.DWDA.355966..CV 10/17/2001 10/17/2001 48.DWDA.367347..CV

Exhibit 1: Special Troubles Coded as "Test" Transactions

Assessment

The exclusion of KPMG CLEC transactions from the processed data files compromises the accuracy of the KPMG CLEC Specific C2C reports. Without accurate CLEC Specific C2C reports, the Virginia State Corporation Commission and CLECs are unable to determine whether or not they are receiving the levels of service required by the *Virginia Carrier-to-Carrier Guidelines Performance Standards and Reports*, dated August 11, 2000.