

Controls matrix — billing platform

Brightline, Inc. · Pre-cutover control review · Tested May 12–22, 2025

RR-BP-02
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Reviewed by Sam Ortiz

CONTROLS IN SCOPE	EFFECTIVE	PARTIAL	NOT IN PLACE	RETEST
14	10	3	1	Aug 2025

Fourteen controls were tested against the six risks the programme board carries for the billing migration. **Ten are effective as designed.** The three partial ratings and the single missing control are set out on the gap table below, each with an owner and a date that lands before the July freeze.

RISK TO CONTROL

RISK	WHAT COULD GO WRONG	CTRL	CONTROL TESTED	RESULT
R-07	Unauthorised access to customer balances	C-01	Role-based access reviewed monthly; twelve of twelve reviews evidenced	EFFECTIVE
R-07	Unauthorised access to customer balances	C-02	Penetration test before cutover — not yet performed , eleven days overdue	MISSING
R-12	Invoices issued against stale prices	C-03	Price-book changes require a second approver; sampled 25 of 214 changes, all approved	EFFECTIVE
R-12	Invoices issued against stale prices	C-04	Nightly reconciliation between price book and billing; alerting exists but is not monitored out of hours	PARTIAL
R-14	Migration drops or duplicates accounts	C-05	Row counts and control totals compared after every dry run; three runs evidenced	EFFECTIVE
R-19	Dunning contacts the wrong customers	C-07	Suppression list applied before send; tested against 400 sample accounts, two false positives	PARTIAL
R-23	No usable rollback once cutover starts	C-09	Restore rehearsed from backup; last rehearsal February , outside the quarterly standard	PARTIAL

GAPS, OWNERS AND DATES

C-02	Penetration test not performed Booked twice and moved twice as the cutover date shifted. The programme board has agreed it cannot go into the freeze untested; the vendor holds a slot on June 9.	June 13 Riley Thompson
C-04	Reconciliation alerts not monitored out of hours Alerts fire into a channel nobody watches after 18:00. Routing them to the on-call pager is a configuration change, not a build.	June 6 Maya Chen
C-07	Two false positives in the suppression test Both were accounts closed in the same billing period. The rule reads the close date, not the close event; a one-line fix with a retest against the same sample.	May 30 Maya Chen
C-09	Restore rehearsal older than the standard allows The February rehearsal succeeded in 41 minutes. The standard is quarterly and the next one is due; it will run against the migrated schema rather than the old one.	June 20 Riley Thompson

CONCLUSION
The control environment is adequate for cutover provided C-02 is completed and C-04 is routed to the pager before the freeze on July 2. C-07 and C-09 are not blockers but should close in the same window. Retest of all four is scheduled for the August review; no other control changes are proposed this quarter.